

13 July 2026

Chief Executive Officer
Douglas Shire Council
PO Box 723
Mossman QLD 4873



Attention: Jenny Elphinstone

Via email: Jenny.Elphinstone@douglas.qld.gov.au

Dear Jenny,

**RE: RESPONSE TO INFORMATION REQUEST – DEVELOPMENT PERMIT FOR MATERIAL
CHANGE OF USE FOR EMERGENCY SERVICES AT 43 FRONT STREET, MOSSMAN
COUNCIL REF: MCUC 2026_5947/1**

Reference is made to the abovementioned development application and Council's Information Request dated 26 June 2026. In accordance with Section 13.2 of the Development Assessment Rules, we hereby provide a full response to all matters raised, and request that Council proceed with assessment of the application.

In support of this response, the following information is provided:

- Existing Floor Plans (**Appendix A**)
- Code Assessment (**Appendix B**).

Each item from Council's information request letter is addressed below:

Outstanding Code Compliance Information

1. Please see attached Code Assessment which provides an assessment against the additional codes identified.

It is noted that at any one time there could be up to 6 paramedics on the site. Therefore, the five (5) car spaces and the single carport at the rear of the site is considered sufficient for the operation of the site.

Bin Storage Area

2. It is proposed to utilise the current waste arrangements for the site which include:
 - a. General waste bins to be collected from the kerb (see **Figure 1**); and
 - b. Medical waste (consumables) to be disposed of in accordance with legal requirements by licenced contractors.

The current and proposed facility are expected to generate the same amount of waste which is similar to that generated by a household.

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Figure 1 – Current kerbside refuse collection

Existing Floor Areas

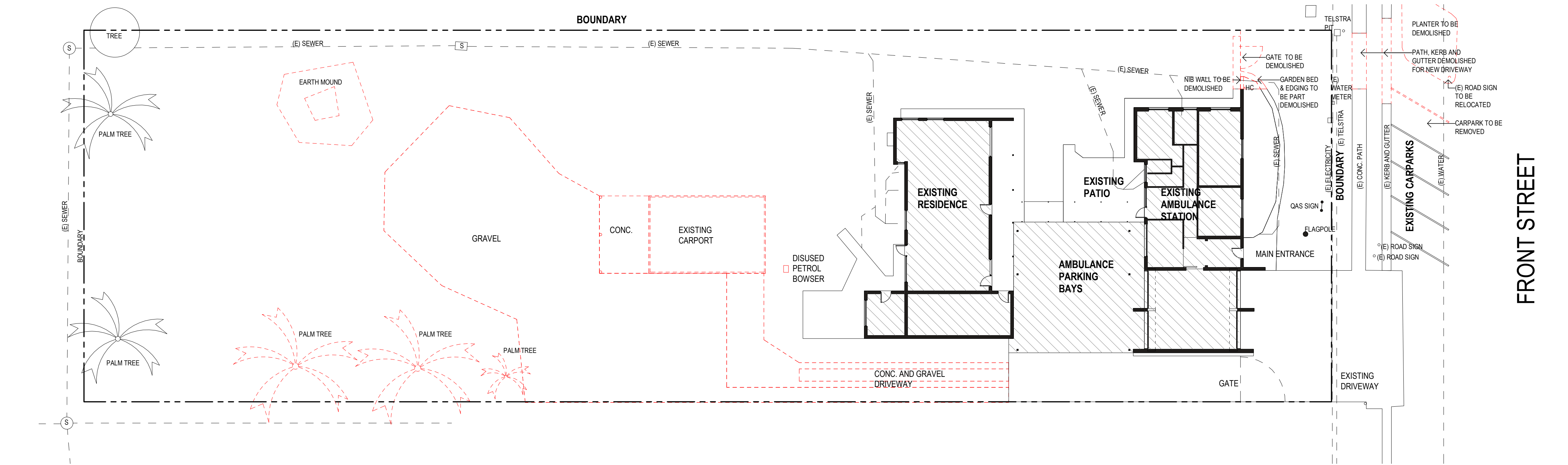
3. Please see attached Existing Floor Plans which show the existing floor areas. The existing enclosed floor areas are listed below:
 - a. Existing ambulance station (including enclosed ambulance bays) – 133m²
 - b. Existing residence and bulk store - 123m²
 - c. Existing plant room - 195m².

