

DEVELOPMENT CONTROLS - MOVING FROM REGULATION TO ADAPTATION

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Summary

This paper outlines the process undertaken within the former Great Lakes Council to transition regulation-style development controls into adaptive objectives and controls, within areas identified as being subject to potential coastal hazards.

The reasoning, opportunities and challenges associated with this transition are discussed in detail and the relevant development objectives and controls provided.

The presentation will focus on the processes of change from regulation to a development- risk matrix and the resulting amendments to the coastal planning section of the Great Lakes Development Control Plan.

Background

The Coastal Hazard Studies adopted by Great Lakes Council (Council) between 2010 and 2014 informed the preparation of coastal management plans and identification of coastal planning areas that affect approximately 183 private properties within the former Great Lakes local government area.

An Integrated Coastal Management (ICM) working group comprising the Strategic Planning, Development Assessment, Building, Engineering and Design & Investigation Sections of Council was formed to review existing development policy and controls for these coastal planning areas.

The primary purpose of the review was to ensure more appropriate and updated guidelines and assessment requirements for development within coastal planning areas were available to Council, affected landholders and the wider community.

Four Council documents were being used to assess development on land within coastal planning areas at this time:

1. Great Lakes Local Environmental Plan (LEP) 2014 - Clause 7.4 Coastal Risk Planning Areas and associated Coastal Risk Planning Area maps;
2. Great Lakes Development Control Plan (DCP) - Environmental Matters - Sea Level Rise and Coastal Erosion; and Pacific Palms - Additional Site Specific Setback Controls
3. Council Policy - Coastal Planning Guideline (NSW): Adapting to sea level rise (2011); and
4. Council Policy - Encroachment on public reserves in dune areas (as amended 2008)

State Environmental Planning Policy (Exempt & Complying Development) 2008 (Code SEPP) also included provisions for some exempt development, but specifically excluded complying development on land identified as being affected by coastal hazards.

The range of Council studies, codes and policies and the Code SEPP, also required multiple notations on S149 Planning Certificates. These notations use jargon and technical terminology, in keeping with the legal nature of the certificate document.

The result was not only a convoluted assessment process, but confusion for property owners and potential purchasers on what could be done to develop, refurbish and renovate properties within identified coastal hazard areas.

Idea

In 2013-14 Council instigated a new program for the integrated planning and management of coastal hazards, aimed at streamlining the integration of technical studies into planning instruments. Critically at this time, Council also faced a legal challenge to development consent conditions issued within a coastal planning area.

This combination of factors resulted in a new way of thinking about an old problem -

How can Council permit development and occupation in areas of coastal hazard, while adequately considering the safety of people and structures?

Moving from Regulation to Adaptation

The development of Great Lakes LEP 2014 resulted in Council's transitioning of previously identified coastal hazard areas and provisions into the standard clause for Coastal Risk Planning Areas and associated map layers.

During this process several Council workshops were held between 2011 and 2014 to establish an organisational understanding of:

- coastal hazard and risk terminology, impacts and classifications;
- adaptive management and assessment; and
- legal responsibilities and protections in hazard identification and communication.

Representatives from the NSW Coastal Panel, Office of Environment & Heritage, Department of Planning & Environment, independent legal firms and specialist consultants participated in these workshops.

Throughout these processes Council confirmed its' commitment to providing the best available, evidence-based hazard information to all members of the community. The common understanding that was achieved through this process confirmed that this information should be provided in publicly available documents such as the LEP and DCP.

To achieve this, methods for the transparent communication of hazard related information and regular review programs were required to be developed. This would ensure that the best available information is informing Council policy and practice.

The Integrated Coastal Management (ICM) framework was recognised as an opportunity to implement a whole-of-organisation program to achieve these outcomes. In response, the ICM working group co-ordinated the preparation, exhibition and communication of:

- the identification of the potential extent of coastal hazards by the year 2060 via maps contained in the publicly available LEP;
- the complete range of options available to Council and the community to respond to coastal hazards within the coastal zone management plan options study;
- Council's preferred options for adaptation and management within the next five to ten years within the Coastal Zone Management Plans (CZMP); and
- updated development objectives and controls for assessment - consistent with the CZMP.

Critically, the development objectives and controls for assessment needed to consider the risk-matrix information provided within the CZMPs, to ensure that there were:

1. a range of options available based on the type of development being proposed; and
2. options could be tailored to individual sites, in response to the extent and type of hazard/s that may be encountered.

