

PLANNING & NATURAL SYSTEMS

ATTACHMENT B

**PLANNING PROPOSAL - HIGHWAY SERVICE
CENTRE - PACIFIC HWY, BULAHDELAH**

ORDINARY MEETING

24 MAY 2017

Addendum to Planning Proposal

Adequacy Assessment

9844 Pacific Highway Bulahdelah



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RELIANCE ON CONSULTANT INFORMATION

As part of undertaking this project, Hamptons has relied on the professional advice provided by third party consultants. No responsibility is taken for the accuracy of the information relied upon by these consultants assisting the project. It is assumed that each of the consultants has made their own enquiries in relation to technical matters forming part of their expertise.



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1. INTRODUCTION

Hamptons Property Services (Hamptons) has been retained by the property owners, Lindfield Property Nominees & NGP No. 3 Investments Pty Ltd of the land known as *9844 Pacific Highway, Bulahdelah*. This planning proposal seeks to amend Schedule 1 of the Great Lakes Local Environmental Plan 2014 (the LEP) to permit approximately 14 hectares of the site to be used for a *highway service centre*, in accordance with the Dictionary contained within the LEP.

The Planning Proposal was lodged with the Council on 10 February 2016. The documentation lodged was on the basis of instructions from Council to ensure that the planning proposal clearly focused on the englobo development to take place at the site, including residential and tourist aspects for which amendments to the planning controls are not required.

At the Proponent's expense, the Council has subsequently had an independent review undertaken by Strategy Hunter Pty Ltd, dated August 2016, and provided to the Proponent in October 2016. The objective of the review, as set out in that document, was to:

- identify where the planning proposal does not meet the legislative requirements for lodgement of a planning proposal
- undertake a review of the economic impact statement
- assess whether the policies and documents referred to in the planning proposal are accurately and reliably interpreted.

Hamptons has subsequently met with the Department of Planning & Environment (DPE) to consider entering the gateway review process to ensure a more expeditious approach to managing this planning proposal.

As such, the purpose of this Addendum Report is to attend to the matters raised by Strategy Hunter.

The purpose is also to advise on consultation subsequent upon lodgement of the planning proposal with both government agencies and the community.

We trust that the enclosed material will enable further assessment of the planning proposal with a view to progressing this in a timelier manner.

2. OBJECTIVES & INTENDED OUTCOMES

For absolute clarity, the purpose of this amendment is to enable a *highway service centre*, by amending Schedule 1 of the LEP to provide for an additional permitted use.

The additional permitted use, as a highway service centre is defined in the Dictionary to the LEP as:

The LEP defines a *highway service centre* as:

a building or place used to provide refreshments and vehicle services to highway users. It may include any one or more of the following:

- (a) a restaurant or café*
- (b) take away food and drink premises*
- (c) service stations and facilities for emergency vehicle town and repairs*
- (d) parking for vehicles*
- (e) rest areas and public amenities.*

The use is to be located on part of Lot 100, Deposited Plan 113447.

The land is located on the western side of the site, north of the Pacific Highway Interchange at Bulahdelah, south of the existing Bulahdelah Golf Club.

The total area is 14 ha and is shown at Figure 1, below.

The purpose of permitting a highway service centre on this portion of the site is to:

- service the traveling public at a locational vantage point where such services are required
- to underpin the future economic growth of Bulahdelah, given that its classification as a highway service town under the Great Lakes Council Highway Service Centre Strategy has been unsuccessful as a result of the Pacific Highway bypass
- provide a location for, and design of, a *highway service centre* that is responsive to the natural conditions of the site
- ensure that sufficient infrastructure is provided to service the *highway service centre*, without adversely impacting on existing supply
- to provide new employment opportunities for the local community, during construction and operation of the development providing jobs for people closer to home.

To accommodate the planning proposal the development standards relating to minimum lot size, height and floor space, will require amendment.



DESCRIPTION OF THE PROPOSAL

The development of a *highway service centre* will include fuel for both light and heavy vehicles, fast food restaurants and take away food, public amenities, and a children’s playground area. Extensive parking for all forms of vehicles will be provided, as will separate trucker facilities.

The initial concept plan provides the following:

For Heavy Vehicles

- 5 x diesel fuelling bays
- 11 parking spaces for semi-articulated vehicles
- 5 spaces for B-double parking
- Direct foyer from the truck fuelling area into the service station and truck driver dining area, of which amenities are located off this.

For Light Vehicles

- 12 x petrol bowsers
- 9 x car parking spaces located adjacent to the service station
- 300m² service station, with amenities located to the rear of this so as accessible from both the service station and the dining area
- 4 food tenancies ranging in size from 75m² through to 300m², with one of these being designed as a drive through restaurant
- 2 x service areas to accommodate the needs of the restaurants
- An internal dining courtyard with direct vantage over a children’s play area
- Approximately 90 car parking spaces, with (including 6 disabled spaces)
- 8 spaces for servicing boat and caravan parking
- A picnic area with associated facilities.

The proposed use accords with the definition of a *highway service centre* contained in the LEP. The aforementioned detail confirms the nature of the Additional Permitted Use intended for the land.

All necessary infrastructure works will be undertaken by way of roads, sewerage, drainage, electricity and telephone, to service the highway service centre. The current concept provides for works to be undertaken in the electricity easement running north-east to south-west across the site. However, such works will only incorporate car parking areas and no buildings will be located in this.

In terms of roadway access, a new roadway will need to be constructed at the southern side of the highway service centre and an egress road will be located below the picnic area, resulting in an up-hill movement of trucks as they exit the site. Discussions will be required regarding relocation of the existing roadway that

traverses this portion of the site, along with possible relocation of part of the electricity supply. Such matters may, however, be addressed at the development application stage.

DESCRIPTION OF THE SITE

The site for the *highway service centre* is located on the western side of the site, adjacent to the local road, accessed from the roundabout which is provided at the top of the sliplane from the Pacific Highway egress into Bulahdelah.

The roundabout is located to the south of the site and the roadway aligns the western boundary of the allotment in its entirety as well as the site.

The total area of land to be occupied by the *highway service centre* is 14 ha.

This is a sloping section of the site with limited amounts of existing vegetation or flora and fauna that warrant retention of this.

A detailed site and context analysis is provided at Annexure 1.



3. PART 2: EXPLANATION OF PROVISIONS

Existing Planning Controls

The purpose of the planning proposal is to amend the following clauses contained within the LEP:

Clause 2.5 – Additional permitted uses, as it relates to Schedule 1.

Clause 4.1 – Minimum Allotment Size in the AB2 zone, which requires a minimum allotment size of 400,000m² (40 hectares)

Clause 4.4 – Floor space ratio, which is limited to between 0.4 and 0.5:1.

Proposed Planning Controls

The proposed provisions are to the effect of the following:

Schedule 1

Use of Certain Land at Bulahdelah

- (1) This clause applies to the land identified as '8' on the Additional Permitted Uses Map.
- (2) Development for the purpose of a highway service centre is permitted with development consent.
- (3) Despite any other provisions of this plan, the allotment size is to be not more than 15,000m²

Clause 4.4 – the permitted floor space ratio is to be amended subject to further detailed design throughout the gateway process.

Objectives of Altering these Provisions

The objectives of altering these provisions is to:

- o ensure that the location and design of the highway service centre is sympathetic to its surrounding land uses, in particular responding to the topography of the land, as well as its natural landscape characteristics
- o provide a diversity of services that assist the travelling public
- o promote tourism within the town of Bulahdelah
- o ensure that the development provides adequate servicing so as not to cause undue pressure on surrounding land uses. This includes forward planning of infrastructure requirements
- o provide new employment opportunities for the local community to avoid lengthy travel distances and improve overall health and social well-being.



4. PART 3: JUSTIFICATION

This section addresses the following:

- Need for the planning proposal
- Relationship to the strategic planning framework
- Environmental, social and economic impact
- State and commonwealth interests
- Strategic merit and net community benefit

Section A - Need for the Planning Proposal

A planning proposal is required insofar as it relates to the use of the land for the purpose of a *highway service centre*, which is not currently permitted in the RU2 or R2 zones.

It is intended that an amendment to Schedule 1 would be made to expressly permit the use.

In addition, it is necessary to amend the controls relating to minimum lot size, height and floor space ratio to accommodate the *highway service centre* as set out previously.

Q1. Is the planning proposal a result of any strategic study or report?

No. The proposal is not the result of any strategic study or report.

Q2. Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

Yes. The proposal is the best means of achieving the objectives and intended outcomes. The options to facilitate the change are considered below.

Table 1: Options to Facilitate Change to the LEP

Mechanism for Amendment	Advantages	Disadvantages
To allow for highway service centres to be a permitted use in RU2 and R2 zones	This would broaden economic opportunities for the local government area, by opening a greater number of locations where these are permitted.	This may result in inappropriate locations being considered for such purpose.
		Locations may be selected that would result in significant land use conflict.
To permit the use via Schedule 1 of the LEP	This restricts the use and extent of development to a location that is fit	This results in a use that is contrary to the LEP standard template;



	for purpose in environmental, social, and economic terms	however, it is the purpose for which planning proposals can accommodate changes to the planning system.
	This allows for the use to be considered on its merit and more detailed consideration of site specific matters than may otherwise be available under the LEP provisions.	
	The change is considered a more time and cost effective approach as it allows for consideration to be limited to a single site, as opposed to anywhere in the LGA, where the potential effect may be significant, but control otherwise lost if the use permitted was in the relevant zones, without express consideration of site specific constraints.	
	The design of the proposal can be considered, to some extent, in tandem with the amendment process so that there is a greater level of certainty around what will result. It is considered that this is more favourable to the public interest.	

The amendment via Schedule 1 is the most appropriate way of amending the LEP as it takes account of individual site constraints and can reduce land use conflict by considering the amendment on a site-specific basis, as opposed to providing the change at a whole of zoning level, where sites may be less appropriate, but otherwise rely upon the zoning table for such use to be permissible.

Section B – Relationship to strategic planning framework

Q3. Is the planning proposal consistent with the objectives and actions of the applicable regional, sub-regional or district plan or strategy (including any exhibited draft plans or strategies)?



Roads & Maritime Highway Service Centres Policy

Strategy Hunter has asked for further consideration of this Policy, having regard to a Council report dated 10 November 2015. The key comments of this report, as they relate to the LGA and the site itself are as follows:

- The recommendations of RMS are that there were no new highway service centre sites nominated in the Great Lakes LGA.
- Bulahdelah should remain as a service town, due to the accessibility of its interchanges on the northern and southern side of town; there is therefore no need for such facilities close to the highway.
- A highway service centre has not been promoted to enable the town of Bulahdelah to remain as a service town and reduce the effects of the bypass.

The primary response to this, in maintaining that Bulahdelah should be promoted as a highway service town, is that this is simply not occurring and nor does Bulahdelah have sufficient opportunities that are being promoted within the town to invite people in. As identified in the Planning Proposal, 90% of people are driving past Bulahdelah, based on traffic surveys undertaken. This means that only 10% of highway users are using Bulahdelah as a highway service town.

Our research over the past 12 months has established that:

- While there is some increase in trade to local food offerings, this is limited and has influenced the way that people are running their businesses.
- That said, there are several businesses up for sale that have been offered for sale for some time and simply cannot be sold. These include the fish and chip shop, a café, the newsagent, the hardware store and so on. Further, an additional café, attached to a motel has significantly reduced its operating hours and the existing Shell Service Station has done the same. There are also a few shop vacancies in the main street.
- When you do travel into Bulahdelah's main street, the offering that is available shuts at 3:00pm in the afternoon – you cannot buy a cup of coffee; the pub and the supermarket are all that is on offer.
- The lack of sale of the business which, in some cases have been offered for a substantial period of time since the bypass has been implemented, shows that there is a lack of confidence in the market of Bulahdelah and what it offers to both local residents and the travelling public, despite its historic role as a township that was visited by a much larger proportion of the travelling public prior to the bypass.
- There is no signage promoting Bulahdelah on entry, or near the township, that promotes this as a place, and encourages people to stop and visit.



Therefore, despite Bulahdelah’s categorisation as a highway service town, it is not serving the intended purpose under the Strategy, despite the label that has been provided to the township. The business community has not been able to respond to a broader cross-section of the travelling public and, in many cases, ownership of businesses is by people whom are coming to retirement age. The limited rate of sale of these demonstrates that, as a town, the economic base has not responded to provide new investors with confidence.

Put simply, this means that the classification as a highway service town is simply not working.