Thank you for your attention to this matter. We anticipate that this information is sufficient for your purposes and ask that you proceed with the assessment of this application.

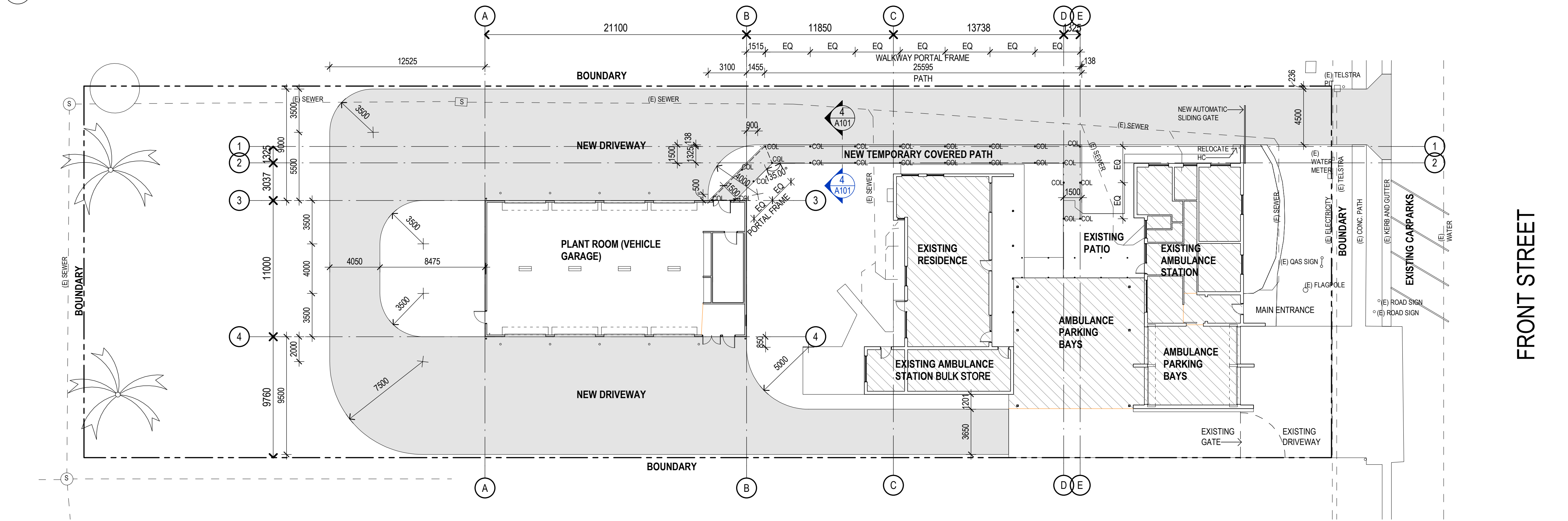
Should you have any queries, please do not hesitate to contact Tim O'Leary on (07) 3217 5771.

Yours sincerely,

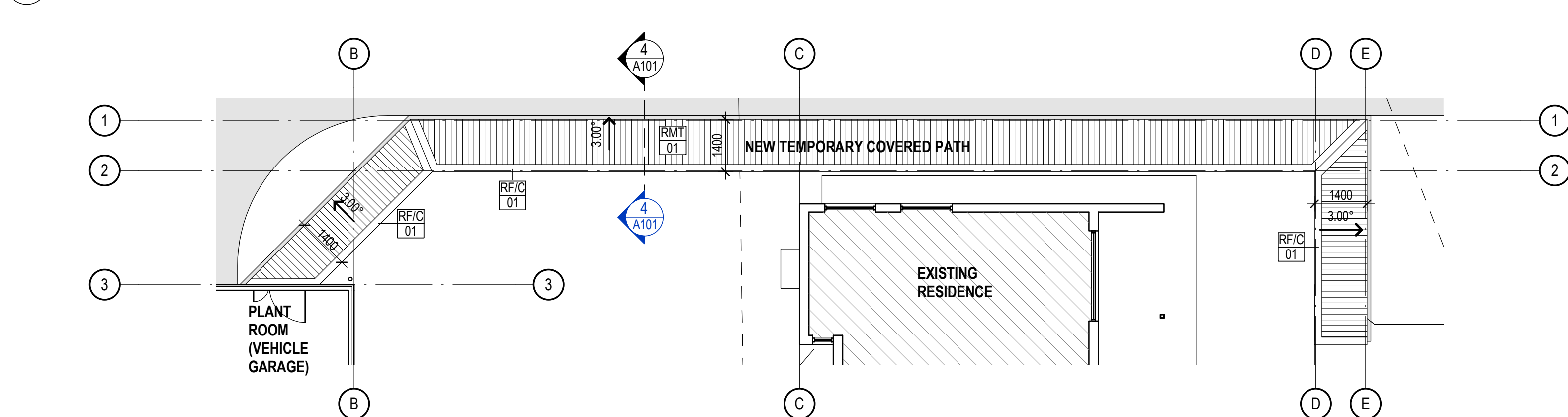
Tim O'Leary
Principal Planner
REEL PLANNING PTY LTD



