

3rd September 2024

2240175

Kiersten Fishburn

Secretary

NSW Department of Planning, Housing & Infrastructure

12 Darcy Street,

Parramatta NSW 2150

Attention: Michael Doyle, Senior Planning Officer, Regional Assessments Development Assessment and Systems

Coalcliff Eco-Tourist Facilities (Pre-Development Application PDA-75447712)

This letter has been prepared by Ethos Urban on behalf of Urban Property Group to provide the additional information as requested by the Department of Planning, Housing and Infrastructure (DPHI) under Pre-Development Application PDA-69123209, to enable the request for Secretary's Environment Assessment Requirements (SEARs) relating to the provision of Eco-Tourist Facilities, Environmental Facilities and Environmental Protection Works at Lot 100 DP 715376, Lawrence Hargrave Drive, Coalcliff.

Further to the Request for Additional Information received on 24th April 2024, the application form and Scoping Report have been updated to address the identified matters. The additional information can be found in the following sections of the Scoping Report, as set out below:

Request for Additional Information		Response within the Scoping Report
2a. The report does not adequately address the project objectives:	i. The report does not make clear how the proposal would 'promote sustainable ecotourism'.	Section 1.6 Section 3.3
	ii. The report does not address how the proposal would 'enhance the appreciation of the environmental and cultural values of the Wollongong LGA' and 'increase visitor appreciation and understanding of the importance of the preservation of the natural environment, including beyond providing view opportunities to visitors and, therefore, in a meaningful way.	Section 1.6 Section 3.3
2b. The report does not clearly identify the main uses and activities of the proposal including:	i. The area likely to be physically disturbed by the project.	Section 3.2
	ii. The extent of Environmental Protection Works across the eastern and western portions of the site, including where the proposed	Section 3.2

	remaining parts of eastern portion of the site is assessed as being of good or moderate ecological value at present.	
	iii. Whether the proposed walking tracks, boardwalks, seats and view decks to the western portion of the site will connect to any public walking tracks, or whether works are proposed on public land.	Section 3.2 Section 3.3 Section 6.4
	iv. Whether proposed walking tracks, boardwalks, seats, view decks and 'multi-purpose building' & amenities will be open to the public (including what hours), and who will service them or whether they are intended to be dedicated to council.	Section 3.3.1
	v. The use/s of the 'multi-purpose building', including how it is consistent with the proposed land uses of the site and nature of the proposal.	Section 3.3
	vi. How 'environmental facilities and eco-tourism uses are physically and operationally integrated', and how 'visitors can appreciate all three [proposed uses, being environmental facilities, eco-tourism and environmental protection work,] together.'	Section 3.3 Section 4.0 – Table 2 (State Environmental Planning Policy (Planning Systems) 2021)
2c. The report does not adequately address how the non SSD-triggering components of the development are sufficiently related to the SSD-triggering components of the development, including:	i. Point (2)(b) above.	Section 3.3 Section 4.0 – Table 2 (State Environmental Planning Policy (Planning Systems) 2021)
	ii. How the eco-tourism will support 'ongoing investment to manage the land and rehabilitate the degraded areas of the site' (section 1.7 of the report) such as through ongoing dedication of a portion of income into rehabilitation and maintenance.	Section 4.0 – Table 2 (State Environmental Planning Policy (Planning Systems) 2021)
2d. The report does not satisfactorily address feasible alternatives, including:	i. Alternative site configurations, including why the indicative siting is most appropriate.	Section 3.4.3
	ii. The alternative scenario of undertaking the uses permitted with consent in the C2 Environmental Conservation Zone under <i>Wollongong Local Environmental Plan 2019</i> but not undertaking the use/s not permitted in the C2 zone under the LEP.	Section 3.4.2
2e. Section 4.1 of the report describes engagement with Council in December 2023, however the report does not provide details of the key findings of this engagement.		Section 5.1
2f. The report does not address all key risks and hazards such as:	i. Steep slope and potential landslip to the western portion of the lot;	Section 6.6.2
	ii. The site being identified as mine subsidence prone land; and	Section 6.6.3

	iii. Any potential coastal hazards.	Section 6.6.4
2g. The report does not address Access – Access to Property, and Built Environment – Public Land, for the western portion of the site during construction.		Section 6.2 Section 6.4
2h. The report does not detail key strategies to avoid, minimise or offset the impacts of the proposal, and mitigation measures that will be built into the design of the project.		Section 6.0
2i. The report does not include a scoping summary table, including that identifies:	i. The level of assessment (i.e. standard or detailed)	Appendix A
	ii. Key factors (i.e. scale of impact, nature of impact, and environment sensitivity)	Appendix A
	iii. Ability to avoid, minimise and offset potential impacts.	Appendix A
	iv. Complexity of technical assessment.	Appendix A
	v. Relevant government plans, policies & guidelines for each potential matter.	Appendix A
2j. The report does not identify whether there are any known restrictions or covenants on the land.		Section 1.3
3a. Attachment B Preliminary Biodiversity Assessment to the scoping report identifies a round part of the eastern portion of the site 'poor' vegetation yet also maps this area as 'medium ecological constraint' and, therefore, recommended for protection. Please clarify how this area will be protected given the location of the proposed communal pavilion building.		Section 3.2
3b. The Department notes the plans do not include at least one parking space per cabin.		Section 6.2

I trust the above is acceptable, however if you need anything further, please do not hesitate to contact me.

Kind regards,



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