

River Oaks, Ballina

Preliminary Environmental Assessment Report



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Executive Summary

Introduction

Address:	Lot 1, Pacific Highway, Ballina
Real Property Description:	Lot 1, 3 and 5 in DP1074242
Site Area (ha):	24.26ha
Land Use Zone:	2(a) Living Area
Name of Owner:	
Name of Ward:	Ward A

PMM Sydney Pty Ltd have been commissioned by Rayshield Pty Ltd to prepare a Development Application to subdivide land known as Riveroaks, Pacific Highway, Ballina for residential development.

Further to a declaration made by the Minister of Planning's delegate on 12th May 2006 that the subdivision of Lots 1, 3 and 5 in DP1074242 is a Major Project, we make application for the Director-General's Environmental Assessment Requirements in accordance with 75F of the *Environmental Planning and Assessment Act 1979*.

Issues

Significant issues associated with the future development of this site include:

- Traffic and Access
- Flood Considerations
- Urban Design and Town Planning Provisions

Traffic and Access

The main access to the site is from the Pacific Highway. A temporary access way is proposed from the highway to service the development. A proposed new road runs adjacent to the eastern boundary of the development, which will in the future provide formal access to the site. At the time when this road is constructed, the proposed temporary access from the Pacific Highway will be closed. In principle an agreement has been obtained from the Road Traffic Authority (RTA) in relation to temporary access from the Highway.

Flood Considerations

Ballina Shire Council's flood information shows the proposed site is subject to flooding. The proposal will be developed to address the requirements of the 'Floodplain Development Manual - the management of flood liable land', April 2005. In this regard we will closely liaise with Council's engineers to ensure appropriate flood management measures are developed.

Urban Design and Town Planning Provisions

The Riveroaks Development Control Plan (DCP) proposes a number of public outcomes delivered by the development of Lot 1, 3 and 5 and adjoining properties, these include the provision of a road easement for the future construction of the West Ballina Arterial Road, the conservation of foreshore land adjacent to the North Creek Canal, the provision of land for a childcare centre, provision of a landscaped sportsground and play area and the provision of a compensatory habitat area.

The proposed development varies slightly from the development anticipated by the DCP in that the future subdivision is proposed for a portion of the site. The DCP anticipated an integrated development application jointly submitted by the adjoining landholders. However, this is no longer possible. Nonetheless, the proposed subdivision does deliver on the following outcomes:

- provision of road easement,
- provision for childcare centre, and
- provision of landscaped sports ground.

In addition the proposal also includes a pedestrian link to the adjoining commercial retail facility (ALDI) north of the Pacific Highway.

Conclusion

The development of a 234 lot residential subdivision on this site is permissible under the Ballina Local Environmental Plan 1987. Notwithstanding, future development of this site will need to ensure that any future development can:

- (a) be accessed from the Pacific Highway,
- (b) satisfactorily addresses flood risk, and
- (c) where possible contributes to the public benefit of the Ballina community as outlined in the Ballina Shirewide Development Control Plan.



Figure 1: Indicative Photo: Constructed Wetland

From our analysis of the site's constraints and opportunities and examination of the relevant planning policies and applicable development controls, the proposed subdivision pattern has been developed to address the key issues identified. Through our consultation with officer's of Ballina Shire Council, the Department of Planning and the Roads and Traffic Authority, we have sought to address the identified key issues in a sustainable manner.

The merits of the proposed development seeks to ensure that future residential development across the site can be undertaken in a manner that results in high quality development outcomes while respecting the constraints of the site.

The proposed development is generally consistent with Ballina Council's Planning instruments. It follows the principles of the Coastal Design Guidelines for NSW and addresses local and state government policy to propose a subdivision design that is consistent in delivering a high quality residential outcome.

Introduction

PMM Sydney Pty Ltd have been commissioned by Rayshield Pty Ltd to prepare a Development Application to subdivide land known as Riveroaks, Lot 1, 3 and 5 in DP1074242, Pacific Highway, Ballina for residential development.

The following makes application for the Director-General's Environmental Assessment Requirements in accordance with 75F of the *Environmental Planning and Assessment Act 1979*.

The following report provides an overview of the site, context and constraints. In addition, we have identified and summarised the relevant planning instruments that apply to this site at State, Regional and Local levels. We have also identified a number of strategic planning policies that inform and will influence future development outcomes in Ballina Shire.

The site has been subject to a range of previous studies and assessments over previous years. This information has provided the basis of our analysis and informed the design of the subdivision layout.



Figure 2: Site Location

Background and Site History

Significant previous planning work has been conducted over the subject site and surrounding land since 1997. We have had the opportunity to inspect Ballina Shire's records and have summarised our findings below.

Rezoning

On 24 December 1997, an application requesting a Local Environmental Study (LES) was made to Ballina Shire Council. The application was made pursuant to an approach to Council to subdivide the land for residential development. The LES was required to rezone the land from 1(a) Rural to a land use zone where residential development was permissible.

On 16 February 2001, the LEP amendment was gazetted and the land was rezoned to 2(a) Living Area, 1(a) Rural and 7(a) Environmental Protection (Wetlands) Zone. The rezoning followed extensive negotiations between Council, the landholders and various State Government Agencies to ensure the conservation of significant wetland value, the provision of urban support facilities such as public open space, public access to the foreshore of North Creek Canal, and provision of a future road reserve for the proposed West Ballina Arterial Road. Subsequent to the gazettal of the LEP amendment, Ballina Shire Council adopted the Riveroaks DCP (which was later included in the consolidated Ballina DCP adopted by Council on 1 October 2006).

Development Application

On 16 June 2003, Council determined DA 2002/566 which sought to subdivide the land encompassed by the Riveroaks DCP. The consent was deferred subject to construction and approval of an intersection between the development site and the Pacific Highway.

The development of the aforementioned intersection is dependent on the agreement of the adjoining landholders. Unfortunately further to the passage of time, the relevant landholders are unable to form an agreement that will allow the development of the intersection.

Therefore in order to proceed with the development an alternative temporary access point needs to be provided. Further, over time development costs have increased and as such a new subdivision pattern is required that will appeal to changes in the market place.