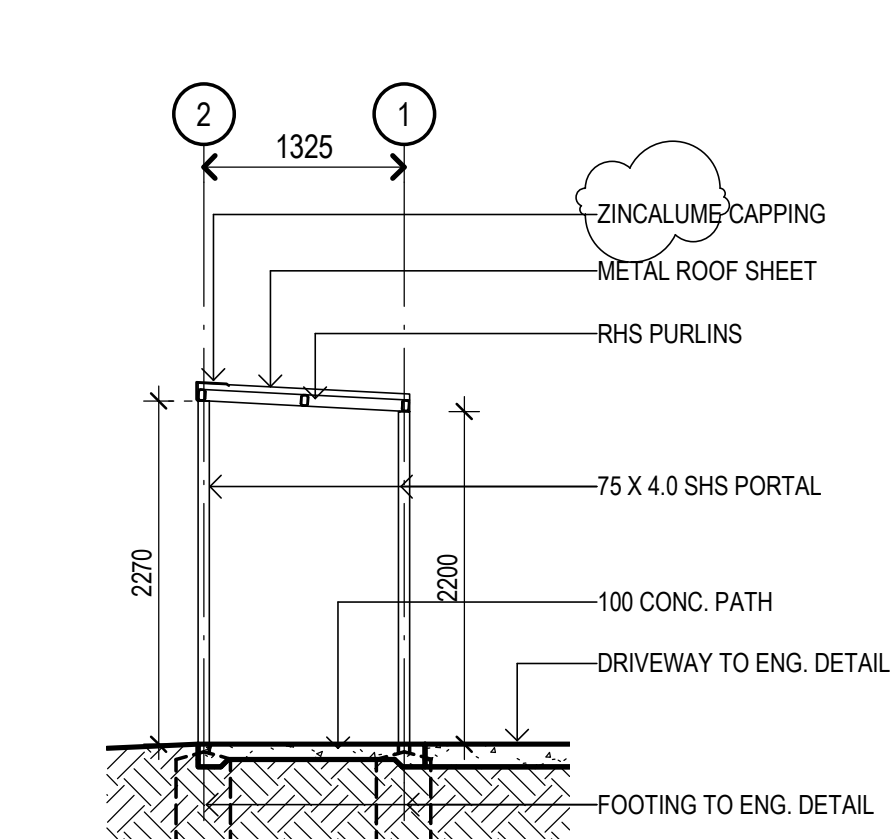
1 EXISTING & DEMOLITION SITE PLAN
A201 1: 200



2 PROPOSED SITE PLAN
A201 1: 200



3 WALKWAY ROOF PLAN
A201 1: 100



4 WALKWAY SECTION
A101 1: 50

Notes
The information contained in this document is copyright and may not be used or reproduced for any other project or purpose.

Verify all dimensions and levels on site and report any discrepancies to Coburn Architecture for direction prior to the commencement of work.

Drawings are to be read in conjunction with all other contract documents.

Use figured dimensions only. Do not scale from drawings. dwg/plsers cannot guarantee the accuracy of content and format for copies of drawings issued electronically.

The completion of the Issue Details Checked and Authorised section is confirmation of the status of the drawing. The drawing shall not be used for construction unless endorsed 'For Construction' and authorised for issue.

