

DEVELOPMENT APPLICATION REPORT for TOURIST RECREATION FACILITY

CAMP LONGBEACH REDEVELOPMENT

LONG BEACH, BATEMANS BAY

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Prepared by Peter Spurway & Associates Pty Limited Natural Resources & Environmental Planning 495 Bingi Road Bingi NSW 2537

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CONTENTS

1	SUN	ЛМАRY	1
2	DES	SCRIPTION OF PROPOSED DEVELOPMENT	4
	2.1 2.2 2.3 2.4 2.5	THE LAND CURRENT DEVELOPMENT PROPOSED DEVELOPMENT STAGING STRATA DEVELOPMENT	4 5 5
3	NA	ΓURAL FEATURES ANALYSIS	7
	3.1 3.2 3.3 3.4 3.5 3.6 3.7	SOILS LANDSCAPES	7 9 9 9 9
4	PLA	ANNING CONTROLS	11
	4.1 4.2 4.3 4.4 4.5	EUROBODALLA RURAL LEP OBJECTIVES OF RURAL 1C ZONE CLAUSE 21 RURAL LEP COASTAL DESIGN GUIDELINES FOR NSW PROPERTY VEGETATION PLAN - EXEMPT	.11 .11 .13
5	SEF	RVICING ISSUES	14
	5.1 5.2 5.3 5.4	CAR PARKING	.15 .15
6	BUS	SHFIRE RISK MANAGEMENT	16
7	WE	TLAND NO. 216 ISSUES	17
	7.1 7.2	ROAD WORK DISTURBANCE Building Work Disturbance	
8	RE	FERENCES	17
9	ASS	SESSMENT OF SIGNIFICANCE (SEVEN PART TEST)	18

FIGURES

FIGURE 1	SITE LOCALITY	1
FIGURE 2	DEVELOPMENT LOCALITY PLAN IN RELATION TO SEPP 14 WETLAND AND SEPP 71	
SENSI	TIVE COASTAL LOCATION' MAPPING	3
FIGURE 3	RURAL 1C ZONING BOUNDARIES	4
FIGURE 4	TREE REMOVAL AROUND DEVELOPMENT SITE	8
FIGURE 5	SPECIAL PROTECTION BUSHFIRE APZ (RED LINE) AROUND PROPOSED DEVELOPMENT	16

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1 SUMMARY

This report summarises a staged proposal for the redevelopment of an existing tourist recreation facility at Camp Longbeach, on Lot 101 DP1100218 (1 Gibraltar Way) Long Beach. The site is located north of Batemans Bay within Eurobodalla Shire (**Figure 1**).



Figure 1 Site Locality

The proposed development comprises expanded recreational facilities, reconstruction and upgrading of school camp bunkroom and teachers accommodation, provision of second storey apartments for conference/event and tourist accommodation, a swimming pool and infrastructure such as car parking areas, roof water storage tanks and signage. Part of the accommodation (total 11 units) is proposed to fall under a Strata Title arrangement.

The land's location in relation to its natural assets is significant:

- The land it is situated within the Coastal Zone north of Batemans Bay;
- The property contains a significant SEPP 14 wetland (Wetland No. 216 known locally as Long Beach 'Reed Swamp')
- Part of the land is designated a Sensitive Coastal Location by way of a mapped 100 meter buffer to the wetland under SEPP 71.

We note that SEPP 14 wetland 216 has been remapped under Amendment 15 of SEPP 14 (gazetted 6th October 2006). Mapping in this report depicts the previous wetland boundary. The new boundary on Lot 101 is located a variable distance, up to some 28m southwards of its previous location.

Council Planning Controls

The majority of Lot 101 is zoned Rural 1(c) under the Eurobodalla Rural Local Environment Plan 1987. Part of the land over the wetland has a 7a Wetlands zoning. Compliance with the objectives and requirements of the Rural 1(c) zone under the Eurobodalla Rural Local Environment Plan 1987 is demonstrated.

Servicing Issues

This section of the report deals with considerations for

- Car parking in accordance with Council's DCP
- Water supply (including bushfire supply)
- Effluent disposal by existing town sewerage connection

Bushfire Risk Management

A Bushfire Protection Assessment (BPA) report by consultants *Bushfire Protection Planning & Assessment Services* addresses in detail the bushfire risk on this property. Compliance with RFS Guidelines for Special Protection Development is demonstrated.

Coastal Design Guidelines Issues

These guidelines would apply in the Coastal Zone. For the proposed improvements the following extracts from the guidelines would apply to the built form.

