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Submission to the E3 Strategic Review draft report by Warringah Urban Fringe Association

7 August 2013

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Executive Summary

This is a generalised submission being submitted on behalf of WUFA's 152 members.

The Warringah Urban Fringe Association (WUFA) agrees with the proposed zonings of over 90% of the land in the deferred area in the draft Oxford Falls Valley and Belrose North Strategic Review.

WUFA disagrees with:

- 1) The methodology used which zones privately owned rural land (which is predominantly cleared) at Belrose East, Cromer, Oxford Falls and Frenchs Forest (BECOFFF) as E3.
- 2) Not having addressed the minimum lot size (that was put in place in 1974 as a temporary measure).
- 3) The twelve properties in Ingleside and Terrey Hills that were zoned as E3, not having been included in the Strategic Review.

We feel the strategic review has correctly zoned the properties shown as SP2, RU4 and R5, but has incorrectly zoned some properties as E3 which should have been RU4.

Appendix A of this submission contains the original zoning map (map 7) from the draft report which has been amended to show WUFA's proposed zonings (ie only a small area of E3 to be changed to RU4).

Earlier Submission

Included with this submission and forming part of it, is a copy of the submission made to the Strategic Review team by WUFA when the Strategic Review was first setup (ie prior to the draft report being produced). We have included this earlier submission with this submission because we would like it on the public record and it provides a very good summary of the situation and factual account of what the residents want. This earlier submission forms Appendix F of this report.

Background of WUFA

On 27 July 2011 there was a community meeting where all owners of land were invited to attend and discuss the proposed zoning of their land as E3. Our Local Member of Parliament, Local Councillors, staff from the Department of Planning, staff from Council and land owners affected by the E3 zoning were invited to attend. John Holman presented a summary of the E3 issues and then Malcolm Ryan (Deputy General Manager, Environment, Warringah Council) presented Council's position, followed by a presentation by Juliet Grant (Regional Director - Sydney Region East, Department of Planning). There were 150 landowners that attended this meeting. After all of the presentations, a vote was taken and 98% of landowners voted that E3 was not an appropriate zoning for their land.

Warringah Urban Fringe Association (WUFA) was formed soon after this meeting in August 2011. WUFA advocates for the views of all owners of land in the E3 area to be taken into consideration in deciding the correct zoning for all land in the proposed E3 area.

More Information on the points WUFA's disagrees with:

1. Methodology generally flawed

The Strategic Review states that its purpose is to carry out a translation from LEP2000, however a different methodology has been used to the original translation.

We find the fact that Duffys Forest and Terrey Hills have been translated to RU4 and Belrose East, Duffy's Forest, Oxford Falls, Cromer, Frenchs Forest (BECOFFF) have been translated to E3 inconsistent and inequitable.

Below we address various aspects of this issue:

a) Desired Future Character

A large part of the justification for zoning BECOFFF as E3 appears to be the fact that the "Desired Future Character Statements" from LEP2000 for these areas refer to protecting the Environment. One fact that appears to have been overlooked is the "Desired Future Character Statement" from LEP2000 for Duffys Forest and Terrey Hills is similar to that of BECOFFF (refer to Appendix B for the Locality Statements for the areas). The area of Duffys Forest and Terrey Hills that is zoned as RU4 is surrounded by National Park and appears far more suitable for an E3 zoning than BECOFFF. We ask that should this review continue to push with the flawed methodology, then the review must carry out the same evaluation process on the land at Terrey Hills and Duffys Forest as has been done on the deferred area.

b) Objectives of E3 not followed

The methodology used does not relate to the objectives of the E3 zoning. The current objective for E3 is "To protect, manage and restore areas with special ecological, scientific, cultural or aesthetic values." (refer to Appendix C). The primary and secondary constraints used in the draft Strategic Review are not all "special ecological, scientific, cultural or aesthetic values".