While some may argue that it is the responsibility of local businesses to respond to change, those making the policy must also provide mechanisms to assist with promoting this change. A main street program is the perfect example of an activity that may have influenced and improved the offering that Bulahdelah provides, which would have included greater opportunities for outdoor seating and street activity, particularly given the width of the street. Outdoor seating opportunities are another example, along with lighting, street trees and traffic calming mechanisms to promote pedestrian activity.

Another example is funding for activities that make the township attractive, such as street markets. This would encourage local talent, as well as nearby businesses, particularly local produce suppliers to come and form part of a community.

Funding to community resources is also limited with the visitor information centre supported by local volunteers and the ‘holiday park’ that has developed alongside the Myall River, an initiative of the Lions Club, again a volunteer organisation.

It is apparent that there is a lack of funding and investment by local and state agencies for Bulahdelah to fulfil its role as a highway service centre.

This being the case, the Proponent is bold enough to engage in significant investment in Bulahdelah. The combination of uses cannot be accommodated within the township itself – there is not a significant enough landholding within the main street, nor its immediate vicinity, that provides the locational features that the subject site does offer. The locational advantage that this site has also provides a greater opportunity to attract people into the township moreso than the current circumstances. The highway service centre will provide opportunity to market the township of Bulahdelah, with information on tourist activity, local business and the offering of the natural environment, all of which are fundamental components of the town. At the moment, there is no facility that draws people in to see what the town has to offer.

The location of the highway service centre would significantly change this and provide the opportunity to promote the town of Bulahdelah, without distracting from use of the town itself, instead providing promotional opportunity for its use.



Without question, this opportunity provides a sound approach to seeing Bulahdelah respond to the travelling public and promote the township to an extent that is not currently being achieved. The assistance of funds through a voluntary planning agreement (discussed below) will also assist in this regard.

Mid North-Coast Regional Strategy

Again, Strategy Hunter has asked for consideration of this Strategy as it relates to the Highway Service Centres Policy and the Section 117 direction, both of which are addressed above and below.

Draft North Coast Regional Strategy

As identified by Strategy Hunter this was not relevant at the time the planning proposal was lodged. Again, it relates back to the locations identified in the Highway Service Centres Policy and the s.117 Direction, as to the appropriate geographic locations for centres.

Goal 5 is relevant to consider as it seeks to designate highway service centres close to bypassed towns to enable economic benefits to be delivered and encourage motorists to take breaks.

In this case, Bulahdelah, without significant external investment, will not be able to fulfil its role as a highway service town. Therefore, without a land use that attracts people to the town, for both short and longer periods of time, the township will continue to struggle in an economic sense, due to its limited offering.

For this reason, it is considered that the proposed use of the site for a highway service centre will aid this growth and promote the township in a location which, despite it fitting a textbook formula for a highway service town is simply not meeting, nor exceeding, this expectation.

In terms of locational benefits that encourage motorists to take breaks, the attributes in this regard are set out in the planning proposal.

Therefore, the proposal will achieve the goal.

Draft Hunter Regional Strategy 2016

The Draft Strategy provides for the North East Coast area, which Bulahdelah is positioned in. The objectives relevant in relation to supporting robust regional communities are to:

- strengthen the roles of existing communities and the accessibility and vibrancy of town centres and main streets, particularly within Forster-Tuncurry and Nelson Bay
- support economic diversity and further tourism opportunities that focus on reducing the impacts of the seasonal nature of tourism and its effect on local economies.

As set out above, Bulahdelah, as a main street community, is not performing its function, as defined, as a highway service town, due to the depletion of local business, because of the by-pass. This is evidenced



through the quality of local services and shops, along with a high rate of businesses for sale. Without significant private investment in this main street, Bulahdelah will continue to decline as people become less confident in its position in the market place, particularly what it has to offer to both the local and tourist community.

In absence of significant funding, the only means for improving the outcomes for Bulahdelah is to rely upon significant private investment. The opportunity provided by the highway service centre to the township of Bulahdelah, to attract people into what is now a by-passed town, with 90% of people not stopping, will bring what is otherwise going to be a limited opportunity for growth. The investment proposed by the Proponent for the highway service centre (and the balance of the master-planned site) will assist to stimulate growth and encourage investment in what is currently a declining highway service town. Through a voluntary planning agreement, the opportunity to strengthen the role of an existing community is far greater than if the same planning classification remains in place, funding is overlooked and businesses continue to decline. Bulahdelah as a tourist location will increasingly decline, as will investment.

Therefore, by supporting the proposal will see this objective implemented.

In terms of economic diversity, it is quite apparent that this proposal will provide a further, diverse source of income that is not provided by the township of Bulahdelah. While there are two existing service stations within the township, these do not service the travelling public to the extent of providing various opportunities. The planning proposal will accommodate not only economic generation to the site, but also have positive flow-on effects to the township itself, through the promotion of local business, facilities and services to attract people to the town.

There is no offering, nor the funding to do so, for Bulahdelah currently.

Whether it is people travelling for leisure, or those commuting, the outcome will remain the same – that the planning proposal will facilitate a more consistent income base for Bulahdelah than it currently captures.

Due to the nature of the road network, there is the opportunity to funnel people through the township itself and encourage use of its local highlights. This is more than is being achieved now.

Despite the site's location out of the main street itself, the Proponent envisages this proposal as forming part of the Bulahdelah business community and not separating itself from the main street activities. It provides an opportunity for an integrated business approach to supporting Bulahdelah instead of seeing the proposal as a divisive means by competing interests.

The proposal will therefore assist not only in providing economic growth, but stimulating growth within the main street of Bulahdelah.



Does the proposal have strategic merit?

Yes, the proposal has strategic merit.

As detailed above, the label of Bulahdelah as a highway service town is simply that – a label defining what the township should be.

The reality is that the town of Bulahdelah has not successfully achieved that ‘status’, despite its short distance for the travelling public. Businesses are coming to the end of their life, due to the ownership structures and new entrants to the market place are generally not arriving, nor taking up on, the sale of existing businesses.

Therefore, the label that Bulahdelah has acquired is not succeeding and the only means for growth to occur is through either public or private investment. In absence of the first, the second is the only likely option for Bulahdelah to have a role in the broader Great Lakes area into the future.

Therefore, by permitting the use will provide a significant strategic approach for Bulahdelah to ‘put itself back on the map’ and achieve an economic base that will underpins its future. The development of a highway service centre to funnel people into the town (along with the broader uses on the masterplanned site), with associated funding for local community improvement is the only means by which this can be achieved.

The proposal therefore has strategic merit.

Does the proposal have site-specific merit, having regard to the following:

- the natural environment (including known significant environmental values, resources or hazards)
- the existing uses, approved uses and likely future uses of land in the vicinity of the proposal
- the services and infrastructure that are or will be available to meet the demands arising from the proposal and any proposed financial arrangements for infrastructure provision

The proposal has site-specific merit as:

- the position of the highway service centre is outside of the natural environmental value of the site to ensure that these are not impeded, nor compromised as a result of the planning proposal
- the location of uses surrounding the site, which will largely be fulfilled through the masterplan for the landholding, will be able to co-exist through appropriate infrastructure provision and design treatment, to ensure that these may coexist without detrimental impact
- the Proponent recognises that to accommodate the planning proposal (and the broader masterplan implementation), services and infrastructure will be the responsibility of the Proponent and early liaison will occur to ensure that sufficient supply is achieved.

The proposal therefore has strategic merit on a site-specific basis.



Q4. Is the planning proposal consistent with a council's local strategy or other local strategic plan?

Great Lakes Council Highway Service Centre Strategy

In 2004, the Council independently commissioned a highway service centre strategy, in preparation of how its towns would respond to changing road networks having regard to the implementation of bypasses around existing townships. This included Bulahdelah and how this should be classified.

Section 2 of the Strategy provides that a highway service town has facilities that vary. In the alternate, a highway service centre encapsulates the following:

- services both directions of travel, or
- service the travel of direction only
- advisory signage
- sealed surface
- bins
- toilets
- drinking water
- tables and chairs
- lighting
- fuel
- commercially operated
- ancillary truck services.

While it is acknowledged that not all facilities are required for a highway service town, the existing offering through both the Shell and BP Service stations are summarised as follows:

- both service their direction of traffic, one being northbound (BP) and one southbound (Shell)
- there is no advisory signage
- sealed services access sites
- bins are provided in association with the fuel pumps
- there is no public tables and chairs
- lighting is limited
- both provide fuel
- both are commercial operated
- there are no ancillary truck services.

It is evident therefore that, as a highway service town, the existing service stations do not provide all the requisite services. Most importantly, the service stations appear as very 'private' developments – they are not encouraging of driver/reviver and appear more as locations, simply to fill a motor vehicle with fuel and continue travelling.

In terms of preferred locations, highway service centres must be a minimum distance of 24 km from the next highway service centre. The preferred range is between 50-100 km.

Having regard to the above, the Council developed their own definition of a highway service town. Below is that definition.

Table 2: Definition of Highway Service Town

Definition	Permitted Activities	Prohibited Activities
<p>A township that is located within 2km (off-highway travel distance) from a bypass and provides a range of services to the travelling public and local community which promote driver safety, local tourism and community interests. The range of services available at a HST must include, at a minimum:</p> <ul style="list-style-type: none"> ○ service stations, including at least one 24-hour facility ○ sit-down and take-away food outlets ○ motor vehicle repair and maintenance workshops ○ overnight accommodation ○ post office and banking outlets ○ medical facilities ○ visitor information 	<p>May include:</p> <ul style="list-style-type: none"> Service stations Restaurants Shops Vehicle repair workshops 	<p>None</p>



centre ○ roadside emergency services ○ public parks and children’s playground areas		
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At face value, Bulahdelah satisfies this classic text book definition of what a highway service town should comprise. However, pertinent points to consider are that:

- one of the two service stations have reduced its trading hours due to a lack of demand for such services
- while there are a variety of food offerings, few of these are open to service night time trade, other than the BP service station and the pub; all other food offerings operate during the day, generally until 3:00pm in the afternoon
- the visitor information centre relies solely on volunteer assistance
- the parks and children’s playground areas are centre in the middle of the township, but do not have any linkage with the main street facilities.

What is most prevalent is that the township services a daytime market only and, despite promoting tourism with its accommodation facilities, does little beside offer a bed for an evening. Further, the lack of trading times of local businesses reflects the lack of demand (forced or by choice) by both the community and the travelling public. This reflects poor economic conditions within the town and a lack of interest and stimulation of activity driven by business owners.

While none of these comments should be taken as criticism, the Proponent and Hamptons has undertaken a large amount of public consultation over the past 9 months and business owners themselves will tell you the difficulty that local business is facing. Many are reaching the end of their life span due to the age of their owners, but are unable to sell their businesses to a younger generation. This is a reflection that no one is willing to take the risk on this highway service town, nor is it one that people perceive growth will occur.

The implementation of this planning proposal (and the attached master planned community) is therefore essential to Bulahdelah surviving as a township, let alone one surviving of as highway service town. It needs significant investment in local business, facilities, and services to attract people to this, not only as tourist, but also as a permanent population (which is currently in decline).



As a highway service town, the decline of local business does not see Bulahdelah passing the fundamental test as a *town to meet the specific social and economic needs of the local community*.¹

Therefore, despite a technical classification as a highway service town, the town of Bulahdelah is not achieving this and significant investment is required for this to be achieved.

Great Lakes Community Strategic Plan 2030

There are objectives that are **relevant** to this planning proposal, identified by Strategy Hunter, as follows, with a response to each of these accordingly.

Objective 2.1: Diversifying local business options

- Our local government area is attractive and supportive of business
- We have a diversity of business and industry across the local government area

While supportive of local business, there is much needed to support the business community of Bulahdelah that is not currently being provided in terms of investment. Similarly, the diversity of business to underpin employment opportunities, particularly from a construction perspective, as well as those to support family needs, are limited.

Objective 2.2: Achieving more sustainable employment opportunities

- We have employment opportunities in the local government area

Employment opportunities are extremely limited in Bulahdelah, other than for those looking to purchase local business. The planning proposal will provide a significant opportunity (in conjunction with the master planned site) to provide local employment, during the construction period for local businesses, along with more permanent employment, particularly those looking for part-time employment. This would include local youth who currently have limited opportunities to work around school and/or tertiary studies.

Such an outcome would promote healthier family environments by providing local employment opportunities as opposed to forcing people to travel longer distances for such purposes.

Objective 2.3: Increasing tourism opportunities and visitation in the area

- We have a diverse range visitor experience across the entire local government area
- Our local government area is attractive to visitors

¹ Great Lakes Council Highway Service Centres Strategy, May 2014, Page 15.



It is acknowledged that Bulahdelah is attractive to visitors, given its riverside location and accommodation for the travelling public. However, the proponent believes that this not maximised to its full potential and requires significant rejuvenation from and by the business community to service its role as making it more attractive to visitors.

