

NEWSLETTER 2003/2004

The Planning Action Network

ISSUED May, 2004

ONGOING ISSUES, 2003/4

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Lee Point - New Suburban Development
Old Admiralty House
Woods Street Developments
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Ostermann Street R3 zoning

Planning Act Review

We appreciated the work of previous Planning Minister Vatskalis, particularly his commitment to public consultation, problem solving, and the proper review of the Planning Act.

From contacts to date, PLan has confidence that the new Minister, Dr Chris Burns, also has the potential to improve planning.

As at April 2004, we have no knowledge of the current status of the review, or of the response to our submissions.

Central to good planning is the concept of amenity, defined by the Macquarie Dictionary as "the quality of being pleasant or agreeable in situation, prospect, disposition, etc." Section 51 (n) of the Act requires "the potential impact on the existing and future amenity of the area" must also be taken into account, but this aspect does not seem to be given due regard in many developments in which PLan

has concerns (see some detailed below).

The review of the <u>Planning Act</u> has been formally in place since early in 2003. Written submissions have been made to make the act work in a more balanced way. PLan and various residents groups have also participated in two facilitated workshops arranged by Minister Vatskalis' office. There was a huge amount of agreement in this. Plan has also asked the Ministers office to have regard to the Combined Community Submission prepared for the 1999 review. This came from ten groups working together, but resulted in only one clause being added to the Planning Act (51(r)).

Important aspects of the review are to have a preamble setting out its purpose; to have planning open and non political; to enshrine balanced decision making; based on quality (performance)) as well as quantity (prescription) as dictated by the <u>Planning Act</u> 1990; the formal definition of amenity, and the provision of an appeals process available to the community. Essential to the Act is the involvement of the community in planning through the land use objectives, and in the Development Consent Authority process.

The whole Planning Act Review is being interfered with by departmental planning staff (John Gronow, Ann Stephens, and Jim O'Neill) wishing to promote a new planning scheme for the northern Territory, in spite of the Planning Minister making it very clear that the review of the <u>Planning Act</u> is to be completed first.

In a report dated 31 October, 2003 following the workshops, the staff rejected almost all of the issues raised by the community. Their report was named 'Report on the Outcomes of Workshops on the Reviews of the Planning Act and the NT Planning Scheme'. The fact is that although Jim O'Neill imposed a session on his draft planning scheme into the workshops, the community has not addressed its issues, since the Planning Minister has made it clear that the the Review of the Planning Act legislation is to be completed first.

The essence of the draft planning scheme is that it is to be one

volume covering the whole of the NT. Its efforts towards uniformity diminishes standards such as the 800 metre house lot throughout Darwin, produces a lowest common denominator effect, and undermines local character, at a time when it is being recognised throughout Australia as a very important factor in community planning. Most significantly it would eliminate the legal status of the land use objectives, and promote denser living in our tropical environment, in a very big NT. In other words, it would favour exploitation of land.

In presenting the draft planning scheme, Jim O'Neill kicked 'over' a box of planning guidelines and other documents, the outcome of addressing years of issues, in favour of a one volume summary scheme in which much of this wisdom would be lost.

The concept of such a uniform planning was part of the terms of reference of the Earl James Report. His report shows that people had little interest in it. It would seems that the planners themselves would benefit by having to refer to only one document. This sounds like a case for clerks, and not professional planners.

These delays, and comments remarks in the document of October, 2004 alerted us to the fact that the actual Planning Act Review process was ill defined, and did not provide for a draft being placed before the public by the Minister's office before committing to Parliament. The document also showed that the intelligence, knowledge, experience and stake holding position of the community is being seriously underrated.

These delays have been drawn to the attention of new planning Minister Burns. We stressed the need for a more open process, similar to that adopted for the review of the Heritage Conservation Act which has involved genuine consultation, progressive feedback, and interstate. expert advice. Land use objectives and genuine public consultation are essential elements of good planning.

Members of Plan: the Planning Action Network have been involved with the DCA for almost ten years. Our experience convinces us that DCA decisions in Darwin are repeatedly based almost entirely on quantifiable aspects of the Darwin Town Plan, not giving sufficient regard to qualitative aspects of Section 51 of the <u>Planning Act</u>. This means that the balance of qualitative and quantitative aspects legally required since the 1990 <u>Planning Act</u>, cannot be achieved, even though the Act requires the DCA consider both aspects.