c) Translation not based on LEP2000 – Agricultural focus missed

Agriculture is the first permissible use under Category 2 in LEP 2000 (Refer to Appendix B for the Locality Statements) for the BECOFFF area. The E3 zone has no mention of agriculture or primary industry in the objectives (Refer to Appendix C). RU4's first objective is "To enable sustainable primary industry and other compatible land uses". Either R5 or RU4 zonings are a more closely aligned zoning to the LEP2000 zoning for the BECOFFF area.

d) Seniors Housing not translated properly

Seniors housing was a permissible use under Category 2 in LEP 2000 on land that adjoins urban areas. Seniors housing is prohibited under E3. The report states “Although the strategic review will not increase the development potential of land in the study area, it will ensure that the supply of land for housing is not reduced”. This is factually incorrect as Seniors housing goes from permissible to prohibited for land that adjoins urban areas for all E3 zoned areas.

e) Environmental Constraints not applied logically

Below lists the Primary and Secondary Constraints used in the report’s analysis:

Primary Environmental Constraints Assessment

- Riparian
- Significant Vegetation
- Wetland Buffers
- Slope
- Designated Wildlife Corridor or Core Habitat
- Flooding
- Acid Sulfate Soils
- Threatened Species Habitat

Secondary Infrastructure and Environmental Constraints Assessment

- Cultural heritage
- Bushfire
- Proximity to centres
- Proximity to public transport
- Availability to connect to water and sewer and electricity
- Telecommunications Buffer
- Riparian Corridor
- Significant Vegetation
- Wildlife Corridor and Core Habitat
- Threatened Species
- Flooding
- Wetland Buffers

The constraints in Red above were used in both the primary and the secondary analysis. This means the weighting applied is effectively used twice providing an illogical outcome.

f) Inaccuracy of Constraints

The information used to carry out the Environmental Constraints is inaccurate. As an example of the inaccuracy of data, when Warringah Council put a riparian land report on public exhibition in 2010, the author noticed his land was shown as having riparian land on it. At the author’s request Adrian Turnbull, Senior Environment Officer Natural Environment, Warringah Council carried out a site visit on 1st September 2010. Adrian inspected the property and concluded there was no

riparian land on the author's property. He advised that the Riparian Land map would be amended as soon as possible. The author's property (Site ID: A5) is still shown on the maps as having Riparian land on it. It has been given a Riparian rating of 3 instead of zero. This caused the author's land to be cross hatched in light blue on the secondary constraints analysis map.

Despite this inaccuracy the author's land was correctly zoned as R5, but this information shows the inaccuracy of the base data used.

g) Inaccuracy of the Site Analyses

Many of the site analyses are inaccurate. As an example, the site analysis for 66 Northcott Rd, Cromer has the following inaccuracies (refer to Appendix D for the Site Analysis for this property):

1. Land adjoins seven residential properties (not noted)
2. Owner – Private (not noted)
3. Vegetation Bushland - ticked, percentage cleared listed as 10% (inaccurate as it is closer to 80% cleared)
4. Building onsite- none (nothing ticked, ignores the fact that there are two buildings on site).
5. Use of site- none (nothing ticked, this site was a quarry up until 1985 and currently has two dwellings on it)

A large number of properties in BECOFFF areas are used for Agriculture, but very few of the Site Analyses reflect this fact.

h) Data used has not been presented to Council or adopted

Page 64 of the draft report, when outlining the status of the data source for the constraints used in the analysis, states "Data has not been presented to Council for adoption and does not form part of Council's development controls". This is the same for the following constraints:

- Significant Vegetation
- Designated Wildlife Corridor or Core Habitat
- Threatened Species Habitat

These constraints all carry a very high weighting in the analysis. Information that has not been presented to Council or does not form part of Council's development controls must not be used to draw conclusions from.

i) Data not based on scientific research

WUFA requested from the Department of Planning (using GIPA) that the scientific basis for the various constraints used in the draft report be provided. No information has been provided by the Department of Planning, leaving us to draw the conclusion that there is no scientific basis for the constraints used in the report.