Objective 3.1: Protecting and enhancing the natural environment and rural character of the area

- Our area’s current rural character and heritage is protected
- Our community is aware of the value of natural resources and biodiversity
- Our environmental amenity is protected and enhanced
- Our waterways and catchments are maintained and enhanced.

As addressed previously, the planning proposal is located outside of the relevant areas of environmental significance and heritage attributes and will not compromise these through the implementation thereof.

The planning proposal will therefore satisfy the objectives of this Strategic Plan.

Q5. Is the planning proposal consistent with applicable State Environmental Planning Policies

The relevant state environmental planning policies are addressed in the Planning Proposal.

For absolute clarity, the table below demonstrates that these have been considered having regard to the highway service centre.

Table 3: Relevant State Environmental Planning Policies

SEPP Title	Purpose	Relevance to Highway Service Centre planning proposal
SEPP 1 – Development standards	To allow for variation to development standards.	Not relevant. The development standards are being amended as part of the planning proposal. Further, SEPP 1 does not apply to Great Lakes.
SEPP 4 – Development without Consent	Facilitates simple and minor change to development	Not relevant
SEPP 6 – Number of Storeys in a Building	References to storeys, floors and walls	Not relevant
SEPP 15 – Rural Land Sharing Communities	Provision for multiple occupancy development in rural and non-urban zones	Not relevant
SEPP 21 – Caravan Parks	Provision for development of	Not relevant



	caravan parks	
SEPP 22 – Shops and Commercial Premises	Change of use of commercial premises	Not relevant
SEPP 30 – Intensive agriculture	Considerations for development associated with intensive agriculture	Not relevant
SEPP 32 – Urban Consolidation	Redevelopment of urban land suitable for multi-unit housing	Not relevant
SEPP 33 – Hazardous and Offensive development	Considerations for hazardous and offensive development, such as petrol stations	Relevant. Appropriate reporting and management will be provided with the Gateway Report and/or Development Application, as required.
SEPP 36 – Manufactured Housing Estates	Permitting use where caravan parks are permitted, including subdivision	Not relevant
SEPP 44 – Koala Habitat	Conservation and management of natural vegetation that provide habitat for koalas.	Relevant. However, location of highway service centre will not interfere, nor remove such habitat.
SEPP 50 – Canal Estates	Bans development for such purpose where coastal and aquatic environments are affected.	Not relevant
SEPP 55 – Remediation of land	Land may not be developed where there is risk that it is contaminated.	Relevant. Preliminary advice will be required consistent with the previous rezoning application for the site.
SEPP 64 – Advertising & Signage	Outdoor advertising must be compatible with the visual character and amenity surrounding a site.	Relevant. To be addressed at DA stage.
SEPP 65 – Design Quality of Residential Development	Design of residential flat development.	Not relevant



SEPP Affordable Rental Housing	Increase in the supply and diversity of affordable rental housing.	Not relevant.
SEPP Building Sustainability Index	Implementation of BASIX certification to residential development.	Not relevant
SEPP Housing for Seniors or People with a Disability	Provision of housing for specific purpose.	Not relevant.
SEPP Infrastructure	Provision of infrastructure and services across NSW	Relevant. Referral to RMS Referral to electricity authority Consideration of electricity network and easement; consideration of traffic generating development.
SEPP State Significant Projects	Major projects	Not relevant
SEPP Mining, Petroleum Production and Extractive Industries	Management of mineral, petroleum and extractive resources	Not relevant.
SEPP Miscellaneous Consent Conditions	Erection of temporary structures	Not relevant.
SEPP Exempt & Complying Development Codes	State-wide application for works that do and don't requires certain levels of development consent	Not relevant.
SEPP Rural Lands 2008	Facilitation of the economic use and development of rural land, including reduced land use conflict.	Relevant. Address in Planning Proposal.
SEPP State & Regional Development	Identification of development and infrastructure that is state significance and provides rights to JRPP	Relevance depends on extent of proposal.

Q6. Is the planning proposal consistent with applicable Ministerial Directions (s.117 directions)



Table 4: Relevant Section 117 Directions

Ministerial Direction	Aim of Direction	Relevance
EMPLOYMENT & RESOURCES		
1.1 Business & Industrial Zones		Not relevant
1.2 Rural Zones	Protect agricultural production value of rural land	Relevant Refer to discussion on Rural Lands SEPP in Planning Proposal.
1.3 Mining, petroleum production and extractive industries	Protection of resources (coal, minerals, petroleum, extractive materials)	Relevant Consultation required with NSW Resources and Energy
1.4 Oyster Aquaculture		Not relevant
1.5 Rural Lands	Protection of agriculture production value of rural land to protect economic development.	Relevant. Proposal does not support agricultural production other than low level grazing. No further works required.
2.0 ENVIRONMENT & HERITAGE		
2.1 Environmental Protection Zones	Protect and conserve environmentally sensitive areas.	Relevant The highway service centre is clear of any environmental protection zone.
2.2 Coastal Protection		Not relevant.
2.3 Heritage Conservation	Conserve areas, items, objects and places of environmental and indigenous significance.	Relevant. The highway service centre is well outside of key features including Alum Mountain and will not preclude direct view.
2.4 Recreational Vehicle Areas		Not relevant.
3.0 HOUSING, INFRASTRUCTURE AND URBAN DEVELOPMENT		
3.1 Residential zones	Promoting variety and choice of housing types to cater for existing and proposed housing needs.	Relevant. Annexure 1 shows the relationship between the highway service centre and the residential zone (R2). There is a very limited degree of loss of residential land (R2), which is not



		considered so significant. The detailed design stage will result in appropriate buffers zones and treatment of issues such as noise, light spill and traffic management.
3.2 Caravan parks and manufactured home estates		Not relevant.
3.3 Home occupations		Not relevant.
3.4 Integrating land use and transport	This is relevant in terms of improving access to jobs, as well as reducing distances travelled, especially by car.	Relevant. The proposal will increase employment opportunities during construction and on-going operation of the site, as well as reducing travel distance for those currently travelling longer distances for employment purposes.
3.5 Development near licensed aerodromes		Not relevant.
3.6 Shooting ranges		Not relevant.
HAZARD AND RISK		
4.1 Acid sulfate soils	Mitigate environmental impact associated with land containing acid sulfate soils.	Not relevant.
4.2 Mine subsidence and unstable land		Not relevant. The land is not within a mine subsidence district
4.3 Flood prone land		Not relevant. The land is not located in a flood planning area.
4.4 Planning for bushfire protection		Relevant. The site contains Vegetation Category 1 and 2 land.
5.0 REGIONAL PLANNING		
5.1 Implementation of regional		Relevant.



strategies		Addressed in Planning Proposal.
5.2 Sydney Drinking Water Catchment		Not relevant.
5.3 Farmland of state and regional significance on the far north coast		Not relevant.
5.4 Commercial and retail development along with Pacific Highway, North Coast		Relevant. Refer below.
6.0 LOCAL PLAN MAKING		
6.1 Approval and referral requirements		Not relevant
6.2 Reserving land for public purposes		Not relevant
6.3 Site specific provisions	Allow a land use that does not impose additional standards	<p>Relevant</p> <p>The proposal is inconsistent with this direction as it seeks to impose site specific controls for minimum allotment size and floor space ratio. This is for the sole purpose of ensuring that the area occupied by the highway service centre does not occupy any more area of the masterplanned site than is necessary to accommodate the proposal.</p> <p>While inconsistent with the intentions of the standard instrument, this is a more appropriate approach to limit the extent and impact of the development. Further, it will ensure that the supply of residential land is not compromised, nor does the</p>



		<p>proposal impact upon the environmentally sensitive landscape which forms part of the masterplanned site. Inconsistency with this direction is therefore acceptable.</p>
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Section 117 Direction 5.4 Commercial and Retail Development Along the Pacific Highway, North Coast

This Direction is addressed below, in conjunction with the comments provided by Strategy Hunter in relation to the economic impact of the proposal are considered in this section.

The objectives of this Direction are:

- (a) to protect the Pacific Highway’s function, that is to operate as the North Coast’s primary inter and intra-regional road traffic route*
- (b) to prevent inappropriate development fronting the highway*
- (c) to protect public expenditure invested in the Pacific Highway*
- (d) to protect and improvement highway safety and highway efficiency*
- (e) to provide for the food, vehicle service and rest needs of travellers on the highway*
- (f) to reinforce the role of retail and commercial development in town centres where they can best serve the populations of the towns.*

The land on which the planning proposal is located is a combination of ‘within town’ and ‘out-of-town’ (residential and rural) land; however, the land is positioned off the bypass itself, where the exit ramps and Bulahdelah Way provide the entrance to the site, and which maintain roads of a lower speed limit (50km/hour), than the highway, being 110km/hour.

In terms of the overall considerations for development along the Highway, the following comments are made:

- the exit ramps are designed to cater for vehicle movements to navigate in accordance with the relevant standards; the road network within the site will also be designed to the relevant standard. The planning proposal will not result in adverse safety conditions to the highway as the exit ramps and lengths are sufficient to accommodate the proposal. This will be further addressed as part of a gateway report, where this will be considered in detail to demonstrate that there is no adverse effect.



- the proposed development, as a highway service centre, does not accord with Table 1 of this Direction. However, the location of the centre is not outside of the distinct centre of Bulahdelah as this is spread over most of the township, particularly the location of the existing service stations which are outside of the town centre itself. Therefore, the location will not derive separation with the balance of the township because:
 - (a) the township is not consolidated, particularly with the service stations located outside of the town centre itself, but on the way to the subject site
 - (b) the speed zones provide the opportunity for a balanced approach to all the sites, including the subject site, and have physical linkages between them such that the idea of a distinct centre is limited.

In terms of the objectives of the Direction, the planning proposal:

- will not compromise the inter or intra regional road network of the Pacific Highway, with the site being accessed from existing entry and exit ramps, therefore not requiring additional infrastructure works to accommodate the use. As a result this will not compromise public investment that has been provided for
- the type of development proposed is a type consistent with that which exists along the Pacific Highway
- the proposal will not compromise public expenditure along the Pacific Highway, utilising existing access points, which are newly constructed
- the location of a highway service centre will improve the safety and efficiency of the road network by providing a rest stop for the travelling public that is contemporary in design and responsive to current community needs in terms of expectations for tourism and service purposes. The attributes in this regard have been set out in the planning proposal.

The Strategy Hunter report makes specific comments in this regard which are addressed below:

It does not address the 2014 RMS HSCs Policy Review. Rather, it provides a descriptive narrative which does not provide sufficiently detailed and evidenced based analysis about market characteristics, complete detail about competing sites, and so on.

The Planning Proposal application describes the Heatherbrae/Tomago service centre site on the eastern side of the highway as an 'inconvenience' to northbound travellers because of the onerous turning movements involved but does not acknowledge that access to the Planning Proposal site is similar and slightly more complex to navigate.

We do not concur that the same access arrangements apply in terms of convenience. The location at Heatherbrae is at a busy intersection for the fast-food locations and similarly for the roundabout, where

fuel is primarily accessed from. The road system that provides access to the subject site is more easily traversed from two locations south of the site, heading in a northerly direction and one north of the site, parallel to the subject site, heading south. These traffic movements occur outside the general highway system and are more easily navigated in a smoother traffic flow than through the traffic network at Heatherbrae.

Therefore, we do not support the position that the same level of inconvenience applies to the subject site.

The narrative also does not discuss the services delivered by highway service towns, such as Bulahdelah and Nahiic and the impact of a new HSC.

Bulahdelah, as a highway service town, is not functioning as it should be. This has been detailed below.

From an economic perspective, the impact has been addressed in the Hill PDA Demand Assessment on Page 24 (Ref: C16001). This identifies, at Table 7, the ancillary uses identified at the service stations and highway service centres within an 80km stretch of the Pacific Highway, north and south of the site.

Under the Councils Highway Service Centre Strategy, the only other town identified as a highway service town, is Nahiic. Nahiic has a range of commercial and retail facilities like Bulahdelah with the provision of localised services such as a bakery, IGA supermarket, cafes, real estate agent, bottle shop. It has also been bypassed.

Council has recently approved upgrade and expansion works to the Nahiic Service Centre; therefore, representing a degree of confidence in the market place for expansion of such uses to service the travelling public.

46 kilometres north of Bulahdelah, representing a travelling time of 31 minutes, it is not considered that the planning proposal would have any worse effect on Nahiic than the existing service station at Nahiic itself, particularly once upgraded works are completed. Similar to Bulahdelah, the town relies on a similar make up of retail accommodation to that at Nahiic; therefore, the efforts of individual business owners is paramount to achieving on-going economic preservation.