This situation seems to be derived partly by a development imperative for quantity overriding balanced planning considerations, but more particularly the appeals process, now through the Lands and Mining Tribunal knocking out DCA decisions based on anything other than quantifiable schedules. This denies the role of the DCA, and the purpose of Section 51 of the <u>Planning Act</u> which does require decisions to be made by it on non-quantifiable matters., as well.

FOUR SQUARE DEVELOPMENTAL SUSTAINABILITY

Any new development must be measured against its economic, environmental, social, and cultural implications. This will take care of the future.

PLan was concerned when the Chair of the DCA, at a hearing last year, told an affected neighbour and objector Ken Wu, that social impact was not the concern of the DCA, and could be considered by it.

Section 51(r) of the current Act states "any potential impact on natural, social, cultural or heritage values" are matters to be considered.

AMENITY

Central to good planning is the concept of amenity, defined by the Macquarie Dictionary as "the quality of being pleasant or agreeable in situation, prospect, disposition, etc."

Section 51 (n) of the <u>Planning Act</u> states "the potential impact on the existing and future amenity of the area" must also be taken into account by the DCA.

PLan has observed by long experience of this aspect of planning, so vital to living environments, streetscapes, the local character of precincts apparently being neglected by the DCA. One excuse is that it is difficult to define, and attempts to do so in the <u>Planning Act</u> may lead to legal difficulties. Strangely it is already defined in the <u>Darwin Town Plan</u>, but has not been adequately applied.

Following incidents at Trower Road, Tiwi and Ostermann Street, Coconut Grove, the importance of amenity has been recognised and the need to consider it has been publicly stated.

LANDSCAPING

Recent experiences at Tiwi has demonstrated the need to upgrade landscaping standards.

PLANNING VERSUS DEVELOPMENT

Overall planning means that development is integrated into a functional whole. Public infrastructure, such as roads, civic places and buildings, community service centres, including schools, properly located; transport, parklands, promenades, commercial centres and viewing points; must be properly planned. The DCA does not do this. It only approves individual applications as they come forward from developers.

(Francis, CapitaLs are intended only to highlight island changes to text.

Wickham Point LNG PLANT

DARWIN HARBOUR WILL NEVER BE THE SAME. SOME FEEL THAT IT IS AS IF THERE HAS BEEN A DEATH IN THE DARWIN FAMILY

Despite many statements that the plant will present a low visual profile, the huge storage tank being built at the site, which will be virtually equal in height above ground-level to NT House (on the corner of Mitchell and Bennett Streets), is already visible from sites such as Bayview, AND OUR POPULAR STOKES HILL WHARF FAMILY EATING AREA. Significantly, there is no height data in the EIS or PER. ORIGINALLY two smaller tanks were envisaged, AND PEAK HILL, NOW PARTIALLY DEMOLISHED WAS TO HIDE THE STORAGE.

At the beginning of this Wet season, considerable damage to the plant's access road was evident, and heavy soil run-off was clearly damaging mangroves adjacent to the road, _--\$18.4 million was allocated to infrastructure needs in the project. WHY WAS THIS DONE FOR THE SECOND FASTEST GROWING COMPANY IN THE US? OUR DUNDEE RESIDENTS HAVE BEEN LOBBYING FOR AN WEATHER ROAD AND SERVICES INFRASTRUCTURE FOR YEARS.

Following strong community representations, THE possibility of further damage was addressed. However, during the 2003/4 Wet, huge stands of weed grasses have established around a heavy equipment park on the road. These have clearly been brought in by work on the access road, as surrounding bushland is so far free of them; SADLY, exactly the same problem has sprung up along the new rail corridor in the vicinity.

PLan members IS CONCERNED TOO THAT THERE IS no real understanding of the implications of A super-tanker TRAVELLING every second day per day slowly THROUGH the harbour. These vessels are roughly the length of Stokes Hill Wharf and about as high as a 14-storey building. Other harbour users have yet to find out how this will affect entry and exit by harbour traffic GIVEN Darwin's extreme tidal variations, especially considering SAFETY regulations for vessels of this size, including exclusion zones on ships AND JETTY. HOW WILL THIS AFFECT TOURISM AND FISHING?