j) Data not from robust data sources and analysis

LEP practice note for Standard Instrument for LEPs issued by the Department of Planning – Standard Zones (PN 09–002; 30 April 2009) identifies that:

“Prior to applying the relevant zone, the environmental values of the land should be established, preferably on the basis of a strategy or from an environmental study developed from robust data sources and analysis. This is particularly important where land is identified as exhibiting high ecological, scientific, cultural or aesthetic values outside national parks and nature reserves”

As outlined in points f, g, h & i above, the environmental values have not been established *“from an environmental study developed from robust data sources and analysis”*, so cannot be used as a basis for an E3 zoning.

k) Proximity to Key Centres

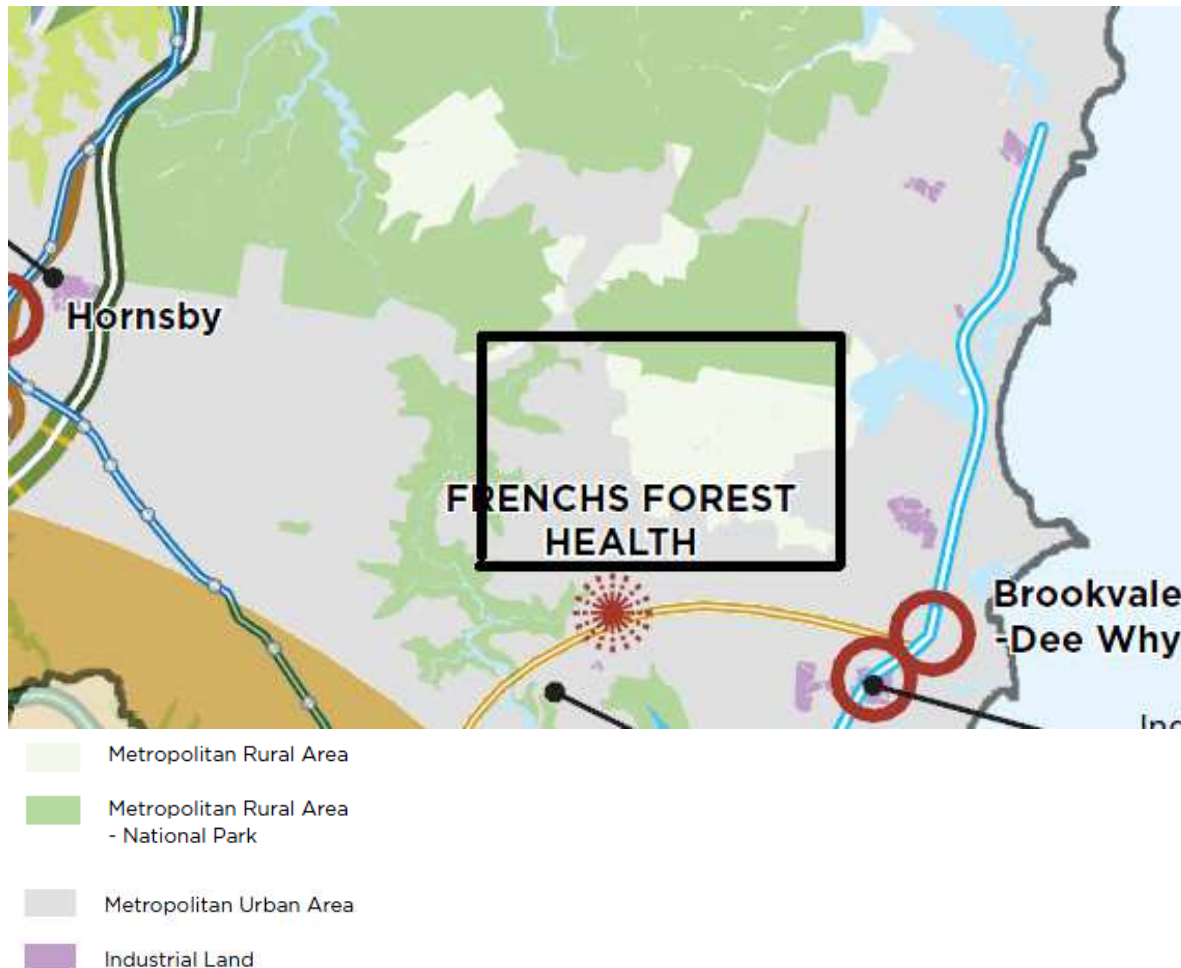
Page 7 of the draft report states “Although the aim of this strategic review is to identify development controls that most closely reflect existing planning controls for the area, it is important to note that the area is relatively isolated from key centres which provide jobs and services”. This is untrue.

