

SHOALHAVEN CITY COUNCIL

SUBMISSION TO THE NSW DEPARTMENT OF PLANNING PART 3A, ENVIRONMENTAL PLANNING & ASSESSMENT ACT, 1979

ENVIRONMENTAL ASSESSMENT REPORT SUBMISSION

MAJOR PROJECT APPLICATION CONCEPT PLAN MP06_0136

PROPERTY: Land within the Shoalhaven local government area.
Lot 1 DP725955, Lot 1 DP 550098, Lot 4 DP 63405, Lots 59, 60
and 61 DP 755928 (known as Comberton Grange)

APPLICANT and OWNER: Shaolin Temple Foundation (Australia) Limited

DEPARTMENT OF PLANNING REFERENCE: MP06_0135

COUNCIL REFERENCE: 3A08/1008

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1. Introduction

The application seeks Concept approval and consists of a tourist and residential development that will be developed on approximately 280 developable hectares of the land. The total area of the land is 1248 hectares. The existing use of the land has been grazing on cleared areas and the past use of a small section of the land for a sandstone quarry for road making materials.

The Council supports the proposed development in principal because there will be significant economic benefit to the regional community and employment creation during the development phase and in the ongoing management of the tourist and residential precincts. The submission requests the Department of Planning (DPI) to clarify and seek additional information from the applicant on matters that are raised in the submission.

The Council was the previous owner of the land and has had ongoing discussions with the applicant over a number of years.

This will be the first Shaolin development in Australia and there are few if any comparable developments. The occupation rates, patterns of visitation, traffic movements and residential living and employment within the development do not have readily available comparisons with established standards in the regional context. It is in many respects unique. The DPI is requested to assess the development on its merits.

2(a) Summary of the development proposal

The development is required by DPI to be retained in one ownership under community title and a management plan will apply. There will be a number of development precincts as outlined in the Environmental Assessment Report (EAR). The EAR states (cl 7.19) the residential component will be subdivided into individual lots with each lot owner responsible for the care and maintenance of their homes and lot. The tourist components will be managed under provisions of the *Community Land Management Act 1989*

The EAR concept plan refers to staging (cl 7.20) with the Shaolin Temple constructed in Stage 1 and the facilities and residential lots developed incrementally depending on investor support and financial capacity. The application provides occupation related information for a Stage 1 and the "Ultimate" development for each precinct but has not described the timeframes or likely roll-out of the development. It is possible that a number of project applications and specific staging will be submitted as market drivers occur and finance becomes available.

The three residential precincts will have up to 300 lots and there is also a 250 room hotel (500 person capacity) and cabins, as well as up to 10,000m² floor area as 60 serviced apartments (1, 2, and 3 bedrooms) in conjunction with commercial areas in a Village Centre precinct. The tourist precincts include educational facilities (Kung-fu academy) for up to 300 students and 30 staff, health and wellbeing centre (Chinese medicine) and golf course. The Buddhist Temple sanctuary precinct will occupy a 44 hectare site and will have facilities for 30 monks and a main hall for up to 330 people.

The use of the land requires rezoning under the Shoalhaven Local Environmental Plan (SLEP 1985 and draft SLEP 2009) and the DPI will undertake this process as part of the assessment of the application. The EAR (cl 7.6.12) indicates a future land use option for film and media production and seniors housing, however, no details are provided.

2(b) Summary of key Issues

- The EAR states that the car parking provision is less than Council's Development Control Plan 18 (Car Parking) (DCP 18) requirements, being 781 at Stage 1 and 1640 at Ultimate while the proponent intends to provide 972 car spaces at Ultimate development.

Council requests a Statement of Commitment (SoC) be provided that will address the DCP 18 shortfall (eg, dedicated overflow areas) where occupation rates exceed the on-site parking facilities to avoid unregulated car parking within the development. The SoC may refer to additional onsite car parking being provided to meet the occupation requirements as each precinct is fully developed over time.

- Connections for water and sewer will be made to the Council's reticulated systems in the region and Shoalhaven Water has provided advice and requirements to the applicant.
- The proponent states the majority of visitors are expected to arrive by coach rather than single cars. There is a reference in the EAR that HMAS Albatross airfield is available for passenger aircraft; however this matter is one the Department of Defence and they should be asked to clarify their position with respect to access for private or commercial aircraft.
- The EAR does not include a SoC for any of the external Council local or State roads in the network and additional clarification should be requested to avoid any misunderstanding and/or unnecessary assumptions in respect of traffic impacts. The EAR does not address whether the internal roads are to be public or private roads and that detail should be clarified. Council requests the opportunity to further review the likely impacts for the Council's local road network once this information is provided.

