

CALDERWOOD URBAN DEVELOPMENT PROJECT

RESPONSE TO SUBMISSIONS

Response to Issues Raised in Public Submissions

Concept Plan and State Significant Site Listing

Delfin Lend Lease

August 2010

Attachment 2: Summary of issues raised in the public submissions

Item	Issue	Response
	Strategic Planning	
Public Sub 01	The proposal is inconsistent with the Illawarra Regional Strategy. The IRS identified West Dapto as the priority release area and residents of Stages 3 & 4 West Dapto and Marshall Vale are seeking to have their land rezoned ahead of Calderwood.	<p>This statement is not supported by Government advice. The Department of Planning wrote to Shellharbour Council on 7th June 2010 specifically addressing this issue – refer response at Item Public Sub 05 below.</p> <p>The Illawarra Urban Development Programme Update Greenfield Dwelling Forecast (page 8) specifically identifies Calderwood as providing 700 dwellings in the 5 year period covered by the forecast, being 2008/09 to 2012/13. This document confirms the need for Calderwood to produce land and housing in order for Regional Strategy Dwelling targets to be met.</p> <p>Delfin Lend Lease has updated the relevant elements of Section 2 (Strategic Justification) of the EA to take account of the Recent Illawarra Urban Development Update and Explanatory Note and associated Government Press Releases - refer to the Preferred Project Report (PPR) and Attachment C</p>
Public Sub 02	Part of the site is not included in the IUDP, especially adjoining the Macquarie Rivulet Flood Plain, and should not be part of the proposal.	This matter has been addressed in accordance with the DGRs. Refer EAR Section 2.2.6.
Public Sub 03	Already sufficient land for residential and employment land in the area, with existing zoned areas providing 10-30 years supply of residential and employment land. These include Shell Cove, Flinders, Tullimbar, Hayward's Bay, Cedar Grove and Elambra, which have existing infrastructure such as roads and utilities. Therefore there may be an oversupply of land.	Refer response at Item Public Sub 01 above.
Public Sub 04	Stages 3 and 4 of West Dapto are not included in the maps on page 54 of the EA showing release areas in the region and the report is therefore misleading.	The Projects shown are those specifically confirmed by the Department of Planning Regional Office and the RTA - refer EAR Fig 13 Future Growth Areas (p.54) and Appendix T - Transport Accessibility Study and Transport Management and Accessibility Plan (TMAP) pp 53-61 inclusive.
Public Sub 05	The GCC review recommended dealing with West Dapto, Yallah and Calderwood together in a coordinated manner, however the proponent wants this site dealt with on its own.	<p>On 7th June 2010 the Department of Planning issued a letter of formal advice to Shellharbour Council on the status of Calderwood, a copy of which has been provided to Delfin Lend Lease and which is attached to this document. In summary the letter states that:</p> <ul style="list-style-type: none"> The review of the proposed West Dapto Release Area by the NSW Growth Centres Commission assessed the impact of the early release of Calderwood and concluded that, consistent with Government policy, there may be merit in the early release of Calderwood thereby achieving a higher overall dwelling production rate and delivering a mix of affordable housing by releasing as much land to market as quickly as possible. Having regard to the above, and information submitted by Delfin Lend Lease, the Minister for Planning formed the opinion that the proposed development constitutes a potential State Significant Site and authorised submission of a Concept Plan for the site. <p>The information submitted by Delfin Lend Lease to Government included a detailed Gateway Justification Report, which comprehensively addressed the public interest) and Preliminary Environmental Assessment Report for the Project.</p>

Item	Issue	Response
Public Sub 06	The site at Marshall Mount/Yallah should be released and progressed prior to Calderwood was this will bring necessary infrastructure closer to the Calderwood site, which is further from transport and other infrastructure than other sites in the region.	Refer response to Item Public Sub 05 above. In addition, the comment made about proximity of the site to necessary infrastructure is not correct. Infrastructure and service delivery are addressed in detail in the EAR – refer EAR Section 2.3 and Appendix G – Infrastructure, Services and Facilities Implementation and Delivery Proposal
Public Sub 07	The 3 regional Councils and a local community group oppose the development.	Noted. Detailed responses to Council submissions have been prepared and submitted to the Department of Planning.
Public Sub 08	Tullimbar has not been a success, including only 40 houses built and an underutilised school.	Noted. Development of Master Planned Urban Communities is a core Lend Lease operation through Delfin Lend Lease. At present Delfin Lend Lease has 26 Projects trading in 10 major population centres across Australia and these Projects deliver a diverse range of product that is priced to meet local market conditions. It is noted that Calderwood provides an opportunity to remedy the underutilised capacity at Tullimbar primary school.
Public Sub 09	Vacancy rates of industrial premises are significant, and some are derelict.	Noted. Refer EAR Section 2.4.1 and Appendices H – Economic Impacts of the Proposed Calderwood Urban Development Project and I – Calderwood Employment Update respectively.
Public Sub 10	Albion Park town centre has many empty shops and offices, this development could make things worse.	Refer response to Item Public Sub 09 above.
Public Sub 11	Concern the population projections for Calderwood are underestimated as Albion Park has a higher number of persons per household than average.	The demographic projections have been based on average household size for different types of dwellings in Shellharbour LGA based on the 2006 census. Average household size in Shellharbour has then been applied to the dwelling mix proposed for Calderwood. The methodology is both transparent and a standard methodology for population forecasting, based on evidence from the last census and is clearly identified in the Social and community Assessment. DLL notes that the EA Appendix AA – Social and Community Planning Assessment applies the standards that Shellharbour Council had proposed in its “Open Space and Community Facilities Needs Study and Design Guidelines” as they are the standards Council is using for its own planning of community facilities and open space, and are the standards Council asked us to use when we met with them – refer record of meeting of 30 November 2009 with Council.
	Infrastructure and Servicing	
Public Sub 12	The proposal will dilute the provision of infrastructure across the region due to having too many development fronts, ensuring none of the areas get adequate levels of infrastructure, including transport facilities to reduce car dependence.	This statement is not agreed. The Calderwood proposal has an independent and separate servicing strategy. Appendix Y to the EAR - Utility Services Study for Concept Plan Application (Cardno) explains the utility services delivery strategy. Appendix G to the EAR - Infrastructure, Services and Facilities Implementation and Delivery Proposal (DLL) details the methods for delivery of all requirements for the Project.
Public Sub 13	If West Dapto has to reduce its S94 contributions, Wollongong Council will have to pay more for service provision, and will have difficulty funding services for Calderwood.	Refer response to Item Public Sub 12 above.

