



## Pre-lodgement Meeting Notes

<b>Application No:</b>	PLM2024/0007
<b>Meeting Date:</b>	5 March 2024
<b>Property Address:</b>	122 Crescent Road NEWPORT
<b>Proposal:</b>	Demolition of an existing commercial marina and the construction of a private marina - Prelodgement Meeting
<b>Attendees for Council:</b>	Daniel Milliken (Development Advisory Services Manager) Adam Croft (Principal Planner) Clare Costanzo (Planner) Rafiq Islam (Principal Officer – Coast & Estuary) Steve McGain (Senior Environment Officer (Coast)) James Brisebois (Team Leader – Catchments) David Hellot (Senior Environment Officer – Catchments) Pierre Vignal Atherton (Biodiversity Officer) Rob Barbuto (Principal Engineer – Major Developments)

### General Comments/Limitations of these Notes

These notes have been prepared by Council's Development Advisory Services Team on the basis of information provided by the applicant and a consultation meeting with Council staff. Council provides this service for guidance purposes only.

These notes are an account of the advice on the specific issues nominated by the Applicant and the discussions and conclusions reached at the meeting.

These notes are not a complete set of planning and related comments for the proposed development. Matters discussed and comments offered by Council will in no way fetter Council's discretion as the Consent Authority.

A determination can only be made following the lodgement and full assessment of the application.

In addition to the comments made within these Notes, it is a requirement of the applicant to address the relevant areas of legislation, including (but not limited to) any State Environmental Planning Policy (SEPP) and any applicable sections of the Pittwater Local Environmental Plan 2014 and Pittwater 21 Development Control Plan, within the supporting documentation including a Statement of Environmental Effects, Modification Report or Review of Determination Report.

You are advised to carefully review these notes and if specific concern have been raised or non-compliances that cannot be supported, you are strongly advised to review your proposal and consider amendments to the design of your development prior to the lodgement of any development application.



## SPECIFIC ISSUES RAISED BY APPLICANT FOR DISCUSSION

Response to Matters Raised by the Applicant	
<b>Deliverables</b>	<p>Council has provided a detailed list of supporting documentation that will be required for lodgement and assessment of the future development based on the master set of architectural plans and the summary of proposed works provided by the applicant.</p> <p>This list has been included at the end of these prelodgement notes.</p>

### PITTWATER LOCAL ENVIRONMENTAL PLAN 2014 (PLEP 2014)

PLEP 2014 can be viewed at <https://www.legislation.nsw.gov.au/view/html/inforce/current/epi-2014-0320>

Part 2 - Zoning and Permissibility	
<b>Definition of proposed development:</b> (ref. PLEP 2014 Dictionary)	<p><b>marina</b> means a permanent boat storage facility (whether located wholly on land, wholly on a waterway or partly on land and partly on a waterway), and includes any of the following associated facilities:</p> <ul style="list-style-type: none"> <li>(a) any facility for the construction, repair, maintenance, storage, sale or hire of boats,</li> <li>(b) any facility for providing fuelling, sewage pump-out or other services for boats,</li> <li>(c) any facility for launching or landing boats, such as slipways or hoists,</li> <li>(d) any car parking or commercial, tourist or recreational or club facility that is ancillary to the boat storage facility,</li> <li>(e) any berthing or mooring facilities.</li> </ul>
<b>Zone:</b>	W2 Recreational Waterways
<b>Permitted with Consent or Prohibited:</b>	Permitted with consent

Part 4 - Principal Development Standards			
Standard	Permitted	Proposed	Compliance
<b>5.7 Development below mean high water mark</b>	Development consent is required to carry out development below the mean high water mark.	Works are proposed below the mean high water mark.	Intention to lodge a development application and therefore appropriate environmental assessment will be conducted.