The narrative does not acknowledge that the Site is not visible from the south, despite a reference in the narrative that ‘the Site is in such a position that it will be evident’.

The site, through signage will have a degree of visibility.

However, through consultation with the community, concern was raised that high degrees of visibility may impact on people’s desire to visit the township itself. Therefore, it was agreed that signage for the highway service centre would only be provided at the first exit to Bulahdelah, which then requires people to drive through the town itself, as opposed to the later turnoff, albeit closer to the site, but which would not encourage people to go through the town itself. Therefore, from a community perspective it is preferred



that the site is not necessarily visible to protect the community's business base and encourage the use and promotion of this.

Limited analysis is provided about the impact of the proposal on other HSC's/towns. It is also not clear why the narrative concluded 'the inconsistency of the planning proposal is of minor significance'.

Page 34 of the Economic Impact Assessment prepared by Hill PDA (Ref C16337), provided at Table 10, the effect on other highway service centres and service stations within the vicinity of the site, on an 80km radius.

This demonstrates that:

- the most immediate impact is on the Coles Express and BP Service stations within Bulahdelah of a 14% reduction in trade
- the effect on all other of the identified sites, in the immediate, is less than 10%
- in the longer term, the shift away from those service centres in Bulahdelah is likely to be 15-16%, while for all other identified site, the effect is greater than 20%, with the largest effect being on those at Heatherbrae, being between 27-28%.

Factored into this, must also be the projected growth in demand estimated over the next 12 years to be in the order of 34% growth in traffic; therefore, all service stations are projected to increase their trade by 10% above current levels. The conclusion, therefore, is that the proposed service centre is responding to growth over time.

Most important, however is the following conclusion, identifying that it is not the impact of the proposed service centre that would affect the existing service stations in town, but instead, it is the sunk impact of the bypass itself. *Now that the bypass is sunk the opportunity exists for Bulahdelah to capture a share of highway expenditure that would otherwise bypass the town. On a number of fronts, this is resulting in escape expenditure to other locations, therefore undermining the economic base and potential of Bulahdelah.*

This goes to the heart of the point that Bulahdelah has not taken measures to insulate itself as a result of the opening of the bypass and a proposed highway service centre presents an opportunity to capture a share of highway expenditure that is instead escaping to other locations. It is the current circumstance, and not the proposed one, that is therefore having the effect on the township of Bulahdelah and, without response, decline will continue to manifest.

Therefore, while there will be some impact on nearby service stations and highway service centre, the immediate impact will be less than that experienced by closer service stations, while the longer term will likely be compensated by overall growth in traffic along the Pacific Highway.



Great Lakes Local Environmental Plan

The provisions to be altered because of this planning proposal to accommodate a highway service centre are set out previously.

Below is a summary of the effect of providing a highway service centre on the site, in terms of these provisions.

Table 5: Relevant Local Environmental Plan Provisions

Clause	Response
<p>Clause 1.2: Aims – how does the proposal respond to these.</p>	<p>(a) to facilitate the orderly and sustainable economic development of land</p> <p>The proposed use of the land for a highway service centre will enable this to be used in an orderly and economic fashion, by developing only an area of land that is required to accommodate the highway service centre. The land is currently underutilised as it has no productive agricultural purpose and, to stimulate extensive development on the masterplan area of the site, the purpose of the development will assist to fund this. Overall, this will provide a contribution to the orderly and economic use of the land within the locality.</p> <p>(b) to promote the health and well-being of the population</p> <p>The proposal will have significant benefit to the health and wellbeing, particularly for this looking to work in part-time roles, or for the youth of the community, whom are seeking employment experience, but currently have limited opportunities, due to the limited offering within the township of Bulahdelah. The opportunity for local employment, that does not require travel over extensive distance for such purpose, will allow for the pursuit of other lifestyle activities, as well as greater time in family roles.</p> <p>(c) to protect and enhance environmental, scenic and landscape assets</p> <p>The location of the highway service centre is outside of the environmental, scenic and landscape assets of the masterplan site to ensure that such attributes are not compromised and may be retained without adverse impact. This is ensured by the highway</p>



	<p>service centre being location outside of areas which contain environmentally significant attributes, as well as being on lower portions of the site to ensure that the scenic character and quality of this landscape is not compromised.</p> <p>(d) to facilitate cultural activities that will benefit the community Promotion of local tourism opportunities on the site itself, as well as displaying the benefits of Bulahdelah as a tourist town will ensure that local cultural and community activities are actively promoted.</p> <p>(e) to promote the equitable provision of services and facilities for the community The proposal will not compromise the provision of services and facilities within the community.</p> <p>(f) to ensure that development does not create unreasonable or uneconomic demands for the provision or extension of public amenities or services Public amenities and services will be catered for by the development, to avoid uneconomic demands on the public purse.</p> <p>(g) to promote the public transport patronage and encourage walking and cycling The nature of the township does not necessarily warrant such outcomes, as opposed to more centralised locations within the local government area, such as Forster.</p> <p>(h) to ensure that development has regard to the capability of the land so that the risk of degradation is minimise As stated previously, the land has no benefit for agricultural purposes; aside from the on-site management of cut and fill to accommodate the development, there are no other circumstances that will cause, nor effect, land degradation, through careful on-site management during the construction process.</p> <p>(i) to minimise land use conflict The proposed highway service centre may be suitably designed to minimise land use conflict. Land uses on the eastern side of the</p>
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	<p>highway, surrounding the site are somewhat limited, other than the Bulahdelah Golf Course, as they surround the highway service centre site.</p> <p>Future design development of the master planned site will be undertaken to ensure that amenity is protected and the effect of the highway service centre minimised on both future residential and tourist accommodation.</p> <p>(j) to ensure that development meets and local water quality objectives adopted by Council in relation to groundwater, rivers, wetlands and other waterbodies</p> <p>The proposal will be designed taking account of these matters, with further technical direction anticipated at the gateway reporting stage.</p> <p>(k) to protect, enhance and provide for the long term management of native biodiversity, including habitat linkages, threatened species, population and engendered ecological communities and to identify and protect biodiversity links or corridors throughout the landscape.</p> <p>As stated previously, the location of the highway service centre is outside of such significant areas and the development will not compromise the further context of these.</p>
<p>Clause 2.3: RU2 Rural Landscape – how does the proposal respond to these objectives</p>	<p>(a) to encourage sustainable primary industry production by maintaining and enhancing the natural resource base</p> <p>The highway service centre site has no purpose associated with primary industry production; it is low-grade agricultural land.</p> <p>(b) to maintain the rural landscape character of the land</p> <p>The proposal will, to some extent, alter the rural landscape and provide a denser form of development than may otherwise be anticipated. However, the location of a highway service centre in this location has generally limited difference to other highway service centres, which are generally in a similar location.</p> <p>Sympathetic materials and finishes, as will the location of built form, will need to be incorporated into the detailed design stage to ensure</p>



	<p>that this adequately addressed.</p> <p>(c) to provide for a range of compatible land uses, including extensive agriculture</p> <p>The land has no agricultural purpose, other than low-level grazing.</p> <p>(d) to provide for rural tourism in association with primary industry capability of the land which is based on the rural attributes of the land.</p> <p>As stated previously, the land on which the highway service centre is located has no primary industry capability. However, it is the intention of the highway service centre having a key role to play in promoting Bulahdelah as a town and this will include such attributes. This will occur through a Voluntary Planning Agreement process and how the community see this occurring.</p> <p>(e) to secure a future for agriculture in the area by minimising fragmentation of rural land and loss of potential agricultural productivity.</p> <p>The land uses surrounding the site, particularly, the Bulahdelah Golf Course and Alum Mountain will not fragment rural land use, nor result in the loss of potential agricultural productivity. These do not immediately surround the location of the highway service centre and adjoining lands are not zoned for such purpose, instead being zoned for residential and environmental protection purposes. Therefore, the proposed highway service centre will not fragment, nor sterilise such land.</p>
<p>Clause 2.3: R2 Low Density Residential – how does the proposal respond to these objectives</p>	<p>(a) to provide for the housing needs of the community within a low density residential environment.</p> <p>A small portion of land zoned for low density residential use is required to accommodate the highway service centre. However, this is considered negligible in terms of the broader residential context of the master plan site.</p> <p>(b) to enable other land uses that provide facilities or services to meet the day to day needs of residents.</p> <p>The nature of the proposed use will provide services to meet</p>



	the day to day needs of residents.
Clause 2.5 – Additional Permitted Uses	As stated previously, it is proposed to amend Schedule 1, on the premise of this clause, to accommodate the intended use.
Clause 4.1 – Minimum Lot Size and Lot Size Map	The minimum lot size is to be amended to accommodate the proposed highway service centre.
Clause 4.4 – Floor space ratio	It is proposed to amend this clause to permit an adjusted floor space ratio which requires further resolution.
Clause 4.6 – Exceptions to development standards	It is not anticipated that Clause 4.6 will apply, due to the amendment to Clause 4.1, 4.3 and 4.4.
Clause 5.4 – Controls relating to miscellaneous permissible uses	Not applicable.
Clause 5.10 – Heritage Conservation	Upon receipt of a gateway determination, matters of heritage impact will be considered in more detail, particularly in terms of the highway service centres visual relationship with Alum Mountain, as well as potential impacts associated with landform modification as this presents to the northern side, coming towards the site. The Great Lakes Heritage Conservation Study would also be addressed as part of the gateway determination.
Part 6 – Urban Release Area	This clause is not relevant, as the proposal seeks only to use the land for a highway service centre. Further, the master plan site has previously been rezoned to accommodate residential development and therefore further designation as a release area is considered unnecessary given the scope of the zoning already in place.

Section C – Environmental, social and economic impact

Q7. Is there any likelihood that critical habitat, threatened species, populations or ecological communities or their habitats, will be adversely affected as a result of the proposal?

As stated in the Planning Proposal, the site has had numerous environmental investigations undertaken previously.

While these studies will need to be updated as part of the Gateway Determination, the environmental constraints map previously prepared by RPS Consulting makes plain that the land to be occupied by the highway service centre does not contain any of the aforementioned attributes.

Q8. Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?



As stated in the Planning proposal matters of water management, geotechnical investigations and landform modification, as they relate to the highway service centre, will be detailed as part of the requirements of a Gateway Determination.

It is premature to undertake studies or design detail that addresses noise, light spill, traffic and fauna prior to the Gateway Determination being issued.

Q9. Has the planning proposal adequately addressed any social and economic effects.

Social Impacts

The social effects of the highway service centre that may be anticipated, have been addressed in the Planning Proposal and are summarised below.

Table 6: Social Advantages and Disadvantages of the Planning Proposal

Social Advantages	Social Disadvantages
Local employment will be created to provide various employment types, including that for youth and higher levels of part time employment.	Short term impact on local businesses who are not able to respond to the change in growth to the locality.
Greater levels of employment closer to home, which means the opportunity for greater time spent within families and reduced travel time. This has positive health outcomes.	Potential decline in health of business owners who are not able to respond to the change in growth, due to stress.
Less time pressures associated with commuting to and from employment	
Retention of expenditure within the town, as opposed to 90% expenditure which is outside of town, predominately made up by the tourist market.	
Exposing tourist benefits of the locality through an increase number of people visiting Bulahdelah and establishing what it does offer.	
Opportunity for people to consider new business opportunities in shops that are in decline or vacant, because of increased visitors to town.	



<p>Opportunity to encourage a meeting place along the highway where people are travelling together but in different vehicles with a diverse rest stop that encourages people to enjoy the site and the broader context of Bulahdelah.</p>	
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The social disadvantages are considered short term and will largely depend on how existing businesses respond to changing opportunities; the social advantages are considered far greater and will have short, medium, and long term benefit.

Economic Impacts

The economic impacts of the highway service centre are addressed in the Planning Proposal. In addition, the Proponent has been asked to consider the following:

- **information on other highway service centres approved within the region**
These were addressed in the report prepared by Hill PDA.
- **consideration of the Caltex service station in town, which provides for interstate coaches at night**

There is no Caltex service station in the township of Bulahdelah. This has recently been purchased by BP. The relevance of this in terms of interstate coaches at night is unknown and, in our view, has no bearing on the planning proposal. If the currently facility is providing sufficient services for its travelling public, then there is no reason this would not remain despite the location of the highway service centre. However, if the existing service station cannot respond to market demand for services required by the travelling public, then that is a detriment bought on by the operators themselves, and not the result of the highway service centre. Retailing must respond to market pressure, which results in better market competition which is preferred for consumers.

- **information about actual business performance since the opening of the bypass**

This is a matter that cannot be addressed as it suggests that financial data of businesses be obtained to determine the extent of impact.

