



NSW Government

DEPARTMENT OF NATURAL RESOURCES

28 April 2006

Our ref: ERM 2006/04294

Your ref: 05/70

Cowman Stoddart Pty Ltd
PO Box 738
NOWRA NSW 2541

Attention: Stephen Richardson

Dear Sir

**Subject: Major Project – Part 3A Environmental Planning & Assessment Act
23 Additional Short Term Sites and 93 Additional Camp Sites
Kioloa Beach Holiday Park**

I refer to your letter dated 21 February 2006 seeking comments from the Department of Natural Resources (DNR) in relation to the above mentioned proposal. The Department apologises for the delay in providing this response.

The former Department of Land and water Conservation (DLWC) worked with Shoalhaven City Council to address a number of management issues associated with the Kioloa Beach Holiday Park and its use of Portions 128 (Crown lease 139551) and 130 (Reserve 9679).

As a result of your inquiry, the DNR has consulted with the Department of Lands who have advised that as the land is occupied under a Crown Lease, any proposals concerning the Holiday Park must be referred and approved by the Department of Lands prior to the proceeding any further. To discuss matters further in this regard, you should contact Mr Chris Fowler or Mark McClellan at the Department of Lands, Nowra on (switch) 44286900.

In regard to matters of concern to DNR regarding the proposal to increase the number of sites on the Holiday Park, the following comments are provided for your attention and consideration:

Effluent Management

The issues of onsite effluent management and the use and management of the adjoining Crown Reserve (Reserve 9679) by the Holiday Park have been particularly significant issues to the Department, former agencies and Shoalhaven Council for several years.

In 2003, Shoalhaven Council issued an approval for sewerage, plumbing and stormwater drainage for the Park. This approval was in accordance with Council's Onsite Sewage Management DCP No. 78 and the "Revised report on sewage treatment and effluent management for Kioloa Beach Holiday Park for Mr T Van Bergen, 27th February 2003" by Pacific Engineering and Management.

The current proposal to increase the number of sites on the Holiday Park should include an assessment of the capacity and efficiency of the existing sewerage scheme and any necessary upgrade works/additional capacity which would be required to accommodate the increase volumes of effluent. DNR would not support any increase in the disposal of effluent within the dune system on the adjoining Crown Reserve. In the long term, all effluent generated by the Park should be disposed of/reused within the Holiday Park lease area.

Adjoining Crown Reserve

DNR and former agencies have previously identified a number of issues associated with the Holiday Park's use and management of the adjoining Crown Reserve. Some of these issues have also been identified in the O'Hara Head Reserve, Kioloa Draft Plan of Management (Appendix 4 page 83) which was recently been publicly exhibited.

In order to provide greater community access to, and use of, the coastal foreshore, DNR reiterates previous advice from DLWC in supporting a reduction in the area of Crown Reserve available and licensed to the Park. The area to the north of the Park adjacent to Butlers Creek and the headland do not contain any Park infrastructure and could therefore be removed from the licensed area and fall immediately into the management of the Crown Reserve.

The area along the beach and to the south of the southern unnamed watercourse is currently used for sewage disposal and recreation (boardwalks and showers). With the implementation of the new sewage management facility there is an opportunity to eliminate the use of the most northern sewage disposal trench. This area of land could then be rehabilitated and returned into the management of the Crown Reserve.

The Department recommends that the Park owner develops and implements a beach management plan over the area of coastal foreshore. Such a plan should identify and locate the existing structures on and within the dune system and identify areas of degradation and public usage and proposed management options. The long term objective of the Plan should be to stabilise the sand dune and subsequently relinquish the area east of the sewage disposal trenches and allowing the management of the area to revert to the Crown Reserve.

NSW Coastal Policy

The subject site lies within the NSW Coastal Zone as defined by the Coastal Protection Act 1979 and as such the NSW Coastal Policy 1997 will apply. The proposed development should demonstrate that it is consistent with the NSW Coastal Policy. Specifically the environmental assessment should ensure that:

- it identifies the type, nature and significance of any coastal processes and hazards that affect the area and that the proposal does not cause any significant or unacceptable growth in hazards or damage potential by adverse interaction with coastal processes;
- it takes into account the long-term implications of climate change and sea level rise;
- the proposal does not adversely affect any beach, dune, shoreline, foreshore etc.

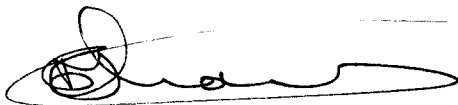
- the proposal does not affect cultural heritage of the area;
- beaches, frontal dunes and undeveloped headlands are protected;
- it conforms to specified design and planning standards to control height, setback and scale to ensure public access and to ensure that beaches and foreshore open spaces are not overshadowed.

With reference to coastal hazards and setbacks mentioned above, it is specifically recommended that a coastal hazard study be prepared for the proposed development taking into account all the relevant coastal hazards (ie beach erosion, shoreline recession, coastal inundation, sand drift etc) that may affect the subject site.

For matters relating to the coastal hazards, please contact Habib Ullah (Coastal Unit) at the Wollongong Office on (02) 4224 9653. To discuss other matters, please contact David Zerafa, Senior Natural Resource Officer at the Nowra Office on (02) 4429 4441.

Please forward future correspondence to Keti Nikolovski, Environmental Review Coordinator of Department of Natural Resources, Sydney/South Coast Region, PO Box 867, Wollongong NSW 2520.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Marwan El-Chamy', written over a horizontal line.

Marwan El-Chamy
A/Manager, Access and Compliance
Sydney/South Coast Region