Subsequently a new development application is required. On 16 May 2006 the Minister of Planning declared that the subdivision of this site

for residential development is a Major Project and any application would be considered in accordance with Part 3A of the *Environmental Planning and Assessment Act 1979*.

Site Description & Context

The following section provides an overview of the site and its context.

Site Address

Lot 1, Pacific Highway, Ballina. The site is more formally described as Lot 1, 3 and 5 in DP1074242.

Topography

The site is approximately 24.26ha in size and is relatively flat across the site. The site gradually slopes down from the Highway, towards the adjoining lot to the south.

Flora and Fauna

Limited significant Flora and Fauna exists on the site. The site is predominantly vegetated with grass however it does retain a portion of Swamp Shea Oaks which are considered to be regrowth. Nonetheless, on 11th May 2006 Ballina Council determined DA 2006/650, a development application to clear the site of remnant vegetation.

Access

The site's primary access will be from a temporary access point from the Pacific Highway. A proposed new road runs adjacent to the development, which will in the future provide formal access to the site. At the time when this road is constructed, the proposed temporary access from the Pacific Highway will be closed. In principle agreement has been obtained from the Road Traffic Authority (RTA) in relation to the temporary access from the Highway.

Land Use Zone

The site is located within the 2(a) Living Area Zone of the Ballina Local Environmental Plan 1987. Residential development is permissible development within this zone. Zones surrounding the site include the

following:

- 1(b) Rural – Secondary Agricultural Land
- 4 Industrial
- 2(a) Living Area

Infrastructure – Sewerage, Water, Telephone, Gas, Electricity, Broadband

An Electricity Easement currently extends through the site, running north-south. This easement will be relocated underground within the 22m road reserve of the north-south avenue road and within the landscaped buffer along the southern boundary of the site.

Adjacent Land Uses

The land immediately surrounding the site is rural in nature. The site fronts the Pacific Highway. On the opposite side of the Pacific Highway are more urban uses, including an Aldi Supermarket, Bunnings Warehouse, and other commercial and low impact industrial uses. Further residential development is located to the east of the subject site.

Previous Uses / Consents

The site is currently vacant, however it has previously been used for agricultural purposes.

A previous approval was granted by Ballina Shire Council (DA 2002/566). This application was lodged over Lot 1 in DP799238, Lot 268, 269, 422 in DP 755684, Lot 6 in DP243060, Lot 1 & 2 in DP1033657, Lot 1 & 2 in DP527161, Lot 1 in DP241779 and Lot 1 in DP133628. These allotments have since been amalgamated to comprise Lots 1 & 2 in DP1074242, Lot 268 & 269 in DP755684 and Lot 1 in DP799236.

This approval was for a residential subdivision. This approved layout has since been adopted by Council as part of a Development Control Plan (DCP) over the Riveroaks land. This DCP sought to provide an integrated outcome for the entire development site, providing access, open space and an approved residential subdivision layout over the site.

In addition, minor applications to consolidate land holdings and undertake vegetation clearing on site have been determined by Council.

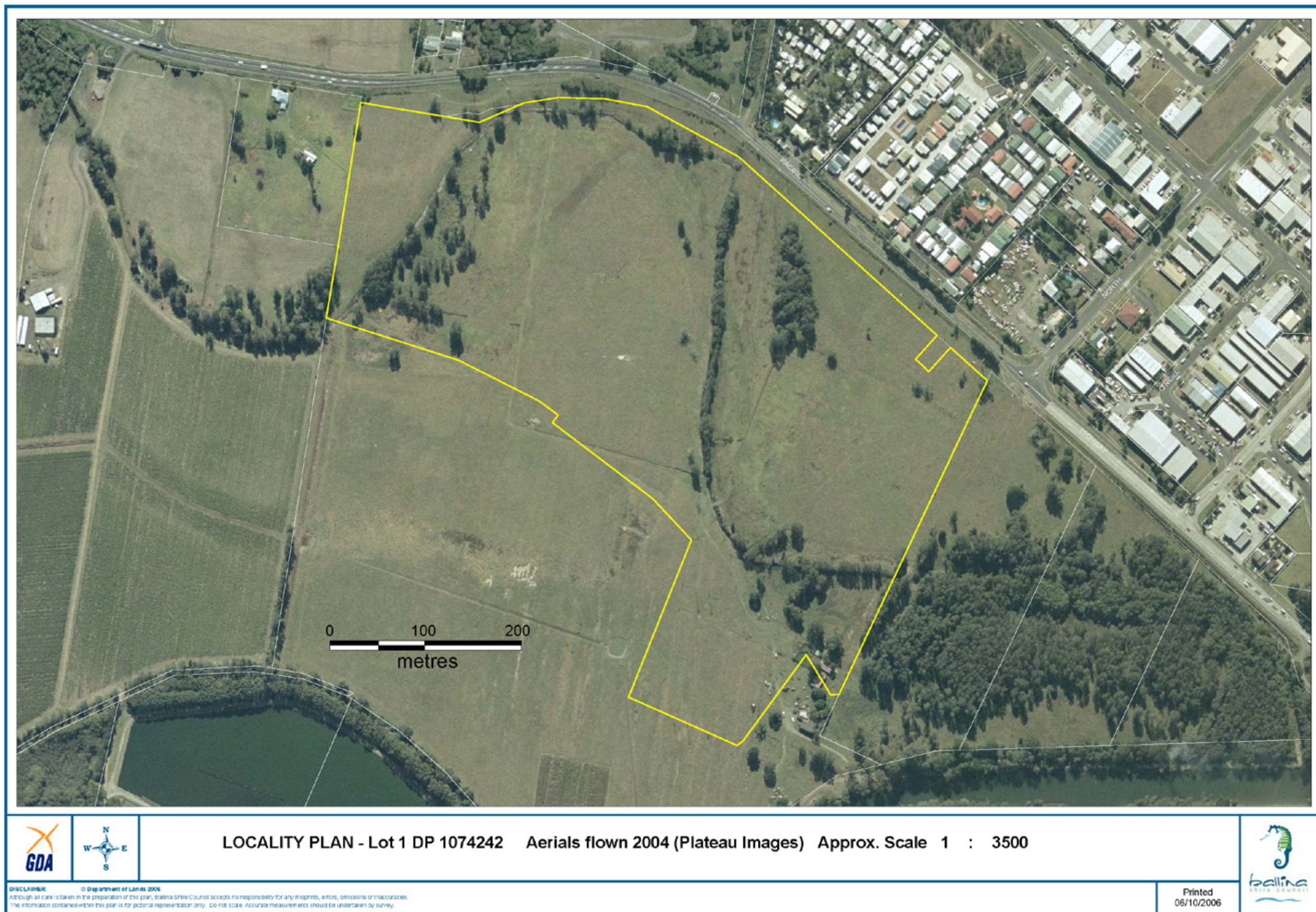


Figure 4: Site

Environmental Planning Instruments

State Environmental Planning Policies (SEPPs)

State Environmental Planning Policies articulate the planning interests of the State on a range of issues. The following State Planning Policies are relevant to the development of this site.