6 COBURN ARCHITECTURE PTY LTD
Registered Architect Alpha Coburn BDAQ 4185

LEGEND

- SET OUT POINT
- EXISTING BUILDING
- ITEM TO BE DEMOLISHED
- MATERIAL / FINISHES TAG
- ABBREVIATION 'P' FOR PAINT CODE
- EXISTING COLUMN
- EXISTING HOSE COCK

North

FOR CONSTRUCTION
FOR USE DURING CONSTRUCTION

C	FOR CONSTRUCTION	11.07.2017	AC	AC
B	FOR CLIENT REVIEW	19.06.17	AC	AC
A	FOR REVIEW	12.06.17	AC	AC
Issue	Description	Date	Chk	Auth
Architect	Coburn Architecture			
	www.coburnarchitecture.com.au			
Project	QAS MOSSMAN			
Location	Front Street, Mossman QLD			
Client	WIP Construction			
Drawing	SITE PLAN - EXISTING & PROPOSED			
Scale	As indicated @ A1	Date Printed	11/07/2017 1:29:21 PM	
Project Number	40605	Drawing Number	A101	Issue
File Name	R:\Projects\1000\40605 - Mossman Ambulance Station CODESIGN DOCUMENTS\10 Architecture\Drawings\00 Model\40605 - Mossman Ambulance Central 2017.rvt			

COBURN
architecture

9.3.6 Community facilities code

9.3.6.3 Criteria for assessment

Table 9.3.6.3.a— Community facilities code – assessable development

Performance outcomes	Acceptable outcomes	Response
For assessable development		
PO1 Development ensures that the hours of operation are consistent with reasonable community expectations for the use and do not impact on the amenity of nearby sensitive land uses.	AO1 Development for non-residential use has hours of operation, including indoor activity areas and delivery vehicles, which are limited to 7am to 6pm.	Complies with PO1 Due to the nature of the use, it is not possible to restrict hours of operation to standard business hours. Activities such as external facility and vehicle cleaning, deliveries/pickup, building maintenance etc., will be conducted at the station within business hours. Emergency service vehicle lights and sirens are only engaged when required to alert surrounding vehicles of their approach. Ambulance vehicles will not leave the site with sirens engaged unless there is a hazard on the road, and sirens are required to clear the road. In consideration of the existing use of the land and the essential service to be provided it is considered that the hours of operation are consistent with reasonable community expectations.
PO2 Development is designed to protect nearby sensitive land uses from adverse	AO2.1 Where on a site adjoining a sensitive land use and located within 20 metres from the	Complies with AO2.1 Fencing will be provided to all boundaries including the

Performance outcomes	Acceptable outcomes	Response
impacts on the existing levels of amenity, including by way of light, noise, odour or other nuisance.	common boundary, a minimum 1.8 metre high acoustic fence is provided for the full length of the common boundary.	common boundary to the west.
	AO2.2 Development does not involve amplification devices and does not generate noise that is clearly audible from nearby sensitive land uses.	Complies with AO2.2 Amplification devices are not proposed.
	AO2.3 Development provides outdoor lighting which is installed and operated in compliance with the requirements of AS4282-1997 Control of the obtrusive effects of outdoor lighting.	Complies with AO2.3 All outdoor lighting will comply with the Australian Standard.
	AO2.4 Mechanical plant and equipment is acoustically and visually screened from adjoining sensitive land uses.	Complies with AO2.4 All plant will be screened and acoustically treated including a 2.4m acoustic fence to the generator on the southern boundary.
	AO2.5 Development: (a) does not involve activities that generate air emissions, including odour dust, fumes or smoke beyond the site; (b) where cooking or food odour is released, exhaust is discharged vertically and directed away from a sensitive land use, and vents are separated by the following distances:	Complies with AO2.5 The proposal does not involve activities that generate air emissions, including odour dust, fumes or smoke beyond the site.

Performance outcomes	Acceptable outcomes	Response
	(i) a minimum of 6 metres horizontally from a sensitive land use; (ii) a minimum of 2 metres above any thoroughfare with regular traffic.	
PO3 and PO4 – Not applicable		
PO5 Development must be consistent with the reasonable expectations for built form, site layout and landscape design of development on surrounding land.	A05 Development is of a scale, height and bulk that is not greater than that of surrounding development.	Complies with AO2.5 The scale of the proposal is limited to a single storey and is consistent with prevailing development in the locality.
PO6 Development does not impose adverse visual amenity impacts on any land associated with Accommodation activity group.	AO6.1 Development has a building setback from a site boundary with any land use associated with the Accommodation activity group of 6 metres, or half the height of the building at that point, whichever is the greater.	Complies with PO6 The rear wall of the relief quarters will be located a minimum 6m from the rear boundary, however the deck will be 3m from the rear boundary. Despite this, it is noted that the deck and roof is limited to a single storey and will be screened by landscaping. The deck will not impact on habitable rooms and provides adequate separation to the dwelling at the rear of the site.
	AO6.2 Development provides a 3 metre wide landscape buffer capable of deep planting provided between vehicle movement and car parking areas and common boundaries any land use associated with the Accommodation activity group.	
PO7 Development ensures that on-site car parking is located so as to ensure that employee, patron and visitor	A07 Car parking is: (a) provided below or at the rear of the primary building for the	Complies with PO7 Car parking spaces will be located at the front of the site; however, they will be

