ORDINARY MEETING
9 OCTOBER 2019

SUBMISSION ON THE CAIRNS SOUTH STATE DEVELOPMENT AREA DRAFT DEVELOPMENT SCHEME AND PROPOSED EXPANSION

Sean Lisle | 8/26/48 | #6188696

RECOMMENDATION:

That Council:

1. Makes the submission to the Coordinator General on the Cairns South State Development Area Draft Development Scheme and Proposed Expansion; and

2. Delegates authority to the Chief Executive Officer in accordance with the Local Government Act 2009 to finalise any and all matters associated this submission.

EXECUTIVE SUMMARY:

The Coordinator-General is undertaking public consultation on the Cairns South State Development Area (SDA) draft Development Scheme and proposed expansion.

Since declaration of the SDA in November 2017, the Coordinator-General has undertaken further planning and infrastructure analysis for the Cairns South SDA.

A potential expansion of the Cairns South SDA is proposed that includes 332Ha of land around the Mulgrave Mill at Gordonvale to support the Mill in its business diversification plans and the sugar industry in general.

A draft development scheme has been prepared which addresses both the SDA and potential expansion. The draft development scheme has been prepared by the Coordinator-General to regulate development in an SDA.

The submission details Council’s position on the following items:

- Support for the proposed expansion of the Cairns South SDA;
- Further information required on the proposed timing, staging and sequencing of development of the SDA;
- Greater clarification provided on the nature and scale of proposed SDA uses;
- Further information on infrastructure provision and costs to support the development of the SDA; and
- The development application process.
In particular, the submission supports the proposed expansion of the Cairns South SDA to facilitate MSF Sugar’s significant development and diversification in the region over the next decade. The submission, however, raises serious concerns about the uses proposed directly competing with privately owned and zoned industrial land in the region. Concerns are also raised about the lack of infrastructure planning and financial analysis to support the SDA as this could lead to a significant cost shift to Local Government and the ratepayers of Cairns.

**BACKGROUND:**

An early 2017 industrial land study undertaken by the Queensland Government concluded that:

- There is a shortfall in existing industrial land beyond 2036; and
- There is a need to provide additional industrial land in the Region; and
- Identified a suitable site to the south of Cairns.

Council at the time commissioned an independent peer review of the study. The independent peer review rejected the expected shortfall in industrial land and stated that there is industrial land supply to cater for demand to 2092.

In July 2017, the potential Cairns South SDA was proposed. At the Ordinary Meeting of 23 August 2017, Council endorsed the lodgement of a submission of the potential SDA. The submission stated that whilst Council supported State investment into Cairns, the SDA is in an unsuitable location; there is no demonstrated need for the SDA and the SDA can be alternatively accommodated on appropriately zoned land in the Region.

In November 2017, the Coordinator-General declared the Cairns South SDA. The SDA is approximately 840Ha of primarily agricultural land located to the east of the Bruce Highway between Edmonton and Wrights Creek, as shown on the map below.
The purpose of the SDA is to provide land for regionally significant industrial development.

Since declaration, the Coordinator-General has undertaken further planning and infrastructure analysis for the Cairns South SDA.

The Coordinator-General is proposing a potential expansion of the Cairns South SDA that includes 332Ha of land around the Mulgrave Mill at Gordonvale to support the Mill in its business diversification plans and the sugar industry in general.

A draft development scheme has been prepared which addresses both the SDA and potential expansion. The draft development scheme has been prepared by the Coordinator-General to regulate development in an SDA.

The draft development scheme:
- identifies the area regulated by the development scheme;
- states the matters or things a development application will be assessed against, including the:
  - strategic vision for the SDA;
  - overall objectives for development in the Cairns South SDA; and
  - preferred development intent for each development precinct and the assessment criteria.

The draft development scheme also contains a framework and processes for making, assessing and deciding development applications.

The public consultation period closes on 11 October 2019.

**COMMENT:**

Attachment 1 to this report contains Council’s submission on the on the draft development scheme and proposed expansion of the Cairns South SDA.

The submission details Council’s position on the following items:
- Support for the proposed expansion of the Cairns South SDA;
- Further information required on the proposed timing, staging and sequencing of development of the SDA;
- Greater clarification provided on the nature and scale of proposed SDA uses;
- Further information on infrastructure provision and costs to support the development of the SDA; and
- Confirmation of Council’s involvement in the development application process.
Support for the proposed expansion of the Cairns South SDA

The proposed expansion of the Cairns South SDA is supported.