Part 4 - Principal Development Standards			
<p><b>7.8 Limited development on foreshore area</b></p>	<p>To ensure continuous public access along the foreshore area and to the waterway and opportunities to provide continuous public access along the foreshore and to the waterway will not be compromised</p> <p>The appearance of any proposed structure, from both the waterway and adjacent foreshore areas, will be compatible with the surrounding area.</p>	<p>Public access along the foreshore area has not been demonstrated on any supporting documentation for the prelodgement meeting.</p> <p>The size of the proposed works are not considered to be compatible with the surrounding area.</p>	<p>Further information regarding access along the foreshore must be provided with lodgement of the development application.</p> <p>The provisions of PLEP Clause 7.8, SEPP (Resilience &amp; Hazards) and the objectives of the W2 zone requirement maintenance of continuous public access to and along the foreshore.</p> <p>The Pittwater Waterways Strategy also identifies the objective to <i>“Improve public access to the Pittwater waterway and along the Pittwater foreshore”</i>.</p> <p>The terms/details of the lease agreement/s with NSW Government – Department of Industry – Lands, particularly in relation to public access to the affected land/waterway.</p> <p>It is recommended that amendments are made to reduce the extent of the proposed works to avoid or minimise impacts to public access and ensure compatibility with the surrounding character. In this regard, it is noted that the proposal includes more berths (9) than the approved residential lots on the adjoining site (8), and that the proposal breaches various development controls within the P21 DCP.</p>



## PITTWATER 21 DEVELOPMENT CONTROL PLAN (P21DCP)

P21DCP can be viewed at

<https://eservices.northernbeaches.nsw.gov.au/ePlanning/live/Pages/Plan/Book.aspx?exhibit=PDCP>

The following notes the identified non-compliant areas of the proposal only.

<b>Part D15 - Waterways Locality</b>		
<b>Control</b>	<b>Permitted</b>	<b>Proposed</b>
<b>D15.1 Character as viewed from a public place</b>	Buildings which front the street and/or the waterway must have a compatible presence when viewed from the waterway and incorporate design elements (such as roof forms, textures, materials, the arrangement of windows, modulation, spatial separation, landscaping etc) that are compatible with any design themes for the locality.	No detail provided within prelodgement architectural plans regarding the future boatsheds.
<p><b>Comment:</b></p> <p>The development will need to achieve the outcomes of this control and the desired future character of the locality. Commentary on this should be included within the Statement of Environmental Effects.</p> <p>Details must be provided in relation to the scope of the proposed works to the existing concrete hardstand and waterway interface, including the intended materials and finishes. It is recommended that the 'face' of the hardstand be improved visually such that it better fits contextually with the nearby residential seawalls (if deemed feasible with regard to environmental impacts/considerations).</p> <p>Where possible, the levels of the hardstand should tie in with the levels of The Avenue to the north and the adjoining land to the south between the MHWM and the waterway.</p>		
<b>D15.2 Scenic Protection - General</b>	Development shall minimise any visual impact on the natural environment when viewed from any waterway, road or public reserve.	The development comprises a marina, boatsheds and associated landscaping works.
<p><b>Comment:</b></p> <p>The proposed size of the marina and berthing areas are not considered to achieve the desired future character of the locality. It is recommended the proposed size is significantly reduced to achieve the outcomes of the control.</p>		
<b>D15.12 Development seaward of mean high water mark</b>	To ensure minimal adverse impact on the water quality hydrodynamics and estuarine habitat of Pittwater and to ensure public access is maintained and provided for along the foreshore	Works are proposed seaward of mean high water mark.
<p><b>Comment:</b></p> <p>Requirements of this section D15.12 needs to be addressed within the Statement of Environmental Effects Report as they relate to development within the crown land below the</p>		



