



OBERON COUNCIL
23 JUL 2010
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P.O. Box 243 ORANGE., N.S.W. 2800.

Our Reference: 0909-01
Your Reference: PR 17.2968 JB:DM.

12th July 2010

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The General Manager
Oberon Council
P.O. Box 84
OBERON NSW 2787

Dear Sir/Madam

RE: PROPOSED TOURIST FACILITY – LOT 73 DP 753027 being 2968 SHOOTERS HILL ROAD, SHOOTERS HILL – DA 10.2009.225.1

Reference is made to Council's correspondence dated 12th January 2010 – REF: PR 17.2968 JB:DM.

In response to Council's thirteen (13) points of issue, the following is provided as an addendum to the original 'Information in Support of Development Application' and Development Application lodged, seeking approval to establish a tourist facility, comprising a series of motorcycle tracks and an ancillary primitive camping area situated on an area of land of approximately 25 – 30 hectares. The subject land is within the confines of Lots 50, 51, 53, 66 and 73, DP 753027 and utilises Lot 4, DP 1079460 as an access corridor. It is acknowledged that the original application did not include Lot 4, DP 1079460 in the description of the land.

1. Submissions:

After Council publicly notified the development proposal a total of five (5) submissions were lodged. These submissions were provided to the Applicant for consideration and comment.

Review of the submissions provides that although legitimate concerns are raised a significant proportion of the issues are emotive rather than planning based. Council's points of issue comprised in correspondence dated 12th January 2010 appear to be a general summary of the planning related issues raised in the submissions. These issues and general response to the submissions are addressed and provided in the following:

The 'Information in Support of Development Application by Abacus Planning adequately encompassed the statutory considerations in accordance with the provisions of the Oberon Local Environmental Plan, Associated Development Control Plan 2001 and Councils codes and policies as well as legislative requirements.

I have chosen not to individually address each concern raised in each of the five submissions as to do so would convolute the basis of the issues pertaining to planning based matters applicable to the proposal.

It is acknowledged that the proposal is primarily conceptual yet seeks a full development approval accepting requirements for additional subsequent approvals to be sought as conditions associated with necessary construction and certifications on all associated works.

Clause 54 of the Environmental Planning and Assessment Regulation 2000, provides that a consent authority may request the applicant for development consent to provide it with such additional information about the proposed development as it considers necessary to its proper consideration of the application. It also provides that information in relation to building and construction works required does not need to be provided by the applicant until an application for construction certificate is made. The aim of this provision is to ensure that the consent authority does not oblige the applicant to provide these construction details up-front where the applicant prefers to test the waters first and delay applying for a construction certificate until, or if, development consent is granted. Such situations requiring additional and subsequent approvals are able to be conditioned as components of and favourable development consent that may be granted.

Notwithstanding the submissions made and in no way diminishing their content the original application and documents lodged together with these responses to Councils requisitions has provided sufficient information to lawfully and adequately address the necessary statutory requirements and matters for consideration generally to permit Council to make an informed decision on the suitability of the proposed development to the site, the Shire and the region.

In summary the proposal as submitted may be supported by Council on the following grounds:

- The overall proposal is consistent with the stated objectives of the Oberon LEP 1998 and the zone 1(a) (Rural 'A' Zone);
- The overall proposal is permissible within the zone with the consent of Council in accordance with the Oberon Local Environmental Plan 1998;
- The overall proposal is consistent with the stated objectives of the Oberon Development Control Plan 2001 – where applicable;
- The overall proposal is unlikely to have and long term adverse cumulative impacts;
- The environmental impact and potential for significant impact is minimal;
- The overall proposal will not impact on the existing or future amenity of the locality, beyond that which expected and associated with such development;
- The health and / or safety of the locality and community generally will not be affected;
- The proposal is consistent with the stated objectives of the Planning for Bush Fire Protection Guideline;
- The potential for bushfire hazard and or risk resulting from or impacting on the proposed development is unlikely to be significant and is able to adequately and suitably controlled;
- The overall proposal has the potential to contribute to the continued existence, expansion and economic development of Oberon generally;
- Adverse social impacts in the locality would be negligible and overall the benefit to Oberon would be positive;
- Council has the ability to impose suitable conditions of consent to ensure that the development is completed in accordance with the application as submitted and the normal requirements of Council as the consent authority

