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Michelle Niles
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Your Ref:
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MP 09_131 MOD A
Z20/19088
MP-2009/131/A
10 February 2020

Dear Ms Niles

ADDENDUM TO RESPONSE TO SUBMISSIONS

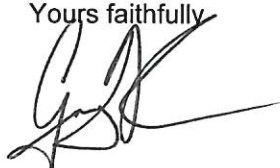
Thank you for your email providing Council with the opportunity to review the Addendum Response to Submissions for the proposed modification to the Tallawarra Lands major project.

Council's position remains that infrastructure should lead the development and employment lands prioritised within the development of Tallawarra Lands. The modification as proposed would likely result in residential development becoming the primary focus of the development of Tallawarra Lands, and the early delivery of the majority of employment generating lands not being realised. Council considers that a holistic response is required for the development of Tallawarra Lands to ensure appropriate development outcomes across the whole site that are in accord the strategic intent of the rezoning and the framework of the Concept Approval granted by the Department in 2013. This is not reflected in the documentation provided by the proponent.

Further, the fragmentation of the Tallawarra Lands development through proposed changes to conditions removes any surety that the desired environmental outcomes for the overall site will be achieved. Instead proposed condition changes provide the proponent with the ability to delay addressing significant environmental issues that exist in the Southern precinct for an indeterminate period of time, if at all.

Council's attached response provides additional commentary on key issues. Should you have any enquiries or wish to discuss these matters further please contact Nicole Ashton, Senior Development Project Officer, on telephone 4227 7111.

Yours faithfully



Greg Doyle
General Manager
Wollongong City Council
Telephone: (02) 4227 7111

Attach.

Comments in relation to proposed changes to Concept approval terms

Schedule 2

A6 First Future Application

Council considers that the wording of condition A6 should not be altered. The proposed modification to the condition, which includes a reference to the Proposed First Super Lot Subdivision plan by Bridgehill, reflects future land ownership and serves primarily to facilitate the fragmentation of the development of the Tallawarra Lands with a resultant increase in residential yields. This is inconsistent with the strategic intent of the rezoning and the importance of employment generating lands at Tallawarra.

Consideration of increased residential lot yield can occur without the specific need to amend condition A6, whilst ensuring that necessary further studies are submitted for the whole site, and not just a portion.

Schedule 3- Future Environmental Assessment Requirements

8. Cultural Heritage Management Plan

The applicant notes that a CMHP will be prepared in two stages, for the first superlot application for central and northern and for the southern precinct. Whilst it may be possible to practically split the plan and implementation into two stages, both of the CHMPs should be clearly integrated and allow for holistic management of cultural heritage values across the site.

Council considers that the CMHP should include relevant maps and an updated HIS as is noted in the proponent's response to submissions.

11. Further Investigation of the Areas of Environmental Concern and engagement of the Site Auditor accredited under the Contaminated Land Management Act 1997

12.Engagement of a site auditor to verify the adequacy of asbestos soil sampling and asbestos contamination investigations

It is Council's position that the site investigation and remediation should occur for the entire site, and subsequent subdivision of the land. This will ensure contamination matters are addressed holistically and that key environmental outcomes are achieved across the developable land and without delay to the southern area, which is the area of greatest concern with regard to contamination.

General Comments

Stormwater

The following items should be considered as part of future development applications for subdivision for the development:

- PMF flood modelling should be undertaken to ensure the development complies with Chapter E13 and E14 of the Wollongong DCP 2009.
- In the northern precinct, it is unclear how flows from the existing watercourse within the centre of the proposed residential lots will be managed. The design of the development should ensure overland flow paths are provided for contributing flows. The flow paths should be designed to ensure flows are not directed through residential lots and that the discharge to Crown land replicates the pre development scenario to ensure no impacts.
- The design of the development should ensure shared paths proposed in watercourse areas are designed to ensure overtopping/inundation in lower order storm events does not occur to limit potential for debris build up and ongoing maintenance.

Traffic

The increased yield scenarios within the Traffic Impact Assessment were both modelled with the Haywards Bay Link in place, whereas the scenarios with the approved development yield were not. It is therefore considered that any approval for additional yield under this modification should include a requirement for the provision of the Haywards Bay Link.

Open Space

Council considers that the open space proposed under the modification should be based on the findings of a community/social infrastructure needs assessment or similar appropriate planning study detailing the amount of community use land required to accommodate the future Tallawarra Lands population.