One of Warringah Council’s three key employment hubs within the Warringah Local Government area is Austlink Business park which is located in Belrose and adjoins the deferred area. The new Northern Beaches Hospital will be located approximately 2 kilometres from the deferred area. Contrary to this statement, the deferred area is very close to key centres, and as stated in the draft report this fact “is important to note”.

l) Land identified as non-urban in the Draft North East Subregional Strategy

Page 7 of the draft report states “Oxford Falls Valley and Belrose North are identified in the draft Strategy as non-urban land”. This is not true

Below is the map from the Draft North East Subregional Strategy (the Black rectangle represents the Map 7 region):



The whole of Belrose North and other large areas of the deferred area are classified as “Metropolitan Urban Area” in the Draft North East Subregional Strategy.

It is interesting to note that all of Duffys Forest and some of Terrey Hills is classified as “Metropolitan Rural (ie Non –Urban) in the Draft North East Subregional Strategy.

m) Proximity to Telecommunications buffer used as a secondary constraint

Proximity to telecommunications facilities was not used in the translation process from LEP2000 to LEP2011, and we can find no justification for using it now.

n) The draft report has worked backwards to achieve the zoning that Warringah Council sought

It appears that this report has found a methodology that suits the outcome that Warringah Council was after (ie zoning the BECOFFF area as E3), rather than apply a consistent and logical methodology to the Strategic Review to provide fair and equitable zonings for all properties.

The submission by WUFA dated 2 December 2012 (Appendix F of this submission) outlines the process Warringah Council has gone through to try and have the Oxford Falls Valley and Red Hill Areas zoned as E3. It can be seen from this history that Warringah Council is driven to have these areas zoned as E3 without any justification for it. Residents of the BECOFFF areas are relying on the integrity of this Strategic Review process to ensure zoning is done in a factual, consistent, equitable manner which has integrity.

2. Minimum Lots Sizes

The report states:

Page 26 of the draft report states “The density control was developed in 1974 under an Interim Development Order 51 to respond to the water quality issues of the Narrabeen Lagoon Catchment impacted on by the residential development in the 1960s and 1970s within the study area. Revising the density control within the study area is therefore premature until water quality impacts for the catchment is considered in detail”.

Three issues:

- 1) A lot of this land does not drain to Narrabeen Lagoon.
- 2) Why spend all of this time and effort doing a strategic review if you don’t revise the density controls (which were meant to be revisited in 6 months from 1974)
- 3) The Water Quality Study has been done (The report is titled “Warringah Non Urban Lands Study Stage 2 – Impacts on Water Quality of Narrabeen Lagoon” and forms Appendix E of this submission).

The conclusion of the Water Quality Study was:

“CONCLUSIONS

It has been determined that development of the areas identified as suitable from Stage 1 of the NULS (PPK, 2000), which drain to Narrabeen Lagoon, can be undertaken without a subsequent reduction in water quality in Narrabeen Lagoon, and in most cases an increase in water quality can be achieved.”

The minimum lot size for all land in the deferred area must properly addressed.