2. Designated Development:

Council staff, undertaking the preliminary assessment of the development application, indicated that they considered the application to be designated development - *"as it involves a sewerage system with an intended processing capacity of more than 20 persons per day located within 100 metres of a natural water body."*

Response:

Clause 38 of Schedule 3 of the Environmental Planning and Assessment Act 1979 (EP & A Act) defines a "natural water body" as:

- (a) a natural waterbody, including:
- i) a lake or lagoon either naturally formed or artificially modified, or
 - ii) a river or stream, whether perennial or intermittent, flowing in a natural channel with an established bed or channel artificially modifying the course of the stream, or
 - iii) tidal waters including any bay, estuary or inlet, or
- (b) an artificial waterbody including and constructed waterway, canal, inlet, bay, channel, dam, pond or lake, but does not include a dry detention basin or other stormwater management construction that is only intended to hold water intermittently.'

It is suggested that the assessing staff member has given a very liberal interpretation to this in relation to the proposed daily use and the location and definition of a natural waterbody.

The proposed location of the waste water systems, indicated in the Effluent Disposal Report prepared by Calare Civil Pty Ltd and annexed at appendix 'C' to the Information in Support of Development Application, provides that the approximate distance to any potential ephemeral watercourse (not natural waterbody) is in excess of 100 metres. Further this report provides that the soil characteristics are suited to and capable of supporting an evapo-transpiration / absorption trench system for septic disposal, capable of sustaining a twenty (20) person per day equivalent in respect of the proposed event/operation frequency relative to a maximum seventy (70) days per year use – based on weekend and public holiday usage. This anticipated usage equates to an annual equivalent of 3.8 persons per day, or the same as an ordinary residential development.

Options of:

1. simply trucking in self contained ablution facilities with no on site requirements thereby negating the need for on site systems, or

2. reducing the intended capacity of the proposed facilities to be limited to less than a capacity of 20 persons per day, or realistically
3. considering the matter on a merit based approach with the potential of 20 persons per day in relation to the proposed event / operation frequency relative to the maximum 70 days per year use (based on week end and public holidays) this equates to an average annual equivalent of 3.8 persons per day: or
4. a mix of both 2 and 3 above.

were put to Council's Director of Development and discussion ensued.

Council's Director of Development has advised that as a potential alternate trucked in self contained facilities would not be acceptable to council. It has been agreed upon re-assessment of the proposal that the effluent disposal system proposed is not designated development, by definition, and would be suitable for the development however, would require additional approval being sought prior to establishment.

3. Integrated Development:

Council staff undertaking the preliminary assessment of the development application indicated that the proposal is integrated development relative to the Rural Fire Service requirements for Special Fire Protection Purpose (SFPP) Development and the Fisheries Management Act 1994 (section 219) in relation to a proposed crossing of Emigrants Creek and possibly the Retreat River. Further it implied that potential augmentation of raw water from Emigrants Creek and excavation on site requires concurrence under the Water Management Act 2000.

Response:

The Information in Support of Development Application lodged, acknowledged integrated development assessment relative to Rural Fire Service Bush Fire Protection and included at 'appendix' "B" a Bushfire Protection Assessment. A complete copy of the Information in Support of Development Application was provided at lodgement, for referral of the application by council to the RFS for comment. Council accepted the application lodged and did not request payment of a referral fee. When this anomaly was discovered, the necessary referral fee payment was made by the applicant and we are advised by Council that referral was made. No indication however, of any resultant comment has been provided.

In reply to suggestion that approval under Section 219 of the Fisheries Management Act is required, we draw Council's attention to the nominated section:

- '219 *Passage of Fish not to be blocked*
- (i) *A person who:-*
 - (a) *sets a net, netting or other material, or*
 - (b) *constricts or alters a dam, floodgate, causeway or weir, or*
 - (c) *otherwise creates an obstruction; across or with a bay, inlet, river or creek, or across or around a flat, so that:*
 - (d) *fish will or could be blocked or left stranded, or*
 - (e) *immature fish will or could be destroyed, or*
 - (f) *the free passage of fish will or could be obstructed.'*

The area of potential disturbance in question being a causeway crossing of Emigrants Creek is questionable as being part of a stream, creek or otherwise as it is not physically defined, there is no permanent water and certainly no fish. Councillors are invited to inspect the site to form their own opinion.