The sugar cane industry represents a key driver for the regional economy.

MSF Sugar (MSF) has a significant development and diversification program for its sugar mills in Queensland, including a $600M investment over the next decade into cogeneration plants at its mills, as well as process upgrades to improve efficiency and implement current technologies. The proposed SDA expansion facilitates MSF’s plans.

Attachment 2 to this report contains the proposed Cairns South SDA development precinct plan, including the proposed expansion area. The plan identifies a 37Ha Mulgrave Mill Industry Precinct to provide land for a cogeneration plant and accommodate other development that relies on the Mill's products or by-products. Future expansion of the Mulgrave Mill Industry Precinct to the north-east of that precinct and east of the cane rail line to Highleigh Road (currently within the Rural Zone in the SDA) has been indicated to facilitate the long-term to support the future diversification of the Mulgrave Mill and associated industries.

The plan also identifies a 10Ha Transport and Support Services Precinct to support the operation and potential future expansion of sugar processing and cane transportation activities associated with the Mulgrave Mill.

The proposed expansion of the Cairns South SDA, and MSF’s investment supports a more robust and diversified sugar industry and, therefore a more robust and diversified regional economy.

Proposed timing, staging and sequencing of development of the SDA

Further information is required in the draft development scheme on the proposed timing, staging and sequencing of development of the SDA.

The purpose of the SDA is to support the medium to long-term industrial needs of the region. Other than the statement that the development of the SDA is to occur in a logical sequence, the draft development scheme provides no details on any timing, staging and sequencing of development within the SDA.

It is recommend that details are included in the draft development scheme that:

- prioritises the development of the Mulgrave Mill Industrial Precinct, so that it aligns with MSF’s timing for their plans; and

- development within the SDA (other than within the expansion area) only occurs when there is a demonstrated need for land within the SDA for a use that cannot be accommodated elsewhere in the region (this could include for example: including a market need or threshold for the commencement of development under the development scheme).
Providing the further information in the draft development scheme on the proposed timing, staging and sequencing of development of the SDA ensures that the development of the SDA aligns with industrial needs of the Region and avoids competition with private business and existing approvals.

**The nature and scale of proposed SDA uses**

Greater clarification on the nature and scale of proposed land uses within the SDA is required, to ensure that the development of the SDA aligns with industrial needs of the Region and avoids competition with private business and existing approvals.

The draft development scheme identifies preferred development intent (including preferred uses) for each development precinct. The draft development scheme uses standard planning use definitions to identify preferred uses within the SDA. This creates uncertainty around the uses that may be established within the SDA. A number of uses may fall within a standard planning use definition and not all defined uses are appropriate within the SDA. It is recommended that the draft development scheme identify specific and targeted land uses for preferred development within the SDA.

The preferred development intent in the draft development scheme for the Intermodal Transport Precinct is clear, as freight terminal and transport depot are identified as preferred uses in the precinct.

There is uncertainty in the preferred development intent for development in the High and Medium Impact Industry precincts, which occupies the majority of the developable area of the SDA (approximately 220Ha).

The draft development scheme states that development in these precincts must be for regionally significant industrial uses that align with the Queensland Government’s priority sectors. However, standard land use planning definitions for high and medium impact industry include the following land uses, for example: concrete batching plants, engineering, spray-painting, cabinet-making workshops. These uses are generally not regionally significant industrial uses and do not align with the Queensland Government’s priority sectors. It is recommended that the draft development scheme identify specific and targeted land uses for preferred development within the SDA.

The draft development scheme also identifies minimum lot sizes for land within the SDA. It is understood the scale of industrial development promoted within the SDA is such that requires larger lot sizes. A review of the minimum lots sizes to ensure that the SDA provides adequate land to accommodate the intended uses and does not compete with existing zoned industrial land within the Region is recommended.

It is also noted that the draft development scheme may reduce the ability for existing residents located within the SDA to undertake some ‘as of right uses’ to ensure that existing or future industrial uses in the Cairns South SDA are not compromised.
Infrastructure provision and costs

It is essential that the infrastructure requirements associated with the SDA are known in full prior to development of the SDA commencing.

The SDA, including the expansion area, is located outside of any planned infrastructure networks, including the Priority Infrastructure Area. Council’s financial forecasts do not allocate any funds for the provision of infrastructure to support the SDA.