The two most significant challenges to this process related to:

1. the need for a variety of options that could not only be used in one identified 'hot-spot' of active erosion; several areas of immediate hazard; but also future 'potential' hazards within the one development control plan; and
2. the process of engaging with a community that was already operating in an environment of confusion, misinformation, heightened awareness and concern.

Therefore, while incorporating Coastal Risk Planning Area provisions in LEP 2014 was consistent with Council's intention to identify hazards within the publicly available planning instruments, this process had already created a generally negative environment for consultation.

In contrast, the DCP was seen as a vehicle to empower land owners and the community, by creating real opportunities for collective decision-making: by reflecting the forward-thinking recommendations of the CZMPs; and providing a mixture of traditional and adaptive development design and construction options in coastal hazard areas.

At this time, Council's DCP contained controls for development in coastal hazard areas that were conservative, outdated and provided little guidance to the community or assessing officers:

4 Environmental Considerations

4.3 Sea Level Rise and Coastal Erosion

Controls

1. *For development proposals on land identified in the Coastal Risk Planning Area map under Great Lakes Local Environmental Plan 2014, a report from a suitably qualified geotechnical engineer and an engineer specialising in coastal marine processes will be required. The geotech report shall be required to address:*
 - a. *geotechnical and physical stability of the land*
 - b. *determine suitable measures for protection of the building against coastal erosion and recession,*
 - c. *address changes in storm frequency and intensity and sea level rise.*
2. *Where native vegetation that currently protects a dune system from erosion processes will be affected by proposed development, a Vegetation and Environmental Impact Assessment by a qualified arborist or ecologist may be required.*
3. *A linear sea level rise of 0.9m to the year 2100 is to be taken into account.*
4. *A Geotechnical Report shall also be required on sites affected by coastal hazards such as coastal erosion or erosion or reduced foundation capacity.*

5 Single Dwellings, Dual Occupancies, Villas and Townhouses

5.5 Setbacks

Controls

Pacific Palms and Seal Rocks - Additional Site Specific Setback Controls

To maintain visual amenity along the coastal frontage within the Pacific Palms area, a minimum setback of 15m from the seaward property boundary applies to the coastal hazard areas identified within Great Lakes LEP coastal hazard maps. No habitable buildings or structures are permitted within the setback area.

Prior to the commencement of the review, the ICM working group determined that there were four key questions when it came to improving the useability and effectiveness of the DCP:

- a. Are the objectives and design controls clearly understood by applicants and assessors?
- b. Do the controls reflect the flexibility required to address variations between coastal planning areas in draft LEP 2014 Coastal Risk Planning Area maps?
- c. Are the provisions consistent with Clause 7.4 Coastal Risk Planning in LEP 2014?
- d. Are the provisions or requirements already contained in the *NSW Office of Environment and Heritage Coastal Risk Management Guide: Incorporating sea level rise benchmarks in coastal risk assessments (2010)* or any other state-based controls or guidelines?

The first draft amendments "DCP - Coastal Risk Planning Areas", were prepared and exhibited with two draft CZMPs and a Planning Proposal that identified additional Coastal Risk Planning Areas in the Great Lakes local government area, for six weeks in April and May 2015.

This draft included a range of provisions including references to the LEP, Code SEPP and trigger points. In particular, the trigger point information was considered to be a key component in the DCP as they had been a matter of contention in the recent court case, in so far as they related to development consent conditions:

Trigger Points

- *Council may set a 'trigger point' for future adaptive actions as a relevant condition of approval of a new building, addition, structure or subdivision in the coastal risk planning area.*
- *The 'trigger point' will identify the action required to be undertaken by the holder of the development consent and may include:*
 - *Undertake further investigation of the coastal hazard;*
 - *Relocate the building or structure landward of its current position; or*
 - *Remove the building or structure and stabilise the disturbed area*
- *Council may also impose a condition which prescribes that the use or occupation of the new building, addition or structure is required to cease in response to a specified coastal hazard 'trigger point'.*

Note: *A standard 'trigger point' cannot be established for the purposes of assessment of development in the coastal risk planning area of the Great Lakes. Any trigger point will take into account the information available within the relevant coastal hazard study and coastal zone management plan adopted by Council; and the Coastal Risk Management Report submitted with the application.*

However, it was found that this one section of the DCP caused more concern and confusion within the community than any other provision. Therefore, it was quickly acknowledged that any provisions relating to 'trigger points' had to be removed.