State Environmental Planning Policy 1 – Development Standards

The above SEPP provides flexibility to specific planning provisions where a proposal demonstrates that the requirement is unreasonable or unnecessary. The proposed development seeks a minor variation on the minimum allotment size under the provisions of the Ballina Local Environmental Plan.

State Environmental Planning Policy (Major Projects) 2005

The proposed development has been identified as a Major Project pursuant to SEPP (Major Projects) 2005 to which Part 3A of the *Environmental Planning and Assessment Act 1997* applies. The proposed development is seeking approval to subdivide land into approximately 236 Lots on land that is located within the Coastal Zone. Schedule 2 (1) (i) of this policy lists subdivision in a residential zone, within the coastal zone, of 25 lots or more is a Major Project.

State Environmental Planning Policy No 71 – Coastal Protection.

The site falls within the New South Wales coastal zone. The aim of the policy is to ensure that coastal values are protected and conserved. The plan sets out a range of objectives that coastal development must achieve. In this regard reference to the NSW Coastal Policy 1997 and Coastal Design Guidelines is required.

Regional Environmental Planning Policies

Regional Planning policies are developed to inform local planning instruments and provide a regional context to certain development issues.

North Coast Regional Environmental Plan

The aim of the plan is to provide regional policies for the protection and conservation of natural environmental values and to encourage

efficient and attractive built environment. The Plan details of principles and policies that guide policy development and development control throughout the region. Relevant policies include protection of wetlands, urban housing, the provision of services and utilities.

Local Environmental Plans

The site is zoned 2(a) Living Area Zone under the Ballina Local Environmental Plan 1987.

The Ballina Local Environmental Plan 2000 states that the primary objective of the 2(a) Living Area Zone is:

- To regulate the subdivision and use of land to permit housing and ancillary development where the scale, type and traffic generating characteristics of the ancillary development are compatible with the character and amenity of the surrounding residential development;
- To permit development which is considered by the council to be an essential land use within the urban living area, but not including a shop (other than a general store); and
- To allow detailed provision to be made, by means of a development control plan, to set aside specific areas within the zone for varying housing densities as well as other associated urban and tourist facilities.'

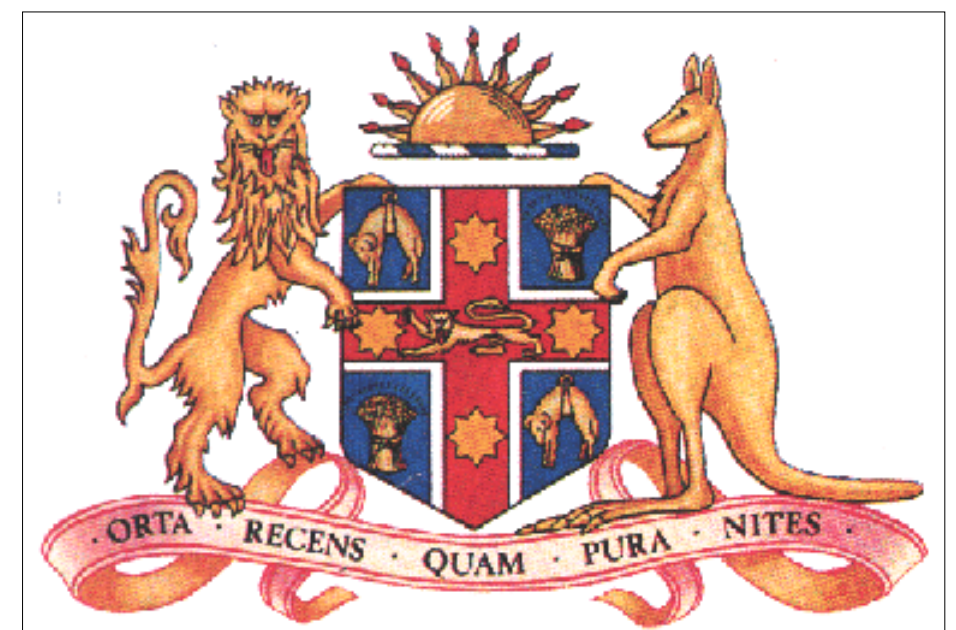
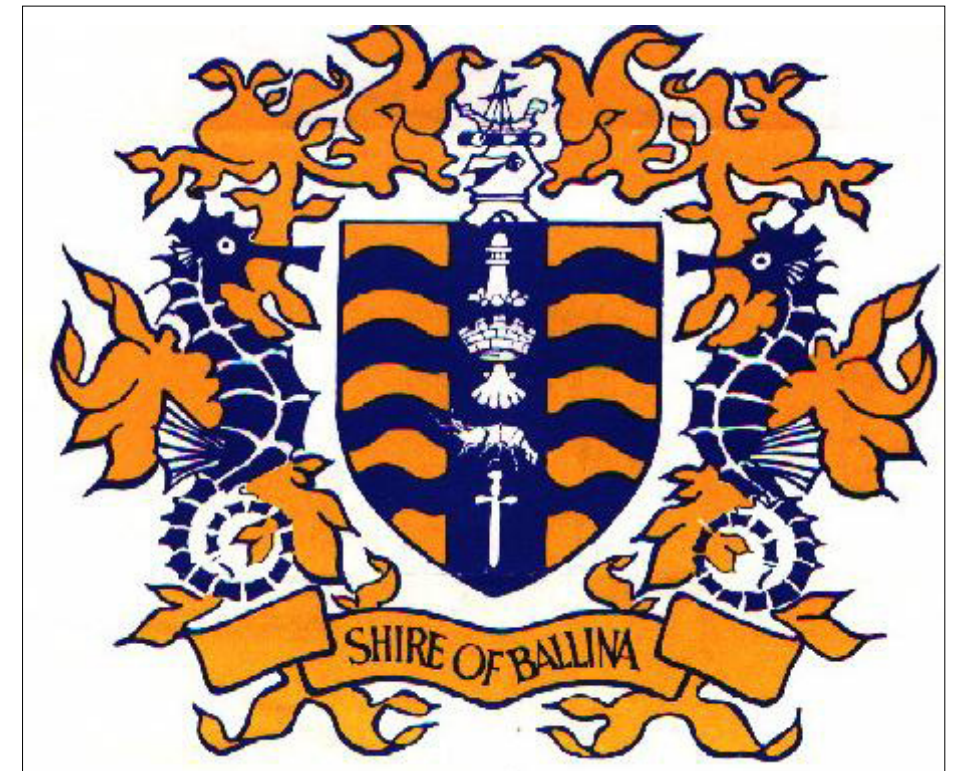
In addition, secondary objectives of the zone include:

'To allow a variety of housing types and designs and to encourage greater visual amenity by requiring site landscaping.'

The proposed residential development of 235 residential lots plus one child care lot is permitted within the zone as consent development subject to the preparation of a Development Control Plan detailing provisions for the varying housing densities proposed.

Development Control Plans

The Ballina Shire Combined Development Control Plan (the Combined DCP) is the principle Development Control Plan (DCP) in Ballina Shire. It came into force on 1 October 2006 and replaces most of Council's "old" DCPs. It contains a wide range of planning controls and supports the provisions of the Ballina Local Environmental Plan 1987. The following Policy Statements under the Combined DCP are relevant to the future development of the site.



Ballina Shire Council Combined Development Control Plan – Policy Statement No. 1 Multiple Dwellings

The policy articulates assessment criteria to manage the development of multiple dwellings in Ballina Shire. It focuses on the efficient use of residential land and the preservation of the existing and future amenity. The policy sets out controls on the following desirable amenities:

- Density
- Landscaped Open Space
- Landscaping of Open Space
- Conservation of the urban character
- Amenity
- Parking
- Height Limitations
- Setbacks
- External Appearance/Compatibility with Existing Development

Consideration of this Policy has been made during the preparation of the proposed layout for the site.

Ballina Shire Council Combined Development Control Plan – Policy Statement No. 2 Car Parking and Access

The policy relates to car parking and vehicular access requirements for developments. It focuses on design controls for Parking Layout Standards including:

- Design Considerations
- Parking Requirements
- Manoeuvring Areas
- Driveways For Internal Roads
- Garage Setbacks From Roads And Streets
- Access From Laneways
- Kerb And Gutter Crossing Widths

The issues addressed in this Policy Statement are relevant to the development of the proposed site. The layout of the proposed development provides inter-connectivity and high permeability for residents of the development. The proposal is consistent with the manoeuvring requirements of the policy statement.

Ballina Shire Council Combined Development Control Plan – Policy Statement No. 4 Urban Subdivision

The policy sets out design principles for urban subdivisions in Ballina. The policy is concerned with ensuring the scale, type and traffic generating characteristics of proposed developments are compatible with the character and amenity of the surrounding residential areas.

The policy supports the provisions of the Ballina Local Environmental Plan 1987.

The policy identifies Design Principles which predominantly relate to lot size. For residential areas, such as the subject site, the policy states:

‘Allotments created for residential development shall generally have a minimum area of 600m² with a minimum frontage.’

The development site is located within the area identified as Riveroaks, (Refer Policy Statement 15 – Riveroaks, discussed below). This policy statement identifies that the intended development form is for low and medium density residential development. The proposed development provides a range of allotment sizes, including smaller villa and courtyard allotments, traditional allotments and duplexes. The predominant development form proposed involves a minimum allotment size of 575m² with a frontage of 18m. This is broadly in accordance with the provisions of the Policy Statements. The proposal also includes a consistent number of duplex allotments, as identified by the Riveroaks Policy Statement.

Ballina Shire Council Combined Development Control Plan – Policy Statement No. 6 Landscaping Guidelines

The policy provides landscape guidelines for development in the Ballina Shire. A landscape concept will be prepared over the site to address the landscape requirements stated in this policy.

Ballina Shire Council Combined Development Control Plan – Policy Statement No. 11 Flood Levels

This DCP identifies the fill levels and minimum floor levels required for residential uses within the Ballina area to ensure flood immunity. The proposed development will address this DCP to ensure flood immunity.

Ballina Shire Council Combined Development Control Plan – Policy Statement No. 15 River Oaks Estate

This policy relates specifically to the subject site and surrounding allotments and is intended to provide guidelines for the development of the area. This policy seeks an integrated development outcome for the entire Riveroaks area. The policy identifies that development of this area should be residential in nature and comprise low and medium density development such as traditional single detached housing, duplexes, and dual occupancies with some medium density development in the areas designated as medium density.

The policy identifies a minimum lot size of 600m² for single residence housing allotments. This lot size is understood to be included, based on the previous approval that applies to the subject site and the provisions of the Ballina Shire Council Policy Statement No. 4 - Urban Subdivision. While the proposed development does not comply with the minimum lot size of 600m², a variety of allotment sizes are provided, creating an interesting development form. The development of the site incorporates 33 duplex allotments, generally consistent with the policy which identifies 34 duplexes. The proposal also provides for the creation of higher density, villa and courtyard allotments throughout the development, including some focused in proximity to the proposed sporting fields, consistent with the policy which seeks for low and medium density residential development.

The traditional allotments proposed comprise a minimum allotment size of 575m² with a frontage of 18m. This development outcome, while less than the 600m² lot size, creates a consistent urban outcome, through the maintenance of the 18m frontage. The reduced lot size is considered to be broadly consistent with the intention of the low density residential area. This proposed development outcome for the site is consistent with the overall intentions of the policy and Urban Subdivision Policy.