3. Ingleside and Terrey Hills

When the Minister for Planning (Brad Hazzard) deferred the E3 area from LEP2009, we believe the whole E3 area should have been deferred. Instead only the localities of Oxford Falls Valley and Belrose North were deferred. This left approximately 12 properties in Ingleside and Terrey Hills that were zoned E3 in WLEP2011 where property owners did not want to be zoned E3.

We believe this was either a simple oversight because the E3 area is often referred to as affecting Oxford Falls and Belrose North, or an active attempt to devalue the properties so Warringah Council could purchase them (Some of the properties in the area at Ingleside have already been purchased by Warringah Council to allow expansion of Kimbriki Tip). This issue effects the following properties:

- five (5) lots along the Southern side of Mona Vale Road, Terrey Hills
- two (2) lots in Kamber Road, Terrey Hills and
- five (5) lots in Kimbriki Road, Ingleside.

Below is a map showing that the two sides of Kimbriki Road are zoned differently (SP2 for Council owned land and E3 for privately owned land):



The above properties should be analysed for correct zoning as part of the E3 Strategic Review process.

Public Consultation and Transparency

The draft report for the E3 Strategic Review for Oxford Falls and Belrose North was on public exhibition from 22 June to 7 August 2013. On 23 June 2013, WUFA requested further information be made available (This information included the maps of environmental constraints and the site analysis of the properties which were used in the draft report). Rather than provide this information through either public or informal disclosure, the Department of Planning advised WUFA that we had to apply through GIPA (Government Information [Public Access] Act 2009, the replacement of the Freedom of Information Act). WUFA formally applied for this information through GIPA and received the first of it on Friday 19 July 2013 (4 weeks after we first asked for the information). Some of the information (the environmental constraints maps and the site analysis) that we requested was subsequently publicly exhibited on the Department of Planning's website. All of the information that WUFA requested is of public interest and seeks only to increase the transparency of the process.

The fact that source documents used to formulate the report had to be requested, they took so long to be supplied, and there was no extension granted to the exhibition period are all a poor reflection on the transparency and integrity of the process.

We have not had adequate time to review the information and have been unfairly disadvantaged by the source documents being released four weeks after the draft report.

[illegible]

Appendix B – Locality Statements from LEP 2000

B.1 Locality Statement from LEP2000 for Terrey Hills and Duffys Forest

LOCALITY A2 BOORALIE ROAD

DESIRED FUTURE CHARACTER

The Booralie Road locality will remain a non-urban area consisting of detached style housing in distinctly non-urban settings and occasionally low intensity, low impact business or community uses that are compatible with non-urban nature of the locality and predominant scale of existing development.

The impact of new development on views from the adjacent National Park will be minimised by the use of articulated building forms, generous landscaped spaces around buildings and building materials that blend in with the colours and textures of the natural landscape.

Emphasis will be given to protecting and where possible enhancing the natural landscape, including landforms and vegetation. The increased planting of indigenous canopy trees will be strongly encouraged.

LAND USE

Category One

Development for the purpose of the following:

- housing
- agriculture

Category Two

Development for the purpose of the following:

- animal boarding or training establishments
- child care centres
- community facilities
- health consulting rooms
- housing for older people or people with disabilities (on land described in the initial paragraph (b) under the heading “Housing density” below)
- retail plant nurseries
- veterinary hospitals
- other buildings, works, places or land uses that are not prohibited or in Category 1 or 3.

B.2 Locality Statement from LEP2000 for Oxford Falls Valley

LOCALITY B2 OXFORD FALLS VALLEY

DESIRED FUTURE CHARACTER

The present character of the Oxford Falls Valley locality will remain unchanged except in circumstances specifically addressed as follows.

Future development will be limited to new detached style housing conforming with the housing density standards set out below and low intensity, low impact uses. There will be no new development on ridgetops or in places that will disrupt the skyline when viewed from Narrabeen Lagoon and the Wakehurst Parkway.

The natural landscape including landforms and vegetation will be protected and, where possible, enhanced. Buildings will be located and grouped in areas that will minimise disturbance of vegetation and landforms whether as a result of the buildings themselves or the associated works including access roads and services. Buildings which are designed to blend with the colours and textures of the natural landscape will be strongly encouraged.