<b>Part D15 - Waterways Locality</b>		
<p>Mean High Water Mark. An analysis of the proposal demonstrating that the proposal does not adversely impact on the visual amenity of the foreshore or water quality or estuarine habitat of the Pittwater waterway</p>		
<p><b>D15.13 Lateral limits to development seaward of mean high water mark</b></p>	<p>Waterfront development shall be set back a minimum of 2.0 metres along the full length of the lateral limit lines to development to minimise conflict. This setback shall also apply to any vessel that is to be berthed at a wharf or boating facility, marina, water recreation structure or the like. Vessels which cannot meet this criterion are considered to be inappropriate for the site and should be accommodated elsewhere.</p>	<p>The northernmost marina pontoon structure and berthing area significantly extend outside the lateral limit lines of the site.</p> <p>The southernmost marina pontoon structure is built adjoining the lateral limit lines and therefore does not meet the minimum setback.</p>
<p>All marina pontoon structures and berthing areas shall be setback a minimum of 2m from the lateral limit lines to ensure that fair and equitable enjoyment of the waterway is achieved between neighbouring waterfront landowners.</p> <p>Council considers the proposed marina to be excessive in size. It should be significantly reduced prior to lodgement to meet this control and maximise equitable access to the waterway.</p> <p>In addition, berthing areas shall also present a 2m setback to the lateral limit lines and therefore the size of vessels occupying these berths will need to be considered and adjusted accordingly.</p> <p>There are no variations to the control and lateral limit lines for the development will be enforced.</p>		
<p><b>D15.15 Waterfront development</b></p>	<p>Structures shall generally be no greater in length than existing structures, and shall not impede general navigation or equitable access or use of the waterway by adjoining landowners. The length of any jetty is to be minimised.</p> <p>Gates and like devices shall not be permitted across structures where public access around the foreshore is obstructed, or where such devices are visually obtrusive.</p> <p>The maximum dimension for berthing areas perpendicular to shore shall be 5 metres x 9 metres.</p>	<p>The proposed marina pontoon structures significantly exceed the length of the existing structures.</p> <p>The proposed minimum berthing area is for an 18m long boat, which will exceed the maximum dimensions by 11m in length and approximately 2m in width.</p>



Part D15 - Waterways Locality		
	<p>Where provided, berthing areas shall meet the following criteria:</p> <ul style="list-style-type: none"> <li>• The proponent must demonstrate that they do not already hold, or cannot obtain, a swing mooring, marina berth or boat shed where they could reasonably store their boat;</li> <li>• That there is sufficient depth of water below the vessel being 600 mm depth at zero low tide ( -1.53 AHD);</li> <li>• That it does not extend beyond the seaward face of any related pontoon, piles or jetty steps;</li> <li>• That there is sufficient clearance from prolongation of adjoining boundaries (i.e. a minimum of 2.5 metres)</li> <li>• That it be designed and located to enable efficient and safe manoeuvring without impinging on adjoining neighbours; and</li> <li>• The size of vessel must be accommodated wholly within the lease area.</li> </ul> <p>Boatsheds shall be one storey and no greater than 4.5 metres in building height above the platform on which it is built, 4.0 metres in width and 6.0 metres in length</p>	<p>The proposed footprint of the boatsheds are indicated as being 6m in length and 4m in width which is consistent with the development control plan.</p>
<p>The proposed length of the marina pontoon structures are likely to result in navigational and access issues within the waterway. It is recommended the length of the structures are reduced prior to lodgement.</p> <p>The proposed berthing areas are significantly larger than the maximum dimension within the development control plan and the future intended vessel size for these berths should be reconsidered in order to meet the maximum berthing dimensions.</p> <p>The size of the berthing areas are not supported. The berthing criteria shall be taken into consideration and commentary included in the statement of environmental effects addressing the criteria.</p> <p>Minimal details have been provided regarding the proposed boatsheds, however the footprint indicated on the plans is consistent with that of the maximum dimensions. The design of the boatsheds shall take all relevant criteria into consideration under this control.</p>		



## Part D15 - Waterways Locality

Further consideration and design amendments must be made to meet the criteria under this control. The current proposal has been designed maximising berthing within the lease area without consideration of the Pittwater Development Control Plan and specifically D15 Waterways Locality.

