

Memorandum

To: Robert Byrne, Senior Planner, Industry Assessments
cc.
From: Graham Towers, A/Team Leader, Southern Region
Date: 2 August 2017 **File no** **File** 10/19038

**Subject: West Culburra State Significant Development Application (SSD 3846) –
Supplementary Response to Submissions**

I refer to your request for comment on the applicant's Supplementary Response to Submissions. Southern Region would like to provide the following comments:

Strategic planning framework

- Page 14 of the Supplementary Response to Submissions states that the South Coast Regional Strategy is the principal document shaping planning policy for the land covered by the Concept Plan. This is not correct. The Illawarra Shoalhaven Regional Plan, which was released in 2015, is the applicable planning document for the subject land. The Regional Plan has replaced the South Coast Regional Strategy.
- With respect to the need for urban development at the West Culburra site, the Regional Plan (p.38) identifies West Culburra as a smaller release area that will add to the diversity of supply in the Shoalhaven local government area. The Regional Plan identifies the major release areas at Nowra Bomaderry as providing the long term focus for greenfield housing in the Shoalhaven LGA. Notably, six precincts in Nowra-Bomaderry, with capacity for 6,400 lots which were rezoned in 2014.
- In relation to the Illawarra-Shoalhaven Urban Development Program, the site is identified as an "investigation area" and does not identify any lot yield at this stage given the significant environmental considerations. The 2016 update report on the program (p.44) states that "potential yields are to be determined and will depend on evaluation of scale, water catchment issues, and other environmental considerations. A number of planning processes are currently proceeding for this area that will, once finalised, resolve appropriate land use yields."
- The Regional Plan (p.56) adopts the recommendations of the 2006 South Coast Urban Lands Review Panel in relation to the Culburra Beach site, namely that lands within the Lake Wollumboola catchment are unsuitable for urban development due to environmental sensitivity of the Lake which supports migratory birds protected by international treaties.
- The Regional Plan (p.56) adopts the outcomes and recommendations of the 2013 Office of Environment and Heritage Study on the sensitivity of Lake Wollumboola (Scanes Report). It requires that the Scanes Report will guide protection and conservation of the Lake Wollumboola catchment, and future land use decisions such as that for the Culburra Beach site. The Supplementary Report on Submissions does not mention the Scanes Report or the requirements of the Regional Plan in relation to this report.
- It is noted that the applicant is pursuing development in the Lake Wollumboola catchment, notably a roundabout and associated roadworks, public oval and Stage 1 development south of Culburra Road. This is despite the clear policy position in relation to avoiding development in the catchment which is stated in the Department's covering

letter to the 8 July 2010 Director General's requirements for the Concept Plan application.

Status of the Planning proposal for Halloran Trust land at Culburra, Callala Bay and Currarong

- The Planning Proposal for Halloran Trust land at Culburra, Callala Bay and Currarong seeks to provide sustainable urban growth of Culburra to support the local economy and housing and to protect the local environment notably Lake Wollumboola and the Crookhaven River estuary. A Gateway determination was issued for the PP in November 2015.
- A number of studies are currently being prepared for the Planning Proposal as required by the Gateway determination. A flora and fauna study and offset strategy are nearing completion. A groundwater investigation, to help define the Lake Wollumboola hydrological catchment, is currently being prepared in three stages comprising:
 - Stage 1: Review and conceptualisation.
 - Stage 2: Detailed field investigation.
 - Stage 3: Ongoing groundwater monitoring.

A Preliminary report on Stage 1 has been prepared and is provided for your information. The Stage 2: Detailed field investigation study has commenced and is expected to be completed in coming months. The Stage 3 groundwater monitoring is planned to be undertaken over a 6-12 month period.

The flora and fauna and offset strategy and groundwater investigation will be used to identify an appropriate urban footprint and zonings that provides for urban development and protection of the sensitive Lake Wollumboola catchment and Crookhaven River estuary.

Water quality

- Page 26 of the Supplementary Response to Submissions indicates that the assessment and management of water quality impacts as a result of the proposed development may not have been resolved.
- As mentioned previously, the groundwater investigation and other studies being undertaken as part of the planning proposal process is intended to provide a strong evidence base to determine a suitable urban footprint and zonings for the West Culburra site as well as the broader Halloran Trust land at Culburra, Callala Bay and Currarong.

If you require any further information or assistance you can contact George Curtis, Senior Planner, Southern Region on telephone 4224 9465.



3/8/17

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