It is unclear how potential gas leakage from either the plant, storage tank, or tanker vessels, very difficult to detect, will be monitored. Although risk of exposure is said to be 'minimal', recent events at Ranger, where 'operator errors' saw USE OF pipe connections resulting in water contamination. THERE HAVE BEEN a spate of appalling fires at fuel processing plants, where subsequent inquiries demonstrate that simple trust in expertise and responsibility of operators CAN FAIL TO PREVENT DANGER.

On 17 August 2001, an earth tremor resulted in a gas leak at Channel Island; and the

Tennant Creek tremors some years ago caused considerable damage to the overland pipeline. Whether this plant is sufficiently protected from tremors remains to be seen.

In the current global climate, there is also very real potential for the vessels and the plant to be targeted by terrorists, and this danger seems to have be ignored. In the event of leakage, whether accidental or resulting from an attack, it is possible that the nearby sea would freeze, and a gas plume could travel far enough to reach the NORCOM headquarters approximately 1.2 km away, seriously impacting on capacity to respond to a terrorist event.

PLan members will be interested that in March 2004, the US Federal Energy Regulatory Commission (FERC) asserted exclusive jurisdiction for liquefied natural gas facilities. This is aimed to prevent local people vetoing an LNG plant or tanks in their community.

ENVIRONMENTAL IMPACT STATEMENT (EIS) GLYDE POINT

The first steps in compiling an Environmental Impact Statement on a proposed industrial AND RELATED development at **Glyde Point**, have BEGUN. COMMUNITY IS STRONGLY AGAINST THE EIS BEING DONE BY the ENVIRONMENTAL HALF OF DIPE FOR THE DEVELOPMENTAL HALF OF the Department of Infrastructure and Planning WHICH IS INITIATING THE PROPOSAL. THERE COULD only be a truly transparent and neutral EIS BY USING an independent body, such as a statutory EPA, with clearly defined responsibilities. THE OUTCOMES MUST BE PUBLIC.

IT WILL BE RECALLED THAT PLAN WORKING WITH THE DARWIN HARBOUR. GROUP COLLECTED 6500 LOCAL SIGNATURES ON THE BASIS OF HAVING A GAS PLANT, BUT NOT IN THE HARBOUR. AT THAT TIME,A CLEAR CALL WENT OUT THROUGH THE PETITION FOR AN INDEPENDENT ASSESSMENT OF ALL POSSIBLE SITES.

GLYDE POINT IS A RECREATIONAL AREA, TIDES ARE BIG AND CURRENTS STRONG. A LOW JETTY WILL BE REQUIRED TO DEEP WATER. PARTS OF THE SITE WOULD BE BETTER USED FOR DARWIN'S OWN RESIDENTIAL EXPANSION. ENVIRONMENTALISTS ARE CONCERNED ABOUT PLANT AND ANIMAL LIFE ON LAND, AND SEA DWELLERS SUCH AS DUGONGS.

HERE IS A CASE AGAIN FOR LOOKING AT A NUMBER OF OTHER SITES< INCLUDING POINT MARGARET BEFORE DECIDING ON GLYDE POINT-AWAY FROM GUNN POINT.

A VERY LARGE AREA IS SELECTED FOR INDUSTRIAL USE, TO BE DEALT WITH APART FROM THE NORMAL CONSULTING PLANNING SYSTEM. THIS LAND SHOULD REMAIN LEASEHOLD, RATHER THAN BECOMING FREEHOLD.

BEFORE 73 hectares of land was released by the Defence Housing Authority AT LEE POINT NEAR THE TRACY VILLAGE CLUB, for a joint development of a new minisuburb, FORMER Lands Minister Kon Vatskalis promised to consult Plan ABOUT THE WAY THIS BUSH LAND WOULD BE CLEARED AND LAID OUT. A MEMORANDUM OF UNDERSTANDING WAS SIGNED ON SITE BEFORE CHRISTMAS, BUT THE PROMISE HAS COME TO NOTHING. LAND USE OBJECTIVES BASED ON DEPARTMENTAL EXPERTISE AND COMMUNITY CONSULTATION ARE NEED BEFORE THIS BIG DEVELOPMENT GOES AHEAD.