Further, the proponent should ensure there is a well distributed network of open space, with an equal split between the active (formal) and passive (informal) recreation areas. Open space should reflect Wollongong City Council's Urban Greening Strategy, ecological conservation principles and need to provide amenity.

Additional opportunities should be provided for children and young people. This was a key recommendation for Planning Area 8 in Wollongong's Planning People Places A Strategic Framework for Open Space, Recreation Facilities and Community Facilities April 2006. Facilities proposed for Central Precinct are noted however facilities are absent from Northern Precinct.

Heritage:

- Council does not support the relocation of the culturally significant Fig tree from both a landscaping and heritage perspective. Fig Trees have been consistently identified by the local Aboriginal Community as a highly significant feature integrated in cultural landscapes. The relocation of a tree removes its cultural ties from the landscape, its setting and will have unreasonable impacts on cultural heritage values – if even feasible without killing the tree.
- The modification to the concept plan appears to provide for an expansion of the potential heritage impacts on both Aboriginal and non-Aboriginal heritage sites, and would result in further encroachment of the development into areas higher on the development site. These additional impacts do not appear to be consistent with the aims and intentions of the earlier considerations relating to the development of the Tallawarra site and are generally not supported on heritage grounds.
- The concept plan should be undertaken in accordance with the recommendations of the final reports titled - Archaeological Report: North Precinct and Archaeological Report: Central Precinct prepared by BIOSIS in August 2017.
- A Heritage Interpretation Plan should be required to be developed by the proponent and the recommendations and outcomes of this should be incorporated in any future development of the site. The plan should provide for the interpretation of both the Aboriginal and European history of the site and any significant sites/features identified within it and ensure that Aboriginal objects are managed appropriately through further consultation with the local Aboriginal Community. Consideration should be given to planning for an on-site Keeping Place for removed objects. The plan should also be informed by the additional historical records Council holds from newspaper references related to the property.

Landscape

- The developer should ensure there is a well distributed network of open space. There should be an equal split between active (formal) and passive (informal) recreation. An open space hierarchy should be developed. Open space should reflect WCCs urban Greening Strategy, ecological conservation principles and need to provide amenity. Pocket parks to be developed within superlot boundaries.
- Where stormwater management in open space has been designed to also include informal recreation areas they should safely accommodate public interaction. Any informal ball sports area to be a minimum of 40 x 60m with maximum 5% gradient & adequate subsurface drainage. Any side slopes cannot exceed 16%. A Safety in Design Report to be prepared to assess proposed infrastructure.
- Council would like to see a linkage to Hector Henry Park developed. There is also scope to develop a sportsfield/ activity space on land off Malonga Place that has a relatively flat grade west of the existing dam (No. 11) with access from Wyndarra Way. There is further scope to develop this area for potential habitat considering 4.37 ha of EEC is proposed to be removed.

- Proposed sportsfields should have northern orientation. Netball courts are shown orientated east/west which is not ideal. An orientation 15 degrees east of north is common. Prevailing winds should also be taken into account
- Street trees should be shown on the landscape plan. Proposed planting is indicated on proposed open space but street trees are only shown on Yallah Bay Road. At a 1:2000 scale this issue should be addressed. Streets which have constraints of high voltage transmission easements/other utilities/ bicycle path need to be looked in detail to ensure that street trees can be accommodated and to ensure sufficient width is provided. A wider road reserve for major collector roads should be provided to accommodate street trees. Yallah Bay Road currently indicates street trees in centre of proposed bike path. These matters should be addressed in future applications.
- Existing vegetation should be shown on plan. Proposed open space shows only proposed trees. Existing vegetation has been indicated in the approved Tallawarra Lands Landscape Plan by Corkery Consulting May 2012 and this information should be reflected on modified plans submitted. Attention is drawn to vegetation near Stormwater detention basin in Northern precinct (No. 11), on southern side of Gilba Road extension (near No.8) and near equestrian centre. The large tree in Lot 15 DP 1050255 should be retained. These matters should be addressed in future applications.
- Equal Access should be addressed. Proposed pathway leading to Lookout in Northern Precinct (No.2) should follow contours to achieve 1:20 grade with landings in accordance with AS 1428.1, linking with the path to the proposed jetty. Proposed BBQS should be equally accessible with shelters provided. These matters should be addressed in future applications

Visual Impact

Council's previous concerns regarding the visual impacts of the proposed development remain outstanding.