

*MO/GK*14352
23 September 2016

Ms Caroline McNally Secretary NSW Department of Planning and Environment 23-33 Bridge Street SYDNEY NSW 2000

Attention: Ben Lusher (Director, Key Sites Assessments)

Dear Ben,

REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS - S75W MODIFICATION TO MP10_0229)
WOOLOOWARE BAY TOWN CENTRE - 461 CAPTAIN COOK DRIVE, WOOLOOWARE

We are writing on behalf of Bluestone Capital Ventures No 1 Pty Ltd and the Cronulla Sutherland Leagues Club to request Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Assessment for a proposed S75W Modification Application to the Concept Plan Approval (MP10_0229) for the Woolooware Bay Town Centre.

Under Schedule 6A of the *Environmental Planning and Assessment Act 1979*, the Secretary of the Department may continue to issue environmental assessment requirements for modifications to an approved Part 3A Concept Plan in accordance with S75W(3) of the Act.

This letter provides some background to the Concept Approval, describes the proposed modifications to the Concept Plan and provides a preliminary description and assessment of the planning and environmental assessment issues that are likely to inform the preparation of SEARS.

1.0 BACKGROUND

The Concept Plan (MP10_0229) for Woolooware Bay was approved by the Planning Assessment Commission (as delegate of the Minister) on 27 August 2012. The Concept Plan established the site as a new centre within the hierarchy of centres within Sutherland Shire. Woolooware Bay Town Centre will provide a unique offering of food and grocery retail, leisure, community, medical, dining and recreational uses and 643 apartments. The precinct will includes strong new pedestrian and cyclist linkages within the site, including a rehabilitated foreshore park along the Woolooware Bay frontage and through-site linkages drawing people from Captain Cook Drive to the waterfront.

In short, the current Concept Approval (as modified) currently provides for:

- use of the site for a mixed use development with associated public open space;
- indicative building envelopes for the residential and retail/club precinct;
- stadium upgrades;
- maximum gross floor area (GFA) of 88,712m²;
- maximum gross building area (GBA) of 176,134m²;
- ground and above-ground car parking, comprising:

- minimum of 770 spaces for retail and club uses.
- maximum of 883 spaces for residential and ancillary uses.
- road works to support the development, including three signalised intersections;
- pedestrian and cycle paths, and landscaping throughout the site;
- sales and marketing facilities; and
- superlot subdivision.

Since the approval of the Concept Plan, a Project Application for the eastern Club/retail precinct has also been approved by the PAC and Development Applications for the first two residential stages have been approved by the Sydney East Joint Regional Planning Panel. The Concept Plan has been modified a number of times since the original approval to reflect ongoing evolution of the project and design development.



Figure 1 – Indicative aerial view of the approved Concept Plan (eastern precinct highlighted)



Figure 2 – Approved Woolooware Bay Town Centre Concept Master Plan (eastern precinct and indicative location of Centre of Excellence highlighted)

2.0 DESCRIPTION OF PROPOSED MODIFICATION

The proposed modification seeks to strengthen the town centre by introducing a broader mix of uses into the eastern precinct, take advantage of expanded public transport catalysed by the development and improve the urban amenity of the new centre.

The proposed modification involves four new buildings above the podium, additional car parking levels and minor modifications to the approved ground floor and public domain, retail level and club entrances.

In summary, this Section 75W application seeks the following modifications to the Concept Plan Approval:

- expand the range of land uses within the eastern precinct to provide a more comprehensive town centre, with residential, serviced apartment/hotel and additional community uses to complement the retail and club facilities already approved.
- include indicative building envelopes above the retail/club building for:
 - 1 x serviced apartment/hotel building;
 - 3 x residential flat buildings and a small number of terraces with 222 dwellings and associated amenities;
 - landscaped podium with private communal open space;
 - additional car parking.
- provide indicative building envelopes and land use for a Sharks Centre of Excellence adjoining the western grandstand.
- increase the total maximum GFA and GBA to reflect the additional proposed uses;
- increase the number of car parking spaces within the eastern precinct from 770 spaces to approximately 1,080 spaces.
- amend the landscape master plan to incorporate new landscaping on the eastern podium rooftop areas and identifying opportunities for feature landscaping to break up building massing and provide a more attractive centre.