Large buildings designed without consideration for the local context, or a clear vision for the future form of the settlement as a whole, result in the following problems:

- buildings out of scale with the natural and built form context
- loss of amenity and development potential on neighbouring sites

Coastal sites are typically highly visible and new development has the potential to impact by:

- overshadowing public foreshore areas and reserves
- being visually prominent from key public places
- polluting waterways, lakes, wetlands, soil and ecologies
- alienating foreshores from public areas.

Objectives which are common to all new developments are to:

- ensure amenity is maintained on public land and on site
- be appropriate to its location within the settlement and the settlement type
- be appropriate to its natural setting
- add economic, cultural and visual value to its location
- be of high quality design
- recognise the importance of materials suitable to the coastal setting

These issues have been addressed in relation to the development's locality, scale and architectural style and finishes. The proposal is considered to be in keeping with the locality as discussed in this report.

Site Masterplan

Although not required by legislation, accompanying this report is a Conceptual Site Masterplan, depicting for clarity the camp redevelopment under this and future DA's.



Figure 2 Development Locality Plan in relation to SEPP 14 Wetland and SEPP 71 'Sensitive Coastal Location' mapping

2 DESCRIPTION OF PROPOSED DEVELOPMENT

2.1 THE LAND

The subject land, Lot 101 DP1100218, was formed by a recently approved subdivision of Lot 11 DP 868527. It comprises 10.41 hectares with about 5.83ha zoned Rural 1c under the Eurobodalla Rural Local Environment Plan 1987. A further 4.58 ha is zoned 7a Wetlands (blue in green outline - **Figure 3** below).

Lot 101 is bound

- to the east by undeveloped forested land known as Lot 2 DP 535535 and similarly zoned Rural 1c.
- to the southeast by eight developed residential lots in Long Beach
- to the south and west by vacant rural smallholding lots of area about 5000 m²
- to the north by undeveloped forested land zoned Rural 1c beyond the wetland.

Adjacent Lot 9 to the west of the camp is in the camp's ownership and control, to maintain a buffer between the camp's activities and rural residential blocks.



Figure 3 Rural 1c zoning boundaries

2.2 CURRENT DEVELOPMENT

Camp Longbeach was established in the late 1960's as a youth camp by the YMCA. It grew over a period of about 6 years to its current bunkroom accommodation layout, and has been operated since that time catering for mainly school groups. Two cabin-style accommodation units were added in 1981 for teacher accommodation. A two-storey indoor recreation room, dining hall and kitchen were added in 1992, with this DA confirming its compliance as a Tourist Recreation facility. A new Managers Residence and garage is under construction.

The camp has a current capacity of 140 beds including 60 beds in the area proposed for redevelopment and 30 beds below the amenities building proposed to become a gymnasium facility.

Camp Longbeach caters for the following market at present:

- School groups
- Church organisations
- Military and Police Camps
- Girl Guides and Boy Scouts

Casual users include sporting groups, yoga retreats and craft workshops. These user groups combined are insufficient for continued financial viability. The camp's bunkroom design is of an older style which is less attractive to school groups than the newer ensuite-style accommodation. Accordingly the camp needs to upgrade to ensuite accommodation to remain competitive in this market.

2.3 PROPOSED DEVELOPMENT

The proposed development aims to broaden the market of potential camp users. This will be achieved by

- increasing the floor area and quality of bunk house accommodation this would maintain the current 140 bed capacity of the camp.
- upgrading the bunk houses to maintain a 1-bedroom (8 children) layout with an added group area and ensuite facilities in each unit
- provision of two wheelchair accessible units downstairs for school children or tourism use
- providing a 4-bedroom apartment downstairs for teachers accommodation
- providing a lockable kitchenette area within each bunkhouse for tourist or event accommodation use
- providing separate upper storey apartment style accommodation for the more expensive school market, and to attract conference and event markets.
- making all apartment accommodation available in non-school times (school holidays and weekends) for tourist accommodation
- 11 apartments are proposed to be sold to investors as a Strata Title development, with limits placed on usage outside of school times.

Staged construction is proposed under a second DA, to improve the financial viability of the project. This approach will ensure that tourist recreation facilities and accommodation are developed progressively in a workable and financially sound manner.

Provision of car parking is proposed in accordance with Council's codes. Car parking has never been formalised for this development.

2.4 STAGING

This development application involves a single stage comprising development as follows. A future development application would be staged according to a cash flow budget based on expected demand. See attached Site Masterplan for details.

STAGE 1 - CURRENT DA

- Conversion of ground floor group bunkroom to gymnasium facilities (structure exists below amenities building internal fit out required)
- Construction of 13 ground floor accommodation units and 8 first floor units as follows:
 - The replacement of existing school children bunkroom accommodation with ten larger ground floor units. The upgrade will include ensuite facilities to all bunk rooms in line with best practice school group accommodation.

