

11<sup>th</sup> November 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 18<sup>th</sup> October 2024, the Scoping Report has 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
1. Scoping Report The scoping report does not include all information required by the <i>SSD Guidelines Appendix A: Preparing a Scoping Report</i> .	a. The report does not address development application DA-2018/1175 Environmental protection works – approved 28/3/2019, including its status: The report does not include all relevant history as background to the project, and the report does not include a description of approved development for the site, including which may relate to the subject proposal.	<b>Section 1.3.1</b>
	The Department also notes advice by Wollongong City Council that a submission to the draft exhibition of <i>Wollongong Local Environmental Plan 2009</i> (the LEP) in 2008 to rezone the land to SP3 was not supported due to concerns with the significance of the coastal location and landslip, and the proposal has not otherwise been pursued as a Planning Proposal. The Department considers this advice relevant where Eco-	An assessment against the site's coastal location with consideration to the Resilience and Hazards SEPP and Coastal Management Act has been provided at <b>Section 4.0</b> of the Scoping Report. An assessment of any potential coastal hazards that may impact upon the site's development and require necessary mitigation, as well as landslip risk, will be provided within the EIS.

	<p>Tourism Facilities are not permissible under the LEP.</p>	
	<p>b. The report describes that the site is unlikely to be contaminated given it has never been developed.</p> <p>However, Council has identified the following:</p> <ul style="list-style-type: none"> <li>• <i>Historic aerial imagery that indicates landfilling and materials stockpiling on the subject site</i></li> <li>• <i>There is one mapped subsurface stormwater pipe with an inlet in the rail corridor that traverses the subject site in a drainage easement. Installation will have required earthworks and backfilling</i></li> <li>• <i>Three open stormwater lines are mapped traversing the subject site which are characterised by inlets and pits in both the South Coast rail and Lawrence Hargrave Drive road corridors. The rail corridor has a long history and continues to be used to transport freight from Port Kembla and further south to Bombaderry, including materials used or manufactured in industrial and agriculture in the Illawarra region</i></li> </ul>	<p>The Applicant acknowledges this statement and will assess the site through the necessary geotechnical and contamination reports as part of the preparation of the EIS.</p>
<p>2. Information requested by Council to enable Council to provide further advice to inform any SEARs</p>	<p>a. The SEARs request does not adequately address the Resilience and Hazards SEPP, does not address the Coastal Management Act 2016 including its objectives, and does not genuinely address construction and operation feasibility.</p>	<p>An assessment against the Resilience and Hazards SEPP and the Coastal Management Act has been set out in <b>Section 4.0</b>.</p> <p>The construction and operational details for the works will be addressed in detail through a Construction Plan and Operational Management Plan, during the preparation of the EIS.</p>
	<p>b. The SSD Guidelines require scoping reports to include strategies (to the extent known at scoping stage) to avoid or minimise impacts, mitigation measures (again to the extent known at scoping stage) that will be built into the design of the project, and reasons for the current project form.</p>	<p>A full set of mitigation measures are to be provided based upon technical documentation prepared alongside the EIS. Likely mitigation measures, as identified by the preliminary report, undertaken to support this SEARs request, are set out in <b>Section 6.0</b> of the Scoping Report.</p>
	<p>The proposed site configuration is spread out and, in turn, may increase the size of any required Asset Protection Zones and clearing: Section 3.4 Analysis of Alternatives in the scoping report does not adequately address feasible alternatives, or impacts associated with them.</p>	<p>The Asset Protection Zones of the site have been identified as part of the design development process as identified in <b>Appendix B</b>. An assessment against the bushfire hazard will be further developed during the preparation of the EIS.</p> <p>See <b>Section 3.4</b> in the Scoping Report for further information.</p>

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

Kind regards,

A handwritten signature in black ink, appearing to read 'Balazs', with a stylized flourish at the end.

**Jordan Balazs**

Senior Urbanist

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