## Specialist Advice

### Riparian Lands and Water Management

The following were taken into consideration as part of the preparation of notes from Council's Riparian and Water Management Officers:

- Coastal Management Act 2016;
- State Environmental Planning Policy (Resilience and Hazards) 2021;
- Water Management Act 2000;
- Water Management (General) Regulation 2018;
- Northern Beaches Water Management for Development Policy; and
- Relevant LEP and DCP clauses.

Pittwater 21 DCP B5.13 Development on Waterfront Land frames the environmental protection outcome on the waterfront land. In particular the DCP objective: "Waterfront land in a degraded state, should be restored and rehabilitated".

The existing riparian vegetation (see survey extract below) is to be protected and enhanced. The proposed 'vista point' located on the Avenue might require clearing or reduced vegetation that is unlikely to comply with riparian objectives.

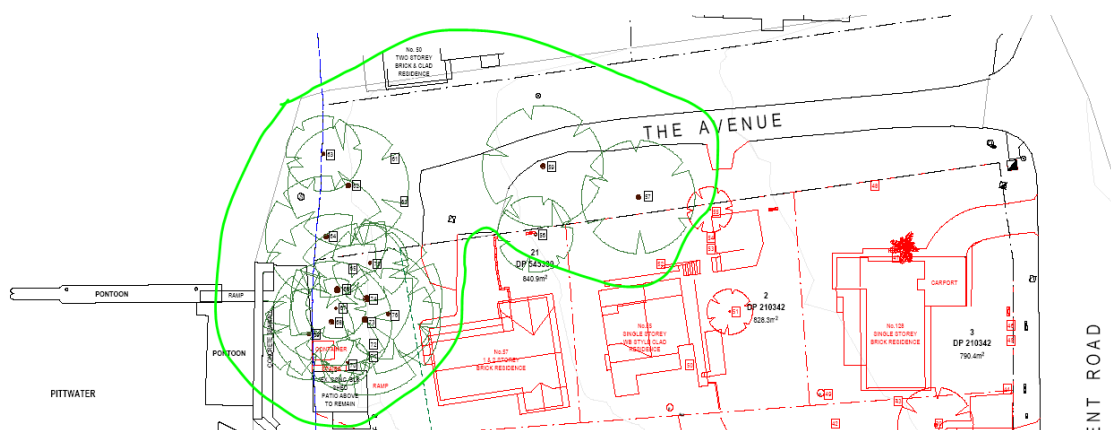


Figure 1: Survey Extract

Northern Beaches Council suggest a shoreline naturalisation is included in the Crown Land as part of the proposed redevelopment of the marina. Where possible naturalised seawall should replace the existing concrete structures. The use of sandstone boulders is recommended to create habitat features. The Marina design is to incorporate habitat friendly structures (fish hotel, living seawall tiles, etc).

The pontoon is to be ecologically sensitive and should let natural light through it.



### Specialist Advice

The proposed northern pontoon is not aligned with the lot boundary and moved further North with a 30m and 25m vessels allocation. The boats manoeuvre will have a strong impact on the shoreline in a stern-to mooring.

The propeller wash from the main engine and bow thruster (common for boat of this sizes) are increasing the likelihood of foreshore erosion along The Avenue Reserve.

We note that NSW Maritime may have concerns regarding safe navigation and manoeuvring large vessels in a narrow channel.

The development application is to include aquatic ecological study and assessment to establish ecological conditions and seagrass habitat in the foreshore and waterway area and to assess the impacts and mitigations measures required to protect the aquatic ecology.

The development is subject to a control activity permit for waterfront land by DPE Water as well as a Fisheries dredging permit.