Instead, requirements for Coastal Risk Management Reports certifying that a development is able "to adapt to the impact of coastal processes, coastal hazards and sea level rise planning benchmarks" were considered for incorporation.

Discussions at public information sessions and submissions received during the exhibition period also indicated a high level of confusion regarding the development and re-development potential of land within a coastal planning area. Officers were told that some landowners believed that a development application would be required to replace a door or window, paint a wall or renovate a bathroom; and that any development that was approved, would be conditioned so that the building would have to be demolished or transferred into Council ownership at a fixed date in the future.

Furthermore, the limited knowledge and understanding of how the LEP and Code SEPP worked in conjunction with the DCP, demonstrated to Council officers that while these relationships were documented within the DCP, the use of jargon or technical terms made this information unclear to land owners.

The community also made it clear that the language used in the LEP and Code SEPP, was considered to be emotive and negative, in comparison to the language used for other environmental hazards e.g. coastal **risk** planning areas, compared to flood planning and bushfire management.

In direct response to these community concerns and questions, a second round of DCP amendments was prioritised to: remove emotive language; provide additional guidance on exempt development; and clarify the options for development in coastal hazard areas.

External input was also sought on how the objectives and the controls could provide for site specific and adaptive provisions. The ICM group went back to basics and asked:

- Are the information and illustrations clearly understood
- What type of development is being proposed - permanent or sacrificial
- What is the dominant risk to the property - inundation or erosion
- Can we provide any flexibility to locate the structure away from the risk

The second version of amendments was exhibited for another six weeks in October - November 2015.

The messaging with the second exhibition was also very specific:

The draft amendments aim to clarify the requirements for development on land affected by a coastal planning area, including:

- *development that may not need Council approval (exempt development);*
- *subdivision and new buildings;*
- *additions, alterations and other structures such as garden sheds; and*
- *setbacks for single dwellings, dual occupancies and town houses.*

The resulting community engagement program was well received, with only seven submissions in comparison to 56 submissions from the original combined exhibition program. The most significant concerns raised in these submissions also related to higher-level assessment matters in comparison to straightforward requests for the hazard information to just be removed from all planning documents.

In particular, how did the DCP assist applicants in satisfying Clause 7.4 Coastal Risk Planning of Great Lakes LEP 2014? For example, a person may wish to have a small lightweight structure that does not involve the footings and foundations, but they are prepared for it to be relocatable or moveable.

The DCP as drafted did not appear to clearly address this scenario - as it does not address all potential structures, risks or extent of risk - therefore applicants may think the proposal was 'prohibited' by the DCP.

Council acknowledged that it was impossible to determine all possible scenarios. However, it was confirmed that the DCP is only a guideline document and any variation that is proposed is considered on merit, as part of a development assessment process where inconsistencies with DCP controls may be justified by compliance with DCP objectives and LEP 2014 requirements.

In response, officers put forward a new concept for a development-risk matrix to be provided to guide applicants on how to address the controls for each form of development being proposed.

The relevant sections of the DCP now look and feel radically different to the original:

Great Lakes Development Control Plan

1 Name of Plan

1.2 Relationship of this DCP to other Planning Documents

The Act incorporates provisions relating to State and local planning instruments. State Environmental Planning Policies ('SEPPs') may also apply to land within the local government area. Where this is the case, the statutory provisions of the SEPP will prevail over this Development Control Plan.

Local Environmental Plans (LEP) are local level statutory plans that establish land use zones, objectives and development standards for development and environmental conservation within the local government area.

The provisions of the Development Control Plan are in addition and complementary to the provisions of the Great Lakes Local Environmental Plan 2014 (or as amended).

If there is an inconsistency between the two documents, the Great Lakes Local Environmental Plan 2014 (or as amended) shall prevail.

1.3 Development not needing Council consent (Exempt Development)

Exempt development can be undertaken under State Environmental Planning Policy (Exempt and Complying Development) 2008 without development consent. To see if your development can be considered as exempt, go to the Electronic Housing Code website www.onegov.nsw.gov.au/new/agencies/ehc.

By providing your property address and identifying the development you want to undertake, the website will provide you with an Exempt Development Report. The Report will outline the rules that you must satisfy for the development to be exempt. If you cannot comply with these rules, a development application must be lodged with Council.