- Provision of two ground floor apartments designated as suitable for access and use by the disabled (proposed for Strata Title).
- Provision of one four-bedroom ground floor unit for teachers use (proposed for Strata Title).
- Construction of 8 Strata Title first floor accommodation units, capable of use by the conference / event market & by tourists in school holiday / non-event periods.
- Construction of Indoor Rock Climbing recreational facility
- Expansion of equipment and storage areas
- Formalising of vehicle entry, reception dropoff, carparking and boat storage areas
- Provision of disabled parking areas and access pathways.
- Fabrication of swimming pool, with associated fencing and decking
- Minor internal redevelopment of office areas for reception and information counter

In addition, future Development Applications will cover additional recreational facilities. These facilities are staged to meet expected demand and would be lodged in late 2007 for commencement of Stage 2 construction in 2008. The locality of these facilities is shown on the Site Masterplan accompanying this report.

STAGE 2 (Future Development Application)

- Reconstruction of administration building to incorporate new offices and reception, café, outdoor eating and additional education / conference breakout room.
- Extension of gymnasium and associated renovation of common bathroom facilities below amenities building
- Second freeform pool and activity area
- Construction of a covered recreation area to expand available indoor recreational activities such as basketball, volleyball, indoor soccer
- Additional replacement of remaining (existing) school children bunkroom accommodation with ensuite units on the eastern part of the site
- Additional tourist accommodation on the eastern part of the site dependent on demand

STAGE 3 (Future Development Application)

• Construction on Lot 9 of tennis court and associated amenities / games room which would double as a conference breakout room.

2.5 STRATA DEVELOPMENT

As mentioned above, this application incorporates the proposed Strata Titling of 11 apartments. This would permit individual sale of apartments to investors.

The concept is for investment returns from rental to the school / conference / event market, with holiday rental for tourist or investor use in fixed periods. These tourism usage periods as defined by school holidays and weekends would be limited in a management agreement and would form part of the Strata Plan. The 10 ground storey school bunkhouse accommodation units would not be included in the Strata scheme.

The proposed Strata development allows the project to be financially viable by providing an early return to the camp on the substantial capital investment involved. It does not alter the use of the buildings, yet makes a quality development affordable by offering investment potential to individuals or larger financial backers. Investment returns would be from accommodation bookings (conference, school or holiday markets) and do not involve residential use by owners.

Without this component of capital for upgrading, the current Camp Longbeach development is unsustainable.

3 NATURAL FEATURES ANALYSIS

This section details the site's characteristics, both from existing natural resource GIS data and field inspection. The proposal is designed to fit sustainably into the landscape and have minimal impact on natural values.

This section contains a summary of information about the land's natural features, with analysis of the following attributes:

- Soils landscapes
- Vegetation
- Threatened Flora and Fauna
- Scenic amenity
- Buffers

3.1 SOILS LANDSCAPES

The land comprises a combination of

- Long Swamp (Isz) landscape over the coastal alluvial swamp
- The (crz) landscape comprising Ordovician metasediments, mainly shale in this location.

The crz landscape is common around Batemans Bay. Regolith stability is Stable (Class 1) with a low erosion potential. Footings can be designed to a Foundation Hazard **Class S** under AS 2870.

The wetland area has a low probability of Acid Sulphate Soils occurring within less than 1 meter soil depth. Soils in this area would not be disturbed by the development.

3.2 VEGETATION

Forest Ecosystem No 9, Coastal Lowlands Cycad Dry Shrub Forest, covers the remaining forested parts of the land. The canopy is dominated by Spotted Gum *Corymbia maculata* with understorey of the cycad *Macrozamia* (Burrawang). This forest type is found in fairly large patches on the South Coast and is not endangered. Small patches of Swamp Oak Forest are located around the wetland fringes. These are not impacted by the development.

The small areas of trees around the development site have been thinned many years ago and understorey is virtually absent. These trees are isolated from larger patches of forest to the north and the east. The local value of these trees is their scenic amenity - notably they provide a visual buffer to residences located to the south-east.

A number of trees overhang the existing bunkhouses and local RFS approval for their removal had been given in 2003 but not fully acted upon. Retention of some trees between the unit sites and private residences will maximise this visual buffer, however the removal of some trees identified on plan closest to these structures is inevitable for safety reasons alone, whether the development were to proceed or not.

In order to minimise the potential for adverse impacts on threatened species, a minimum of disturbance to the forest canopy is proposed within the Bushfire Asset Protection Zone. This is considered appropriate given the predominance of smooth barked species in the locality, the extensive understorey clearing already achieved on the property and the regular maintenance effort on fuel load reduction.