Performance outcomes	Acceptable outcomes	Response
car parking associated with the use does not dominate the frontage of the premises and maintains the amenity of the street and adjacent properties.	use and is not within the front setback of the site; or (b) where forward of the building line, car parking is integrated with high quality landscaping.	located behind landscaping to screen their view.
PO8 Safety of users of the development and surrounding community is considered and incorporated into the design of the facility.	AO8 No acceptable outcomes are prescribed.	Complies with PO8 The development is limited to single storey construction and is mindful of the surrounding built form in Front Street. The proposal incorporates a mix of materials, colours, recesses and projections to create articulation and visual interest.
PO9 Landscaping contributes to establishing an attractive and safe streetscape and a high standard of amenity.	AO9 No acceptable outcomes are prescribed.	Complies with PO9 The development incorporates attractive and safe landscaping throughout the development. The landscaping provides a high level of amenity.

9.4.1 Access, parking and servicing code

9.4.1.3 Criteria for assessment

Table 9.4.1.3.a— Access, parking and servicing code– assessable development

Performance outcomes	Acceptable outcomes	Response
For assessable development		
PO1 Sufficient on-site car parking is provided to cater for the amount and type of vehicle traffic expected to be generated by the use or uses of the site, having particular regard to: (a) the desired character of the area; (b) the nature of the particular use and its specific characteristics and scale; (c) the number of employees and the likely number of visitors to the site; (d) the level of local accessibility; (e) the nature and frequency of any public transport serving the area; (f) whether or not the use involves the retention of an existing building and the	AO1.1 The minimum number of on-site vehicle parking spaces is not less than the number prescribed in Table 9.4.1.3.b for that particular use or uses.	Complies with AO1.1 There is no prescribed rate for Emergency services, however the proposal will provide sufficient spaces to accommodate number of vehicles likely to be parked at any one time.
	AO1.2 Car parking spaces are freely available for the parking of vehicles at all times and are not used for external storage purposes, the display of products or rented/sub-leased.	Complies with AO1.2 Car parking spaces will be available for parking at all times.
	AO1.3 Parking for motorcycles is substituted for ordinary vehicle parking to a maximum level of 2% of total ordinary vehicle parking.	N/A

Performance outcomes	Acceptable outcomes	Response
previous requirements for car parking for the building; (g) whether or not the use involves a heritage building or place of local significance; (h) whether or not the proposed use involves the retention of significant vegetation.	AO1.4 For parking areas exceeding 50 spaces parking, is provided for recreational vehicles as a substitute for ordinary vehicle parking to a maximum of 5% of total ordinary vehicle parking rate.	N/A
P02 Vehicle parking areas are designed and constructed in accordance with relevant standards.	AO2 Vehicle parking areas are designed and constructed in accordance with Australian Standard: (a) AS2890.1; (b) AS2890.3; (c) AS2890.6.	Complies with AO2 Parking will be provided in accordance with the Australian Standards.
P03 Access points are designed and constructed: (a) to operate safely and efficiently; (b) to accommodate the anticipated type and volume of vehicles (c) to provide for shared vehicle (including cyclists) and pedestrian use, where appropriate; (d) so that they do not impede traffic or pedestrian movement on the adjacent road area; (e) so that they do not adversely impact upon existing intersections or future road or intersection improvements; (f) so that they do not adversely impact current	AO3.1 Access is limited to one access cross over per site and is an access point located, designed and constructed in accordance with: (a) Australian Standard AS2890.1; (b) Planning scheme policy SC6.5 – FNQROC Regional Development Manual - access crossovers.	Complies with P03 The site already has two crossovers. The crossovers are not proposed to change as part of this proposal. Two crossovers are required for operational needs.
	AO3.2 Access, including driveways or access crossovers: (a) are not placed over an existing: (i) telecommunications pit; (ii) stormwater kerb inlet; (iii) sewer utility hole; (iv) water valve or hydrant.	Complies with AO3.2 Access is existing and not located over existing infrastructure.