Figure 3 below illustrates the indicative proposed building envelopes for the eastern precinct. Indicative architectural drawings prepared Turner Studios illustrating the proposed layout of the modified centre have been provided for information purposes (see **Attachment B**).



Figure 3 – Indicative building envelopes (Note: all building heights expressed as storeys and include podium height) Source: Turner Studios



Figure 4 – Sketch image of Sharks Centre of Excellence (located to west of the stadium adjacent Captain Cook Drive) Source: Turner Studios

3.0 PLANNING CONTEXT

3.1 Environmental Planning and Assessment Act 1979

The Woolooware Bay Town Centre Concept Plan was approved under Part 3A of the EP&A Act, which has since been repealed. As such, the proposed modification is subject to assessment in accordance with the Transitional Part 3A provisions included in Schedule 6A of the Act. Under Schedule 6A, a Concept Plan approved under Part 3A may continue to be modified in accordance with the provisions of S75W of the Act.

The proposed modification is consistent with the objects of the Act as follows:

- provides for improvements to the town centre that will not result in any adverse environmental impacts and will promote the social and economic welfare by providing for additional housing to meet local demand and increased employment
- promotes the orderly and economic use of land by providing additional land uses to meet community needs in a location that has been established as a new centre and which will be provided with adequate infrastructure to support growth;
- provides a new Centre of Excellence associated with the football club's operations, providing additional employment and flow-on economic benefits to the Sutherland Shire;
- does not result in any adverse impacts on significant flora, fauna and ecological communities located in the broader vicinity of the site;
- supports the principles of ecologically sustainable development by ensuring development minimises energy and water consumption and provides services and housing to meet the needs of future generations;
- increases housing diversity and supply to meet local demand, thereby contributing to the ability
 of local residents to access suitable and appropriately-priced housing; and
- supports involvement by Sutherland Shire Council, stakeholders and the broader community in the planning process through upfront community consultation which has informed the proposal.

3.2 Sutherland Shire Local Planning Policies

Since the approval of the Concept Plan in August 2012 Sutherland Shire Council's new comprehensive local environmental plan, the Sutherland LEP 2015, has come into force. The Sutherland LEP reflects the establishment of Woolooware Bay Town Centre as a new centre within the Shire, rezoning the site from the previous private recreation zoning to the B2 Local Centre zone with development standards generally reflecting the current Concept Plan Approval. Within the B2 zone, 'shop top housing', 'residential flat buildings' and 'tourist and visitor accommodation' are all proposed to be permissible with development consent.

Detailed compliance with Sutherland's local controls would be addressed in the S75W modification application and as part of future detailed planning applications.

3.3 Other Planning Policies

In addition to the above, the following policies apply to the site and will need to be considered as part of the modification application:

- Infrastructure SEPP
- Major Development SEPP
- SEPP 65 Design Quality of Residential Flat Buildings
- SEPP 55 Remediation of Land

4.0 CONSULTATION

The Cronulla Sutherland Leagues Club and their development partner, Capital Bluestone, have consulted widely and comprehensively throughout the project's planning phases. Over 250 stakeholder meetings, drop-in evenings and information sessions have been held in relation to the project, keeping the community informed and providing numerous opportunities for input from the community.

A number of the comments and suggestions arising from previous consultation have informed this proposed modification, particularly in regard to:

- comments made by Sutherland Shire Council during the Concept Plan assessment phase regarding the ability of the centre to grow and evolve with a more diverse mix of uses within the eastern precinct;
- queries from Department officers during the Concept Plan assessment phase regarding the ability to incorporate residential within the eastern precinct;
- comments made by the PAC in its determination report for the Concept Plan regarding the role, functionality and future design of the centre;
- feedback received from local business and tourism operators regarding the limited availability of tourist and visitor accommodation in the area, for both holiday and business travel; and
- information provided by potential and actual purchasers of residential apartments and business owners who have expressed interest in establishing operations within the town centre.

Engagement in relation to the Stage 4 Hotel/Residential modification has been undertaken by the Woolooware Bay Town Centre project team over nearly two years. Councillors of Sutherland Shire Council were briefed about the proposed modification at their meeting on 26 November 2014, with a further presentation to Council on 18 May 2015. Following this briefing, evening drop-in sessions were held for members of the Cronulla Sutherland Leagues Club (as the land owner) and for those who have already purchased residential apartments in the western precinct of Woolooware Bay Town Centre to brief them about the modification. The local State parliamentary representative, Mark Speakman MP has also been briefed.