LOCAL RESIDENTS WANT CAREFUL CLEARING TO PROTECT CATCHMENTS, FLOOD PLAINS, THE CASUARINA COASTAL RESERVE, AND SPECIAL PLANTS AND ANIMALS. Concern about whether good planning principles WILL BE FOLLOWED, WITH SUFFICIENT INFRASTRUCTURE, PARKS AND OPEN SPACE, AND TRANSPORT. POSSIBLY A NEW PRIMARY SCHOOL AND OVAL WILL BE NECESSARY, SINCE THE TIWI SCHOOL WAS CLOSED SOME YEARS AGO.

Clearly, population densities should be appropriate for Darwin, especially as these are AFFECT law and order issues. LOT SIZES SHOULD AT LEAST COVER THE STANDARD 800SQ METRES FOR HOUSES,. AND NOT BE SMALL, AS AT FAIRWAY WATERS, AND CITY VALLEY. MANY RESIDENTS WILL HAVE BOATS AND TRAILERS. HOUSES SHOULD BE SUITED TO TROPICAL LIVING, COOLY ORIENTED, CONSERVING POWER IN ANY WAY POSSIBLE. AND HAVE GARDENS. THE CASUARINA ASSOCIATION OF RESIDENTS NEEDS THESE ISSUES DISCUSSED AT A PUBLIC MEETING IN THE AREA. A PROMISE IS A PROMISE.

OLD ADMIRALTY HOUSE

This beautiful and (now very rare) old TROPICAL building of high heritage value, is endangered by a development planned for part of DOUBLE block on which it is situated. While THE DEVELOPER SEEMS TO HAVE CHANGED HIS PLANS FROM TIME TO TIME, work on the surrounding building site has commenced BY JALOUISE P?L (ANDREW LIVERIS) EXCAVATING FOR A FOURTEEN STOREY BUILDING (C/F THE MITCHELL CENTRE), ALREADY SERIOUSLY AFFECTING THE GARDEN. BOTH HOUSE AND GARDEN ARE HERITAGE LISTED, AND WERE PREVIOUSLY LEASED TO COMMERCIAL AND NON-GOVERNMENT GROUPS.

SOME RESIDENTS PICTURE THEMSELVES WEEPING OVER THIS SITE, AS THEY DID THE HOTEL DARWIN, BUT SOME ARE FIGHTING ON. THEY CANNOT SEE THE REALITY IN MINISTER BURNS' ASSURANCE THAT THE BUILDING IS NOT BEING DAMAGED. IT ALL STARTED IN THE 1990'S WHEN PART OF THE GARDEN WAS PACED OFF, AS 'NON-HERITAGE', IN SPITE OF HERITAGE UNIT ADVICE AND RECOMMENDATION THAT THE HOUSE AND ALL OF THE GARDEN HAD SIGNIFICANT VALUES AND THE WHOLE SITE WAS ESSENTIAL TO THE LISTING.

A REPORT TO THE PUBLIC BY PETER FORREST, ON 22 APRIL 2004, SHOWED OLD ADMIRALTY HOUSE AS SECOND IN SIGNIFICANCE TO GOVERNMENT HOUSE IN ENTERTAINING VISITORS AND LOCAL VIP'S. THUS IT WAS MADE

CLEAR THAT THE NOW EXCAVATED TENNIS COURT WAS OF HERITAGE SIGNIFICANCE.

THIS ARBITRARY DIVISION OF THE LAND LED TO AN EXPRESSION OF INTEREST ADVERTISEMENT ON THIS CROWN LAND AND GOVERNMENT OWNED PROPERTY. ALTHOUGH IT IS LOCATED ON THE ESPLANADE, IF THE PROPOSED WORK IS COMPLETED, BOTH THE HOUSE AND LAND WILL BE LOST TO THE PEOPLE. A RESTAURANT IS PLANNED DOWNSTAIRS, WITH GLASS WALLS AND EVERY SECOND COLUMN REMOVED, WITH EXCAVATIONS AND BUILDINGS, ADDED AT THE REAR. THE GARDEN WILL BE MUCH REDUCED.

PLAN WOULD LIKE TO KNOW WHETHER ALL CROWN LEASE AND EXPRESSIONS OF INTEREST CONDITIONS HAVE BEEN STRICTLY MET. WE WOULD ALSO LIKE TO KNOW, WHY, GIVEN THE GENERAL PUBLIC CONCERN, AND WITH BUT A FEW DAYS TO GO ON THE DCA DEVELOPMENT PERMIT, WITH VIRTUALLY NO START MADE, EXCEPT SOME TREE CUTTING, A NEW PERMIT WAS ISSUED.