Performance outcomes	Acceptable outcomes	Response
and future on-street parking arrangements; (g) so that they do not adversely impact on existing services within the road reserve adjacent to the site; (h) so that they do not involve ramping, cutting of the adjoining road reserve or any built structures (other than what may be necessary to cross over a stormwater channel).	(b) are designed to accommodate any adjacent footpath; (c) adhere to minimum sight distance requirements in accordance with AS2980.1	
	A03.3 Driveways are: (a) designed to follow as closely as possible to the existing contours, but are no steeper than the gradients outlined in Planning scheme policy SC6.5 – FNQROC Regional Development Manual; (b) constructed such that where there is a grade shift to 1 in 4 (25%), there is an area with a grade of no more than 1 in 6 (16.6%) prior to this area, for a distance of at least 5 metres; (c) on gradients greater than 1 in 6 (16.6%) driveways are constructed to ensure the cross-fall of the driveway is one way and directed into the hill, for vehicle safety and drainage purposes; (d) constructed such that the transitional change in grade from the road to the lot is fully contained within the lot and not within the road reserve; (e) designed to include all necessary associated drainage that intercepts and directs storm water runoff to the storm water drainage system.	Complies with A03.3 Existing access crossovers and driveways are to be retained.

Performance outcomes	Acceptable outcomes	Response
	AO3.4 Surface construction materials are consistent with the current or intended future streetscape or character of the area and contrast with the surface construction materials of any adjacent footpath.	Complies with AO3.4 Existing hardstand areas to be retained.
P04 Sufficient on-site wheel chair accessible car parking spaces are provided and are identified and reserved for such purposes.	A04 The number of on-site wheel chair accessible car parking spaces complies with the rates specified in AS2890 Parking Facilities.	Complies with P04 Parking is not open to the public. Due to operational needs accessible parking is not provided.
P05 Access for people with disabilities is provided to the building from the parking area and from the street.	A05 Access for people with disabilities is provided in accordance with the relevant Australian Standard.	Complies with P05 Adequate access is provided from the parking area and street.
P06 Sufficient on-site bicycle parking is provided to cater for the anticipated demand generated by the development.	A06 The number of on-site bicycle parking spaces complies with the rates specified in Table 9.4.1.3.	Complies with P06 Due to operational needs bicycle parking is not provided.
P07 Development provides secure and convenient bicycle parking which: (a) for visitors is obvious and located close to the building's main entrance; (b) for employees is conveniently located to provide secure and convenient access between the bicycle storage area,	A07.1 Development provides bicycle parking spaces for employees which are co-located with end-of-trip facilities (shower cubicles and lockers); A07.2 Development ensures that the location of visitor bicycle parking is discernible either by direct	Complies with P07 Due to operational needs bicycle parking is not provided.

Performance outcomes	Acceptable outcomes	Response
end-of-trip facilities and the main area of the building; (c) is easily and safely accessible from outside the site.	view or using signs from the street. A07.3 Development provides visitor bicycle parking which does not impede pedestrian movement.	
PO8 – Not applicable		
PO9 Access, internal circulation and on-site parking for service vehicles are designed and constructed: (a) in accordance with relevant standards; (b) so that they do not interfere with the amenity of the surrounding area; (c) so that they allow for the safe and convenient movement of pedestrians, cyclists and other vehicles.	A09.1 Access driveways, vehicle manoeuvring and onsite parking for service vehicles are designed and constructed in accordance with AS2890.1 and AS2890.2. A09.2 Service and loading areas are contained fully within the site. A09.3 The movement of service vehicles and service operations are designed so they: (a) do not impede access to parking spaces; (b) do not impede vehicle or pedestrian traffic movement.	Complies with PO9 Existing access and driveways will be retained and are constructed in accordance with the relevant standards. Onsite manoeuvring and servicing is adequate for the use and available onsite.
PO10 – Not applicable		