Those trees that are required to be removed adjacent to the proposed building extensions to the south are depicted on **Figure 4**. All trees to be removed are located within the identified bushfire Asset Protection Zone for the development. The retention of patches of tree canopy to the south of the buildings is appropriate - retention of canopy assists with filtering embers (*Matt Jones, pers. comm*).



Figure 4Tree Removal around Development Site

In addition an area of clearing for car parking is located wholly within the bushfire APZ to the southeast of the amenities building. A number of smaller trees are to be removed to allow for carpark construction in this area. Retention of a buffer between the carpark and residences is proposed to manage noise issues.

3.3 THREATENED FLORA

Healthy forest habitat occurs on the subject property north of the wetlands, and on adjoining lands to the north and east. An assessment of the locality was carried out in February 2002 by PMA Consulting as part of considerations for the adjoining Rural 1c subdivision. Its findings are transferable to this site in general terms.

The National Parks database lists no threatened species of plant within 10 kilometres of this site. No threatened or regionally plants were found by site assessment. It is concluded that the possibility of threatened plant species occurring on Lot 101 is very slight.

3.4 THREATENED FAUNA

The National Parks database lists no threatened species of fauna within 1 kilometre of this site. The adjoining forest patch surveyed by PMA Consulting (2002) revealed a high level of animal activity with several species of bird, amphibian, reptile and mammal being recorded. Three listed species of forest bat were recorded on this land, and it would be reasonable to assume their presence on occasions on Lot 101.

PMA Consulting (2002) recorded the following threatened species in the locality.

 Table 1
 Threatened Species recorded on adjacent land by PMA Consulting (2002)

Common Name	Scientific Name	Habitat / Use of Land
Grey Headed Flying Fox	Pteropus poliocephalus	Foraging on nectar and fruit, den tree located elsewhere
Eastern Freetail Bat	Mormopterus norfolkensis	Roost in tree hollows and under loose bark, insectivorous
Greater Broad Nosed Bat	Scoteanax rueppellii	Roost in tree hollows, insectivorous

The Grey Headed Flying Fox observed on the adjacent land were foraging, and not roosting on the site.

Forest-dwelling bats could forage on the camp site. Major threats to these forest-dwelling bats would include loss of roosting habitat, notably hollow-bearing trees. No loss of trees with hollows is proposed by this development. Mature trees on Lot 101 capable of hollows are located close to the wetland in an area well buffered from the proposed development. A **Seven Part Test** is appended to this report for impacts on Eastern Freetail Bat and Greater Broad Nosed Bat.

Given the limited linkages to larger forest patches, and the limited species in the locality, the likelihood of other arboreal threatened species such as Yellow Bellied Glider utilising the site is low.

3.5 SCENIC AMENITY

The most public aspect of this site is the view from a small part of Long Beach Road and from eight adjacent residences on Longbeach Road. The current vista is one comprising the Managers Residence and Office areas with an unmarked gravel carpark. A visual buffer of trees prevents all but a brief glimpse of the existing bunk rooms which sit below a cut batter.

The second storey units will be evident from a limited view angle. They will appear as single storey development sitting just above the cut batter line, with a number of retained trees filtering the view from public areas.

Similarly the impacts on the view from the eight adjacent residential houses on Long Beach Road would be tempered by the appearance of a single storey development.

The indoor rock climbing structure and expanded equipment storage area will represent a larger bulk than the residential units. The working area behind the basketball court site was selected for these structures as it is cut about 900mm into the landscape and sits mostly behind a group of retained trees. Retention of the existing tree buffer to the east of these buildings will assist to break down what could otherwise be an intrusion on the landscape. These structures will be eventually hidden from view by the eventual enclosed recreation building.

3.6 BUFFERS

Buffers provide an area free from development or disturbance to accommodate natural processes. Riparian buffers in particular provide for protection of what are normally extremely rich areas for biodiversity.

A buffer of width 30 metres around the wetland fringe exists, with minimal maintenance of the property having occurred within this area. There are no major redevelopment items proposed within this zone.

The items proposed to be retained within this buffer are:

- low key picnic facilities (bush tables and seats) in existing clearings
- existing walking trails
- camp fire / gathering area.

3.7 ABORIGINAL HERITAGE

The development area has been utilised as a YMCA recreational camp area since the seventies. The surface has been disturbed by previous building activity, and for landscaping and recreational pursuits.

A report assessing the Aboriginal archaeological and heritage values of the adjacent forested land to the south-west (subdivided for Rural 1c subdivision) has been carried out by South East Archaeology Pty Ltd in February 2002. The report found three Aboriginal heritage sites, all stone artefact scatters, comprising flakes and flaked pieces of silcrete, volcanics and quartz.

