



Sally Munk
Senior Environmental Planner
Metropolitan and Regional Projects North
NSW Planning and Infrastructure
GPO Box 39
Sydney NSW 2001

Dear Ms Munk,

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

Thank you for your email of 13/12/2012 requesting a submission from the Marine Parks Authority on the above project, including advice on recommended conditions of approval.

Marine Parks Authority staff have considered the environmental assessment and supporting information provided and prepared the following comments and recommendations.

Comments

1. Support retention of vegetated areas in the eastern and south-eastern portions of the site consistent with the South Coast Regional Strategy and the South Coast Sensitive Urban Lands Review (SCSULR) (2006) as there are direct benefits for catchment protection.
2. Support application of a 100m setback from Currumbene Creek to minimise direct and indirect impacts from the development on the riparian area and the aquatic (habitat and water quality) values of Currumbene Creek itself.
3. Support the use of an integrated water management approach and application of Water Sensitive Urban Design principles to maintain and improve water quality, in particular for receiving waters such as Currumbene Creek.
4. Support location of the golf course in areas away from Currumbene Creek which will minimise potential for impacts from pollution due to fertilizers and herbicides/pesticides used for grounds maintenance.

Recommendations

1. The vegetated areas in the eastern and south-eastern portions of the site should be dedicated or managed for ongoing protection, as proposed in the SCSULR (2006) to ensure that catchment and other biodiversity benefits are maintained.
2. Mitigation and management measures proposed in section 8 in relation to: Ecology; Water cycle management and water quality; and Environmental benefits of the development; should be incorporated in their entirety into the Statement of Commitments (SoC) and the Statement

revised accordingly to ensure that the original intention is carried across. For example in the Statement of Commitments 12.9 the summarised commitment regarding the golf course management plan suggests that the issues identified would be addressed through design of the golf course alone rather than ongoing management actions to be detailed in the plan; the original intent would only be clear on reference to the earlier discussion in section 8.

3. The proposed Plan of Management (ref.P.160-162) should as indicated in S.8.3.3.D include a section addressing management of the interface between the development and the aquatic areas within and adjacent to the site, including Georges Creek and Currambene Creek, and address a similar range of issues including passive recreation and rehabilitation.
4. The proposed Golf Course Pollution Management Plan, should as a minimum address the points outlined in S.5.6 of the Water Management Report (WMR) (App 11) and should be maintained and updated during the life of operation of the golf course.
5. Sediment and erosion control should be addressed in the Environmental Management Plan/s for construction and for operation of the project. As noted in s.6.2 of the WMR the soils have high erosion potential and may be highly dispersive which, as indicated in the EA, needs to be further assessed and managed appropriately during and post construction.
6. It appears that the water quality objectives nominated for pollution removal from stormwater (ref. 5.4 and 6.4 WMR) do not relate in any way to the water quality objectives relevant to the receiving waters as per the NSW Water Quality and River Flow Objectives, consistent with the ANZECC 2000 Guidelines (information is available on the OEH website). This issue should be re-examined and water quality objectives set for the Statement of Commitments that reflect a situation where receiving water quality is maintained or improved, as per the commitment given in S.7.13.8 that the stormwater drainage 'design solution will maintain or improve the water quality of water bodies and prevent its degradation, to protect ecosystems and habitats'.

If you require any further information regarding this matter please contact Frances Clements at this office on 4428 3000.

Yours sincerely



Matt Carr
Manager
Jervis Bay Marine Park

Date: 18/12/2012