Exempt development may include minor works around the home such as:

<p>Access ramps Aerials, antennae and communication dishes Air-conditioning units Animal shelters Aviaries Awnings, blinds and canopies Balconies, decks, patios, terraces Barbecues and other outdoor cooking structures Cabanas, cubby houses, garden sheds, greenhouses Carports Clothes hoists and clothes lines Driveways and hard stand spaces Fences</p>	<p>Hot water systems Landscaping structures Letterboxes Minor building alterations: <ul style="list-style-type: none"> • external - non structural • internal - no change of room configuration Pathways and paving Playground equipment Privacy screens Rainwater tanks (above ground) Roller shutter doors adjoining lanes Screen enclosures (of balconies, decks) Sculptures and artworks Shade structures</p>
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Flagpoles Fowl and poultry houses Garbage bin storage enclosure Home businesses Home-based child care	Skylights, roof windows and ventilators Swimming pools (portable) and spas and child-resistant barriers Water features and ponds
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4 Environmental Considerations

4.3 Coastal Planning Areas

This section of the DCP applies to land identified as being within a Coastal Risk Planning Area on the Coastal Risk Planning Maps of Great Lakes Local Environmental Plan (LEP) 2014, where the provisions of Clause 7.4 Coastal Risk Planning of the LEP also apply.

This section also provides guidance on how to meet the requirements of clause 7.4 of Great Lakes LEP 2014. Within this development control plan this is referred to as the 'coastal planning area'.

Note: For the purposes of assessment, the design life of any building or structure is taken to be 50 years, in accordance with the Building Code of Australia and Australian Standard 2870-2011.

Objectives

- To ensure that development is designed and located in response to potential coastal hazards and does not adversely impact neighbouring properties or public land.
- To ensure that development, where possible, avoids the need for physical structures to protect the development from potential damage caused by coastal hazards.

Within this development control plan certain applications for development within the coastal planning area must be accompanied by a report from a coastal engineer certifying the structure. A 'coastal engineer' is a suitably qualified and registered engineer with specialist experience in geotechnical and/or coastal marine processes.

A report from a coastal engineer is a Coastal Risk Management Report that addresses the Coastal Risk Management Guide - Incorporating sea level rise benchmarks in coastal risk assessments (2010), produced by the Office of Environment and Heritage and available at:
www.environment.nsw.gov.au/resources/water/coasts/10760CoastRiskManGde.pdf

Subdivision Controls

1. All proposed allotments are to include a nominated building envelope that is located outside of the coastal planning area.
2. Public services and infrastructure including sewer, water, drainage, electricity and roads are to be located outside of the coastal planning area and landward of any building envelope.

New Buildings

Checklist - what do I need to address in the Coastal Risk Management Report for my new building?

Key Question:	No	Yes
Is the new building proposed in the coastal planning area	A report is not required for the new building - see item 1 below	A report certifying the building is required - see item 2 below
Is the primary road access located in the coastal planning area	A report is not required for the road access	A report may be required on the road access - see item 3 below
Are the service connection points located in the coastal	A report is not required for the service connection points	A report may be required on the service connections - see item 4

planning area		below
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1. New buildings are to be located entirely outside of the coastal planning area wherever possible. If this can be achieved, a report by a coastal engineer certifying the structure is not required.
2. New buildings within the coastal planning area (in whole or part) must be accompanied by a report from a coastal engineer to certify that:
 - a) the foundations and footings of the building are designed to achieve safe bearing into the stable foundation zone; and
 - b) the building has been designed with a minimum habitable floor level that provides adequate protection from inundation by ocean wave run-up.
3. New buildings on properties where the primary road access is located within the coastal planning area (in whole or part) are to be designed so that that driveway access to the building:
 - a) is provided outside of the coastal planning area wherever possible;
 - b) access is not located between the building and the coastal planning area if an alternative location is available;
 - c) is provided from the secondary road frontage on a corner allotment;
 Where access cannot be designed to meet one of these requirements, evidence is to be submitted that the occupants of the dwelling can evacuate the property if the road access or driveway is damaged as a result of a coastal hazard.
4. New buildings are to be designed so that new connections to public services and infrastructure such as sewer, water, drainage and electricity:
 - a) are located outside of the coastal planning area wherever possible;
 - b) not located between the building and the coastal planning area if an alternative connection point is available.