The main access to the site will be from Forest road to the north-east part of the development. This is currently an unformed forestry track and Council is currently acquiring a road reserve from NSW Forests that will be dedicated as public road. The EAR identifies a need for an upgraded intersection onto Forest Road and also at the Princes Highway/Forest road intersection.

The applicant indicates their intention to use Comberton Grange Road (CG Rd) as a secondary access and the need to upgrade this road. A section of CG Rd is an unformed dedicated public road within the site. If the internal roads are to be private, Council considers it appropriate that the public road be closed within the Shaolin site. This submission identifies issues relating to the local roads and interface with the state road. The Roads and Maritime Services (RMS) will make direct comments on impacts and requirements for the Princes Highway.

- The EAR identifies potential noise issues from Department of Defence (DoD) aircraft that use the airspace over or adjacent to the development. The DoD will make direct comments on this matter, however the EAR identifies that noise expectations will exceed acceptable limits and additional building designs will be needed to mitigate noise intrusion. Council requests the DPI consider the appropriate mechanisms to ensure compliance with appropriate building standards to ensure noise mitigation.

The submission addresses the above matters in more detail as well as other matters.

3. Strategic Planning Matters

a. Rezoning

The use of the land will require rezoning under the Shoalhaven Local Environmental Plan (SLEP 1985 and draft SLEP 2009) and the DPI will undertake this process during the assessment of the application. The EAR (cl 7.6.12) indicates a future land use option for film and media production and seniors housing, however, no details are provided.

Following the letter from the (then) Department of Planning received on 24 June 2006 by Council, it is understood that the rezoning will be undertaken via the Minister issuing an Order to rezone the site under section 75R(3A) of the EP&A Act, or other appropriate method.

b. Planning Controls

(i) The development of the Chinese Garden Precinct should ensure that the future use of the quarry for extractive industries is not sterilised. The garden precinct is located within the 1 km buffer currently in Council's SLEP.

(ii) Residential Precinct C will potentially have a visual impact for the existing residences at Falls Creek and from the heritage listed remains of the Comberton Grange homestead. To minimum this impact, dwellings should be kept to low profile. Consideration is requested to providing appropriate landscaping on parts of the cleared area of the property down to Currumbene Creek to protect the visual and heritage importance of this locality.

(iii) It is requested that the 100m wide riparian 'buffer' be revegetated in conjunction with Council having a revegetation program in place on the Crown Reserve along Currumbene Creek. See Appendix 4 Biodiversity Assessment, Section 6 Environmental Management - The paragraph on p58 of Appendix 4 seems to be out of context with the preceding discussion re rehabilitation of wetlands, Currumbene Creek and other riparian zones. DPI is requested to clarify this matter.

(iv) Height of buildings - The proposed heights of parts of the temple precinct and particularly the 6 storeys proposed in the Village Centre Precinct exceed the current controls. The draft SLEP 2009 currently proposes an 11 metre height limit for this area. DPI is requested to address this matter on merit within the context of the scale of the proposal and the size of the property.

(v) The EAR does not address DCP106 Amendment 1 (Development on Flood Prone Land). Part of the golf course and access roads are on flood prone land

under DCP106 Amendment 1 (Performance Criteria or Schedule 7). The assessment of these items in section 8.10 and 12.8 of EAR, should be addressed as part of the detailed design project application stage.

(vii) Development Control Plan 100 (Subdivisions) (DCP100) provides the Council's guidelines for subdivision development. Council requests that DPI seek clarification and re-designs as appropriate to address the following matters:

- a) Bushfire prone land is adjacent to the development areas, particularly the residential precincts and while there is an Asset Protection Zone available via the golf course, it is considered an accessible fire trail or perimeter road system to enable fire fighting access for local fire brigades should be required in accordance with DCP 100 and Planning For Bushfire Protection. The Rural Fire Service and NSW Brigades may also make submissions on these matters.
- b) There are creek lines that flow through the development and some roads are impacted by potential flooding. All internal roads should be constructed above the 1 in 100 flood levels for all weather use in accordance with DCP 100.
- c) The EAR is silent on whether the internal road system within the development is intended to have the legal status of private roads or as dedicated public roads. If the roads are private roads agreements may be necessary in regard to fire fighting arrangements.