This is an unreasonable request.

- **consideration of the highway service centre independent of any other land uses**

This addendum report considers only the highway service centre.

- **the concept of a highway service town and why the proposal will not impact this status**

This has been addressed previously.



- **that the town of Bulahdelah is still adjusting to the effect of the bypass**

The town of Bulahdelah is, to some extent, still adjusting to the effects of the bypass. However, evidence of businesses for sale, particularly where this is taking a substantial period to occur, indicates that the township is likely underperforming if these assets are not being sold quickly. A desire to sell businesses may similarly reflect the same.

As this planning proposal identifies, much of the efforts in restoring the township, post bypass and in absence of local and state funding is likely to occur only through private investment. With the extent of escape expenditure occurring it is clear that, without significant investment, the township will continue to struggle.

- **that the highway service centre will not compromise the ‘niche’ market that Bulahdelah has as a highway service town**

As identified above, Bulahdelah, while satisfying technical definition, is not operating as a highway service town.

- **what effect the proposal will have on local businesses and net economic impacts.**

This is addressed in the Economic Demand Assessment by Hill PDA, at Page 32 as follows:

Highway Service Centre

The negative impacts which have been felt by Bulahdelah’s current fuel retailers since 2013 have been primarily a direct result of the opening of the Bulahdelah Bypass. Where 15,000 vehicles per day formerly passed by the two outlets on Boolambayte Street prior to the construction of the Bypass, the average number of vehicles per day is now just 1,550 vehicles. While the total number of vehicles along the Pacific Highway is forecast to increase by 34% over the period 2016 to 20128, the sustainability of two non-highway based fuel retailers in Bulahdelah is questionable, irrespective of whether a highway service centre is developed on the Subject Site

In this respect, negative impacts on these fuel retailers as a result of the Bypass can be viewed as a ‘sunk impact’ and the opportunity now exists to capture a share of the new market which has been created through the opening of the town bypass. Given this negative circumstance that has occurred, the outcome for a highway based service centre will have a positive economic outcome for Bulahdelah.

Particularly if these existing fuel retailers were to close, this would make Bulahdelah as a location to stop at even less attractive, with the absence of any fuel offering. This would result in people continuing to travel past Bulahdelah and to the next available stop which provides a greater cross-section of services.



The aforementioned demonstrates that the effect of a highway service centre opening on the existing fuel retailers will be limited and the effect is more about what the current service stations have to offer to the travelling public.

Community consultation to date has evidenced significant concern about the effect of implementing a highway service centre on local business. As demonstrated by consideration of the impact on the existing service stations themselves, the effect is also driven by the extent to which existing businesses embrace the proposal and work with the proponent to ensure that their business is promoted, along with ensuring that the voluntary planning agreement is implemented to assist the main street and existing business of Bulahdelah to help themselves be part of a viable business community.

In many ways, the effect of this proposal on existing business is largely going to be driven by the operators of these. Therefore, there is no textbook response to economic or planning concerns, but instead relies on the initiative of the local community to embrace the opportunity and move forward with the benefit of this development. A significantly large proportion of people that have discussed the proposal with the proponent believe that this presents a significant opportunity for the town to embrace this and 'get Bulahdelah back on the map'. The town has benefited previously from 100% of traffic flow along the Pacific Highway; it now benefits from 10% of that traffic flow. The only means to instigate growth is to rely on the assistance of private investment to stimulate this; there are no alternative income streams or public investment offered to promote the township; therefore, the only means of achieving nett growth for the existing community will be with a proposal such as this.

Further to the above, the detailed comments provided by Strategy Hunter have been responded to by Hill PDA and are contained at Annexure 2.

Section D: State & Commonwealth Interests

Q.10 Is there adequate public infrastructure for the planning proposal?

Additional public infrastructure will be required to facilitate this proposal. This will relate to the provision of the following:

- o internal roadway system to service the highway service centre. This will include liaison with the Council in relation to roadway design, as well as any issues associated with traffic flow and roadway design as it relates to the existing entry and exit points into and out of Bulahdelah. However, given the recent construction of road infrastructure it is anticipated that the relevant design requirements for both heavy and light vehicles have been satisfied given the purpose of creating Bulahdelah as a highway service town, which includes facilitating roadway infrastructure that does not preclude use by any vehicle. Further liaison with RMS and Council will be required as part of the gateway process and any works will be at the Proponent's cost.



- augmentation of existing water supply. Discussions with Mid-Coast water has already occurred in March 2016 to consider how the supply may be addressed and what additional tank systems may be required. Subject to more detailed design and, in alignment with expectations by Mid-Coast Water to service the highway service centre (and the master plan) sites, a water supply strategy will be refined at the gateway stage. The works for this purpose are likely to occur through an infrastructure deed, or undertaken by the Proponent themselves, depending on discussions with Mid-Coast Water.
- Similarly, in relation to stormwater and drainage systems, it is anticipated that similar strategy outcomes would be developed and most likely that the Proponent would undertake these works.

In summary, all infrastructure works will be the responsibility of the Proponent, whether undertaken as works in kind, or by payment of through an infrastructure contributions deed for their completion. This will form part of the gateway process.

In relation to a voluntary planning agreement, it is intended that the proponent with be lodging a VPA in association with the proposal as part of the gateway process. The purpose of the VPA will be for public purpose, in association with the township of Bulahdelah. To assist in stimulating growth of the township and promoting Bulahdelah as a broader location for local, tourist and recreational purposes, which will shine in its offering to the tourist and localised market, the Proponent intends that the VPA is to assist in this purpose. It will not be offered as directed funds, but instead offered to the community, through a working party arrangement to look at projects that would assist to stimulate growth. Opportunities may include, but would not be limited to:

- toilet and shower facilities in the Lions Park for campers
- main street program, including opportunities for outdoor seating, lighting, alterations to the road network
- promotional leaflets and signage of the offering that Bulahdelah provides as a whole
- other activities or opportunities that the community sees would be fit for purpose.

The Proponent would request to be involved in the working party, to ensure their on-going commitment to the growth and vitality of Bulahdelah. Funding associated with the VPA would be provided as part of the gateway determination process. However, the funding would extend to the implementation of the program established by the working party, and not simply a means for funding a strategy that does not have the funds to be implemented.

Q.11 What are the views of state and Commonwealth public authorities consulted in accordance with the Gateway Determination?

Subsequent upon lodgement of the planning proposal, Hamptons has held discussions with RMS and Mid-Coast Water.



The matters discussed with Mid-Coast Water have been addressed above.

Discussions with RMS have centred around the site's suitability having regard to the RMS policy review, dated May 2014. These discussions occurred subsequent upon lodgement of the planning proposal. The policy sets out the historical nature of the policy, through to the current review. The policy direction sets out where new highway service centres may be established. This excludes Bulahdelah as an identified location, instead nominating this as a highway service town.

Further, discussions with RMS sought to enforce the difference between a highway service centre, as defined by the standard instrument (as set out above) and additional requirements for these, which include:

- that the centre is open 24 hours per day
- that all traffic arrangements are safe and efficient
- at least 25 heavy vehicle spaces are provided (B-double suitability, with the capacity for longer contributions into the future)
- parking for recreation and motor vehicles
- provision for a children's play area and tourist information
- use of toilets and facilities is free from obligation to purchase goods and services
- separate undercover fuel areas for heavy and light vehicles
- no alcohol be served on site.

The only deviation from this list is the requirement for 25 heavy vehicle spaces; ALL other attributes are incorporated into the concept plan for the highway service centre. The reason that the number of heavy vehicle spaces is limited is simply due to the available land holding, to ensure that the extent of parking does not compromise the environmental protection zone surrounding the highway service centre, nor unduly compromise the provision of residential allotments.

The main concerns of RMS were that Bulahdelah has been designated as a highway service town, and not one required to provide a highway service centre. Even if it were designated, the site is not considered to satisfy the requirements of the Policy, as it cannot accommodate the number of trucks required.

The discussion in relation to Bulahdelah as a highway service town is detailed above. Regarding the latter point about the number of trucks to be accommodated, in discussions with Council, the requirement for 25 heavy vehicle parking spaces is not a statutory requirement. As such, the Council could not refuse an application on grounds of non-compliance with the RMS definition of a highway service centre as this is not a legislated definition. The concept proposal does, however, satisfy all other requirements under both the legislative definition and the RMS principles.

The gateway process will require consideration with other state and local authorities, including, but not limited to:

- the appropriate electricity provider, particularly in relation to relocation of supply across the site.
- Office of Environment & Heritage
- National Parks & Wildlife Service NSW
- The Council in relation to relocation of existing roads within the site.

Part 4 – Mapping

The relevant maps would be amended as part of the gateway determination process, subject to discussions on the most appropriate means for amending the planning controls.

Part 5 – Community consultation

Agency consultation has been outlined above.

In terms of community consultation, the following has been undertaken:

- two meetings with the Bulahdelah Chamber of Commerce, held at the Visitor Information Centre in March and October (approximately 35 attendees on both occasions)
- public meeting organised by the Bulahdelah Community, held on 10 October 2016 (approximately 115 attendees)
- individual discussions with various business owners and community people on different occasions by the Proponent, including telephone and email.

The purpose of these meetings was as follows:

- Chamber of Commerce Meeting No. 1: - the purpose of this meeting was to advise that the planning proposal had been lodged with Great Lakes Council, including what the planning proposal was made up of. The proposal was well received by some, while others were concerned about the potential impact on businesses within the existing township, in terms of potential decline of these as a result of the proposed use as a highway service centre
- Chamber of Commerce Meeting No. 2: - the purpose of this meeting was in to advise on the additional information that had been prepared, in response to the economic concerns raised by Council, with respect to the application. The outcomes were like the first meeting, with impact on existing businesses remaining a key concern, as was the ability of the Proponent to complete the development.
- The public meeting was to brief the community on the planning proposal including the masterplan components and take on board their comments, both positive and negative. Many spoke of the need for growth within the township, with new opportunities required to stimulate this. Others remained concerned about the impact on local businesses, as well as how the highway service



centre development would form part of the broader masterplan concept, including whether the master plan would ever be implemented or simply that the service station would be undertaken. To assure the community that this would not be the case, the Proponent provided an undertaking that this would not occur.

- Discussion was also around the provision of a voluntary planning agreement to support and stimulate economic growth within the township itself, to be provided by the proponent.
- Concern was also raised about how development of the site would encourage people to enter the township. Methods such as signposting the first entrance to Bulahdelah as the location into the highway service centre, so that people had to drive through the town was suggested and the proponent is agreeable to this. This ensures that people would not simply be visiting the highway service centre, but traversing the town to see what Bulahdelah has to offer, prior to visiting the site.
- The level of support for the application was voted upon in this forum, with 90% of those in attendance supporting the proposal.
- Other informal discussions have been undertaken with various business owners and local community members, all with differing views of the application.

The consultation process reflected that, while there is some concern about the proposal, there is also significant opportunity for the township as a whole, particularly as it relates to the whole of site development approach. Most business owners and residents recognise the opportunity that this brings to the township and will not otherwise occur without private investment, not only in the highway service centre, but in the master planned site as a whole.

Section 5 – Strategic Merit & Net Community Benefit

The purpose of this section is to discern the site-specific merit of the planning proposal and its compatibility with surrounding land uses. This needs to be considered in the context of:

- the natural environment
- the existing uses, approved uses and likely future uses near the proposal
- the services and existing infrastructure that will be available to meet the demands of the development, including any financial arrangements.

Voluntary Planning Agreement

The terms of the voluntary planning agreement are outlined above.

LEP Pro-Forma Evaluation Criteria: Category 1 Spot Rezoning LEP

Criteria	Consistency
Will the LEP facilitate a permanent employment	The proposal will result in an employment



generating activity or result in a loss of employment lands?	generating activity. The proposal will not result in any loss of employment lands.
Will the LEP be compatible with agreed State and regional strategic direction for development in the area (e.g. land release, strategic corridors, development within 800m of a transit node)?	Not applicable.
Will the LEP implement studies and strategic work consistent with State and regional policies and Ministerial (s.117 Directions)?	No.
Is the LEP located in a global/ regional city, strategic centre or corridor nominated within the metropolitan Strategy or other regional/sub-regional strategy?	No.
Will the LEP deal with a deferred matter in an existing LEP?	No.
Have the cumulative effects of other spot rezoning proposals in the locality been considered? What was the outcome of these considerations?	No. There are no other spot rezoning applications in the immediate vicinity of the site that would result in adverse cumulative impact.
Is the LEP likely to create a precedent, or create or change in the expectations of the landowner or other landowners?	No. Any proposal for such purpose would be subject to its own merit considerations. The landowner owns the large proportion of land surrounding the site, aside from Bulahdelah Golf Course and therefore the proposal is unlikely to have adverse expectations.
Will the LEP be compatible/complementary with surrounding land uses.	Yes. The proposal may be suitably designed to be compatible with and complementary to surrounding land uses. This will be undertaken at the gateway determination and development application stages.