Council officers have provided feedback on a draft Infrastructure Analysis undertaken by the State for the SDA to date. There is still significant uncertainty regarding the infrastructure requirements associated with the SDA.

There are significant infrastructure requirements to enable development to commence in the SDA and the timing, staging and sequencing of development of the SDA is highly dictated by the preferred infrastructure servicing strategy.

For example, the wastewater infrastructure servicing solution identified for the Mulgrave Mill Industry Precinct involves connection of sewage services to the Edmonton Wastewater Treatment Plant (WWTP). In order to ensure that this solution is feasible, infrastructure is required to be in place (from Gordonvale to the Edmonton WWTP), prior to activation of the Mulgrave Mill Industry Precinct. This represents a considerable investment in infrastructure prior to development occurring.

Any infrastructure requirements associated with the SDA should not consume any planned for capacity within Council’s networks. Any impacts on Council’s planned infrastructure networks needs to be identified and provided for by the State.

Consideration also needs to be given to infrastructure connections through and to areas surrounding the SDA. In particular road connections to Edmonton Business and Industry Area, Gordonvale and to the Mount Peter residential area.

The development application process

The draft development scheme also contains a framework and processes for making, assessing and deciding development applications.

The Coordinator-General will assess and decide applications involving: material change of use, reconfiguring a lot and operational works. The development application process includes a referral stage, where the Coordinator-General may refer the application to a referral entity to assess the application or seek technical advice about any element of an application. The draft development scheme identifies Cairns Regional Council as an example of a referral entity.
The draft development scheme should identify Council as a referral entity and state mandatory referral requirements for development applications, to give Council certainty about its involvement in the development of the SDA.

**OPTIONS:**

That Council:

1. Makes the submission to the Office of the Coordinator General on the draft Development Scheme and proposed expansion of the Cairns South State Development Area; and

2. Delegates authority to the Chief Executive Officer in accordance with the Local Government Act 2009 to finalise any and all matters associated this submission.

OR

That Council does not make the submission to the Office of the Coordinator General on the draft Development Scheme and proposed expansion of the Cairns South State Development Area.

**CONSIDERATIONS:**

**Risk Management:**

There is risk to Council, private business and the wider community associated with the Cairns South SDA.

Council’s position generally in relation to the risk associated with the Cairns South SDA is that the development of the SDA must align with industrial needs of the Region and avoid competition with private business and existing approvals.

**Council Finance and the Local Economy:**

The financial impacts on Council associated with the potential Cairns South SDA remain unknown. Further information is required to fully understand any requirements and impacts on Council.

The Infrastructure Analysis prepared by the State estimates the cost to provide infrastructure to service the SDA is significant. The analysis, however, is currently incomplete so the full cost is not known.

Council’s financial forecasts do not allocate any funds for the provision of infrastructure to support the SDA. Further details are required to be provided in relation to the infrastructure requirements associated with the development of the SDA, including any impacts on Council’s prioritisation and capital expenditure in the future.
Community and Cultural Heritage:

The draft development scheme includes provisions relating to community and cultural heritage. Any impacts on community and cultural heritage values associated with development of the SDA is undertaken and managed in accordance with current best practice.

Natural Environment:

The draft development scheme includes provisions relating to the natural environment. Development is to be located, designed and operated to avoid adverse impacts on environmental values. Where adverse impacts cannot be avoided, impacts are minimised, mitigated or offset.

Corporate and Operational Plans:

The purpose of the SDA is to provide employment opportunities and strengthen the regional economy associated with the potential SDA is consistent with the strategic objectives of Councils Corporate Plan 2017 – 2022 in relation to supporting a strong and diverse economy.

However, the development of the SDA must align with industrial needs of the Region and avoid competition with private business and existing approvals.

Statutory:

The Coordinator-General is responsible for the planning, establishment and ongoing management of SDA’s throughout Queensland.

An SDA is an area of land declared under the State Development and Public Works Organisation Act 1971 (SDPWO Act) for industry, infrastructure corridors and major public works. Planning and development within an SDA is controlled through a development scheme, which is a regulatory document prepared in accordance with the SDPWO Act.

The Coordinator-General will assess and decide development applications for the SDA. The draft development scheme should identify Council as a referral entity and state mandatory referral requirements for development applications, to give Council certainty about its involvement in the development of the SDA.