The proposed development is generally consistent with the key elements of the open space network. A multi purpose sports field is to be provided to service the projected population.

Ballina Shire Council Combined Development Control Plan – Chapter 11 – Mosquito Management

Chapter 11 of the Ballina Shire Council DCP relates to Mosquito Management. This Chapter provides information relating to mosquitos and guidelines for development in relation to mosquito management. Consideration of this Chapter will be made as part of this proposal.

Ballina Shire Council Combined Development Control Plan – Chapter 13 – Stormwater Management

Chapter 13 of the Ballina Shire Council Combined DCP applies to development of the subject site. This Chapter identifies an objective of no net increase in the average annual load of key stormwater pollutants and peak discharge flow rates, above that occurring under existing conditions. The proposed development has considered the current overland flow conditions for the site in the design of the layout. Further investigations relating to Stormwater will be conducted as part of the proposal.

Strategic Documents & Policies

State NSW Coastal Policy 1997

The NSW Coastal Policy 1997 applies to land that falls within the coastal zone. This site falls within the coastal zone. The NSW Coastal Policy 1997 articulates the NSW Government's approach to addressing coastal management issues in light of development. Consent authorities will be required to assess any future development proposals against the policy. It should be noted, that the Coastal Policy does not prohibit development on this site. The Coastal Policy is given statutory effect through State Environmental Planning Policy No. 71 – 'Coastal Protection.'

Coastal Design Guidelines for NSW

The Coastal Design Guidelines for NSW provides a framework for analysing the relationships between settlements and the local, urban and natural areas and between neighbouring settlements. The Guidelines develop a settlement hierarchy that recognises the difference in size, servicing, infrastructure, employment opportunities and the potential for growth.

Five key objectives are stated:

- To protect and enhance the cultural, ecological and visual characteristics of a locality;
- To limit coastal sprawl by establishing separation and greenbelts between settlements;
- To integrate new development surrounding land uses;
- To integrated land use with transport;
- To protect local character.

NSW Floodplain Development Manual 1995

The NSW Floodplain Development Manual seeks to support the NSW Government's Flood Prone Land Policy in establishing sustainable strategies for managing human occupation and use of the floodplain. The manual is based on a hierarchy of avoidance, minimization and mitigation. The Policy identifies several measures that may be adopted as part of a flood management plan, including evacuation plans, community awareness and readiness, flood proofing buildings and flood prediction and warning measures. Consideration of this manual will be made as part of the future development of the subject site.

Regional

The following strategy informs the development of future planning instruments for Ballina and the Far North Coast Region. The following document is not a statutory instrument.

Draft Far North Coast Regional Strategy 2006-31

The purpose of the regional strategy is to manage expected growth in a sustainable manner while protecting and conserving unique environmental assets, cultural values and natural resources. The Strategy aims to limit future urban growth and prevent the spread of coastal development by encouraging development in inland centres. Ballina has been identified in the Strategy to become a Major Regional Centre recognizing the importance of its airport and its role as a river and coastal lifestyle centre. The Riveroaks site is identified as part of the existing urban footprint and is identified as one of the sites to meet the regions future urban needs.



Figure 5: Indicative Photo: Coastal Landscape

Issues

A constraints and opportunities diagram, Figure 6 on the adjoining page, highlights the issues future development will need to consider. These matters are discussed below.

Traffic and Access

Previous planning conducted over the surrounding area have involved the identification of a new road extending along the eastern boundary of the site. This new road is located partially within the subject site, and partially within the adjoining property. It is anticipated that this road will be constructed at such time that the adjoining allotment is developed. In the interim, a temporary access point directly from the Pacific Highway is proposed to enable the development of the subject site. This access point is located approximately 150m from the eastern boundary of the site.

In principle agreement has been obtained from the RTA regarding this temporary access. The access point will be closed upon the construction of the proposed link road.

Noise

Noise issues resulting from traffic along the motorway will be addressed by a noise attenuation mound and appropriate landscape buffering along the northern boundary of the site.

Flooding

Existing flood information shows the proposed site is subject to flooding. The proposal will be developed to be consistent with state planning controls on flood mitigation.

Infrastructure

Council have previously provided advice that indicates water and gravity sewer mains are available for future residential development. Further power and telephone services are available.

Urban Design

The proposed layout is intended to replace the layout previously approved as part of the DCP over the subject site. The proposed

layout is considered to provide an improved urban outcome, providing extensive permeability, a variety of allotment sizes and improved response to the overland flow considerations of the site.