ANNEXURE 1: SITE & CONTEXT ANALYSIS



ANNEXURE 2: ADDENDUM RESPONSE BY HILL PDA





Page & Section	Content	Council Comments	HillPDA Comments in Reply
p5 1. Background	The background refers to the impact statement addressing an intended development application for “full retailing with associated quick service restaurant facilities, along with a hotel and residential lots (“wider development”)	The Economic Impact Statement (EclS) is required for a planning proposal for an additional permitted use (highway service centre- HSC) on the subject site. The focus of the EclS appears to be much wider (although it is acknowledged that some discussion of this is useful).	The development proposal is a range of land uses in a synergistic relationship. This includes the existing golf course. We understand that only one of these land uses is non-complying but it would be inappropriate to consider the economic impacts in isolation of the other land uses. Whilst we acknowledge that there will be patrons that utilise only the HSC, the HSC also serves an important role for the hotel and other components. The purpose of the HillPDA report was to assess the economic impacts of the proposed development in its entirety – not just one component of it.
P5 Report Objectives	The EclS objectives are broader than the nature of the planning proposal.	The objectives should focus on the nature and impacts of development arising the planning proposal, i.e. a HSC. It is reasonable for include a section on the impact of the wider development. However, this should not be allowed to overshadow analysis of the HSC per se.	Refer to comment immediately above
P8 Subject Site	Refers to entire area of the “wider development”, not the HSC per se.	Site description should focus on the HSC in the context of the wider development. Maps should show the actual site of the HSC. The land subject to the planning proposal should be the HSC site, not the entire land holding shown in the maps as the “Site”.	Refer to Annexure 1 of Addendum to Planning Proposal

Page & Section	Content	Council Comments	HillPDA Comments in Reply
p10 Proposed Development	Refers to a “mixed use” development, comprising the HSC, tourist accommodation (4 star 100 rooms), and residential subdivision 200 lots, sold at 15-20 lots pa	The planning proposal is for the HSC only. It is worthwhile considering the HSC in the context of the wider development, not giving the wider development equal attention. “Mixed use development” is probably not an appropriate term for 3 disparate/discrete land uses spread over a 140 ha site. It is not clear how the residential lot take up rate of 15-20 lots per annum is derived, and seems optimistic.	Acknowledged that “mixed use” could be confused with land uses vertically separated. A better description would be a range of land uses in a synergistic relationship. A residential market appraisal was undertaken by HillPDA in December 2015. The study recognised that the Bulahdelah residential market had performed poorly over the past couple of decades. However the proposal will be creating a new market in the locality that is not currently being met. It will be marketed as a “tree change” golf-course lifestyle. The closest example is Tallwood Village which is around 18km north of Forster. This estate is achieving around 20 house lot sales per annum with a wide range of prices from \$40,000 to \$220,000. Median price was \$100,000. The cheaper lots reflect sites with difficult typography whilst the more expensive lots are elevated with distant views including ocean views.
P12 State Plan	Relevant key goals and priorities of the State Plan are quoted.	The State Plan is no longer current. It was placed by NSW 2021 in 2011, which in turn was replaced in 2015 by “NSW Making It Happen 30 priorities for NSW”, including 12 “Premier’s Priorities”	The proposal is consistent with the following priorities of State Government: <ol style="list-style-type: none"> 1. Creating jobs 2. Building infrastructure 3. Encouraging business investment The first two of these priorities are two of the Premier’s top 12 priorities. Whilst not necessarily actively promoting them the proposal is not inconsistent with the remaining priorities.
P13. Draft Mid North Coast Plan	The draft Plan is quoted	The draft Plan has been superseded. The draft Hunter Region Plan includes the former Great Lakes LGA, and the draft North Coast Plan includes the former Taree LGA. These draft Plans should be quoted as is relevant.	The Draft Hunter Regional Plan won’t replace the Mid North Coast Plan until it’s made. In any case the proposal is considered to be consistent with the Plan or at worse is not inconsistent.

Page & Section	Content	Council Comments	HillPDA Comments in Reply
P13 Great Lakes Local Environmental Plan 2014	The land use zoning of the wider site is identified	The EclS should include (from an economic perspective) an assessment of the proposal against the aims of the LEP and the objectives of the relevant zones. There should also be commentary/assessment against any other relevant clauses of the LEP. The definition of a highway service centre (HSC) in the LEP should be highlighted.	Under the LEP a highway service centre means a building or place used to provide refreshments and vehicle services to highway users. It may include any one or more of the following: (a) a restaurant or cafe, (b) take away food and drink premises, (c) service stations and facilities for emergency vehicle towing and repairs, (d) parking for vehicles, (e) rest areas and public amenities. We understand that this use is not permissible in any of the zones that affect the subject property.
P13 Pacific Highway Service Centre Policy	The 2014 RMS "Highway Services Centre Along the Pacific Highway- Policy Review" is quoted only so far as the definition of a HSC is concerned.	The content of the 2014 Policy/Policy Review should be discussed in greater detail, particularly the rationale underlining its recommendations, and the economic implications of its recommendations for the location of HSCs.	The report summarises the Policy adequately for the purpose of the planning proposal. Whilst the policy nominates locations for HSCs it does not prohibit other locations if "the provisions of the planning proposal that are inconsistent are of minor significance".
P15 Population Trends and Levels	Id forecast figures are provided for the "Bulahdelah Region", described elsewhere in the EclS as "Bulahdelah Central Rural"	The Bulahdelah Region should have defined in a map, and in comparison with the town itself. Note: the town's population was 1118 in 2011 (ABS Urban Centre) relative to 1992 for the Bulahdelah Central Rural area, with 495 and 705 private dwellings respectively	Noted
P16 Unemployment Trends	Changes in the nature of unemployment/demand for part time employment between 2001 and 2011 are provided.	The validity of these figures for 2016 is questionable given the impact of the bypass on local employers. There should be some dialogue about changes since 2013. Possibly a survey of major employers, such as food outlets in the main street etc., could be undertaken. The reference to the proposal providing part time employment potentially in demand by residents should be relocated to the analysis part of the EclS.	The analysis is based on available and valid data at the time of reporting. A survey as suggested by Council is either likely to support the argument for more investment in jobs or will be neutral to the planning proposal.

Page & Section	Content	Council Comments	HillPDA Comments in Reply
P17 Labour force Trends	The narrative of this section refers to “Bulahdelah residents” – Table 3 indicates that “Bulahdelah residents” refers to “Bulahdelah Central Rural” residents., not just residents of the town	<p>The EcIS needs to use consistent and clear terminology throughout.</p> <p>The discussion of industries of employment should be clearer- and placed in context, for example “dairy farming, beef cattle production and forestry are described as the “traditional economic base” of the “Bulahdelah region”. While these are important industry sectors, health care/social assistance, retail, construction, and accommodation and food services have been equally important for several decades, and now are just as “traditional” for the town/region. Certainly, from 2001-2011 these latter industries have maintained their contribution to employment of the region, while the former has declined.</p> <p>Some discussion regarding changes in employment structure since the 2013 bypass is of critical importance to the EcIS but is lacking from it, notwithstanding that census results are not yet available- some original research would be useful.</p>	The second paragraph of Council’s comments generally reiterate the HillPDA report. The third paragraph regarding impacts of the bypass are not relevant for the purpose of the planning proposal other than it is recognised that the short term impacts on the town of the bypass alone are likely to be negative and hence would support the case for a HSC to “recapture that lost trade”.

Page & Section	Content	Council Comments	HillPDA Comments in Reply
PP18 Traffic Volumes	<p>Traffic volumes as measured by the RMS are provided for 2007 and 2010, showing growth of 4.6% pa. The 2004 EIS for the bypass is quoted @2.45% growth pa. A combination of the two figures are used to estimate increases in traffic volumes to 2028. RMS traffic counts are not available beyond 2010.</p>	<p>Updated actual counts would assist in determining the impact of the proposal- can this be arranged It is noted that the traffic report quoted in the EclS seems to have updated figures of some sort for the bypass in 2015.</p>	<p>The analysis is based on available and valid data at the time of reporting.</p>
P20 Trips diverting from the highway	<p>A traffic count is provided for 0900-1600 Friday 6 November 2015 showing traffic volumes diverting into Bulahdelah and their dwell time. The counts indicate around 9.1% of traffic on the Pacific Highway diverts into Bulahdelah.</p> <p>The impact on local business of the decline in traffic in Bulahdelah since the bypass is noted.</p> <p>The EclS states that as highway traffic increases the volume of traffic diverting into Bulahdelah will increase, based on a constant percentage of diversion.</p>	<p>The EclS does not provide details as to how the Pacific Highway “passing” traffic was measured/determined (elsewhere it is stated that counts are not available beyond 2010). In addition, it is not clear how many diverting trips relate to medical, school or similar related trips, as distinct from actual highway “passing trade “visitors. A survey of main street movements may assist in providing this detail.</p> <p>It is not clear on what basis the EclS assumes that the diversion percentage will remain at 9.1% over time.</p>	<p>The analysis is based on available and valid data at the time of reporting.</p>

Page & Section	Content	Council Comments	HillPDA Comments in Reply
P23 Highway Service Station	Table 8 shows the service stations on/near the Highway between Hexham and Taree	Table 8 is incomplete. It does not include service stations at “The Rock” (Liberty), Karuah (BP), Nabiac x 2(Caltex and Caravan Park/former Liberty). As a result, the narrative is incomplete. There needs to be narrative about retail/food offerings the highway service towns of Karuah, Coolongolook and Nabiac, noting that the offerings in Nabiac and Coolongolook appear to have expanded as a result of recent small business investment.	The petrol outlet in Karuah is 5km off the highway and competition with a HSC in Bulahdelah is insignificant and almost unmeasurable. The caravan park in Nabiac is an old single pump station almost 50km north of Bulahdelah. Again the impacts are insignificant and almost unmeasurable. The Rock at Viney Creek is a 4 pump United Petroleum outlet with a Subway and pie shop / road house café some 33km south of Bulahdelah. Its exclusion in the report was an oversight. The inclusion of the additional outlet will dilute the impacts a little on the other outlets documented in Table 10 of the report.
P24 Accommodation	Accommodation is not part of the Proposal. However, a review of available accommodation is provided along with an assessment of rates/occupancy of an additional 4 star hotel.	The Plough Inn hotel has accommodation which should be included for completeness, as should caravan and RV overnight opportunities. It is not clear where the occupancy rate for the proposed 4 star hotel is sourced or also the underlying assumptions. It is also not stated whether the 4 star hotel would be viable based on the figures quoted in the EclS.	The Plough Inn Hotel has very few rooms (around 5 or 6) and their availability is unknown. Four star accommodation is currently not available in Bulahdelah. Four star would therefore provide a different offer and would enable tour groups to stay in Bulahdelah. The hotel is a complying use and its feasibility is a commercial risk to the applicant. It is not a planning or social risk. The feasibility of the hotel is not a relevant matter for consideration by the consent authority.
P25 Residential	Residential development is not part of the HSC. The EclS states that the residential market in the area is static, with price growth less than inflation. The EclS identifies a market niche of lots fronting the golf course, albeit that market absorption is likely to be very slow. Sales of 15-20 lots per annum are predicted	However, no statements are made regarding the viability of such development given the relatively low land values in the vicinity, servicing costs and the stated “Very slow” market absorption. Given this statement the EclS appears to be optimistic- indicating a “likely” lot take up of 15-20 lots per annum-possibly as high as 25 lots. It is not stated as to how this take up rate is derived.	A residential market appraisal was undertaken by HillPDA in December 2015. The study recognised that the Bulahdelah residential market had performed poorly over the past couple of decades. However the proposal will be creating a new market in the locality that is not currently being met. It will be marketed as a “tree change” golf-course lifestyle. The closest example is Tallwood Village which is around 18km north of Forster. This estate is achieving around 20 house lot sales per annum with a wide range of prices from \$40,000 to \$220,000. Median price was \$100,000. The cheaper lots reflect sites with difficult typography whilst the more expensive lots are elevated with distant views including ocean views.