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Recently, a felled tree landed IN THE HERITAGE PART OF THE SITE. PLan has asked Environment and Heritage, through Marion Scrymgour, FOR practical safeguards to prevent damage to the house, BUT THERE IS NO ON-SITE SUPERVISION.

Meanwhile, the developer has LODGED AN APPLICATION FOR THE restaurant. THE PUBLIC HAS NOT YET SEEN THE conservation management plan, required OF HIM.

THIS IS A CASE OF THE DEVELOPMENT IMPERATIVE GETTING OUT OF HAND, AND DESTROYING WHAT THE PEOPLE LOVE AS HERITAGE.

WOODS /McMINN/BENNETT STREET DEVELOPMENT (AULETH)

PLan is concerned at the loss of amenity, and inappropriate planning at the BENNETT STREET end of Woods Street. The general height of buildings and number of dwellings in the space available REMINDS US OF BIG CITIES. THESE population densities, AND LIVING SITUATIONS completely inappropriate for TROPICAL Darwin.

SO FAR, TWO TOWERS ARE BUILT, TWO MORE APPROVED, WITH ONE LOT TO GO. THE DCA HAS REFUSED TO CONSIDER THE SOCIAL IMPLICATIONS OF SUCH DENSITY AS REQUIRED BY SECTION 51(R) OF THE PLANNING ACT. ALTHOUGH THE DEVELOPER HAS A MASTER PLAN, THE CHAIRMAN SAYS IT WILL NOT SHOW IT TO THE PUBLIC. PLAN HAS ASKED FOR OPEN GREEN SPACE FOR RECREATION, AS THERE IS NOWHERE FOR CHILDREN TO RUN AND GROW.

Several metres of PUBLIC land edging McMinn Street WERE ADDED to the developer's LAND, thus preventing the possibility of widening roadways or footpaths FOR INCREASING traffic, OR TO MATCH THE LANDSCAPING AT THE NT NEWS. FOR A PLEASANT STREETSCAPE.

(Francis, There are some additions from here on, which are not in differentiated font.)

WATERFRONT CONVENTION CENTRE

*In the latter part of 2003 the NT Government decided to put in \$100million into a \$600 million project to build a Convention and Exhibition Centre in the old port. Bids for projects were to be sought from interstate consortiums. PLan formed quickly formed a history/heritage reference group to bring to document for the government the need to protect history/heritage sites in the port, for their value to the community, and for tourism. as buildings were being demolished, this was an appropriate time to act.

We worked closely with the project team in the Chief Minister's office, and before Christmas, provided a basic for conservation, and relevant documentation, the most being the first settlement site (Goyder's Camp of 1869/1870) below Government House.

There is also both a need and an opportunity to build the equivalent of a Darwin Hall of Heroism, similar to an Outback Hall of Fame, to serve as a focus for World War II commemoration. as well as being important to the psyche of our own community, this would be a unique Darwin tourist destination of national and international significance. There is a wave of interest in such spiritual travel destinations.

Now the NT government is refusing to release the final three designs when they become available to involve the community in judging the suitability of any of them. There is a suspicion now that the government will insist only on the Convention/Exhibition Centre, and on some public art, and not the recognition of our authentic heritage. The EIS does not properly protect our heritage.

PLan is calls on the government to guarantee our history/heritage sites, and for the use of this opportunity for a Darwin Hall of Heroism remembering the courage of local civilians, and all service people alike.

BAYVIEW STAGE II (Austcorp/ Henry Walker Elton)

Bayview is a canal estate on Sadgroves Creek which flows into Darwin Harbour. New canal estates are banned in NSW, because of the environmental destruction caused usually to mangroves, known as marine nurseries. PLan has watched the devastation of the Bayview I, in spite of its EIS. The estate sold so slowly that the developers have had to beg special concessions from the DCA. Even its mixed SU (Specific Use) Zone fails to provide service infrastructure, particularly a school, even though one was originally planned, It 'cheats' on open space provision, by counting the canals as O1 (open recreational space).

An area outside Stage I on the Winnellie side, was used for dumping, hidden by construction security. Questions asked of the Environment section of DIPE was never satisfactorily answered. PLan wanted to protect this area, because of the impact of its degradation on mangrove communities, and harbour pollution. Health threatening biting midges common in low lying tropical areas.