9.4.3 Environmental performance code

9.4.3 Criteria for assessment

Table 9.4.3.3.a— Environmental performance code— assessable development

Performance outcomes	Acceptable outcomes	Response
For assessable development		
PO1 Lighting incorporated within development does not cause an adverse impact on the amenity of adjacent uses and nearby sensitive land uses.	AO1.1 Technical parameters, design, installation, operation and maintenance of outdoor lighting comply with the requirements of Australian standard AS4282-1997 Control of the obtrusive effects of outdoor lighting. AO1.2 Development that involves flood lighting is restricted to a type that gives no upward component of light where mounted horizontally. AO1.3 Access, car parking and manoeuvring areas are designed to shield nearby residential premises from impacts of vehicle headlights.	Complies with PO1 All lighting will be provided in accordance with the relevant standards. All lighting will be designed to ensure it does not cause nuisance.
PO2 Potential noise generated from the development is avoided through design, location and operation of the activity.	AO2.1 Development does not involve activities that would cause noise related environmental harm or nuisance; or AO2.2 Development ensures noise does not emanate from the site through the use of materials, structures and architectural features to not cause an	Complies with AO2.1 and AO2.3 Due to the nature of the use, noise impacts may be experienced infrequently. However, emergency service vehicle lights and sirens are only engaged when required to alert surrounding vehicles of their approach. Ambulance vehicles will not leave the

Performance outcomes	Acceptable outcomes	Response
	adverse noise impact on adjacent uses. A02.3 The design and layout of development ensures car parking areas avoid noise impacting directly on adjacent sensitive land uses through one or more of the following: (a) car parking is located away from adjacent sensitive land uses; (b) car parking is enclosed within a building; (c) a noise ameliorating fence or structure is established adjacent to car parking areas where the fence or structure will not have a visual amenity impact on the adjoining premises; (d) buffered with dense landscaping.	site with sirens engaged unless there is a hazard on the road, and sirens are required to clear the road. Carparking areas do not adjoin sensitive uses.
PO3 and PO4 – Not applicable		
PO5 Waste and recyclable material storage facilities are located and maintained to not cause adverse impacts on adjacent uses.	A05.1 The use ensures that all putrescent waste is stored in a manner that prevents odour nuisance and is disposed of at regular intervals. A05.2 Waste and recyclable material storage facilities are located, designed and maintained to not cause an adverse impact on users of the premises and adjacent uses through consideration of: (a) the location of the waste and recyclable material storage areas in relation to the noise and odour generated; (b) the number of receptacles provided in relation to the	Complies with PO5 The current waste arrangements for the site will remain. General waste bins to be collected from the kerb and medical waste (consumables) to be disposed of in accordance with legal requirements by licenced contractors.

Performance outcomes	Acceptable outcomes	Response
	collection, maintenance and use of the receptacles; (c) the durability of the receptacles, sheltering and potential impacts of local climatic conditions; (d) the ability to mitigate spillage, seepage or leakage from receptacles into adjacent areas and sensitive receiving waters and environments.	
PO6 – Not applicable		
PO7 The quality of stormwater flowing over, through or being discharged from development activities into watercourses and drainage lines is of adequate quality for downstream environments, with respect to: (a) the amount and type of pollutants borne from the activity; (b) maintaining natural stream flows; (c) the amount and type of site disturbance; (d) site management and control measures.	A07.1 Development activities are designed to ensure stormwater over roofed and hard stand areas is directed to a lawful point of discharge. A07.2 Development ensures movement of stormwater over the site is not impeded or directed through potentially polluting activities. A07.3 Soil and water control measures are incorporated into the activity's design and operation to control sediment and erosion potentially entering watercourses, drainage lines and downstream receiving waters.	Complies with PO7 Stormwater will be managed to not cause nuisance. A detention basin will be provided onsite, please see Civil Plans for further stormwater management details.

Performance outcomes	Acceptable outcomes	Response
PO8 Development activities and sites provide for the removal of all pest plants and implement ongoing measures to ensure that pest plants do not reinfest the site or nearby sites.	AO8.1 The land is free of declared pest plants before development establishes new buildings, structures and practices; or AO8.2 Pest plants detected on a development site are removed in accordance with a management plan prepared by an appropriately qualified person prior to construction of buildings and structures or earthworks.	Complies with AO8.1 The site is a developed urban site free of pest plants.

