

10 December 2012

Sally Munk
Senior Environmental Planner
Department of Planning and Infrastructure
23 Bridge St Sydney
NSW 2000

Re: Exhibition of Environmental Assessment for Integrated Residential and Tourist Development, Comberton Grange, Nowra (06_0135)

Dear Ms Munk,

Thank you for the opportunity to respond to the Environmental Assessment for the Shaolin Temple development at Comberton Grange. It is pleasing to note that the development footprint has been largely limited to land that has previously been cleared or disturbed.

Southern Rivers Catchment Management Authority supports retaining the development as a whole with multiple dwellings rather than subdividing into individual allotments. According to the Director General Requirements the proponent is required to keep the development in the one ownership. Division of individual lots into approximately 760 m² (Precincts A and B) and 1,500 m² (Precinct C) is not consistent with this concept and may undermine the intent of the direction. Division of the site into individual allotments could lay the ground work for future subdivision as identified in 17.9.2, which is not consistent with the recommendations of the South Coast Sensitive Urban Lands Review.

Residential precinct D allows for an unidentified amount of dwellings which may take the total amount of dwellings for the site far in excess of 300. This approach is inconsistent with the recommendations of the South Coast Sensitive Urban Lands Review and is not supported by Southern Rivers CMA. This position is consistent with our submission of July 29 2008.

Southern Rivers Catchment Management Authority does not support the claim in 8.3.2 that "from a fauna and flora conservation perspective, the loss of the forest and woodland at that location in the corridor is not of high importance." It should be noted that State Forest is not a conservation area and is considered a resource that may be utilised in the future. Therefore if the State Forest is harvested this corridor would form a critical linkage.

Allotment size of 1500m² is excessive given current trends in "urban release areas." Reduction of the footprint for residential areas would ensure that the golf course can be built without impacting on the surrounding high quality bushland environment. This would minimise the impact on the habitat corridor as identified in figure 5.3. Residential precinct B could be moved to become part of precinct C. Either the village centre or education precinct could then be located in the present location of precinct B. The golf clubhouse, driving range, putting greens, holes 1, 2, 17 and 18 could then be moved outside of the identified habitat corridor into the current village centre precinct location. This amendment to the current plan would reduce fragmentation of the corridor as identified in the Jervis Bay Regional Environment Plan and make the proposed development more consistent with the areas identified as suitable for development in part 8.3.1 of the Environmental Assessment.

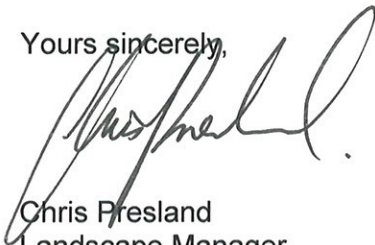
7.18. Consideration should be given to developing a detailed plan that evaluates the suitability of individual flora species for the site. As an example, species such as *Gleditsia tricanthos* are not considered suitable for the site as they are known to become environmental weeds.

The plan should also give consideration to appropriate methods of riparian management as the species listed in 7.18.8 and 7.18.9 for planting represent a landscaping approach to these areas, which may not be appropriate.

SRCMA is currently updating the Catchment Action Plan (CAP). The CAP sets the direction for Natural Resource Management in the region to 2023. A draft can be found at <http://yoursaysouthernriverscma.com.au/document/show/19>

If you require further clarification of any of these issues please do not hesitate to contact Jason Carson on 4429 4446.

Yours sincerely,



Chris Presland
Landscape Manager
Shoalhaven/Illawarra

Southern Rivers Catchment Management Authority

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