Unfortunately, during 2003, the government handed Bayview Stage II over to

the same developers, as a crown lease, saying that the first EIS could be used. This was was a 'Prior commitment'. How many of these are there, that the public does not know about ? Will ALP government automatically approve them all ?

GARDINER STREET, 33 STOREY BUILDING (SUNBUILD)

Early this year, the public was shocked at an application for a 33 storey building on four house lots bounded by Gardiner, McMinn and Knuckey Streets housing 108 flats, and ground floor offices, in a building about 120 metres high. The tallest existing building in Darwin is 13 storeys high. the entrance is into Gardiner Street which is 8 metres wide. There is no landscaping at ground level. This site is not in the core of the Darwin CBD.

Such a building is out of proportion with the size of Darwin. Jeff Kennett, whilst visiting Darwin questioned the wisdom of building such a tower now. Is such a density wise when it is unnecessary, and is it suitable for tropical living? Would it spoil Darwin's image? Many people think it would. How much power will it draw for airconditioning? Would infrastructure cope? How would services in a city of 100,000 people cope with a fire in the building with shut down lifts? Our Darwin Town Plan really only covers buildings up to 8 storeys.

PLan's Straw Poll, 2004, No.1 begun at this time, shows from a sample of almost 300 public responses:

The public wants a tropical city that is properly planned- 89%
The public want the CBD should have building height restrictions- 94%
Very few people think that the DCA is doing a good job - 6%

Four-storey Tiwi development

Darwin has problem areas where archaic R3 (up to four storeys) zones adjoin R1 (single dwellings up to 2 storeys). Tiwi and Nightcliff have recently experienced this problem.

A four storey block of units in Trower Road Tiwi is now complete, after being approved by the DCA, in PLan's opinion, without due consideration of the impact on the amenity of this area, or effect on traffic and infrastructure. When Tiwi residents applied for a rezoning from R3 to R2 (limiting heights to two storeys) to prevent a repeat planning travesty, the Property Council and the local real estate industry went into panic mode, seriously misrepresenting the situation.

Business lawyers made Freedom of Information requests for PLan correspondence to the Planning Minister. Public attacks on residents from developers and the Property Council claimed they were "damaging interstate investment confidence". The <u>NT News</u> branded residents with clear interest in local amenity as mere "bystanders". Opposition Leader Terry Mills and Shadow Planning Minister Peter Maley both strongly hammered local member Kon Vatskalis in Parliament accusing him of improper conduct.

Land Use Objectives for Casuarina have long been of concern to PLan members—in 1998, then local member Peter Adamson was asked to start them, with no result. If he acted then, we would not have the problems we have today. PLan has recently written to Minister Chris Burns repeating the Tiwi residents sound reasons for the re-zoning.

Recently, a development application was made to vary the design approved by the DCA, including changing internal layouts and parking spaces, possibly resulting in three bedroom units in buildings originally for two. This has direct implications for levels of impact by people and traffic through the area, and raises again issues objected to by local residents.

COMMUNITY WINS RECOGNITION OF AMENITY, AND AN INTERIM ORDER AT OSTERMANN STREET, NIGHTCLIFF.

In a similar situation at Coconut Grove, approval was recently denied for a 4 storey building in an R3 zone. Minister Burns pointed out that approval would in an OK on amenity. The developer is reported to have said that his design would be a ghetto if he was forced to put it on the lot without DCA exemptions to setbacks.

As an outcome of the situations in Tiwi and Nightcliff, Planning Minister Chris Burns placed a two year interim order over 100 R3 blocks throughout Darwin, preventing buildings over 3 storeys. This period will allowing proper consideration of how to treat R3 lots adjacent to R1 zones.

FRANCES

This is all I have except brief news pieces, upcoming events, perhaps a full scale version of the straw poll, and a panel about Plan with a joining up and renewal panel.

THANK YOU FOR YOUR PATIENCE. I EXPECT OIT WILL BE TOO LONG, BUT we could CONSIDER IT IS as A BUMPER ISSUE, BECAUSE THERE WAS NONE LAST YEAR.

IF YOU WANT A BRIEF CONVENER'S MESSAGE, I Could Run it up quickly.

Page numbers need adjusting.

Margaret



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