The feedback received from these briefings informed design development and modifications to both the approved Retail/Club podium and the proposed residential and hotel components of the proposal. New architects were appointed to progress major aesthetic and functional improvements to the Retail/Club podium building, which were approved by the Department in August 2016. Substantial changes have been made to the proposed residential building envelopes in order to increase view lines between buildings, reduce visual bulk and increase the articulation of the overall building form within the centre.

It is proposed that further consultation would be undertaken through the application preparation and assessment phases to further engage with the local community.

5.0 PROJECT JUSTIFICATION

5.1 Consistency with strategic planning policies

NSW 2021 State Plan

NSW 2021 (the State Plan) sets out the strategic framework for all government decision-making in NSW. The proposed modification is consistent with a number of the goals and targets of the State Plan, in particular:

- increasing utilisation of public transport by concentrating new housing in close proximity to regular, well-connected services;
- increasing walking and cycling;

- encouraging job growth through the introduction of new hotel/serviced apartment and function centre spaces; and
- providing new opportunities for cultural participation through the provision of at least 500m² of community space for cultural presentations, art exhibitions and the like.

A Plan for Growing Sydney

A Plan for Growing Sydney is the new strategic vision for Sydney's metropolitan area over the next 20 years. Recognising the challenge of accommodating an additional 1.6 million people in Sydney by 2031, requiring 664,000 new homes and 689,000 new jobs, the plan sets out the broad vision and principles to guide this growth. Importantly, this will require more diverse housing choices throughout Sydney. The fastest growing household types will be single-parent families, couples and lone person households, who typically prefer smaller housing typologies with low maintenance and good amenity. Already, strong demand from local Sutherland Shire residents for new apartments at Woolooware Bay Town Centre has demonstrated the underlying demand for more diverse housing options in the area, with approximately 80% of purchasers living in or in the immediate vicinity of the Shire.

A regular shuttle bus service will commence with the first occupation of apartments at Woolooware Bay, providing direct linkages to Caringbah, Cronulla and Woolooware train stations and centres. As development of the centre progresses, this will transition to a full public bus service by July 2017, and additional uses within the centre will further increase utilisation of this service. Providing new housing in locations that maximise utilisation of transport services is consistent with a number of reoccurring themes in the metropolitan plan.

Woolooware Bay Town Centre will provide a range of retail, leisure, medical, entertainment and recreational opportunities to residents of both the new development and the surrounding area. A Plan for Growing Sydney continues long-standing government policy to concentrate new density within existing centres and corridors. This modification presents an opportunity to provide additional uses that will further strengthen the centre, as well as additional residential dwellings that will allow more people to benefit from the high level of amenity resulting from living close to these uses.

Along with a need to provide additional housing, there is also a need to promote employment and economic growth to support a larger city. For the South Subregion, the metropolitan plan identifies a need to support employment activities at Taren Point and to increase opportunities for expansion of the visitor economy. The proposed hotel/serviced apartment feature of this modification has the potential to support both of these objectives, providing accommodation to support business travel, sports tourism and general tourism.

NSW Visitor Economy Industry Action Plan

The NSW Visitor Economy Industry Action plan encourages the strategic growth in the physical capacity and supply of tourist and visitor accommodation throughout Sydney and NSW. Capitalising on opportunities presented by sporting events (such as the NRL competition matches held at Sharks Stadium) and provide flow-on benefits to local economies. Sutherland Shire has a wealth of natural and cultural visitor destinations, however, limited supply and choice in tourist and visitor accommodation options currently limits the attractiveness of the area compared to other locations in Sydney.

5.2 Strengthened and improved town centre

Active and successful centres involve a mixture of uses that complement each other and sustain activity throughout the day. Whilst this is already achieved through the approved retail, club facilities and medical centre, there is an opportunity to create a more dynamic centre with a wider range of uses.