A dense bushland buffer will be retained or established along Forest Way and Wakehurst Parkway. Fencing is not to detract from the landscaped vista of the streetscape.

Development in the locality will not create siltation or pollution of Narrabeen Lagoon and its catchment and will ensure that ecological values of natural watercourses are maintained.

LAND USE

Category One

Nil

Category Two

Development for the purpose of the following:

- agriculture
- housing
- housing for older people or people with disabilities (on land described in paragraph (c) under the heading "Housing density" below)
- other buildings, works, places or land uses that are not prohibited or in Category 1 or 3.

LOCALITY C8 BELROSE NORTH

DESIRED FUTURE CHARACTER

The present character of the Belrose North locality will remain unchanged except in circumstances specifically addressed as follows.

The natural landscape including landforms and vegetation will be protected and, where possible, enhanced. Buildings will be grouped in areas that will result in the minimum amount of disturbance of vegetation and landforms and buildings which are designed to blend with the colours and textures of the natural landscape will be strongly encouraged.

Development will be limited to new detached style housing conforming with the housing density standards set out below and low intensity, low impact uses

A dense bushland buffer will be retained or established along Forest Way. Fencing is not to detract from the landscaped vista of the streetscape.

Development in the locality will not create siltation or pollution of Middle Harbour.

LAND USE

Category One

Development for the purpose of extractive industries (on land covered by Licence Number 64/193 Metropolitan, Belrose – Warringah Gravel and Stone Supplies).

Category Two

Development for the purpose of the following:

- agriculture
- housing
- housing for older people and people with disabilities (on land described in initial paragraph (b) under the heading "Housing density" below)
- other buildings, works, places or land uses that are not prohibited or in Category 1 or 3.

Appendix C - Land use for LEP2011 Zonings

Land use for RU4 Zoning

Warringah Local Environmental Plan 2011 » Land Use Table

Zone RU4 Primary Production Small Lots

1 Objectives of zone

- To enable sustainable primary industry and other compatible land uses.
- To encourage and promote diversity and employment opportunities in relation to primary industry enterprises, particularly those that require smaller lots or that are more intensive in nature.
- To minimise conflict between land uses within this zone and land uses within adjoining zones.
- To minimise the impact of development on long distance views of the area and on views to and from adjacent national parks and bushland.
- To maintain and enhance the natural landscape including landform and vegetation.
- To ensure low intensity of land use other than land uses that are primary industry enterprises.
- To maintain the rural and scenic character of the land.

2 Permitted without consent

Home-based child care; Home occupations

3 Permitted with consent

Animal boarding or training establishments; Aquaculture; Bed and breakfast accommodation; Building identification signs; Business identification signs; Child care centres; Community facilities; Dwelling houses; Environmental protection works; Extensive agriculture; Farm buildings; Home businesses; Home industries; Intensive plant agriculture; Landscaping material supplies; Plant nurseries; Recreation areas; Respite day care centres; Roads; Roadside stalls; Rural supplies; Veterinary hospitals

4 Prohibited

Any development not specified in item 2 or 3

Land use for E3 Zoning

Warringah Local Environmental Plan 2011 » Land Use Table

Zone E3 Environmental Management

1 Objectives of zone

- To protect, manage and restore areas with special ecological, scientific, cultural or aesthetic values.
- To provide for a limited range of development that does not have an adverse effect on those values.
- To ensure that development, by way of its character, design, location and materials of construction, is integrated into the site and natural surroundings, complements and enhances the natural environment and has minimal visual impact.
- To protect and enhance the natural landscape by conserving remnant bushland and rock outcrops and by encouraging the spread of an indigenous tree canopy.
- To protect and enhance visual quality by promoting dense bushland buffers adjacent to major traffic thoroughfares.