4. Road reserve and acquisitions

Council has undertaken negotiations with NSW Forest to acquire land on Forest Road for widening and improved sight distance at the new intersection providing access to the site. The existing NSW Forest track (known as Charcoal Road) is also being acquired with an appropriate road reserve that will be dedicated as public road. NSW Forest has agreed "in principle".

The process to facilitate legal access to the site via a dedicated public road is expected to be completed by mid-2013.

CG Rd extends into the site in the vicinity of the hotel and residential C precincts. Depending on the intention of the proponent on the internal road ownership; if private, Council would recommend that section within the development site, be formally "closed".

5. Traffic and Access

The Director General's Requirements (DGRs) requires a traffic study to include specified detail. It is considered there are insufficient details provided to address all DGRs regarding traffic and access.

It is noted that the proponent has not provided Statements of Commitment (SoCs) in respect of external traffic and access measures for Council local roads or State roads. This is considered a significant omission. To avoid misinterpretation and/or unintended assumptions being made of the potential impacts for Council's local roads and the interaction with the RMS state road, Council requests that DPI seek additional information from the proponent and a further referral be made so factual assessments can be made.

Once the additional information and clarification is provided Council can make more informed comment on the impacts on its local roads and implications for future works programs.

If any of the internal roads are to be dedicated as public roads to Council a more detailed review will need to be undertaken, to ensure compliance with DCP 100 and AUSTROADS standards, including the pedestrian pathways and network. This comment relates to the potential ongoing maintenance liability that Council may inherit.

a. Traffic Generation

The development has few if any comparison in the region and it is accepted that a merit assessment that reflects the unique nature of the development should be undertaken. It is noted that when compared to the guidelines for Traffic Generating Development used by Council and RMS, the traffic generated by the precincts within the development is lower than would be expected. Such potential underestimation could result in greater road network impacts that should be considered at this stage of the assessment process. There is a reliance on bus and coach traffic and applying RMS traffic generation standards is problematic.

The traffic study should include the methodology for determining the 120th HH traffic assessment as this is considered critical to the outcome of the study.

The proponent's traffic consultant suggests that all of the development's traffic will flow through the intersection of Princes Highway/Forest Road. Whilst it is agreed that the majority of traffic will be to/from the Princes Highway/Forest Road intersection, in practice it is not expected to be 100% and consideration of traffic being distributed to the east should be considered as this will inform Council of any mitigation works that are appropriate for the local road system in Forest Road.

b. Access from Forest Road

As previously indicated the process to achieve a public road reserve to provide access to the site from Forest Road is progressing and expected to be completed by mid-2013.

The traffic study suggests either a CHR intersection at Forest Road or a roundabout. Given the existing crash history on Forest Road, the proposed access location, the topographical challenges at that location, and noting this is the sole access road, it is recommended that a non-mountable and landscaped rural road roundabout be provided on Forest Road with advanced warning and significant visual cues on both approaches.

The design of the intersection and the new access road should conform to AUSTROAD standards.

c. Forest Road

The traffic study has not considered crash data which identifies Forest Road as a black spot; the study should identify realistic impacts. The sealing of Forest Road by Council in recent years has made improvements relative to the existing low

local traffic volumes; however the increased generation of the proposed development should be addressed.

The traffic study has not considered AUSTROADS guidelines for lane and shoulder widths on Forest Road to accommodate the impacts of the Shaolin Temple (lane and shoulder widening likely to be warranted).

d. Comberton Grange Road (CG Rd)

CG Rd is a local road that serves a small number of rural properties and is an unsealed gravel formation beyond the sealed section that was completed as part of the Princes Highway upgrade (Forest Road to Jervis Bay Road section).

The EAR clause 7.7.3 states access to CG Rd is proposed as emergency access to the western part of the site and Council supports the emergency use with agreed construction levels to AUSTROADS standards.

CG Rd is also adjacent to the Hotel Precinct and the Residential Area C and the EAR suggests that this will be used by visitors to and occupiers of those precincts. Given the layout of the proposal, and to mitigate the impacts on CG Rd and on the Highway, DPI is requested to seek clarification of the agreed intensity of the use of CG Rd.