The 2002 study on adjacent land to the west did not directly assess Lot 101. Accordingly a site inspection was carried out on 1st December 2006 by the Batemans Bay Local Aboriginal Land Council. This covered the area around the bunkhouses. It also covered the access track and the new car park area behind the amenities building.

The inspection confirmed a low likelihood of significant cultural heritage on the site of the development and carpark areas. No sites of Aboriginal heritage significance were found. The Batemans Bay Local Aboriginal Land Council will provide its written confirmation during the DA assessment process.

4 PLANNING CONTROLS

4.1 EUROBODALLA RURAL LEP

The development areas of the site fall under council's Rural 1(c) zoning under the Eurobodalla Rural Local Environment Plan 1987. This zone permits tourist accommodation in conjunction with a recreation establishment or tourist recreation facilities. The school camp component of Camp Longbeach has existed for many years with the last development approval designated as Tourist Recreation Facility.

4.2 OBJECTIVES OF RURAL 1C ZONE

This zone permits a tourist recreation facility on the land, subject to its satisfying the objectives of the Rural 1(c) zone. The relevant <u>objectives</u> are:

- To ensure that development is compatible in scale and density with the level of essential public services and facilities to be provided.
- To permit a variety of uses where these are compatible with small scale rural activity or require a location outside urban areas or villages.

The first point is addressed by the fact that both town water supply and sewerage connections exist to the land. This is consistent with the land's location within the 1(c) zone but on the fringe of the Long Beach residential area. The current use as Camp Longbeach has established an appropriate level of servicing infrastructure.

In addition, the recreational facilities that exist and that are to be supplied on the land are discussed below.

The second point requires a relationship between the proposal and the land. This is clearly demonstrated in this proposal - the development places great emphasis on the land's natural attributes and scenic qualities that could not be achieved within an urban area. Indeed it relies on preserving the land's natural attributes, particularly the wetland and riparian buffers as a major part of its attraction.

The proposed development is considered to be consistent with the recreational and environmental objectives of the Rural 1(c) zone outlined above.

4.3 CLAUSE 21 RURAL LEP

Clause 21 allows consent for recreation establishments and tourist recreation facilities in the Rural 1(a) and 1(c) zones if Council is satisfied that:

- (a) Except for reasonable accommodation for the manager and employees of the establishment or facilities, any proposed accommodation is for the use of tourists; and
- (b) Any proposed accommodation is integrated with, and ancillary to, the recreational purpose of the proposed establishment or facilities.

Clause 21 would require Council to refer the Development Application to the Director General of the Department of Planning for concurrence if the land is shown on a map held by council. This map does not depict this clause as applying to the land. The Major Projects SEPP 2005 therefore applies to recreational or tourist facilities on this land by way of the proposed increased use of the sensitive coastal area resulting from the development. Additionally a swimming pool is located just within the sensitive coastal land boundary. Advice from the Department of Planning confirms that the Major Projects SEPP 2005 applies to the development.

In regard to point (a), attracting more tourist use is one of the intentions of this facility. Our research shows that the land's natural attributes place it as a marketable commodity in the tourism sector. Aspects such as its coastal location, natural bushland setting and wetland frontage combine to make this proposal an attractive tourism experience in the Eurobodalla. The proposed tourism use maximises the occupancy rates of the existing camp component, which is largely under-utilised during school holiday periods and weekends.

In regard to point (b), it is necessary to establish a link between the primary recreational uses of the site and the need for accommodation (i.e. school camps / environmental education, conference and event / tourist accommodation). As the existing camp is operating under a Tourist Recreation consent, the link between school camp use and the accommodation is current. This discussion therefore focuses on the additional conference and tourism market not covered by the existing approval.

The recreational activities already undertaken on the site as part of Camp Longbeach and that would be available for tourist and conference users include:

- Bush walking
- Volleyball
- Archery
- Basketball
- Canoeing
- Table tennis
- Snooker / pool
- Outdoor activities such as cricket, soccer, touch football on grassed area
- Trampolining
- Low key walking trails and guided natural heritage walks
- Cultural heritage campfire evenings

The site is also handy to the recreational attributes of local beaches, Batemans Bay and the Clyde River.

It is asserted that there is a need for additional upgraded accommodation based on the restricted financial viability of Camp Longbeach catering for mainly school groups at present.

Additional recreational facilities to be provided under this proposal are:

- New swimming pool
- New gymnasium including personal training and fitness classes
- Indoor low ropes course
- Indoor rock climbing facility

A number of these activities present a variety of physical and mental challenges to form part of an extended conference attraction.

A later stage of the development proposed under a separate DA will add a second pool and activity area, tennis court, additional games room and an enclosed recreational area. This DA is timed for later construction to suit cash flows and to meet anticipated demands.