For consideration:

<https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Water/Coasts/how-to-make-your-seawall-more-environmentally-friendly-090327.pdf>

### Coasts and Catchments

The following were taken into consideration as part of the preparation of notes from Council's Riparian and Water Management Officers:

- Pittwater 21 Development Control Plan
- Pittwater Local Environmental Plan 2014
- Pittwater Estuary Mapping of Sea Level Rise Impact Study (Cardno 2015)
- Coastal Management Act 2016
- State Environmental Planning Policy (Resilience & Hazards) 2021

#### Coastal Management Act 2016 and State Environmental Planning Policy (Resilience & Hazards) 2021

The proposed development is located within the coastal zone of NSW and is subject to the provisions of the Coastal Management Act 2016 (CM Act) and State Environmental Planning Policy (Resilience & Hazards) 2021 (SEPP R & H).

Under the SEPP R&H, the subject site has been included on the Coastal Environment Area and Coastal Use Area Map, as such the requirements of sections 2.10 and 2.11 apply. The objectives and requirements of both the CM Act and the SEPP (R&H) must be addressed within the Statement of Environmental Effects (SEE) Report as they relate to development within these coastal management areas. In addition, the general SEPP (R & H) clause 2.12 relating to an increase in risk of coastal hazards must also be addressed within the SEE report.

#### Estuarine Risk Management

##### Estuarine Hazards

The subject property has been identified as being affected by estuarine wave action and tidal inundation on Council's Estuarine Hazard Mapping. The Estuarine Risk Management Policy for





### Specialist Advice

Development in Pittwater (Appendix 7, Pittwater 21 DCP) and the relevant B3.7 Estuarine Hazard Controls will apply to any development of the site. However, the Estuarine Planning Level does not apply to Jetties, Bridging Ramps or pontoons located on the seaward side of the foreshore edge.

Hence, estuarine hazard controls are not applicable based on this PLM summary of proposed works.

However, Estuarine processes affect the physical, chemical and biological behaviour of an estuary. These processes either individually or in combination can produce a situation where built assets are placed at risk, especially with the rising sea level. These risks are identified, assessed, and risk minimizing measures are recommended in an Estuarine Risk Management Report for and duration for the design life of the newly built private marina.

#### Development on Foreshore Area

However, a section of the subject property is within the foreshore building line. Part 7, Clause 7.8 – Limited development on foreshore area of the Pittwater LEP 2014 applies for any development within the foreshore area. Foreshore upgrade works are to be proposed. The objectives and requirements of the Clause 7.8 of the Pittwater LEP 2014 must be addressed within the Statement of Environmental Effects (SEE) Report as they relate to development within the foreshores areas.

#### Development seaward of mean high water mark

As proposed works are located on crown land below the Mean High Water Mark, Section D15.12: Development seaward of mean high water mark of the Pittwater 21 DCP applies to proposed development.

Requirements of this section D15.12 needs to be addressed within the Statement of Environmental Effects (SEE) Report as they relate to development within the crown land below the Mean High Water Mark. An analysis of the proposal demonstrating that the proposal does not adversely impact on the visual amenity of the foreshore or water quality or estuarine habitat of the Pittwater waterway

The DA should be accompanied by:

- Land Owners Consent from the Department of Crown Lands under the NSW Planning, Industries & Environment
- No navigational Concerns from the Transport for NSW- Maritime Division enclosing dated and signed maps
- No Objection from the DPI-Fisheries under the Department of Primary Industries

In addition, an Aquatic Ecological Survey and Assessment Report will be required.

#### Lateral Limits to development seaward of mean high water mark

As proposed works like jetty are located on crown land below the Mean High Water Mark, Section D15.13: Lateral limits to development seaward of mean high water mark of the Pittwater 21 DCP applies to proposed development.



### Specialist Advice

Requirements of this section D15.13 needs to be addressed on the Development Drawings and within the Statement of Environmental Effects (SEE) Report as they relate to the lateral limit lines within the waterway. An analysis of the proposal demonstrating that fair and equitable enjoyment of the waterway is achieved between neighbouring waterfront landowners through restricting unreasonable encroachment of marine facilities in front of adjoining properties

#### Waterfront development

As proposed works are located on crown land below the Mean High Water Mark, Section D15.15: Waterfront development of the Pittwater 21 DCP applies to proposed development.