Potential for secondary emergency egress from the site, along a legal thoroughfare was highlighted in the RFS documentation and would possibly involve the crossing of the Retreat River. There is currently a track in use along this potential emergency access, which crosses the River. As an emergency egress only no formal construction of the legal thoroughfare is proposed or necessary for vehicular access.

Consideration under the provisions of the Water Management Act 2000, relative to the proposed raw water augmentation and associated excavations are not a requirement, as potential for water augmentation exists only if and when substantial rain falls and the ephemeral drainage permits harvesting.

Council's Director of Development has advised that upon review of the application and support information submitted, only a requirement for integrated development relative to the Rural Fire Service is necessary: and the associated referrals have been undertaken. It has been agreed

and confirmed that there are no integrated development triggers for consideration under either the Fisheries Management Act 1994 or the Water Management Act 2000.

4. Local Government Regulation 2005:

Council staff undertaking the original preliminary assessment advised that the application lodged failed to address the requirements of the Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwelling) Regulation 2005 for the proposed primitive camping ground and further indicated that application under Section 68 of the Local Government Act 1993 was required.

Response:

Clause 132 of the Regulation provides:

"132 Primitive camping grounds

- (1) *If an approval to operate a primitive camping ground designates one or more camp sites within that ground, then the maximum number of designated camp sites is not to exceed a mean average of 2 for each hectare of the camping ground (where that figure is the average calculated over the total area of the primitive camping ground).*
- (2) *The following conditions apply to a primitive camping ground:*
 - (a) *if the approval to operate the primitive camping ground designates one or more camp sites within that ground—camping is not permitted within the primitive camping ground other than on those designated camp sites,*
 - (b) *if the approval to operate the primitive camping ground does not designate one or more camp sites within that ground—the maximum number of caravans, campervans and tents permitted to use the camping ground at any one time is not to exceed a mean average of 2 for each hectare of the camping ground (where that figure is the average calculated over the total area of the primitive camping ground),*
 - (c) *a caravan, annexe or campervan must not be allowed to be installed closer than 6 metres to any other caravan, annexe, campervan or tent,*
 - (d) *a tent must not be allowed to be installed closer than 6 metres to any caravan, annexe or campervan or closer than 3 metres to any other tent,*
 - (e) *the camping ground must be provided with a water supply, toilet and refuse disposal facilities as specified in the approval for the camping ground,*
 - (f) *unoccupied caravans, campervans and tents are not to be allowed to remain in the camping ground for more than 24 hours,*
 - (g) *if a fee is charged for camping, a register must be kept that contains entries concerning the same matters as are specified in clause 122 and, in addition, that specifies the size of the group (if any) with whom the person listed in the register camped,*
 - (h) *such fire fighting facilities as may be specified in the approval are to be provided at the primitive camping ground.*
- (3) *If the approval to operate a primitive camping site does not designate camp sites, a council may impose as a condition of the approval that the installation of tents, caravans, campervans and annexes is not permitted on a particular area or areas of land within the primitive camping ground, for reasons of health or safety or to ensure consistency with the principles of ecologically sustainable development or for any other purpose.*
- (4) *The provisions of Subdivisions 1–8 do not apply to a primitive camping ground.*
- (5) *For the purposes of subclause (2) (b), in the calculation of the number of tents using a camping ground, 2 or more tents occupied by not more than 12 persons camping together as a group are to be counted as only one tent."*

Importantly subclause 4, states:

"(4) The provisions of Subdivisions 1–8 do not apply to a primitive camping ground"

The Regulation defines 'primitive camping ground' as:

"a camping ground that is specified in its approval as being a primitive camping ground."

The support documentation to the application acknowledged that subsequent applications and approvals would be required and sought, potentially, as components of any development consent granted.

Council's Director of Development has acknowledged that as a potential component of the overall proposal, inclusion of reference to the primitive camping area was required and that the Rural Fire Service report sought consideration of the proposal under Section 100B (6) of the Rural Fires Act 1997, to permit the establishment of a Special Fire Protection Purpose (SFPP) Development - being a temporary (primitive) camping ground in association with a tourist facility.

Mr Tambasco further agreed that as additional approval would be required in accordance with provisions under the Local Government Act and Associated Regulations, that the possible establishment of a 'primitive camping ground' could be considered as part of the development proposal conditionally upon consent being sought and granted for the specific aspect prior to its establishment.