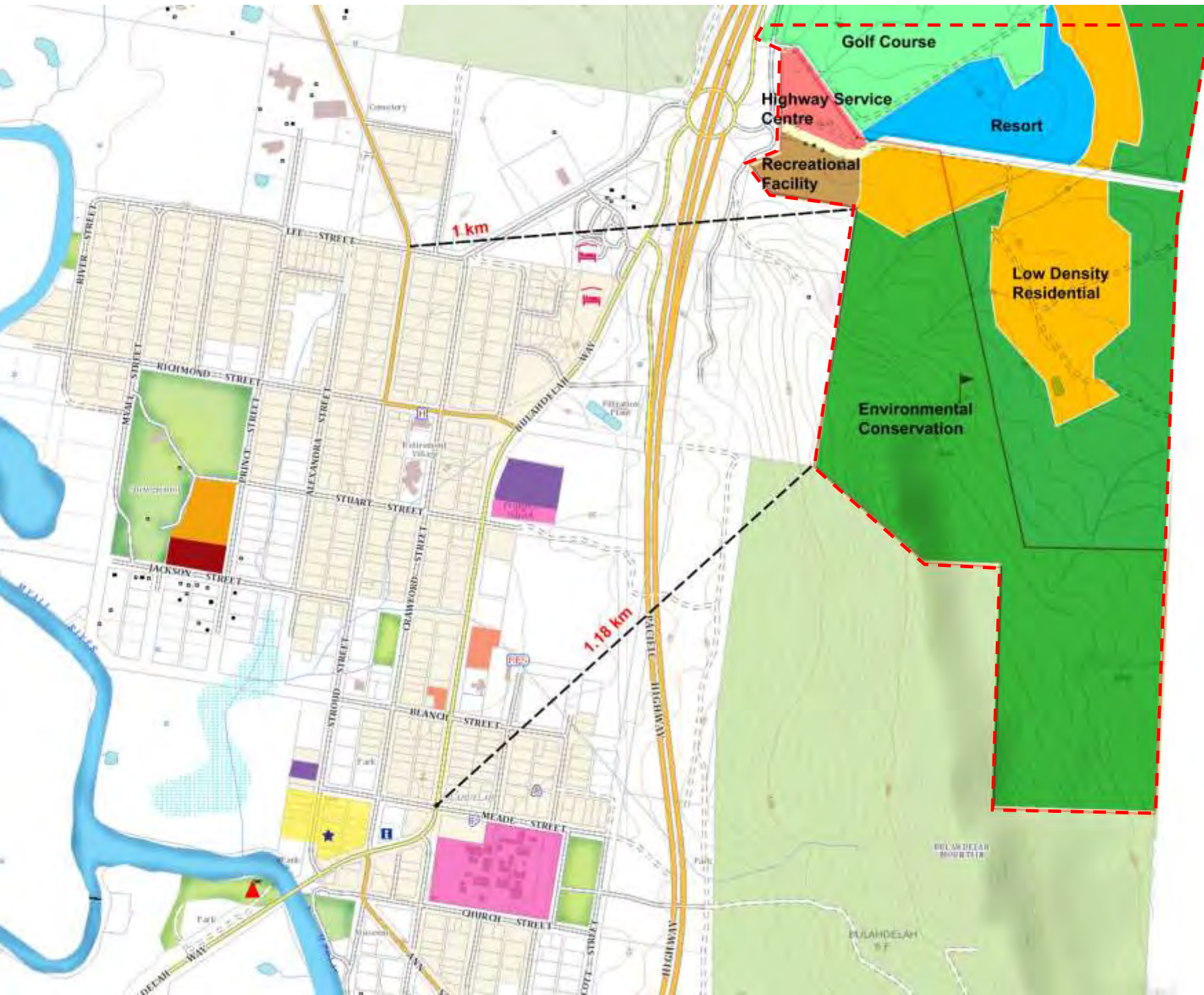
Page & Section	Content	Council Comments	HillPDA Comments in Reply
P27 Development investment	Total construction cost of the HSC, residential land, and hotel is estimated @ \$13 million. The Proposal, i.e. the HSC, is \$6 million.		Noted, but as stated above the purpose of the HillPDA report was to assess the economic impacts of the proposed development in its entirety – not just one component of it.
P27 Construction Employment	Construction of the HSC, residential land, and hotel is estimated to create 117 job years and support another 307 job years, and construction of housing an additional 220 job years directly and 473 job years indirectly.	Using crude proportioning of the figures stated in the EclS, the \$6m HSC will create 16 job years in construction, and 42.83 indirect jobs. The nature of employment estimates is that they estimate all jobs resulting from a development, no matter what the location. How many jobs will accrue to Bulahdelah is not provided, and is very difficult to estimate.	The source of construction labour varies from job to job and it's impossible to predict accurately. Nevertheless construction will provide benefits to the local economy even its limited to some level of consumption induced impacts. The impacts on the local economy can only be positive.
P28 Operational Employment	Construction of the HSC, residential land, and hotel is estimated to create 104 direct and 66 indirect jobs. Of these, 34 direct and 32 indirect jobs are estimated to be employed in the HSC, assuming there is 750 sqm of "retail" floor space.	Direct jobs are related to the specific development, while indirect jobs are those that support the development. It is not clear how many of the 34 direct and 32 indirect jobs will be created in the local area. The EclS provides no indication of any likely loss of employment from existing enterprises in Bulahdelah or other centres, as a result competition from the proposed HSC.	Jobs in operations are jobs located on site, within the boundaries of the statutorily defined locality of Bulahdelah.
P39 Tourism Benefits	A range of national, State and LGA tourism statistics re provided. Although it is not being part of the HSC, it is stated that additional capacity in the 4 star accommodation market will help attract new visitors to Bulahdelah.	No analysis is provided on tourism infrastructure/ attractions in Bulahdelah and the surrounding area and what strategies can be pursued by existing businesses and the proposed HSC to develop the tourism market, including local area improvements/place making	The issues raised by Council are not relevant to the assessment of the application.

Page & Section	Content	Council Comments	HillPDA Comments in Reply
P31 Visitor Expenditures	A discussion on visitor expenditures is provided which shows the expenditure of overnight visitors.	This is not relevant to the proposal, unless it leads to an increase in overnight stays in Bulahdelah, which has not been demonstrated/explored in the report.	The report states that the proposed hotel will generate around 20,000 visitor nights per annum. Expenditure generated by these visitors is a relevant matter for quantifying the overall economic impacts of the proposal.
P31 Expanded levels of household Spending	A discussion of the increase in expenditure by new local households as a result of additional residential development is provided.	This is only relevant to the wider development proposal- not the HSC.	Noted, but as stated above the purpose of the HillPDA report was to assess the economic impacts of the proposed development in its entirety – not just one component of it.
P32 Contribution to Gross Regional Product	It is stated that each person employed in the tourism sector generates approximately \$90,000 per annum towards the gross regional product (GRP). A figure is provided for the additional GRP generated.	The figure is provided by this is based on the wider development and not only on the HSC proposal. Furthermore, it is not clear how much of the additional GRP will be within the Bulahdelah economy and not in the wider economy.	The industry value added contributed by the hotel, and estimated at \$6.3m per annum, includes wages, taxes and earnings before depreciation, interest and amortisation. It is expressed as the contribution to the regional economy. It is impossible to forecast how many of the workers will be residing in Bulahdelah versus other nearby localities.
Potential Impact on Bulahdelah			
P32 Highway Service Centre	Discussion on the impact of the reduction in vehicle traffic through Bulahdelah as a result of the bypass. The EcIS states that it is unlikely that two service services will be viable in Bulahdelah irrespective of the development of a HSC. The EcIS states Bulahdelah town will be less attractive as a stop if both service stations close. It states that a HSC will provide an opportunity to capture new market share.	The narrative does not discuss the impact on the existing service stations should a HSC be established. Furthermore, there is no discussion of the impact on the existing retailers of the proposed food/retail outlets at the HSC, i.e. the impact on the Bulahdelah highway service town (HST).	The report does discuss the impacts on the service stations which is summarised in Table 10. It also states that the impact from the proposed HSC is highly unlikely to result in closure of either of the two existing outlets. It is possible that one of the existing stations could close but the biggest single cause of closure is the bypass itself and not the HSC. There may be some loss of trade to the existing food outlets in the main street resulting from the HSC – possibly as high as 15% based on Table 10 in the report. However this is an immediate impact. Given the growth in trade over time (just over 2% per annum) we would expect these businesses to return to their current trading levels over a period of say 6 years. Again if businesses are trading below the levels they use to trade at, the cause has been the bypass itself.

Page & Section	Content	Council Comments	HillPDA Comments in Reply
P33 Hotel	The EcIS states that the hotel will provide a point of difference to the existing accommodation in town because it is newer and offers higher grade accommodation.	This is not part of the HSC, and is related to the wider development. The assessment does not include the potential impact on the existing accommodation in Bulahdelah. There is no discussion of existing occupancy rates or trends. Trip Advisor comment on the existing accommodation is very positive.	The occupancy rate in Bulahdelah was stated on Page 25 as 42% which is low for NSW. However the proposal is to 4 star accommodation and accommodation for tour groups in Bulahdelah which is the point of difference with the existing motels. Hence the economic impact on the existing motels is not expected to be strong. Under a pessimistic scenario one of the existing motels could close but the subject proposal will more than make good for any loss. The benefits to Bulahdelah will easily outweigh the costs.
P33 Residential	The EcIS states that the increased population resulting from residential development on the wider site will increase retail trade in Bulahdelah.	This is not part of the HSC, and related to the wider development. Increased residential development will support retail trade and services in Bulahdelah.	Noted and agreed but as stated above the purpose of the HillPDA report was to assess the economic impacts of the proposed development in its entirety – not just one component of it.