Policy:

The Coordinator-General is responsible for the planning, establishment and ongoing management of the Cairns South SDA. However, it is important to fully understand any requirements and impacts on Council associated with the development of the SDA.
CONSULTATION:

Council has been consulted in the development of the SDA, the draft development scheme and infrastructure analysis.

Council officers from the Water and Waste, Infrastructure Services Departments and Economic Development branch of Council have provided information for Council's submission.

ATTACHMENTS:

Attachment 1 - Council’s submission on the draft development scheme and proposed expansion of the Cairns South SDA
Attachment 2 – Proposed Cairns South SDA development precinct plan

Sean Lisle
Senior Strategic Planner

Kelly Reaston
General Manager, Planning and Environment
Attachment 1 – Council’s submission on the draft development scheme and proposed expansion of the Cairns South SDA

9 October 2019

The Coordinator-General
Department of State Development, Manufacturing, Infrastructure and Planning
PO Box 15517
Chc East QLD 4002

Email: sdainfo@coordinatorenqeral.qld.gov.au

Dear Madam,

Cairns Regional Council’s submission on the Cairns South State Development Area draft Development Scheme and potential SDA expansion

Thank you for the opportunity to review and submit on the Cairns South State Development Area (SDA) draft Development Scheme and potential SDA expansion.

The submission contained in the attachment details Council’s position on the following items:

- Support for the proposed expansion of the Cairns South SDA;
- Further information required on the proposed timing, staging and sequencing of development of the SDA;
- Greater clarification provided on the nature and scale of proposed SDA uses;
- Further information on infrastructure provision and costs to support the development of the SDA; and
- Confirmation of Council’s involvement in the development application process.

Should you have any further enquiries or require additional information, please contact Council’s General Manager of Planning & Environment, Kelly Reaston, on the above phone number.

Yours sincerely

Kelly Reaston
General Manager Planning & Environment
Cairns Regional Council’s submission on the Cairns South State Development Area draft Development Scheme and potential SDA expansion

Council has reviewed the Cairns South State Development Area (SDA) draft Development Scheme and potential SDA expansion, including the associated infrastructure analysis. Council also appreciates the opportunity to provide feedback on draft versions of these elements to date.

As discussed, the submission details Council’s position on the following items:

- Support for the proposed expansion of the Cairns South SDA;
- Further information required on the proposed timing, staging and sequencing of development of the SDA;
- Greater clarification provided on the nature and scale of proposed SDA uses;
- Further information on infrastructure provision and costs to support the development of the SDA; and
- Confirmation of Council’s involvement in the development application process.

Support for the proposed expansion of the Cairns South SDA

The proposed expansion of the Cairns South SDA is supported.

The sugar cane industry represents a key driver for the regional economy and facilitates MSF Sugar’s (MSF) significant investment in their development and diversification program for the Mulgrave Mill. The proposed expansion of the Cairns South SDA, and MSF’s investment supports a more robust and diversified sugar industry and, therefore, a more robust and diversified regional economy.

Council also notes and supports, the potential future expansion of the Mulgrave Mill Industry Precinct (as stated section 2.4.9 (c) of the draft Development Scheme) may be facilitated in the long-term to support the future diversification of the Mulgrave Mill and associated industries. Any further expansion as provided for in the draft Development Scheme needs to align with the industrial needs of the Region. MSF’s plans and avoid competition with private business and existing approvals.

It is recommended that details are included in the draft development scheme that prioritise the development of the Mulgrave Mill Industrial Precinct, so that it aligns with MSF’s timing for their development plans (as discussed below).

Proposed timing, staging and sequencing of development of the SDA

Further information is required in the draft development scheme on the proposed timing, staging and sequencing of development of the SDA.

The purpose of the SDA is to support the medium to long-term industrial needs of the region. The Strategic vision for the Cairns South SDA (Section 2.2, 1, h) states that the development of the SDA is to occur in a logical sequence. The balance of the draft
development scheme provides no further details on any timing, staging and sequencing of development within the SDA.

It is recommend that details are included in the draft development scheme (in a new section within section 2.1 - development assessment framework) that:

- prioritises the development of the Mulgrave Mill Industrial Precinct, so that it aligns with MSF’s timing for their plans; and

- development within the SDA (other than within the expansion area) only occurs when there is a demonstrated need for land within the SDA for a use that cannot be accommodated elsewhere in the region (this could include for example: including a market need or threshold for the commencement of development under the development scheme).