The improvements proposed will result in

- an ability to attract a larger choice of school group markets by providing a better range of accommodation choices
- the additional viability of the development by providing three star apartment-based accommodation to attract conference and event markets
- better utilisation of existing site infrastructure including the conference / activities room, dining area and commercial kitchen

- additional financial viability for this investment by providing strata-titled accommodation of a standard to suit tourist use in non-school periods
- the ability to sell investment units consistent with a financial stability for the camp.

4.4 COASTAL DESIGN GUIDELINES FOR NSW

The Guidelines provide an approach for how urban design principles can be applied in a coastal context. The site falls within the Coastal Zone as defined by SEPP 71.

The guidelines are principally related to the urban built form. However the vision for built form in coastal settlements is appropriate to this more rural site : 'that all buildings are sensitively designed so as to contribute positively to the settlement character in terms of form, height, footprint, scale, massing, amenity, external appearance and materials'.

Long Beach is a 'village' under these guidelines, consistent with the Draft South Coast Regional Strategy. In coastal villages the natural environment dominates in terms of views, environmental systems and vegetation types. At Long Beach much of the surrounding environment has high ecological and scenic value.

The design for this redevelopment is in scale with the nature and built form of the locality and is appropriate to the natural setting. It has limited visual prominence when viewed from outside the site. The scale of two storey buildings is consistent with the existing dining / amenities area, and suits the site by sitting low in the landscape below a cut batter and retained vegetation screen. There are no issues of overshadowing or loss of privacy.

The site entrance is currently an area of particular visual prominence which at present lacks any attractive natural features. The site design allows opportunities for sensitive landscaping of the entry and reception area and creates a more favourable interface with the street.

Car parks are located away from the street frontage, with those beyond the front of the site located below a cut batter so that noise is directed away from adjoining residences. Car parks and earthwork batters will be suitably landscaped.

4.5 PROPERTY VEGETATION PLAN - EXEMPT

The CMA advises that clearing that is carried out in accordance with a Bushfire Management Plan under the Rural Fires Act 1997 is excluded clearing (*Native Vegetation Act, s 25(c)*). As the bushfire risk assessment submitted with this DA for RFS approval requires an APZ to be maintained around the existing and proposed development, then this clearing would be excluded from the NV Act.

All native vegetation removal under this DA including that for car parking, is wholly contained within the identified APZ for the development (see **Section 6**). Consequently no Property Vegetation Plan is required for this redevelopment (L. Babian SRCAM - pers. comm.).

5 SERVICING ISSUES

This section describes the following servicing issues:

- Car Parking
- Water Supply
- Effluent Disposal
- Waste Management

5.1 CAR PARKING

Car parking is currently an informal arrangement with an unmarked gravel car park at the site entry. This area is unsightly and would generate some sediment during heavy rain. However it is appropriate for the current level of usage and for the mainly bussed-in school group users.

It is proposed to construct an all-weather car park to service apartment users, whether for conferences and events, or for use by tourists in holiday periods. The carpark is designed in accordance with Council's Carparking DCP.

It is noted that parking demand will be generated either by camp or conference goers, **OR** by tourists. Both uses would not be concurrent. Camper arrivals are by bus, which will be able to safely enter and leave the site from the reception parking area.

The highest level of demand and hence the number of vehicular parking spaces (other than a bus drop-down area) will be determined by the tourism component. This comprises 21 apartments. The existing managers residence has dedicated parking in existence for the manager and one full-time employee.

We assess the minimum demand for parking on the basis of Tourist Establishments under Council's Carparking DCP to be:

 Tourist units Visitors Employees (FTE) Managers Residence 	21 @ 1 space 21 @ 0.25 spaces 1 full time * 3 part time Existing garage	21 6 1 * 0 extra
	TOTAL	28 spaces
Additional boat parking	20 @ 0.25 (max 3)	3

NOTES:

* The full time employee vehicle parks within the Managers Residence parking, so allow 1 space for part-time cleaning and maintenance people only.

Two disabled parking spaces will be provided close to the two designated wheelchair accessible units.

Delivery / service access to the commercial kitchen will be provided in an area screened from public view. Service access will operate independently of maneuvering within the main parking area. Garbage pick-up will follow the current servicing arrangements by the camp. Recycling utilises the current Council contractor service.

5.2 WATER SUPPLY

Existing supply to the camp is by reticulated town water only. Design of a more sustainable water supply system for this development aims to regulate the use of town water. It takes into consideration the requirements for fire fighting as well as domestic water supply.

The town water supply would be augmented with roof water stored for combined fire fighting supply and for toilet flushing and laundry use. With a large roof area available, storage will be sufficient for watering the playing field area and for topping up the proposed swimming pool.