Vistas and Views

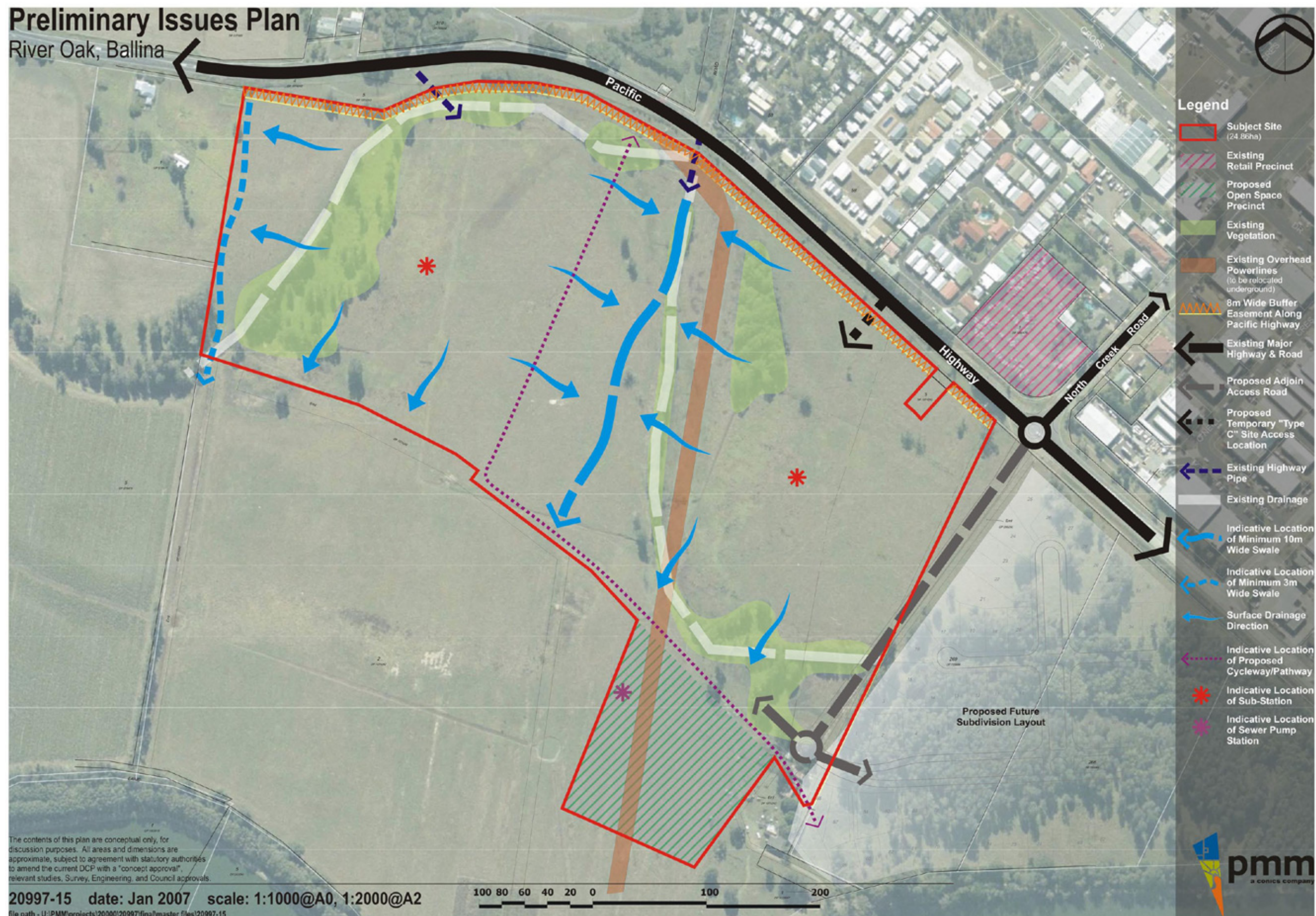
The proposed layout has been designed to mitigate views to the north of the motorway with the construction of a 1m high landscaped mound with additional landscape buffer planting. There are no significant views to the south, east or west.

Internal views and vistas are focused on creating attractive landscaped streets within the development. Two significant landscaped avenues have been designed as key central spines through the development. The main avenue street runs north-south and provides attractive views to the parkland within the sports field complex.

Consultation

To date we have consulted both Ballina Shire Council and the Roads and Traffic Authority (RTA). The RTA have a significant role as they are responsible for the management of the Pacific Highway. To date our consultation has been limited to the design of the temporary access point. The RTA have provided written correspondence endorsing the proposed intersection design.

Ballina Shire Council have been extensively consulted throughout the preparation of this application. In this regard we have sought to address the concerns of Council by ensuring the proposed subdivision layout delivers, where possible, the public benefits proposed by the previous development consent. To date Council have reserved the right to provide their formal response through the Major Project process, however, we are confident that we have addressed Council's issues.



Key Issues

Significant issues associated with the future development of this site are identified as:

- Traffic and Access
- Planning and Urban Design
- Flood Considerations

From our analysis of the site, previous planning documentation and approvals, a subdivision pattern has been developed to address each of the key issues. The proposal seeks to ensure that future residential across the site can be undertaken in a manner that results in high quality development outcomes.

The proposed development is broadly consistent with the Ballina Planning instruments, including the intent of the Riveroaks Policy Statement No. 15. The revised layout provides an appropriate development outcome for the site, in consideration of the planning controls and site characteristics.

Design Philosophy

The proposed layout is considered to provide an improved urban outcome to the subdivision pattern original proposed. This preferred subdivision layout, shown in Figure 11, significantly improves permeability throughout the site, includes a variety of allotment sizes to promote housing diversity and improves the response to the overland flow considerations of the site.

Figures 8 to 10 detail the evolution of the preferred subdivision layout. In each instance we have attempted to develop a subdivision pattern that would satisfactorily address the relevant planning requirements, both statutory and strategic, as well as the site constraints.

On each proposed pattern we were required to balance out the need to promote good urban design principles such as permeability, legibility, walkability and identity with the requirements of the Coastal Design Guidelines as well as the needs of the market place.

In this regard we sought to promote road pattern that would encourage pedestrian and cycling activity, a diversity in housing lots, linkages to adjoining areas, implementation of water sensitive urban design principles that would see the treatment and capture of runoff within the site and accessibility to open space. As such our preferred plan of development is identified in Figure 11.