5. Onsite Waste Water Disposal:

Council's correspondence dated 12th January 2010 states:

"The application submitted provides some details associated to onsite waste water disposal however, the application fails to provide the requires fee and fails to include an adequate plan of drainage."

Response:

Council's letter at point 2 (previously discussed) intimates that the proposal requires a sewerage system not a waste water disposal system. In the context of the correspondence a requirement for both systems is onerous. As the sewerage system component has been discounted and agreed to, the focus of the waste water disposal system was included complete with a geotechnical report to validate the suitability of the site for such a system.

Once again, as a component of the proposed development inclusion of some detail only was provided to validate appropriate assessment and consideration. The application lodged acknowledges that additional approvals will be required and sought at an appropriate time. Prior to construction commencing suitable drainage plans, and an appropriate application together with fees will be lodged.

Council's Director of Development has agreed that as this aspect of the proposal will be subject of a subsequent application for approval, consideration as a component of the proposal my be conditioned requiring specific approval to be sought and granted prior to its establishment.

6. Acoustic Report:

Council's letter of 12th January 2010 states:

"An acoustic report is required to be submitted as part of the assessment of the Development Application."

Response:

The support documentation to the development application acknowledged the potential noise impacts at Section G.17:

"G.17 Acoustic Evaluation

This is not a specific consideration of the Oberon LEP or DCP as no development standards are provided therein.

The subject land currently has rural characteristics with associated acoustic values.

The proposed development has the potential to create noise nuisance however the frequency and effect of noise generated is unlikely to significantly impact adjoining or adjacent land holders in a detrimental manner. Specific noise assessment has not been carried out and has not been requested by Council in pre lodgement discussion. Typical noise assessment of such a facility would involve a dynamic noise evaluation involving the use of the tracks at an optimum level which at this point in time is not possible, is impracticable and

would potentially be cost prohibitive.

Noise associated with the development is acknowledged however the siting of the facility within the 250 hectare holding in a natural amphitheatre together with the distance to the nearest residential receptor not associated with the development suggest that although audible there would be little detrimental effect from the noise. Operation times during normal daylight hours and compliance with manufacturer and Australian design rule requirements should aide in minimising any impacts. Perimeter buffer plantings will also assist in noise abatement."

In discussion with Council on this matter the following information was provided:

The POEO Act and Noise Control Regulation allow for an assessment of offensive noise in some neighbourhood noise situations without the use of a sound level meter to measure actual noise levels.

The Noise Control Regulation restricts the times that certain equipment can be used, including motor vehicles

"Table 4.5: Restricted times of use for vehicles

Type of noise Times for which restrictions apply
Motor vehicle

used on residential premises (except when entering or leaving) (POEO (Noise Control) Regulation, clause 14)

Times for which restrictions apply

Before 8.00 am or after 8.00 pm on any Saturday, Sunday or public holiday
Before 7.00 am or after 8.00 pm on any other day "

Council in determining noise impacts must ensure that the noise level is outside the restricted times provided by the POEO (Noise Control) Regulation and is audible in a habitable room.

In the case of the subject application there is no residence or habitable room within a radius of in excess of 1000 metres or the proposed activities. A static motorcycle test at standing measured at 3 metres distance is permitted by the POEO noise Guidelines to emit up to 100dB in a ride by (Dynamic test) in accordance with Australian design rules this equates to between 70dB and 82db. Noise levels are not increased exponentially by increased number of similar sources but rather result in a cumulative effect that is logarithmically less than the multiple . At distances greater than 1000 metres the potential for noise impacts from the proposed facility within a habitable room where the impact could be offensive ie:

(i) is harmful to (or is likely to be harmful to) a person who is outside the premises from which it is emitted, or

(ii) interferes unreasonably with (or is likely to interfere unreasonably with) the comfort or repose of a person who is outside the premises from which it is emitted,

is negligible.

Noise levels in this circumstance are only likely to be intrusive ie noticeably above background levels - this does not make the noise level offensive. In the absence of any Council noise level policy a requirement for acoustic evaluation prior to establishment of the proposal with little foundation is unrealistic and imposes an enormous imposition on the applicant. Council have the ability to consider the application generally - and if favorably, condition upon the provision of appropriate noise measurement which would need to be undertaken at the potential receptors in a dynamic model.