Water supply components will comprise:

- A fire connection to the town supply servicing hose reels. This will achieve a maximum separation to the apartments of 70m as recommended by the bushfire report.
- A rainwater tank of 100,000 litre capacity, filled from the administration and new recreation building roofs, will service toilet flushing for the bunkhouses and apartments. It will also supply a future shared laundry complex.
- The tank will incorporate a secure, dedicated water storage for bushfire fighting comprising a minimum 5,000 litres.
- An additional tank of 100,000 litre capacity will be filled from the apartment roofs. This will water the playing area, swimming pool and landscaping areas.
- A future greywater recycling system for irrigation of landscaped areas may be considered pending future investigations.

5.3 EFFLUENT DISPOSAL

Local soils are unsuited to disposal of effluent, and the site's proximity to SEPP 14 wetlands reinforces this unsuitability. Effluent generated by the development will be discharged to the Batemans Bay sewerage system via the existing 150mm sewer connection. The existing gravity line discharges to the Pumping Station in Sandy Place.

5.4 WASTE MANAGEMENT

The commercial kitchen and conference room utilise recycling facilities on site. Each unit will have recycling bins and guests will be encouraged to maximise waste recycling. The camp management will service these bins in line with current arrangements. Commercial worm farm facilities will be used to recycle kitchen scraps from the central kitchen for composting around the landscaping areas. Recycling of glass, plastics and paper utilises Council's contractor service.

6 BUSHFIRE RISK MANAGEMENT

Fire management considerations in this essentially residential fringe area do not have a significant impact on the design of this development. Camp Longbeach gained initial approval from the local Rural Fire Service in 2003 for hazard reduction over 3 hectares of the site including burning, slashing and tree removal. This hazard reduction work is in accordance with the Eurobodalla FCC Bush Fire Risk Management Plan. Most of this work has been sensitively carried out to manage bushfire risk while maintaining screen trees.

A Bushfire Protection Assessment (BPA) report from bushfire planning and management consultants *Bushfire Protection Planning & Assessment Services* addresses in detail the bushfire risk on this property. The recommended bushfire protection strategies for the proposed development comply with the PBP guidelines.

The report addresses the Asset Protection Zone (APZ) requirements (**Figure 5** below) which are noted to extend westwards onto Lot 9. The proposal for an APZ easement over Lot 9 as recommended by the bushfire assessment is supported. Retention of Lot 9 under the camp's ownership for this reason will make an easement easily achievable.



Figure 5 Special Protection Bushfire APZ (red line) around proposed development

Hose reels on the town water connection will be sited to service all buildings to guard against ember attack. In addition, it is proposed to extend a 100mm water main onto the site with a hydrant connection point for a minimum of 70m unobstructed access to buildings.

7 WETLAND No. 216 ISSUES

7.1 ROAD WORK DISTURBANCE

The topography of the land serves to protect the wetland extremely well from disturbance due to soil erosion from road or carpark construction. These activities would be carried out with sound erosion control measures in place.

7.2 BUILDING WORK DISTURBANCE

Low impacts could apply to site disturbance for the centre's proposed buildings. The development footprint is limited by utilising already developed areas of the site for the proposed two storey development. Direct runoff from this part of the development site to the wetland is most unlikely due to existing landscaping features and resultant flat grades. Overland flow from the apartment site and the proposed swimming pool is directed by the land's natural contours to the volleyball court, a sand-filled depression which acts as a sand filter after heavy rainfall. There is no evidence of sedimentation of the wetland from overflows from this area.

This volleyball area will be modified by a low downslope bank to act as a small detention and settling basin. Subsurface drainage below the sand bed will provide filtration of runoff prior to slow overland discharge downslope. Full design details will be provided with Construction Certificate plans.

8 **REFERENCES**

Burrawong Environmental Landscape Design (November 2006) Camp Longbeach Redevelopment - Statement of Intent for Landscape Treatment

Bushfire Protection Planning and Assessment Services (October 2006) **Bushfire** Assessment - Recommendations for Compliance for the Proposed Residential Redevelopment of Camp Longbeach

Daly, G. et al (2000) Threatened Fauna of the Shoalhaven

PMA Consulting (February 2002) Flora and Fauna Study - Rural Lifestyle Subdivision - Gibraltar Coastal Developments, YMCA Camp Longbeach Road, Long Beach

South East Archaeology Pty Ltd (February 2002) An Aboriginal Archaeological Assessment of Lot 11 DP 828527, Longbeach Road, Long Beach.