Council requests further discussion with DPI and the proponent on the mechanisms to control the access from the site onto CG Rd based on the further information provided by DPI. As indicated in Section 4, above, this may require a road closure of the part of the road within the site and access controls on the boundary of the site with emergency access provisions only in place.

e. Interface with Princes Highway

The proposals and works associated with the Princes Highway will be detailed by RMS submission. As stated above, there are no SoCs provided for the external road network, including the Council's local roads.

(i) From Forest Road

Depending on the outcome on RMS submissions to DPI there may be impacts within Forest Road for a distance from the Princes Highway for works to facilitate the approved road designs. The EAR suggests a signalised intersection with dual right turn lanes or a single lane grade separation for traffic turning in a northbound direction.

The RMS has commenced Princes Highway upgrades (South Nowra to Forest Road project) and the works do not consider the requirements at the intersection based on the Shaolin development. Council considers that the local traffic growth under conditions **without the Shaolin development** is suitable for a sea-gull intersection as in the current upgrade works. Inclusion of the agreed traffic generated by the development will inform requirements at the interface of the local and state roads.

Council requests the DPI include Council in further discussions as road network outcomes are assessed.

(ii) From Comberton Grange Road (CG Rd)

The EAR refers to the use of CG Rd being for emergency use only. Council supports this based on having an alternate access, for example, during bushfire events.

Council requests that the DPI require the proponent to provide a Statement of Commitment about the CG Rd design upgrade and construction.

The EAR states that at the Princes Highway there is a left in and left out turn only. However the existing intersection allows a right turn option for northbound traffic from CG Rd. With any potential increase of traffic from the development there will be impacts on traffic safety and the RMS should provide more information on the intersection and impacts if the right turn is excluded in future. If there are impacts on the local road section of CG Rd, Council requests that information for consideration by DPI.

6. Environmental Matters

a. Acid Sulphate Soils (ASS)

Council requests a Statement of Commitment be included with an ASS Management Plan for circumstances should ASS be detected through the development phases.

b. Contaminated Land

There are no apparent significant issues and the Statement of Commitment is satisfactory.

c. Surface Water Quality

Developments will increase runoff and this should not cause water pollution and deterioration in water quality in Currumbene Creek including tributaries. The EAR (clause 7.13) addressed stormwater management and proposes water re-use to reduce demand on potable water use.

Council considers there should be on-site detention of flows for ecological flows and to minimise scouring of the natural watercourse embankments. The issue of conserving the riparian corridor is referred to in Section 3 (b), above.

d. Noise

Council has noted the Department of Defence (DoD) letter dated 27 October 2008 to the proponent's consultants Conybeare Morrison International Pty Ltd. The DoD will make their submission for assessment.

The application is supported by a noise assessment prepared by Wilkinson Murray (WM) for the applicant's consultant – Conybeare Morrison and a Noise Assessment prepared by The Acoustic Group Pty Ltd (AG) for the DoD dated 17/10/2006. The WM report provides an assessment of the impact of aircraft noise on the proposal and conclude that planning conditions be imposed to ameliorate the impact of noise on the development. The AG report addresses likely impacts for naval aircraft use of the flight corridor.

Council requests DPI consider the inclusion of appropriate SoCs and conditions to ameliorate the impacts of noise.

7. Flora and Fauna and Biodiversity

Council agrees that the identified development footprint utilises existing disturbed environments and limits disturbance to native vegetation. However, the vegetation descriptions provided within the report indicate that there is potential for threatened species to occur within areas impacted by the development that could require additional survey over time, particularly where staging occurs over a number of years.

The Statement of Commitments contained within the Environment Assessment (Conybeare Morrison International, 2012) Section 12.3, Ecology and Native Vegetation, should include a commitment to ensuring there are no significant impacts to the threatened flora and fauna species known to occur at the site.

The following comments are made to ensure the proposal adequately meets the DGR's for Flora and Fauna and to facilitate this commitment:

- Fauna surveys across all stratification units and within areas of potential direct and indirect impacts in consideration of the DEC 2004 Guidelines. Justification is to be provided for deviations from the recommended survey effort.
- Mapping of survey locations, including threatened orchid survey locations undertaken by *Mills et al* 2010
- Survey of potential Green and Golden Bell Frog (GGBF) breeding and sheltering habitats in consideration of recent records for the species (information available from Shoalhaven City Council) and DECC 2008 Amphibian survey guidelines
- An assessment of hollow bearing tree resources within areas of impacts – particularly to discount potential for nesting/denning resources of hollow dependant fauna including the Powerful Owl, Masked Owl, Yellow-bellied Glider, Gang gang Cockatoo and Glossy Black cockatoo to occur within areas of direct or indirect impacts and mitigation of potential impacts to these species
- Possible further survey of riparian areas directly and indirectly impacted by the proposed residential, Village Centre and Buddhist Temple development site and the proposed access to Forest Road through the wildlife corridor. Surveys may need to include nocturnal surveys and small mammal survey timed appropriately for the detection of the Eastern Pygmy Possum
- Further assessment of impacts based on the results of further survey in accordance with the DECC 2007 Guidelines
- The proposed management plan for riparian areas should be prepared in consideration of any revised survey and assessment of impacts and any mitigation measures proposed.
- Further environmental assessment would be required for any future managed camping facilities within the eastern portion of the site as proposed by the Environment Assessment (p161) as this area has not been surveyed and such activities and associated impacts have not yet been assessed.

8. Infrastructure – water and sewer

Shoalhaven Water has provided the following information. This has been forwarded also under separate letter:–

a. General issues

In accordance with the requirements under the Water Management Act 2000, Shoalhaven Water require the following statements to be included within the development consent/approval -

Prior to Commencement of Any Works.

Upon receipt of an operational consent/approval the applicant/developer is to apply under Section 305 of Division 5 of Part 2 of Chapter 6 of the Water Management Act 2000 for a Certificate of Compliance from Shoalhaven Water.

Relevant conditions/requirements, including monetary contributions (where applicable) under the Water Management Act 2000, can be provided under Section 306 of Division 5 of Part 2 of Chapter 6 of the Water Management Act 2000. A Development Application Notice (pursuant to Section 306) issued by Shoalhaven Water will outline all conditions/requirements to be adhered to.

A Certificate of Compliance shall be obtained from Shoalhaven Water after satisfactory compliance with all conditions as listed on the Development Application Notice and prior to the issue of an Occupation Certificate, Subdivision Certificate or Caravan Park Approval, as the case may be.

In the event that development is to be completed in approved stages or application is subsequently made for staging of the development, separate Compliance Certificates shall be obtained for each stage of the development.

Where a Construction Certificate is required all conditions listed on the Shoalhaven Water Development Application Notice under the heading "PRIOR TO THE ISSUE OF A CONSTRUCTION CERTIFICATE" must be complied with and accepted by Shoalhaven Water. The authority issuing the Construction Certificate for the development shall obtain written approval from Shoalhaven Water allowing a Construction Certificate to be issued.

b. Water Supply

In response to Section 7.13.4 of the Environmental Assessment Report and the Hydraulic Services Infrastructure Concept Report, Shoalhaven Water provide the following response –

Shoalhaven Water has included the proposed development within the city wide water supply servicing strategy which is due for completion/release in January 2013. Once this report has been completed a more axiomatic determination will be available and the connection point for water supply will be determined subject to that strategy and in consultation with Shoalhaven Water.

The applicant/developer shall consult with Shoalhaven Water to determine the connection point/s for the development once the City Wide Water Supply Servicing Strategy has been completed. The applicant/developer will then be required to prepare detailed water supply designs and submit them to Shoalhaven Water for assessment and determination.

Following the water supply strategy work, Council will be reviewing its Water Supply Development Servicing Plan (DSP). This Plan will allocate all augmentation works to the appropriate capital works category (growth, asset enhancement,

renewal/replacement) and in turn identify the timing and funding sources for those works.

c. Sewerage Servicing

In response to Section 7.13.6 of the Environmental Assessment Report and the Hydraulic Services Infrastructure Concept Report, Shoalhaven Water provide the following response –

Shoalhaven Water has included the proposed development within the city wide sewerage servicing strategy which is due for completion/release in January 2013. Once this report has been completed a more axiomatic determination will be available and the connection point for sewerage servicing will be determined subject to that strategy and in consultation with Shoalhaven Water.

The applicant/developer shall consult with Shoalhaven Water to determine the connection point/s for the development once the City Wide Sewerage Servicing Strategy has been completed. The applicant/developer will then be required to prepare detailed sewerage servicing designs and submit them to Shoalhaven Water for assessment and determination.