Page & Section	Content	Council Comments	HillPDA Comments in Reply																																																																													
P33 Impact on Existing Service Centres	A “gravity model” is applied to identify the impact of the HSC on existing service centres (read: service stations). The model identified that the existing service stations in Bulahdelah would lose around 14% of their trade while most others would lose around 4-7%. The assessment postulates that it is not the proposed HSC that would lead to closures of existing service stations at Bulahdelah but rather the impact of the bypass itself. There is reference to the HSC potentially reducing “escape” expenditure from Bulahdelah	The centres at Karuah, Nabiac caravan park/former United, and “the Rock” are not included in Table 10 (which is consistent with Table 8 in any case). Furthermore, the assessment appears to focus on fuel sales and retail integrated with a service station, as distinct from the “highway service towns” of Bulahdelah and Coolongolook for example. This is a limited perspective on the impact of a new HSC and understates its impact. The concept of reducing “escape” expenditure from Bulahdelah should be further explored or detailed. Perhaps “escape” expenditure could be more adequately described as “capturing passing trade expenditure”. Escape expenditure is usually used in the context of local expenditure “leaking” to other centres, such as from local shops to supermarkets in a nearby larger centre.	<p>The petrol outlet in Karuah is 5km off the highway and competition with a HSC in Bulahdelah is insignificant and almost unmeasurable. The caravan park in Nabiac is an old single pump station almost 50km north of Bulahdelah. Again the impacts are insignificant and almost unmeasurable. The Rock at Viney Creek is a 4 pump United Petroleum outlet with a Subway and pie shop / road house café some 33km south of Bulahdelah. Its exclusion in the report was an oversight. The inclusion of the additional outlet will dilute the impacts a little on the other outlets documented in Table 10 of the report. The revised impact assessment is shown below.</p> <table border="1"> <thead> <tr> <th>Facility Name</th> <th>Address</th> <th>Distance from Subject Site</th> <th>Truck stop-over parking</th> <th>Immediate Impact*</th> <th>Shift in Trade 2016-28**</th> </tr> </thead> <tbody> <tr> <td>Coles Express, Bulahdelah</td> <td>22 Booloombay St, Bulahdelah***</td> <td>1.8km, South</td> <td>No</td> <td>-13%</td> <td>17%</td> </tr> <tr> <td>Mobil, Bulahdelah</td> <td>59 Booloombay St, Bulahdelah***</td> <td>1.8km, South</td> <td>No</td> <td>-13%</td> <td>16%</td> </tr> <tr> <td>Caltex Coolongolook</td> <td>Cnr Midge St & Pacific Hwy, Coolongolook</td> <td>28km North</td> <td>Yes</td> <td>-8%</td> <td>24%</td> </tr> <tr> <td>BP Coolongolook</td> <td>Pacific Highway, Coolongolook</td> <td>30km North</td> <td>No</td> <td>-7%</td> <td>24%</td> </tr> <tr> <td>Caltex Nabiac</td> <td>Pacific Highway, Coolongolook</td> <td>45km North</td> <td>No</td> <td>-7%</td> <td>25%</td> </tr> <tr> <td>Caltex, Glenthorne</td> <td>Old Bar Road, Glenthorne</td> <td>66km North</td> <td>Yes</td> <td>-6%</td> <td>27%</td> </tr> <tr> <td>Caltex, Raymond Terrace</td> <td>40 Richardson Rd, Raymond Terrace***</td> <td>73km South</td> <td>Possible</td> <td>-5%</td> <td>28%</td> </tr> <tr> <td>Shell, Heatherbrae</td> <td>290 Pacific Hwy</td> <td>80km South</td> <td>Yes</td> <td>-5%</td> <td>28%</td> </tr> <tr> <td>BP Connect, Heatherbrae</td> <td>2398 Pacific Hwy</td> <td>77km South</td> <td>Yes</td> <td>-5%</td> <td>27%</td> </tr> <tr> <td>7-11, Heatherbrae</td> <td>Pacific Hwy, Cnr Hank</td> <td>79km South</td> <td>No</td> <td>-4%</td> <td>29%</td> </tr> <tr> <td>United Petroleum, Viney Creek</td> <td>"The Rock"</td> <td>33km South</td> <td>Possible</td> <td>-7%</td> <td>24%</td> </tr> </tbody> </table>						Facility Name	Address	Distance from Subject Site	Truck stop-over parking	Immediate Impact*	Shift in Trade 2016-28**	Coles Express, Bulahdelah	22 Booloombay St, Bulahdelah***	1.8km, South	No	-13%	17%	Mobil, Bulahdelah	59 Booloombay St, Bulahdelah***	1.8km, South	No	-13%	16%	Caltex Coolongolook	Cnr Midge St & Pacific Hwy, Coolongolook	28km North	Yes	-8%	24%	BP Coolongolook	Pacific Highway, Coolongolook	30km North	No	-7%	24%	Caltex Nabiac	Pacific Highway, Coolongolook	45km North	No	-7%	25%	Caltex, Glenthorne	Old Bar Road, Glenthorne	66km North	Yes	-6%	27%	Caltex, Raymond Terrace	40 Richardson Rd, Raymond Terrace***	73km South	Possible	-5%	28%	Shell, Heatherbrae	290 Pacific Hwy	80km South	Yes	-5%	28%	BP Connect, Heatherbrae	2398 Pacific Hwy	77km South	Yes	-5%	27%	7-11, Heatherbrae	Pacific Hwy, Cnr Hank	79km South	No	-4%	29%	United Petroleum, Viney Creek	"The Rock"	33km South	Possible	-7%	24%
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P35 Other considerations	<p>The EclS refers to the benefits as a result of the wider development, such as enhanced retail and service facilities for local residents (as a result of demand from increased residential population).</p> <p>It also refers to improved local employment opportunities.</p>	<p>The HSC per se may decrease trade at existing businesses as a result of existing customers being attracted to the HSC's offerings.</p> <p>It may lead to additional trade in town if visitors could be attracted to Bulahdelah after stopping at the HSC. These issues are not explored in the EclS.</p> <p>Any loss of employment if existing businesses close as a result of lost trade to the proposed HSC is not examined, gross employment gain, not net employment gain is discussed.</p>	<p>As stated above there is the potential for some loss of employment in existing businesses although this is expected to be minor compared to the large increase in jobs in the proposed hotel and HSC. Again any loss in jobs in the existing businesses is as much, if not more, attributable to the bypass itself rather than the new hotel and HSC.</p>
P36 7. Conclusion	<p>The EclS states that the wider development (HSC, hotel and residential) would be expected to provide economic benefits for Bulahdelah and the LGA.</p> <p>Refers to the negative impacts of business of the bypass and that these impacts will reduce over time as a result of an increase in traffic on the Pacific Highway</p>	<p>The conclusion provides little detail on the impact of the HSC per se.</p> <p>It does not provide any detail on how any negative impacts on existing businesses can be minimised and or positive impacts maximised.</p> <p>The conclusion does not refer to impacts on other service centres or highway service towns.</p>	<p>As immediately above. The HillPDA report includes an assessment of the impacts on competing service centres and concludes that due to strong growth in trade over time those impacts will be short term.</p>



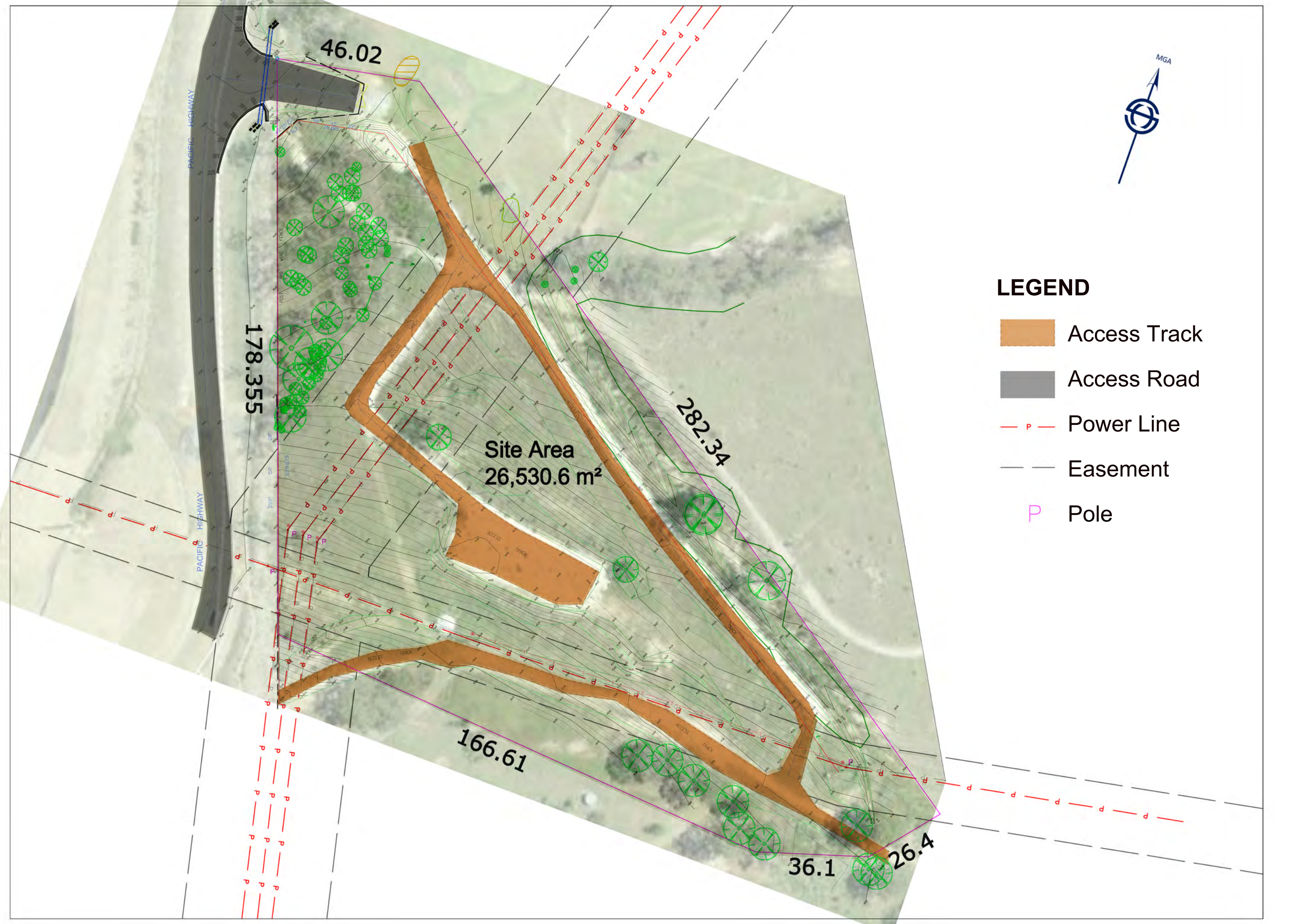
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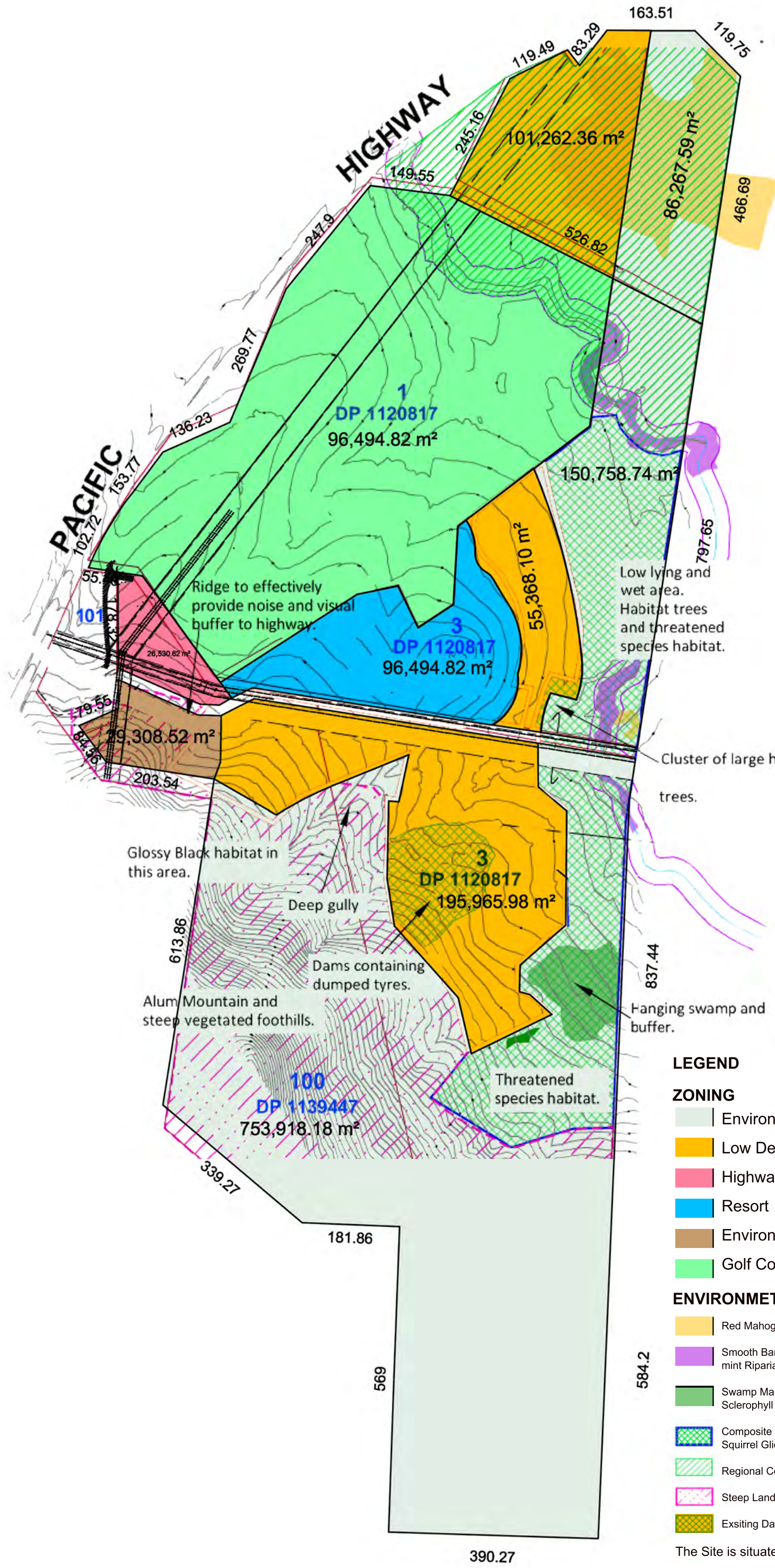
-  Subject site
-  Myall River
-  Park
-  Place of Worship
-  Entertainment facilities
-  Bowling Club
-  Restaurant and Cafes
-  Fuel Stations
-  Educational institutions
-  Hotels/Motels
-  Rest and Camping Area
-  IGA Bulahdelah
-  Police Station
-  Visitor and Information centre



LEGEND

-  Access Track
-  Access Road
-  Power Line
-  Easement
-  Pole





LEGEND

ZONING

- Environmental Conservation
- Low Density Residential
- Highway Service Centre
- Resort
- Environmental Recreation
- Golf Course

ENVIRONMENTAL SENSITIVE AREAS

- Red Mahogany/Paperback Swamp Sclerophy Forest
- Smooth Barked Apple/ Turpentine/ Sydney Peppermint Riparian Tell Forest
- Swamp Mahogany / Wet Health, Low Swamp. Sclerophyll Forest and Woodland
- Composite area for Eastern Pygmy Possum & Squirrel Glider Habitat
- Regional Corridor
- Steep Land
- Existing Dams

The Site is situated Bulahdelah Mountain Conservation Area