Requirements of this section D15.15 and relevant subsections need to be addressed within the Statement of Environmental Effects (SEE) Report.

### Biodiversity

The applicant must address the aims, objectives and controls of the following environmental planning instruments, policies and guidelines.

- SEPP (Resilience and Hazards) 22021 - Chapter 2: Development within the coastal environment
- Pittwater LEP 2014 - Clause 7.6 Biodiversity Protection
- Pittwater 21 DCP - Clause B4.6 Wildlife Corridors

#### Required supporting documentation

The proposal should follow the principles of avoidance and minimisation of impacts to biodiversity and look for alternatives to maximise retention of prescribed vegetation and unique environmental features. Development is to be designed to avoid and minimise impacts to the natural environment, and for any residual impacts to then be assessed. The residual impact is the impact remaining after measures to avoid and minimise impacts to biodiversity have been applied.

Council has developed a set of guidelines to help applicants and ecological consultants meet the biodiversity reporting requirements when submitting a development application (DA). One or more of the guidelines (<https://files.northernbeaches.nsw.gov.au/sites/default/files/documents/general-information/environmental-and-community-protections/biodiversity-requirements-development-applications.pdf>) will help you prepare your DA, based on the level of development impact proposed.

- If works are to be undertaken within 5 metres of an existing tree an Arboricultural Impact Assessment prepared by an AQF5+ arborist is required to determine whether impacts from the proposed works are acceptable or not.
- If more than 4 prescribed trees are to be impacted by the proposed development, the application is to be accompanied by a Flora and Fauna Assessment (FFA) prepared by a suitably qualified ecologist. The ecologist will have to demonstrate whether the proposal triggers entry into the Biodiversity Offsets Scheme (BOS) or not based on the clearing thresholds established in the Biodiversity Offsets Method (BOM). If the BOS is triggered by the proposal, a Biodiversity Development Assessment Report (BDAR) will be required.



### Specialist Advice

- If prescribed (protected) trees are to be removed for the purposes of the proposed works, like for like replacement plantings will have to be considered in a landscape plan with a selection of the species and number of plants for replacement. In the case of the proposed plans, if tree 69 is indeed confirmed to be removed, a new *Eucalyptus paniculata* (ironbark) will have to be planted on site).
- Any new landscaping is to incorporate a minimum 80% locally native vegetation species as a proportion of the total number of plants. Locally native species are to be consistent with the relevant section of the Native Planting Guide available on Council's website.

### Traffic

As the proposed marina will service only the adjacent residential lots it is not considered that the proposal will generate significant traffic or parking impacts and may in fact result in improved traffic and parking conditions as the traffic movements and parking demands generated by the existing commercial marina will no longer be present. There is limited detail provided with the PLM material however it is noted that a traffic impact report is proposed to be lodged with the DA. A review of that report may result in issues that have not been apparent at this stage becoming evident.

In terms of traffic concerns, at this stage these relate mainly to the impacts during construction and any DA would need to be accompanied by a detailed Construction Traffic Management Plan outlining how the development would be constructed and managed so as to limit construction impacts on the surrounding residential and environmentally sensitive waterfront areas.

### Parks, Reserves and Foreshore

The proposal exhibits a scheme that lends to privatisation of the land below the mean high water mark (MHWM) for the benefit of lots 6, 7, 8 and 9, whereby the land below MHWM is proposed to be raised including retaining walling, boat sheds and mass planting to effectively limit access.

It is noted that the proposal essentially mirrors the existing situation forward of adjoining property 120 Crescent Road, and other properties along the waterway where public access is restricted along the waterway.

The plans do indicate a concrete pathway along the waterway that may be utilised for public access however there is no connection between the pathway at lot 9 and the adjoining public road reserve land.

Any development application shall provide justification on how the proposal satisfies Pittwater LEP clause 7.8 Limited development on foreshore area, as well as the objectives of Zone W1 Natural Waterways and Zone W2 Recreational Waterways for "public access to the waterway and foreshore areas".