Following the sewerage strategy work, Council will be reviewing its Sewerage Development Servicing Plan (DSP). This Plan will allocate all augmentation works to the appropriate capital works category (growth, asset enhancement, renewal/replacement) and in turn identify the timing and funding sources for those works.

d. Developer Contributions

In response to the Hydraulic Services Infrastructure Concept Report Section 1.2 (Equivalent Tenement Assessment), Shoalhaven Water provide the following response –

	Area (approx) (GFA)	Stage 1	Maximum Development (inclusive of Stage 1)	Equivalent Tenement (ET) Rate
Buddhist Sanctuary Precinct	44 hectares			
▪ Monks-in-residence (located within the Temple Precinct)	72,000m ² (200m x 360m excluding Pagoda)	30 people/ staff)	50 people/ staff	1ET/4 persons
▪ Prayer Hall		330 seats	330 seats	1ET/100 seats
Educational Precinct	5.3 hectares			
▪ Educational & residential buildings (Students-in-residence)	12,000m ² (2 storeys)	150 students	300 students	1ET/6 students
▪ Staff (in residence – 6 people)		15 people	30 staff	1ET/6 staff
▪ Sports field (+ exhibition demonstrations)	100m x 70m (min)			NIL – Assumed reclaimed water
Village Centre Precinct (7.6.3)	8 hectares			
▪ Retail/ commercial/ dining spaces	5,000m ² initially & up to 20,000m ²	100 staff	400 staff	Retail: 1ET/250m ² Commercial: 1ET/250m ²

				Dining: 1ET/100m ²
▪ Residential Precinct D – serviced apartments	10,000m ² max.		10,000m ² max.	0.4ET/1 Bed Apartment 0.6ET/2 Bed Apartment 0.8ET/3 Bed Apartment 1.0ET/4 Bed Apartment
▪ Convention Centre		300 people	600 people	1ET/100 persons
▪ Amphitheatre (within public domain)				NIL
Wellness Precinct (7.6.4)	2.3 hectares			
▪ Clinics for traditional Chinese medicine practitioners, treatment areas	6,000m ² initially & up to 10,000m ²	20 staff & practitioners	50 staff & practitioners	1ET/250m ²
Hotel Precinct (7.6.5)	13.4 hectares			
▪ Accommodation		100 rooms (200 person capacity)	250 rooms (500 person capacity)	0.25ET/Room
		12 staff	30 staff	
▪ Restaurant		100 patrons	200 patrons	1ET/100m ²
		8 staff	20 staff	
▪ Café		50 patrons	100 patrons	1ET/100m ²
		4 staff	8 staff	
▪ Convention areas with meeting rooms for 60 & 150 people		Shared with above or temporary staff	Shared with above or temporary staff	1ET/100 persons
Information Precinct (7.6.6)	2 hectares			
▪ Information Centre, Museum, Administration & golf cart hire facilities	1,000m ²	4-6 staff	4-6 staff	1ET/500m ²
Heritage Precinct (7.6.7)				
Residential Precincts A, B & C (7.6.8)	155.2 hectares			
▪ Dwellings (allotments)		100 dwellings/lots	300 dwellings/lots	1ET/dwelling/lot
Recreation				
▪ Clubhouse (for golfers) (7.6.10)	Up to 300m ²	3 staff	3 staff	1ET/250m ²
▪ Golf course (7.6.10)	18 holes	Maintenance as above		Water NOT available to course or greens
▪ Chinese garden complex (7.6.9)				NIL – Assumed reclaimed water
	Area (approx) (GFA)	Stage 1	Maximum Development (inclusive of Stage 1)	
Agricultural (7.6.11)				
▪ Agricultural huts (storage)	Up to 1,000m ²	6 staff	10 staff	1ET/500m ²
▪ Agricultural & herbal farms				

e. Other Matters

It is requested that the applicant/developer be made aware of other Council policies which need to be taken into consideration during the detailed design phase:

- Building Over Sewer Policy
- Cross Connection Control & Backflow Prevention policy
- Liquid Trade Waste Discharge to the Sewerage System policy
- Water Availability & Connection Policy

9. Conclusion

Council supports the development because of major economic, social and tourism benefits a development of this type and scale can bring to this locality. While there are matters to be clarified and additional information provided, these are not seen as insurmountable issues. The DPI should complete its assessment taking on board the comments provided in this submission

For further information it is requested that you contact Council's Part 3A Coordinator, John Britton on 4429 3432 or email to britton@shoalhaven.nsw.gov.au.

Tim Fletcher
Director, Development & Environmental Services Group.
21 Dec 2012