The integration of uses within the centre was raised as an issue at a number of stages during the Concept Plan assessment process by a number of key planning authorities:

- Sutherland Shire Council's submissions on the Concept Plan raised concerns with their characterisation of the town centre as separate retail and residential precincts without integration. It identified good town centres as having "an urban character where a mix of commercial and residential uses interact with the public domain to produce a vibrant place".
- During the assessment phase building heights within the western precinct were reduced to alleviate built form concerns, resulting in the reduction of approximately 100 dwellings. At the time, the Department suggested the possibility of these dwellings being transferred to the eastern precinct, however, this was not possible at the time due to the extended time required to undertake additional design and environmental studies and to re-exhibit the modified proposal.
- The PAC concluded that whilst the location of the stadium presents challenges in terms of establishing links and connections between the eastern and western precincts, planning and design ingenuity could be used to overcome these and further take advantage of the site's setting.

The establishment of a new town centre within the Sutherland Shire is a unique opportunity, and it is vital that the opportunities presented by this development are fully realised. The Department and the PAC ultimately agreed that the fundamental structure of the town centre was sound and that design issues could be resolved as part of later stages. Providing additional land uses within the eastern precinct offers the chance to deliver a more comprehensive town centre that capitalises on the close proximity to retail, medical and recreational services, maximises public transport utilisation and takes advantage of the high level of amenity arising from the centre's location adjacent to Woolooware Bay. The proposed modifications are the result of a comprehensive design review to ensure that the functionality and urban design of the Woolooware Bay Town Centre is optimised, and are based on feedback from a wide range of stakeholders.

5.3 Local housing supply and diversity

As noted in **Section 5.1** above, Sydney must plan for significant population growth over the coming decades. The Department's 2016 population forecasts indicate that Sutherland Shire will need to accommodate 40,150 additional people requiring 19,500 new dwellings between 2011 and 2036. The projected population growth equates to a predicted need for approximately 780 additional dwellings per year. This is significantly higher than the rate of housing development in Sutherland Shire over the past decade – on average only 380 new dwellings were constructed per annum between 2004 and 2016 (financial years). In light of the additional projected housing demand, as well as the strong demand by Sutherland Shire residents for new housing at Woolooware Bay, it is considered that the addition of housing within the eastern precinct presents a good opportunity to meet some of this demand in a location that is within a centre and suitable for additional housing.

5.4 Social and economic benefits

The proposed modification seeks to build upon the social and economic benefits that will be provided by the approved Woolooware Bay Town Centre in the following ways:

- New Centre of Excellence that will modernise existing administration facilities, attract additional sports and health-related business and sports tourism to Sutherland Shire.
- Provide new tourist and visitor accommodation within the Sutherland Shire, increasing opportunities for tourism to the local area as well as opportunities to capture additional economic benefits from visitors to NRL games.
- Increase the supply of tourist and visitor accommodation available for use by local businesses, particularly in the Taren Point area. Enabling interstate and overseas staff to stay in close proximity to businesses in these areas improves productivity, reduces costs and keeps jobs in Sutherland Shire.
- Increase housing supply to meet growing local demand, with a range of typologies that increase diversity in the local area. Increased housing will be particularly beneficial for young people

looking to stay or move back to the Shire as well as older down-sizers looking for housing with good amenity and close access to services.

 Increased patronage of the new local bus service, increasing viability and the potential for greater service frequencies.

5.5 Community Benefits

The Woolooware Bay Town Centre project supports a number of significant community benefits which are being delivered on-site, in the immediate surrounds and throughout the broader community by both Capital Bluestone and the Cronulla Sutherland Leagues Club. These community benefits include new facilities and services delivered directly by the development, the augmentation and expansion of existing services already being delivered by the development partners, and an increased capacity for the Cronulla Sutherland Leagues Club to continue investing in the local community into the future. Some of the key community benefits associated with the project include:

- Completion of the Cronulla High School playing fields upgrade, with the new clubhouse already completed and in use.
- Provision of a new foreshore playground designed in accordance with the Touched By Olivia
 Foundation to provide an accessible and inclusive children's play area.
- Providing 350m² of flexible community space within the Retail/Club precinct that will be fitted out with Wi-Fi, IT and operable walls to maximise the ability for multiple uses. The intention is that a flexible space could be utilised by a range of organisations to deliver learning, health and wellbeing programs as well as opportunities for much needed space for the promotion local arts, artists and cultural works. Conversations with Sutherland Shire Council and a range of groups to best identify how the space can be shared and best activated.
- Significant community involvement by the Club and Capital Bluestone, including sponsoring of community sports, arts and youth activities.
- Involvement in collaboration with local schools and environmental groups to design school based education programs that nurture a connection to the local environment and help develop a connection to this unique environment amongst our young locals
- Bike and car share schemes are being explored to benefit this location and others in the Shire to promote non-car travel options.
- Hospitality Training and Management work opportunities are being explored for the site capitalising on the entertainment and tourism hub being created
- Increasing the percentage of adaptable apartments within Stage 4 residential component from the mandated 20% to 30% for the new 222 apartments, increasing the diversity of housing suitable for persons with special physical requirements.
- Inclusion of a new child care centre within the retail centre and resident's Men's Shed within the western precinct (subject to separate approvals).
- Construction employment throughout the duration of the project, including Parkview's Indigenous Employment Policy and opportunities for local apprenticeships, and flow-on economic benefits to local suppliers and support businesses.
- Ongoing employment within the approved retail centre and the upgraded Cronulla Sutherland Leagues Club.

The proponent will consider to work with Council and the community to identify opportunities to maximise the public benefit of the proposed modifications within the context of the overall approval.

6.0 OVERVIEW OF LIKELY ENVIRONMENTAL AND PLANNING ISSUES

Based on our preliminary environmental assessment, **Table 1** below summarises the expected key environmental assessment issues that will need to be considered as part of the future DA. **Attachment A** to this letter lists the specialist studies and assessments that would accompany the S75W Modification Application. A preliminary assessment of the key issues is contained in the following sections, and will be elaborated upon in the S75W Modification Planning Report.

Table 1 - Summary of key assessment issues

| Issue | Proposed Assessment Issues |
|-------------------------------------|---|
| Built Form and Urban Environment | Provide indicative floor plans of all development components, including retail, club, hotel/serviced apartments, residential and Sharks Centre of Excellence. |
| | Provide ground floor and public domain plans illustrating indicative landscape treatments, pedestrian flows, entrances, amenities etc. |
| | Comprehensively address the potential built form and amenity issues arising at a level of detail commensurate with the scope of the Concept Plan through an update to the urban design studies Provide comparison photomontages from key views identified for the approved Concept Plan application. |
| | Assess potential overshadowing impacts on surrounding land. |
| Internal Residential | Provide indicative residential floor plans to allow an understanding of functionality and amenity. |
| Amenity | Consider the key design principles and amenity guidelines outlined in SEPP 65 and the Residential Flat Design Code, as well as proposed amendments to these documents, to ensure that compliance can be achieved through detailed design. |
| Planning Approvals Pathway | Detail approvals pathway for future detailed planning applications, including treatment of existing Stage 1 Club/Retail Project Application MP10_0230. |
| Social and Economic | Assess demand and need for the proposed hotel/serviced apartments. |
| Impacts | Update the Social Impact Assessment conducted as part of the original Concept Plan application. |
| Transport, Traffic and Parking | Assess the predicted traffic generation associated with the proposed modification and the consequent demand for parking within the town centre. |
| Major Event Management | Demonstrate how town centre amendments and additional uses would be managed during major events. |
| Community Consultation | Outline community consultation undertaken to date and outcomes of this, as well as further consultation proposed. |
| Biodiversity, Flora and Fauna | Assessment of the potential impacts of the proposed development on adjacent wetlands, including on both flora and fauna. |
| Other Issues | Ecologically Sustainable Development Measures |
| | Stormwater, water quality and flooding |
| | ■ Infrastructure and servicing |
| | Acoustic impacts |
| | Electromagnetic radiation |
| | Structural considerations |
| | Development contributions |

6.1 Built Form and Urban Environment

The Concept Approval for the eastern precinct of the Woolooware Bay Town Centre provided for a parapet level for the main retail centre of approximately 14 metres (4-5 typical storeys) above ground level, with 8 residential towers within the western precinct with building heights of up to 15 storeys (including podium). The proposed modification would provide for three new residential buildings of 11-16 storey (including podium) within the eastern precinct, with significantly greater building separation, building articulation and landscaping treatment within this precinct.