9 ASSESSMENT OF SIGNIFICANCE (SEVEN PART TEST)

This assessment is to assess impacts on potential threatened species which may utilise the Camp Longbeach site. In particular it assesses the loss of forest vegetation for car park construction and expansion of apartments on the listed species **Eastern Freetail Bat** and **Greater Broad Nosed Bat**.

a) in the case of a <u>threatened species</u>, whether the action proposed is likely to have an adverse effect on the life cycle of the species such that a viable local population of the species is likely to be placed at risk of extinction

The Greater Broad-nosed Bat and Eastern Freetail Bat would utilise hollow bearing trees in the area as roost sites. The removal of hollow bearing trees would pose a threat to the life cycle of the species. Provision should be made for the retention of large hollow bearing trees where possible.

The proposal will not result in the loss of hollow-bearing trees. As such the activity would not have an adverse affect on the lifestyle of these species.

b) in the case of an <u>endangered population</u>, whether the action proposed is likely to have an adverse effect on the life cycle of the species that constitutes the endangered population such that a viable local population of the species is likely to be placed at risk of extinction

No populations currently listed under Part 2 Endangered Populations of Schedule 1 of the TSC Act 1995 occur in the area. No assessment is required.

c) in the case of an <u>endangered ecological community</u> or critically endangered ecological community, whether the action proposed :

- i. is likely to have an adverse effect on the extent of the ecological community such that its local occurrence is likely to be placed at risk of extinction; or
- ii. is likely to substantially and adversely modify the composition of the ecological community such that its local occurrence is likely to be placed at risk of extinction

Patches of forest vegetation on Lot 101 falling within the Endangered Ecological Community (EEC) 'Swamp Oak Floodplain Forest of the NSW North Coast, Sydney Basin and South East Corner bioregions' is located adjacent the wetland. There are no impacts on this vegetation which is well removed from the proposed development.

d) in relation to the <u>habitat</u> of a <u>threatened species</u>, <u>population or endangered</u> <u>community</u> :

- i. the extent to which <u>habitat</u> is likely to be removed or modified as a result of the action proposed: and
- ii. whether an area of habitat is likely to become fragmented or isolated from other areas of habitat as a result of the proposed action; and
- iii. the importance of the habitat to be removed, modified, fragmented or isolated to the long-term survival of the species, population or endangered community in the locality

The habitat of the Greater Broad-nosed Bat is tall open forest and open forest of the escarpment and coastal plain. The habitat of the Eastern Freetail Bat is more open

vegetation. Both species may utilise tree hollows for diurnal roosts. No hollow-bearing trees are to be removed. This should cater for the local population of these species.

The proposal will not isolate currently interconnecting or proximate habitat for these threatened species.

e) whether the action proposed is likely to have an adverse effect on <u>critical</u> <u>habitat</u> (either directly or indirectly)

The site is not listed as Critical Habitat in the Register of Critical Habitat.

f) whether the action proposed is consistent with the objectives or actions of a <u>recovery plan</u> or <u>threat abatement plan</u>

There are no current recovery plans or threat abatement plans for these species.

g) whether the action proposed constitutes or is part of a <u>key threatening process</u> or is likely to result in the operation of, or increase the impact of, a key threatening process

Aspects of the proposed development are considered a threatening process. Under Schedule 3 of the TSC Act (1995) "clearing of native vegetation" is listed as a Key Threatening Process.

Clearing of any area of native vegetation, including areas less than 2 hectares in extent, may have significant impacts on biological diversity. The determination applies to clearing of native vegetation as a process, regardless of the species, populations and communities affected in a particular instance.

Clearing of leaf litter and some fallen logs would remove habitat for a variety of vertebrates and invertebrates. Further, the creation of increased edge habitat and disturbed habitat may permit the establishment and spread of exotic species which may displace remaining native species on the residual edges of the uncleared area.

Specifically the proposal could adversely affect arboreal species present in the area, such as the Brushtail Possum and Ringtail Possum.

Attributes of the key threatening process 'Removal of dead wood and dead trees' has minimal application on this site, that is covered by the above discussion.

Conclusion

This assessment concludes that potential impacts upon threatened species Greater Broadnosed Bat and Eastern Freetail Bat at Camp Longbeach would be negligible as no hollowbearing trees exist near the development site. No habitat tree will be removed or isolated due to the proposed development.

There are no impacts on Endangered Ecological Communities from the proposed development.

P.J. Sp

Peter Spurway Peter Spurway & Associates Pty Limited 18.12.06



2006 MOB 0416292466 PH (02) 6161 3423 FAX (02) 6161 3429 CANBERRA OFFICE 7/25 JERRABOMBERRA AVE NARRABUNDAH ACT 2604 SOUTH COAST OFFICE LOT 55 WOODLAND DRIVE NAROOMA NSW Ш Δ EMAIL: fred@kasparek.com.au WEB: www.kasparek.com.au ი