### Environmental Health

An Acid Sulfate Soils assessment and Management Plan was prepared in 2022 associated with DA2022/1078 – the findings concluded:



### Specialist Advice

- It was concluded that slow acting, unoxidised sulfur compounds (i.e. potential ASSs) were present in the clay sediments. These sulfur-containing materials were relatively weak acid generators; however
- Due to the presence of potential ASS within the proposed excavation area, a corresponding Acid Sulfate Soils Management Plan is warranted.

The above outcome was based on two soil samples taken on 122 Crescent Road, Newport. This current proposed development also relates to the property 122A however no soil sampling was taken on this property. Given the above, an Acid Sulfate Soils Assessment will need to be conducted of the entire area proposed for development and if an Acid Sulfate Soils Management Plan is recommended, then it is to be completed and submitted with the DA.

The assessment and plan is to be conducted in accordance with the Acid Sulfate Soils Manual 1998.

### Development Engineering

The development proposes turf over the existing concrete boat hardstand area. A structural engineers certification is required demonstrating that the existing concrete hardstand area is firstly in a satisfactory structural condition and does not need to be demolished due to concrete cancer/existing structural failures. Secondly certification by a structural engineer be provided as to the viability of the hardstand structure to have topsoil/turf placed upon it in terms of loadings but also water egress into the structure.

The existing viewing area within Councils adjacent road reserve is not supported as this has no public benefit to Council and would be a maintenance liability.

### Documentation to accompany the Development Application

- Lodge Application via NSW Planning Portal
- Statement of Environmental Effects
- Scaled and dimensioned plans:
  - Site Plan;
  - Floor Plans;
  - Elevations; and
  - Sections.
- Cost of works estimate/ Quote
- Survey Plan (Boundary Identification Survey)
- Site Analysis Plan
- Demolition Plan
- Excavation and fill Plan
- Waste Management Plan (Construction & Demolition)
- Erosion and Sediment Control Plan / Soil and Water Management Plan
- Stormwater Management Plan / Stormwater Plans and On-site Stormwater Detention (OSD) Checklist
- Aquatic Ecological Survey and Assessment Report
- Estuarine Risk Management Report
- Traffic Impact Report
- Construction Traffic Management Plan
- Arborist Report (may be required)



- Biodiversity Development Assessment Report (may be required)
- Land Owners Consent from the Department of Crown Lands under the NSW Planning, Industries & Environment.
- Written letter from the Transport for NSW- Maritime Division enclosing dated and signed maps stating that there will be no navigational concerns.
- Written letter from the DPI-Fisheries under the Department of Primary Industries stating no objection.
- Structural Engineering Certification (Specifically for the works to the hardstand)

**Note:** The works are classified as Integrated Development and are subject to a controlled activity permit for waterfront land by DPE Water as well as a Fisheries dredging permit.

#### **IMPORTANT NOTE FOR DA LODGEMENT**

Please refer to the Development Application Lodgement Requirements on Council's website (link details below) for further detail on the above list of plans, reports, survey and certificates.

<https://files.northernbeaches.nsw.gov.au/sites/default/files/documents/pdf-forms/development-application-da-modification-or-review-determination/2060-da-modification-lodgement-requirements-mar21.pdf>

The lodgement requirements will be used by Council in the review of the application after it is lodged through the NSW Planning Portal to verify that all requirements have been met for the type of application/development.

#### **Concluding Comments**

These notes are in response to a pre-lodgement meeting held on 5 March 2024 to discuss the demolition of an existing commercial marina and the construction of a private marina at 122 Crescent Road, Newport. The notes reference the plans prepared by Scott Carver dated 21 October 2022.

The application would not be supported in its current form and significant amendments to the overall design based on the prelodgement notes are recommended prior to lodgement of the development application.

#### **Question on these Notes?**

Should you have any questions or wish to seek clarification of any matters raised in these Notes, please contact the member of the Development Advisory Services Team at Council referred to on the front page of these Notes.