9.4.5 Infrastructure works code

9.4.5.3 Criteria for assessment

Table 9.4.5.3.a— Infrastructure works code— assessable development

Performance outcomes	Acceptable outcomes	Response
For assessable development		
PO1 Works on a local government road do not adversely impact on footpaths or existing infrastructure within the road verge and maintain the flow, safety and efficiency of pedestrians, cyclists and vehicles.	AO1.1 Footpaths/pathways are located in the road verge and are provided for the hierarchy of the road and located and designed and constructed in accordance with Planning scheme policy SC5 – FNQROC Regional Development Manual. AO1.2 Kerb ramp crossovers are constructed in accordance with Planning scheme policy SC 5 – FNQROC Regional Development Manual. AO1.3 New pipes, cables, conduits or other similar infrastructure required to cross existing footpaths: (a) are installed via trenchless methods; or (b) where footpath infrastructure is removed to install infrastructure, the new section of footpath is installed to the standard detailed in the Planning scheme policy SC5 – FNQROC Regional Development Manual, and is	Complies with PO1 All lighting will be provided in accordance with the relevant standards. All lighting will be designed to ensure it does not cause nuisance.

Performance outcomes	Acceptable outcomes	Response
	not less than a 1.2 metre section. AO1.4 Where existing footpaths are damaged as a result of development, footpaths are reinstated ensuring: (a) similar surface finishes are used; (b) there is no change in level at joins of new and existing sections; (c) new sections are matched to existing in terms of dimension and reinforcement. AO1.5 Decks, verandahs, stairs, posts and other structures located in the road reserve do not restrict or impede pedestrian movement on footpaths or change the level of the road verges.	
PO2 – Not applicable		
PO3 and PO4 – Complies as the site is already serviced with water and sewer connections.		
PO5 Development is planned, designed, constructed and operated to avoid or minimise adverse impacts on stormwater quality in natural and developed catchments by: (a) achieving stormwater quality objectives; (b) protecting water environmental values; (c) maintaining waterway hydrology.	AO5.1 A connection is provided from the premises to Council's drainage system; or AO5.2 An underground drainage system is constructed to convey stormwater from the premises to Council's drainage system in accordance with the Design	Complies with AO5.1 Stormwater infrastructure will be designed to ensure it is drained to a lawful point of discharge. A detention basin will be constructed onsite. Please refer to Civil Plans for further details.

Performance outcomes	Acceptable outcomes	Response
	Guidelines set out in Sections D4 and D5 of the Planning scheme policy SC5 – FNQROC Regional Development Manual.	
PO6 and PO7 – Not applicable		
PO8 – PO11 – Complies as the site is already serviced with electricity and telecommunications services.		
PO12 – Complies as access and driveways are existing and not proposed to change. No roadworks proposed or required.		
PO13 Infrastructure is integrated with, and efficiently extends, existing networks.	AO13 Development is designed to allow for efficient connection to existing infrastructure networks.	Complies with A013 The site is already connected to existing services.
PO14 – Complies as public utilities are not required to be altered.		
PO15 Work is undertaken in a manner which minimises adverse impacts on vegetation that is to be retained.	AO15 Works include, at a minimum: (a) installation of protective fencing around retained vegetation during construction; (b) erection of advisory signage; (c) no disturbance, due to earthworks or storage of plant, materials and equipment, of ground level and soils below the canopy of any retained vegetation; (d)	Complies with A015 Construction will be undertaken in accordance with the relevant requirements listed in the acceptable outcome.

Performance outcomes	Acceptable outcomes	Response
	removal from the site of all declared noxious weeds.	
PO16 Existing infrastructure is not damaged by construction activities.	A016 Construction, alterations and any repairs to infrastructure is undertaken in accordance with the Planning scheme policy SC5 – FNQROC Regional Development Manual.	Complies with A016 Construction, alterations and any repairs to infrastructure (where required) will be undertaken in accordance with the relevant standards.
PO17 and PO20 – Not applicable		

9.4.6 Landscaping code

Response to code

Please see attached Landscape Concept Plan for details of the proposed landscaping. The landscaping will create a high quality landscape character for the site and the local area. Landscaping has been provided in accordance with the dimensions required in the Centre zone code and the Mossman local plan.

The following landscaping will be provided:

- Garden beds along the front fence
- Landscaping to screen the carpark
- Planting to soften the generator enclosure on the southern boundary
- Tall shrubs to screen the fence and adjoining residential land to the rear of the site.

All landscaping will be installed and maintained in accordance with Planning scheme policy SC 6.2- Landscaping.

It is considered that the landscaping complies with the relevant provisions of the Landscaping code.