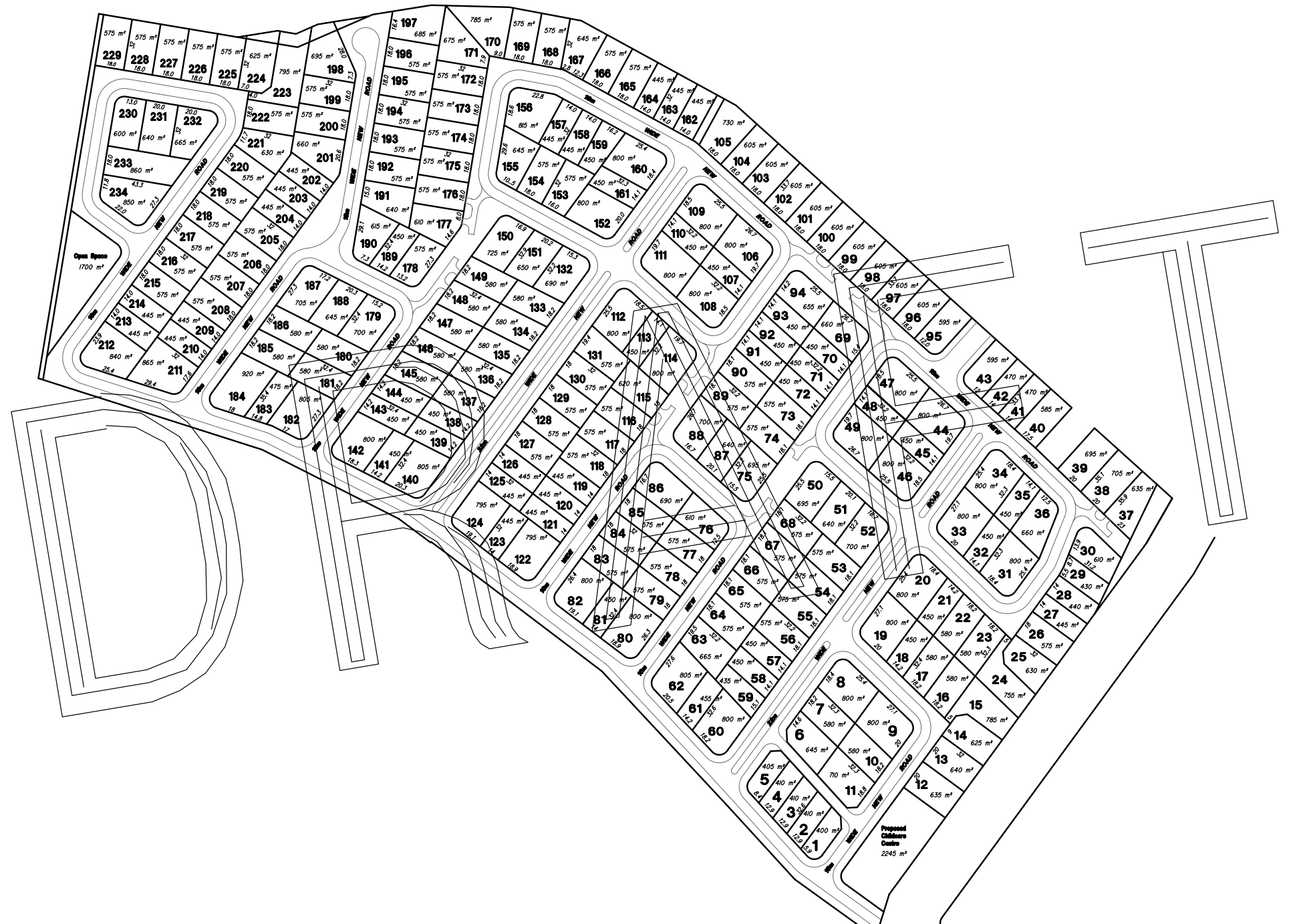
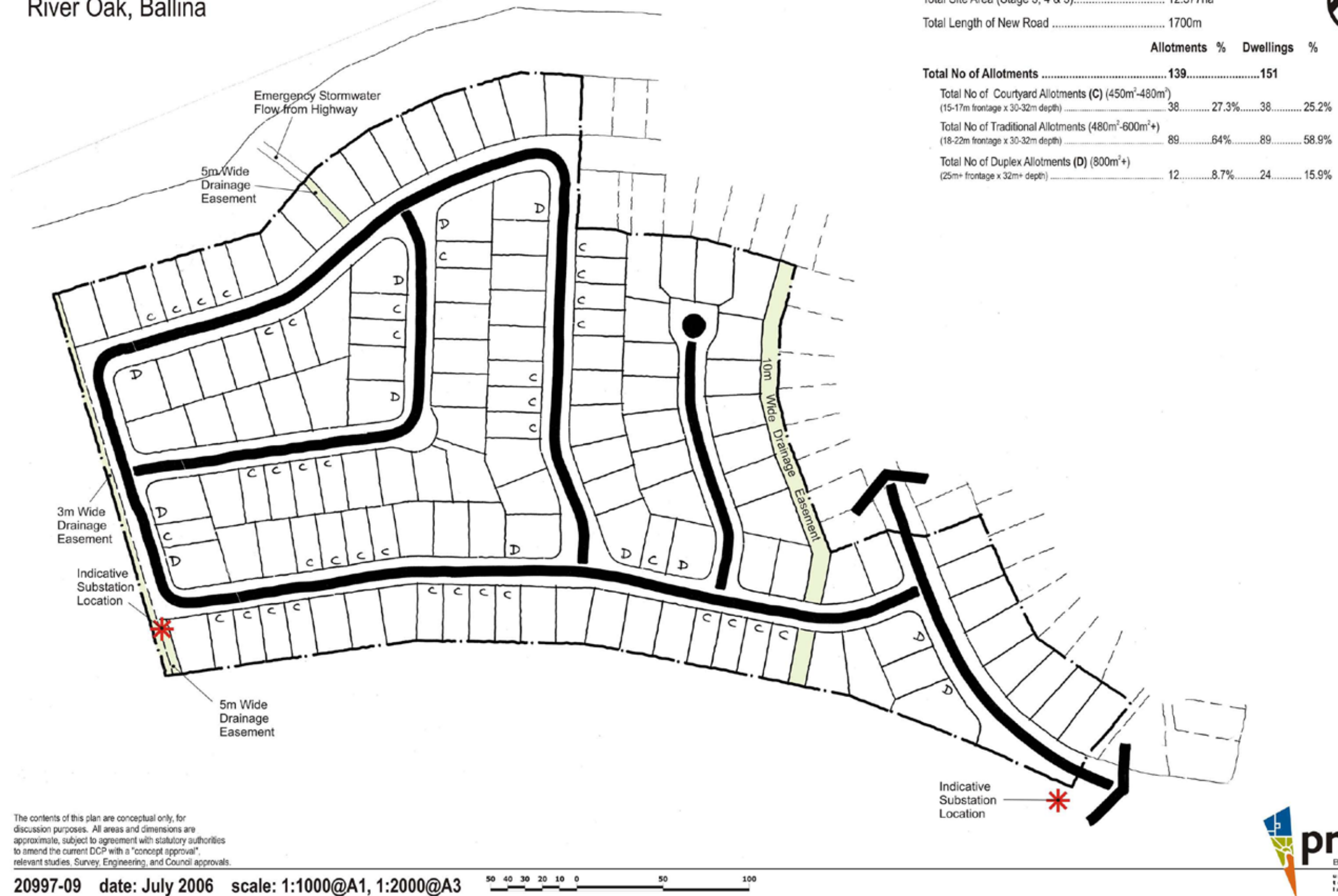