Providing the further information in the draft development scheme on the proposed timing, staging and sequencing of development of the SDA, ensures that the development of the SDA aligns with industrial needs of the Region and avoids competition with private business and existing approvals.

The nature and scale of proposed SDA uses

Greater clarification is required in the draft Development Scheme (in Section 2.4 Cairns South SDA development precincts and Schedule 1 - Definitions) on the nature and scale of preferred land uses within the SDA is required. This ensures that the development of the SDA aligns with industrial needs of the Region and avoids competition with private business and existing approvals.

Section 2.4 of the draft Development Scheme identifies the SDA development precincts. The preferred development intent, including identification of preferred uses, are detailed for each precinct.

The draft development scheme uses standard planning use definitions to identify preferred uses within the SDA, to ensure consistency with those used in the current planning legislative framework and local planning instruments. The use of specific land uses (if known) should also be used in the identification of preferred uses for each precinct.

For example, the preferred development intent, including preferred uses, for the High and Medium Impact Industry Precincts (Sections 2.4.3 and 2.4.4 of the draft Development Scheme) is ambiguous.

The preferred uses for the High and Medium Impact Industry Precincts include ‘high impact industry’ and ‘medium impact industry’. The preferred development intent for the precincts is also to accommodate regionally significant industrial development (that align with the Queensland Government’s priority sectors as detailed in the definition of regionally significant development contained in Schedule 1).

The definition of ‘high impact industry’ and ‘medium impact industry’ include the following land uses, for example: concrete batching plants, engineering, spray-painting, cabinet-making workshops. These uses are generally not regionally significant industrial uses and do not align with the Queensland Government’s priority
sectors. It is recommended that the draft development scheme identify specific and targeted land uses for preferred development within the SDA for all precincts in Section 2.4 of the draft Development Scheme.

A review of the minimum lots sizes contained in Section 2.5 the SDA wide assessment criteria for ‘Reconfiguring a lot’ (Section 2.5.13) is required. It is understood the scale of industrial development promoted within the SDA is such that requires larger lot sizes. The strategic vision for the Cairns South SDA is that the SDA provides for large footprint development (Section 2.2 (c)). A review of the minimum lot sizes to provide land to accommodate larger development as anticipated. This will ensure that the SDA provides adequate land to accommodate the intended uses and does not compete with existing zoned industrial land within the Region is recommended.

Infrastructure provision and costs

Council officers have provided feedback on a draft Infrastructure Analysis undertaken to date. These comments do not seek to duplicate those previously provided.

There is still significant uncertainty regarding the infrastructure requirements associated with the SDA. It is essential that the infrastructure requirements associated with the SDA are known in full prior to development of the SDA commencing.

The SDA, including the expansion area, is located outside of any planned infrastructure networks, including the Priority Infrastructure Area. Council’s financial forecasts do not allocate any funds for the provision of infrastructure to support the SDA.

The draft Infrastructure Analysis details the significant infrastructure requirements to enable development to commence in the SDA. The timing, staging and sequencing of development of the SDA is also highly dictated by the preferred infrastructure servicing strategy.

For example, the wastewater infrastructure servicing solution identified for the Mulgrave Mill Industry Precinct involves connection of sewage services to the Edmonton Wastewater Treatment Plant (WWTP). In order to ensure that this solution is feasible, infrastructure is required to be in place (from Gordonvale to the Edmonton WWTP), prior to activation of the Mulgrave Mill Industry Precinct. This represents a considerable investment in infrastructure prior to development occurring.

A co-ordinated approach to the development of the SDA, through introduction of additional development application referral requirements into the draft Development Scheme (as discussed in the next section of this submission) would enable co-ordination of infrastructure services, reducing cost, maintenance and risk.

Particularly, it is noted that significant risk is identified with regards to planning for potential load generation in industrial areas due to the highly variable nature of potential development outcomes. Risk is significantly reduced when residential and industrial loads are merged as residential loads are more reliable and predictable. Any infrastructure requirements associated with the SDA should not consume any planned for capacity within Council’s networks. Any impacts on Council’s planned infrastructure networks needs to be identified and provided for by the State or developers of the SDA.
Consideration also needs to be given to the following additional comments in relation to the following sections of the draft Development Scheme:

Section 2.4.7 – Infrastructure corridors precinct - Council notes that current planning identifies Lot 130 on NR5005 as a potential future site for the proposed Mulgrave River intake, as identified in Council’s LGIP. This site also currently contains pilot intake infrastructure. The proposed draft zoning for this lot is identified as Environmental Management. It is considered that Lot 130 on NR5005 should be included within the Infrastructure Corridors precinct, to support identified regionally significant infrastructure requirements and assist in managing expectations with regards to future outcomes.