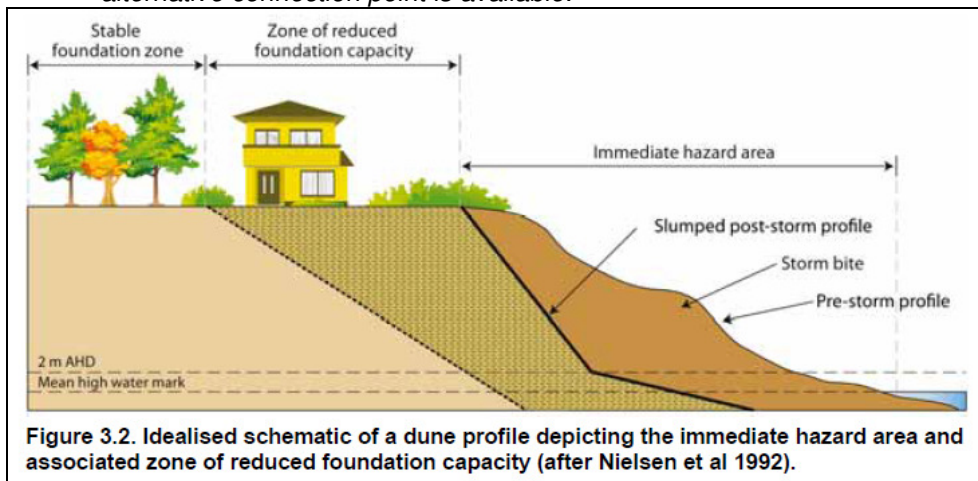


Figure 3.2. Idealised schematic of a dune profile depicting the immediate hazard area and associated zone of reduced foundation capacity (after Nielsen et al 1992).
 Diagram from Office of Environment & Heritage Coastal Risk Management Guide (2010)

Note: For the purposes of this DCP the **stable foundation zone** is to be regarded as natural dune material occurring **landward and/or below the zone of reduced foundation capacity** as defined in the Coastal Risk Management Guide. A copy of the Guide is available at: www.environment.nsw.gov.au/resources/water/coasts/10760CoastRiskManGde.pdf

Additions and Alterations

Checklist - do I need to provide a Coastal Risk Management Report with my additions and alterations?

Key Question:	No	Yes
Is my addition within the coastal planning area?	A report is not required - see item 1 below	A report is required - see item 2 below
Are my building alterations within the coastal planning area	A report is not required - see item 1 below	A report is required - see item 3 below

1. Additions and alterations are to be located entirely outside of the coastal planning area wherever possible. If this can be achieved, a report by a coastal engineer certifying the structure is not required.
2. Additions that are proposed within the coastal planning area (in whole or part), are to be accompanied by a report from a coastal engineer to certify that the foundations are designed to ensure safe bearing into the stable foundation zone.
3. Alterations to an existing building within the coastal planning area (in whole or part), other than those permitted as exempt development, are to be accompanied by a report from a coastal engineer to certify that:
 - a) the alterations do not place any additional load on the existing footings of the building; or
 - b) the existing foundations are capable of carrying the additional load and provide safe bearing into the stable foundation zone; or
 - c) additional foundations have been designed to carry the additional load and will ensure safe bearing into the stable foundation zone.

Ancillary Structures

Checklist - do I need to provide a Coastal Risk Management Report with my ancillary structures?

Key Question:	No	Yes
Are ancillary structures proposed in the coastal planning area	A report is not required - see item 1 below	No report is required - see item 1 below
Are lightweight structures proposed in the coastal planning area	A report is not required - see item 2 below	No report is required - see item 2 below
Are masonry structures proposed in the coastal planning area	A report is not required - see item 1 below	A report is required - see item 3 below
Are coastal protection works proposed in the coastal planning area	Not applicable	A report is required - see item 4 below

1. Ancillary structures are to be located entirely outside of the coastal planning area wherever possible. If this can be achieved, a report by a coastal engineer certifying the structure is not required.
2. Light weight structures such as sheet metal garden sheds and detached timber pergolas do not require a report from a coastal engineer certifying the structure.
3. Masonry structures such as swimming pools and retaining walls are permitted within the coastal planning area if they are accompanied by a report from a coastal engineer to certify that the structure is designed:
 - a) so that it is structurally separate from existing building/s; and
 - b) to ensure safe bearing into the stable foundation zone.
4. Any proposed coastal erosion protection structures must be accompanied by a report from a coastal engineer to certify that the structure is designed and located wholly on private land and must not cause damage to, or otherwise adversely impact, an adjacent, neighbouring or public property.