2 Permitted without consent

Home-based child care; Home occupations

3 Permitted with consent

Aquaculture; Bed and breakfast accommodation; Building identification signs; Business identification signs; Community facilities; Dwelling houses; Emergency services facilities; Environmental facilities; Environmental protection works; Extensive agriculture; Farm buildings; Home businesses; Home industries; Horticulture; Recreation areas; Roads

4 Prohibited

Industries; Multi dwelling housing; Residential flat buildings; Retail premises; Seniors housing; Service stations; Warehouse or distribution centres; Any other development not specified in item 2 or 3

Appendix D – Site Analysis for 66 Northcott Rd, Cromer



Planning &
Infrastructure



Warringah
Council

OXFORD FALLS VALLEY & BELROSE NORTH STRATEGIC REVIEW SITE ANALYSIS

Date: 12/12/12 Precinct: F SITE ID: 5
 Property Address: 66 Northcott Lot/DP:
 Inspection Officers: Contact: No
 Owner's consent to access land: ☐ Yes ☒ No Owner(s) present ☐ Yes ☒ No
 Left calling card? ☒ Yes ☐ No

DESKTOP ANALYSIS		Verified on site (Y/N)
Owner <input type="checkbox"/> Private <input type="checkbox"/> Warringah Council <input type="checkbox"/> Commissioner for Roads <input type="checkbox"/> Metropolitan LALC <input type="checkbox"/> Minister for Education <input type="checkbox"/> Ausgrid <input type="checkbox"/> Minister Administering the Sporting Venues Management Act <input type="checkbox"/> Optus <input type="checkbox"/> State Planning Authority <input type="checkbox"/> Sydney Water Corporation <input type="checkbox"/> Crown Land <input type="checkbox"/> Telstra <input type="checkbox"/> NSW Electricity Transmission Authority		
Adjoins an urban area <input type="checkbox"/> Yes <input type="checkbox"/> No Adjoins bushland <input type="checkbox"/> Yes <input type="checkbox"/> No		
Vegetation <input checked="" type="checkbox"/> Bushland <input type="checkbox"/> cleared paddocks Percentage cleared (10%) <input type="checkbox"/> Other Rock!		
Proximity to a telecommunications facility <input type="checkbox"/> < 500m <input type="checkbox"/> 500-1,000m <input type="checkbox"/> 1,000-1,500m <input type="checkbox"/> 1,500-2000m <input checked="" type="checkbox"/> >2,000m		
Environmental Constraints <input checked="" type="checkbox"/> No env. Constraints (3%) <input type="checkbox"/> Moderate (3%) <input checked="" type="checkbox"/> Significant (46%) <input checked="" type="checkbox"/> Severe (4%) <input type="checkbox"/> Prohibitive (4%) <input checked="" type="checkbox"/> Bushfire 4% <input type="checkbox"/> Heritage 1%		
SITE VISIT ANALYSIS		
Building on site <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unable to determine Construction underway		
Type of buildings on site (if applicable) <input type="checkbox"/> Dwelling (Seniors, attached, detached) <input type="checkbox"/> Utilities e.g. sub station, satellite dishes <input type="checkbox"/> Domestic outbuildings <input type="checkbox"/> Storage <input type="checkbox"/> Agricultural <input type="checkbox"/> Educational <input type="checkbox"/> Commercial <input type="checkbox"/> Other		
Use of site <input type="checkbox"/> Residential <input type="checkbox"/> Rural <input type="checkbox"/> Commercial <input type="checkbox"/> Educational <input type="checkbox"/> Industrial <input type="checkbox"/> Infrastructure <input type="checkbox"/> Retail <input type="checkbox"/> Mixed <input type="checkbox"/> Other		
Additional comments/ observations Rock outcrops throughout v. steep		

Appendix E - Warringah Non Urban Lands Study Stage 2 – Impacts on water quality on Narrabeen Lagoon

See separate attached document

Appendix F – WUFA’s submission to the Strategic Review committee (prior to the draft report being created)

See separate attached document