Section 2.4.7 – Infrastructure corridors precinct - Council notes that its Cordovalo WWTP outfall is currently located within Lot 9 on RP051531. It is considered that the impacted portion of Lot 9 on RP051531 should be included within the Infrastructure Corridors precinct, to support identified key infrastructure requirements and assist in managing expectations with regards to future outcomes.

Section 2.5.1 - Infrastructure and services assessment criteria - It is noted that the proposed criteria includes consideration of maximising efficiency, minimising cost and consideration of harvested water in preference to town water, and waste minimisation practices. Please describe how proposed developments will demonstrate compliance, and what criteria/standard represents a satisfactory outcome for the purposes of demonstrating compliance. The stated criteria represent key guiding principles for developing infrastructure plans. It is unclear what acceptability criteria will be in place to demonstrate compliance. As noted in commentary against sections 2.2.1f, it is considered that significant efficiency and cost reduction could be achieved through co-ordinated staging, however this does not form part of the proposal as currently developed.

Section 2.5.10 – Energy and water efficiency - It is noted that the proposed criteria includes optimisation of water efficiency through use of alternate water sources. Please describe how proposed developments will demonstrate compliance, and what criteria/standard represents a satisfactory outcome for the purposes of demonstrating compliance. The stated criteria represent key guiding principles for developing proposals. It is unclear what acceptability criteria will be in place to demonstrate compliance, i.e. must buildings achieve a certain star rating to be deemed compliant.

The development application process

The draft development scheme also contains a framework and processes for making, assessing and deciding development applications.

The draft development scheme identifies Cairns Regional Council as an example of a referral entity (Schedule 1 – Definitions). The draft development scheme should identify Council as a referral entity and state mandatory referral requirements for development applications (in particular as discussed below at the pre-lodgement and application stage of the process), to give Council certainty about its involvement in the development of the SDA.
Schedule 2, 1.0 details the request for pre-lodgement consideration process. It is recommended that referral entities are included in the pre-lodgement consideration process. As the potential uses for the areas are significantly varied, and infrastructure requirements for the scheme are considerable, with potentially complex connection arrangements and discharge requirements, it is anticipated that advice with regards to infrastructure outcomes (or connection limitations) will form a critical feature of early advice and may impact decisions with regards to the commercial viability of certain proposals. In order for early advice to be provided to potential applications, it is important to understand their needs. Whilst it is acknowledged that they may not yet have a detailed servicing plan, discussion of higher level requirements is critical to providing meaningful and accurate advice, and may significantly impact commercial viability of proposals, depending of the infrastructure provision methodology adopted to service the SDA. Including referral agencies in early advice statements will assist in ensuring no significant surprises later down the track, once more material investment has already been committed.

Schedule 2, 2.1 details the application stage process and includes provision for referral entities to assess the application. It is noted in the definition section, however, that referral entities 'may' be consulted as opposed to 'will' be consulted. It is considered that referrals should be mandatory requirements of the process. This will ensure that downstream approvals such as connection applications and regulated waste have a high likelihood of success. Council has specific obligations under legislation with regards to being the identified service provider for the service area. If council is not consulted at the pre-lodgement and application stage, there is a risk that we may be unable to adequately meet our service obligations.

The draft Development Scheme also identifies self-assessable development for the SDA. It is noted that approval from referral entities does not form part of the self-assessable process. It is noted, also, that self-assessable applications may include significant infrastructure requirements and construction. It is considered that pre-approval from referral entities that will take over future ownership of constructed infrastructure should be identified as compulsory in the self-assessable criteria, to ensure that its legal obligations as a service provider can be met both now and into the future. Council has specific obligations under legislation with regards to being the identified service provider for the service area. If council is not consulted under the self-assessable criteria, there is a risk that service obligations will not be met. Amendments need to be made to be Schedule 3 to include a referral entity review.
Attachment 2 – Proposed Cairns South SDA development precinct plan