Additional Information

www.environment.nsw.gov.au/resources/water/coasts/10760CoastRiskManGde.pdf

www.planning.nsw.gov.au/adapting-to-sea-level-rise

www.environment.gov.au/archive/coasts/publications/nswmanual/index.html

www.legislation.nsw.gov.au/maintop/view/inforce/epi+572+2008+cd+0+N

5 Single Dwellings, Dual Occupancies, Villas and Townhouses

5.5 Setbacks

Objectives

- To ensure residential buildings have sufficient separation to provide privacy, solar access, landscaping opportunities and amenity for occupants.
- A residential building must be setback from its primary road frontage a sufficient distance to ensure safe vehicular access and egress from the site.

5.5.2 Residential and Village Zones

5.5.2.1 Primary Road Setback Controls

1. Where there are existing neighbouring houses within 40m, the primary road setback should be an average of the setbacks of the nearest two neighbouring houses, with the same primary road frontage.
2. Garages, carports and open car parking spaces must be setback at least 6m from the primary road frontage.
3. A reduced primary road setback may be considered when the side and rear boundaries of an allotment are located within (in whole or part) the coastal planning area. It must be demonstrated that the reduced setback does not detrimentally impact upon the amenity of adjoining properties, streetscape or vehicular access and egress from the site.

5.5.2.5 Side and Rear Setback Controls

1. A residential building must be setback from its side boundaries:
 - a) A minimum of 900mm for a building with a maximum wall height of 3.8m.
 - b) Where the wall height is greater than 3.8m the minimum setback shall be:
 $900\text{mm} + (\text{building height over } 3.8\text{m}/4)$
For example for a building with a wall height of 6.2m:
 $900\text{mm} + (6.2\text{m}-3.8\text{m}/4)$
 $900\text{mm} + (2.4\text{m}/4)$
 $900\text{mm} + 600\text{mm} = 1.5\text{m}$
2. A residential building must be setback from its rear boundary:
 - a) A minimum of 3m for a building with a maximum wall height of 3.8m.
 - b) Where the wall height is greater than 3.8m the minimum setback shall be:
 $3\text{m} + (\text{building height over } 3.8\text{m}/4)$
For example for a building with a wall height of 6.2m:
 $3\text{m} + (6.2\text{m}-3.8\text{m}/4)$
 $3\text{m} + (2.4\text{m}/4)$
 $3\text{m} + 600\text{mm} = 3.6\text{m}$
3. Windows, balconies, terraces and decks closer than 3m from a side or rear boundary may require privacy screening, to reduce the impact on the privacy of adjoining buildings.
4. A two storey residential building could have its ground floor 900mm from the side boundary with the second storey set back further as required by the formula.
5. Reduced side and rear setbacks may be considered when the primary road frontage of an allotment is located within the coastal planning area. It must be demonstrated that the reduced setbacks do not detrimentally impact upon the amenity, privacy and solar access to private outdoor areas of adjoining properties.

Pacific Palms and Seal Rocks - Additional Setback Control

1. In Pacific Palms and Seal Rocks a 6m rear boundary setback generally applies to any part of a residential building or ancillary structure on a site:
 - a) with a slope in excess of 1:6; or
 - b) adjoining a National Park or land zoned for environmental conservation.