The proposed residential buildings will support significant architectural and landscaping improvements to the façade and upper levels of the approved retail/Club building. Whilst the main facades are architecturally treated, the approved building would be constructed of a concrete panelling system and the upper level of the building would be entirely comprised of open car parking, resulting in a highly urbanised design outcome. The ability to cap the approved building

with a landscaped podium, and the introduction of new landscaping and improved activation of the facades, represents a significant opportunity that is supported by the addition of the residential components.



Figure 5 - Indicative photomontage of amended development from Captain Cook Drive

Whilst the proposed development will result in the introduction of additional building height within the eastern precinct, it is considered that the substantial architectural improvements to the façade and public domain result in an overall positive effect on the urban design outcome for the Woolooware Bay Town Centre. The increase in building height is sufficiently distant from residential areas in the vicinity of the town centre that no overshadowing or significant visual impacts are expected as a result of the proposed modification, and is befitting the nature of the site as an identified centre. Views from Captain Cook Drive and Woolooware Road are expected to be significantly improved as a result of the design improvements, and the presentation of building forms to the street will be consistent with the western precinct in concentrating height toward the northern edge. A full revision of the original visual impact study undertaken for the Concept Plan application taking into account the proposed buildings will accompany this S75W Modification Application.



Figure 6 - Indicative photomontage looking north along Woolooware Road

6.2 Transport, Parking and Access

The approval of the Concept Plan has catalysed planning to bring new public transport to Woolooware Bay. Transport for NSW has recently committed to the commencement of a new public bus Route 985 connecting Woolooware Bay to Miranda and Cronulla, with services to commence services during 2017. This is a significant public benefit facilitated by the project, bringing additional public transport to a previously un-serviced area to the benefit of the broader surrounding community. This service will be strengthened by increased patronage from the proposed modification. In the interim period between the first occupation of dwellings in late-2016, a shuttle bus service will also be implemented by the proponent to connect to key local centres and transport nodes. These improvements in terms of connectivity present an opportunity to provide additional housing within a town centre which is highly accessible by non-car modes of travel.

The Concept Approval provides for two signalised intersections providing direct access to the eastern precinct, comprising the upgrade of the Woolooware Road/ Captain Cook Drive intersection and a new access point from Captain Cook Drive. Preliminary traffic studies indicate that additional traffic associated with the new land uses can be readily accommodated within the approved intersections and will not result in any adverse effects on the local road network. The revision of the NSW Road and Maritime Service's traffic generation guidelines since the approval of the Concept Plan also reflect decreased private vehicle usage and greater multi-purpose trips and non-car travel.

Residential car parking will be provided in accordance with the parking rates established in the Concept Approval, whilst visitor parking and parking for the hotel/serviced apartments and function centres will be provided to meet assessed demand.

New car share spaces not currently required within the Retail/Club precinct will also be provided for use by residents, employees, visitors and the general public, promoting reduced car-ownership and increased non-car travel within Sutherland Shire.

7.0 CONCLUSION

The purpose of this letter is to request the SEARS for the preparation of an S75W Modification Application to the Woolooware Bay Town Centre Concept Plan Approval (MP10-0229).

We trust that the information detailed in this letter is sufficient to enable the Secretary to issue SEARS for the preparation of the S75W Modification Application. Should you have any queries about this matter, please do not hesitate to contact Michael Oliver or myself on 9956 6962 or at gkirkby@jbaurban.com.au.

Yours faithfully,

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Gordon Kirkby Director

Attachments:

- Attachment A Indicative schedule of technical and specialist studies
- Attachment B Director General's Assessment Requirements for Concept Plan MP10-0229
- Attachment C Indicative Concept Plan Modification drawings prepared by Turners Associates

ATTACHMENT A: INDICATIVE SCHEDULE OF TECHNICAL AND SPECIALIST STUDIES

- Updated Master Plan Report
- Amended Concept Plan Envelope Drawings
- Amended Landscape Concept Plan and Design Report
- Indicative Architectural Plans
- Indicative Retail Plans
- Indicative Staging Plan
- Architectural Design Statement
- SEPP 65 + Design Verification Statement
- Shadow Diagrams
- Visual Impact Assessment
- Traffic Management and Accessibility Plan
- Electromagnetic Radiation Statement
- Social Impact Assessment
- Community Consultation Report
- Updated Stormwater, Flooding and Servicing Report
- ESD Report
- Noise Impact Assessment
- Ecological Assessment
- Structural Statement