Subsequent to this, an Environment Noise Assessment Report dated May 2010 has been prepared by Central West Environmental Services as is attached herewith.

The report concludes *"that the operation will be well within the amenity criteria for the locality and will also comply with the intrusiveness criteria and therefore will comply with the NSW Industrial Noise Policy."*

7. Property Description:

Council have advised that there is an omission in the Development Application relative to the inclusion of all lots associated with the land holding as described in the support documentation and the correct reference to the legal description of the access.

Response:

The anomaly in description is acknowledged and is purely an oversight. The development application should be amended to provide the property description as:

"Lot 50, 51, 53, 66, 67 and 73, DP 753027 and Lot 4, DP 1079460" being 2968 Shooters Hill Road Oberon.

The omission of reference to Lot 4 DP 1079460 as the access way in the support documentation was accidental as it did not appear in holding searches but was considered to be a private ROW access established under previous development consent for subdivision. The access description and reference there to although not correct was provided in the documentation.

8. Development Application 31/05:

Council indicate that DA 31/05 relates to the site and appears to have lapsed on 4th January 2010. Council seeks confirmation that no works have been carried out on the site as to the commencement of the subdivision.

Response:

DA 31/05 qualified building entitlements on the subject land in accordance with Council's prevailing Planning Instrument. The access road from Shooters Hill Road to the subject lands within Lot 4 DA 1079460 was formed and constructed to Council's nominated standard in consultation with Council in satisfaction of the access condition of Development Approval 31/05. Mr Tambasco has confirmed that Council's Engineering Section have inspected and approved the road construction and accordingly, as a physical commencement of DA 31/05 has been made it would be deemed NOT to have lapsed.

The development consent previously granted is not intended to nor should it be required to be surrendered in favour of the current proposal. Multiple development consents attaching to land can co-exist until and if any one or all of them are fully realised.

Mr Tambasco acknowledged that in the circumstance this point of Council's correspondence no longer applied.

9. Existing Dwelling:

Council's assessing staff member requires confirmation that the building known as 'Platto' as indicated on the topographical map is not used and will not be used as a dwelling.

Response:

This request obviates that Council's assessing officer did not undertake a personal site inspection for the purpose of familiarisation, as the name 'Platto' is nothing more than a geographical name reference and does not refer to a dwelling - current or former. The only structure on the land is a non habitable shearing shed without power.

Council's Director of Development has confirmed geographical place name status and has indicated that this issue is no longer applicable.

10. Food Van:

Council requires confirmation that any food van is registered with NSW Food Authority.

Response:

Authorised food vending vans will need to be licensed and registered in accordance with requirements and will be the responsibility of the respective operators. There is not intended to be any permanent fixtures on site.

It has been agreed by Council's Director of Development that such requirement is superfluous to

the application and would be subject of subsequent approval not related to this site development.

11. Conflicting Information:

Council's correspondence suggests that details in the support document to the development application and the information provided with the application are conflicting, requiring identification of one document in support of the proposal.

Response:

Information provided by the applicant is explanatory only and should have been regarded as *commercial in confidence* relative to the potential aspects of the development.

Any inconsistency between the applicant's information and detail provided in the 'Information in Support of Development Application' prepared by Abacus Planning dated September 2009, should devolve on the latter mentioned document as being accurate for the purpose of considering the development application. The information provided by the applicant relative to the potential operational aspects of the proposal should not have been provided for public viewing.

12. Signage:

Council's letter of the 12th January 2010 indicates that specific detail of the proposed signage is requires to be submitted for assessment.

Response:

Signage is proposed if approval to the development proposal is granted. Type, structure and content together with placement of any signage, with the exception of any signage on the site relative to any activity carried out on the site, will be subject of subsequent applications seeking consent from Council and / or the RTA.

Council's Director of Development has agreed to this and indicated that it can be suitably conditioned in any consent granted.

13. Access:

Council's letter of 12th January 2010 states that on page 11 of the SOEE, the use of a secondary access from the site in its current state is unacceptable. The use of a Crown Reserve Road would need referral to Council to deem acceptance of this road as a dedicated public road where Council would become the responsible authority. The process would also include the upgrading of the road to Council's standards and associated creek crossing which would require approval as integrated development under the Fisheries Management Act.