Figure 8: Preliminary Subdivision Concept No. 1

Conceptual Subdivision Layout Plan (Stage 3, 4 & 5) - Option G

River Oak, Ballina



Conceptual Subdivision Layout Plan (Stage 1-5) - Option H

River Oak, Ballina

Development Statistics

Total Site Area (Stage 3, 4 & 5)..... 21.299ha

Total Length of New Road 3200m

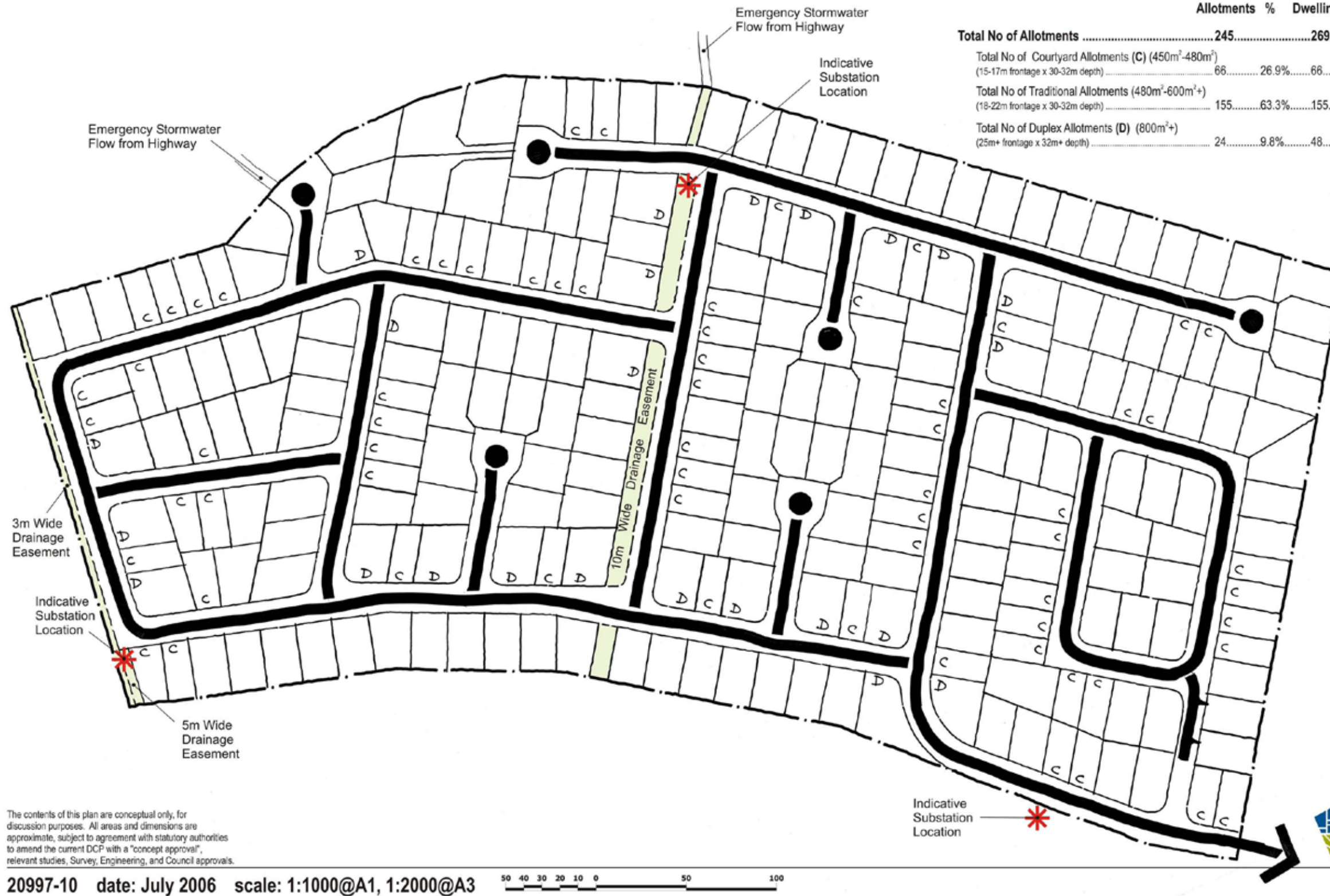
Allotments % Dwellings %

Total No of Allotments245.....269

Total No of Courtyard Allotments (C) (450m²-480m²)
(15-17m frontage x 30-32m depth) 66..... 26.9%..... 66..... 24.5%

Total No of Traditional Allotments (480m²-600m²+) (18-22m frontage x 30-32m depth) 155..... 63.3%..... 155..... 57.7%

Total No of Duplex Allotments (D) (800m²+) (25m+ frontage x 32m+ depth) 24..... 9.8%..... 48..... 17.8%



RIVER OAKS, BALLINA

preliminary environmental assessment report



Figure 11: Preliminary Subdivision Concept No.

Conclusion

The Preliminary Environmental Assessment Report follows the Minister of Planning's declaration that the future residential subdivision of this site is a Major Project. As such we have sought to provide relevant information to determine the Key Issues that would be relevant in the preparation of an Environmental Assessment Report.

In identifying the relevant key issues we have reviewed the following:

- State Environmental Planning Policies;
- Regional Environmental Planning Policies;
- Ballina Shire Local Environmental Plan;
- Ballina Shire Consolidated Development Control Plan;
- Ballina Shire Council's records;
- The NSW Coastal Policy 1997;
- The Coastal Design Guidelines for NSW; and
- Consent DA 2002/566 and relevant supporting information.

In addition we have consulted with the Department of Planning, Ballina Shire Council and the Roads and Traffic Authority.

From our analysis of the relevant planning documents and previous approvals relevant to this site we consider the Key Issues being the following:

- The provision of suitable and safe temporary access from the Pacific Highway;
- Management of potential flooding impacts;
- Provision of public facilities, where possible; and
- Promotion of good urban design that will encourage community development sustainable development opportunities.

In this regard our preferred development plan of subdivision seeks to address each of the Key Issues described above in a manner consistent with achieving the objectives of the relevant planning documents.