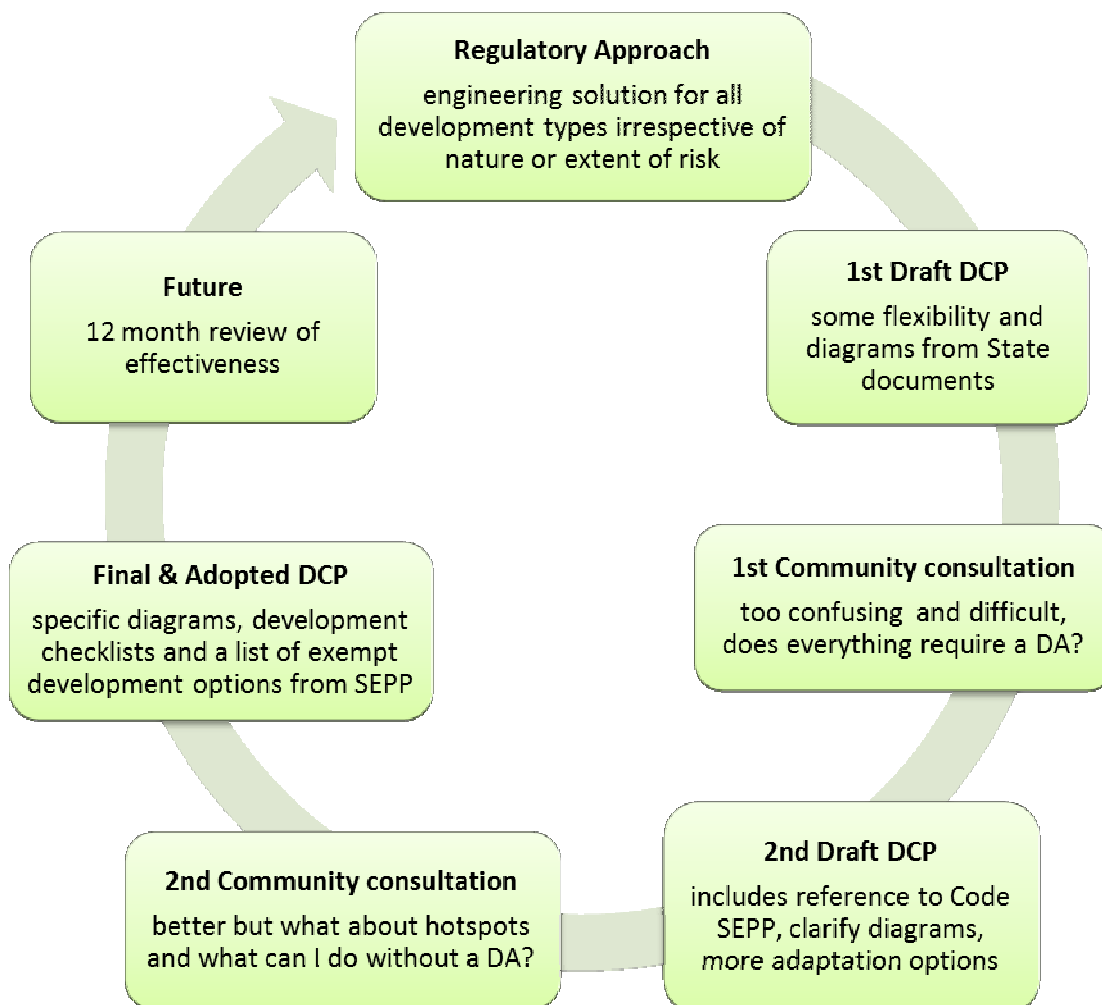
Conclusion

The work undertaken to update and revise the original development control plan provisions for coastal planning areas was informative and consultative. While the program was significantly extended by the additional external and internal review and community consultation, the outcome has been beneficial.

In particular, the number of enquiries by potential purchasers and landowners seeking to redevelop their properties has been reduced; and the assessment process has been streamlined.

Therefore, the cycle undertaken in updating the Great Lakes Development Control Plan shown below, is likely to be repeated in the future. In doing so the benefits are also expected to increase over time, as the DCP and other planning instruments continue to be reviewed and updated as new and improved technical information becomes available.

Great Lakes Development Control Plan - Coastal Planning Objectives and Controls review process 2014 - 2015



Therefore the significant learnings from this project may be summarised as follows:

Negatives:

1. The legislated planning language around coastal hazards is emotive and inflammatory compared to language used for other environmental hazards such as bush fire and flood.

The terminology and language used by the State in planning legislation and other regulatory documents continue to be a primary cause for concern for land owners and potential purchasers, no matter what other measures Council may put in place.

2. The complexity of coastal hazards and assessment processes were difficult to overcome for some participants.

The process of enabled the majority of community members came to an understanding of Council's approach of adaptation in the face of uncertainty, but this will be a long-term process.

Positives:

1. The mapping of the coastal hazard areas in LEP 2014 assisted community members by clearly identifying which properties were affected by the development controls.
2. Having a working group involved in reviewing and amending the DCP and attending community information sessions enabled a large number of one-on-one discussions between community members and officers. This in turn, improved Council's ability to identify specific issues and opportunities for improvement very quickly.
3. The community welcomed Council's attempts to 'normalise' the language around coastal hazards.
4. The community appreciated the 'immediate' recognition and response to their concerns, demonstrated by Council prioritising a second round of DCP amendments and community engagement.
5. The project has had positive impacts on breaking down some barriers to communication between Council and community members and identified additional opportunities for collaborative review and monitoring programs.