In respect to the primary access off Shooters Hill Road, Lot 4 will be required to be consolidated with other lots in the development to ensure legal and practical access; or a Right of Way registered.

Response:

Review of the 'Information in Support of a Development Application' reveals that there is no reference on page 11 to a secondary access. Secondary / alternate access was only included in the application for emergency egress if necessary. The attached diagram indicates two existing tracks in use that are passable for this purpose which in the eventuality of an emergency egress, do not require upgrading or dedication to the public as Council Road. To upgrade and dedicate would attract unwanted and conflicting traffic usage. The egress to the west linking with Abercrombie Road is generally within Crown Reserve Road alignments. No construction or upgrading of these alternate emergency access routes is anticipated or proposed.

The subject lands are currently serviced by an all weather road construction entirely with Lot 4, DP 1079460 from the Shooters Hill Road in a location and to a standard previously approved by Council as appropriate and safe. Lot 4 is in the same ownership as the balance of the property. The reason for consolidation of the lot with adjoining land is not obvious; however could be part of any conditional approval that may be granted. There is no necessity or obligation nor legal opportunity to create a right of way over your own land for your own purpose.

Council's Director of Development has agreed that this issue is no longer applicable.

Summary:

In dealing with the issues raised in Council's correspondence dated 12th January 2010, resulting from numerous discussions with Council's Director of Development, the abovementioned responses have resulted in conferred agreement that:

- Item 2 is no longer applicable;
- Item 3 relates only to RFS and the referral of the application has been undertaken;
- Item 4 will be the subject of subsequent approval and can be conditioned as such;
- Item 5 will be the subject of subsequent approval and can be conditioned as such;
- Item 8 no longer applies;
- Item 9 no longer applies;
- Item 10 is superfluous and would be the subject of subsequent approval and potentially does not relate to this site development;
- In respect of item 11, Council are satisfied that the 'Information in Support of a Development Application' document prepared by Abacus Planning takes precedence for any perceived conflict, as the additional textual information supplied by the applicant was primarily *commercial in confidence* information for Council only and should not have been provided to the public;
- Item 12 will be the subject of subsequent approval and can be conditioned as such; &
- Item 13 is no longer applicable.

With regard to items 1, 6 and 7 additional information as provided within this response and attachments should suffice. An Acoustic report using straight line attenuation calculations has been prepared by Central West Environmental Services and is attached herewith in satisfaction of Item 6.

In correspondence (Email) dated 1st April 2010, Council's Director of Development confirmed agreement to the above providing responses of:

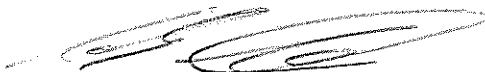
Item 2) Agree	Item 8) Agree	Item 12) Agree
Item 3) Will be done	Item 9) Agree	Item 13) Agree
Item 4) Agree	Item 10) Agree	Items 1, 6 & 7 noted
Item 5) Agree	Item 11) Agree	

Again I commend to Council that the proposal as submitted may be supported by Council on the following grounds:

- **The overall proposal is consistent with the stated objectives of the Oberon LEP 1998 and the zone 1(a) (Rural 'A' Zone);**
- **The overall proposal is permissible within the zone with the consent of Council in accordance with the Oberon Local Environmental Plan 1998;**
- **The overall proposal is consistent with the stated objectives of the Oberon Development Control Plan 2001 – where applicable;**
- **The overall proposal is unlikely to have and long term adverse cumulative impacts;**
- **The environmental impact and potential for significant impact is minimal;**
- **The overall proposal will not impact on the existing or future amenity of the locality, beyond that which expected and associated with such development;**
- **The health and / or safety of the locality and community generally will not be affected;**
- **The proposal is consistent with the stated objectives of the Planning for Bush Fire Protection Guideline;**
- **The potential for bushfire hazard and or risk resulting from or impacting on the proposed development is unlikely to be significant and is able to adequately and suitably controlled;**

- The overall proposal has the potential to contribute to the continued existence, expansion and economic development of Oberon generally;
- Adverse social impacts in the locality would be negligible and overall the benefit to Oberon would be positive;
- Council has the ability to impose suitable conditions of consent to ensure that the development is completed in accordance with the application as submitted and the normal requirements of Council as the consent authority.

Yours Faithfully



**Wayne D McDonald
Principal Planner**