Item	Issue	Response
Public Sub 14	Shellharbour Council will not be able to afford to cover the inevitable shortfall between the proponents now capped contributions without borrowing and raising rates across the entire council area, which is inequitable. Suggested up to \$2 million shortfall a year after rates.	DLL notes that the figures identified in Public Sub 14 are the same as those stated in SCC's submission. Council's estimates have not been provided to the Department of Planning for its assessment or to DLL, so a detailed response to this issue is not possible. DLL has provided a comprehensive response to this matter including an analysis of future open space ownership and management arrangements. Refer response to Agency Submissions (items DOP 08, DOP 09, SCC 009 and PPR Section 2.2.) and
Public Sub 15	Concern that community service providers may not be able to provide adequate services for the additional population.	Refer response to Item Public Sub 12 above.
Public Sub 16	Albion Park population already too big for existing infrastructure.	Refer response to Item Public Sub 12 above.
Public Sub 17	Existing infrastructure including sewerage, garbage and recycling will not be able to cope with the additional development.	Refer response to Item Public Sub 12 above.
Public Sub 18	The State government will be expected to fund the provision of water, sewer and electricity to the site.	Refer response to Item Public Sub 12 above.
Public Sub 19	Sydney Water has advised that Calderwood has not received approval for the uncommitted system capacity.	This statement is not agreed. The servicing strategy is consistent with Sydney Water's Growth Services Plan and makes best use of Sydney Water's assets, particularly given the acknowledgement in the Illawarra Urban Development Programme Update of the need for Calderwood – refer Item Public Sub 01 above.
Public Sub 20	Should not be utilising surplus capacity reserved for other developments including Tullimbar as it may compromise the delivery of these sites.	Refer response to Item Public Sub 19 above.
Public Sub 21	Should not take any existing capacity for water from the Mount Brown reservoir which Marshall Mount landowners are relying on for their development.	Refer response to Item Public Sub 19 above.
Public Sub 22	Concern about adequate sources for water for the site, may have a conflict with rural landholders and their water requirements.	This statement is not agreed. – refer Item Public Sub 01 above.
Public Sub 23	Oppose to route proposed for the new 133kw overhead electricity line along Yallah Road then to the site. The planned Marshall Vale township is at the intersection of Marshall Mount Road and Yallah Road and erection of high voltage electricity lines in that area is therefore not supported.	It is noted that with regard to the 132kV lead-in conductors: <ul style="list-style-type: none"> the proposed route uses the public road reserves of Yallah Road and Marshall Mt Road (rather than private landholdings) leading to TransGrid's Dapto Bulk Supply Point, north of Yallah Road; The final location of the line is subject to detailed investigation and design by Integral Energy; Yallah Road and Marshall Mt Road both have existing timber poles and overhead conductors for distribution to existing properties; The proposed line may be located above ground or underground at the discretion of Integral Energy; and The status of the "planned" Marshall Vale township is unknown. No development proposal, rezoning application or master plan has been made available to the general public upon which to make any considered opinion. Notwithstanding, the proposed 132kV line will provide the Marshall Vale area with infrastructure that is likely to be required for its future development, also linking into the Dapto Bulk Supply Point, north of Yallah Road.
Public Sub 24	Landowners in Marshall Mount oppose a 25m electricity easement through their land.	Refer response to Item Public Sub 23 above.
Urban/Site Design		

Item	Issue	Response
Public Sub 25	Urban growth should be centred around the two currently zoned town centres, Albion Park and Tullimbar, not as linear development along the Macquarie Rivulet valley.	Refer response at Items Public Sub 01 and 02 above.
Public Sub 26	There will be excessive retail floor space which will undermine the existing retail hierarchy in Shellharbour and other regions.	The Assessment of Retail Floor Space Potential lodged with the EAR documentation takes into consideration the development potential of lands identified on the MDP. This is considered to be an appropriate level of strategic long term planning for a Concept Plan. It will result in a coordinated approach to the implementation of services and facilities in a small number of viable centres that service the local population and immediate surrounds.
Public Sub 27	The Village centre is located only a short distance from Albion Park and Tullimbar Town centres which is already zoned, and therefore should be moved future west away from these centres to ensure their viability.	The Retail Assessment lodged with the EAR documentation clearly identifies that the Calderwood project will not undermine the retail hierarchy of the region. Refer EA Sections 2.4 and Appendix J – Assessment of Retail Floor Space Potential.
Public Sub 28	Opposed to Macquarie Rivulet and Marshall Mount Creek being zoned SP2, as these watercourses are of regional importance for habitat and biodiversity corridors and must have an appropriate environmental protection zone.	Noted. The zoning of Macquarie Rivulet and Marshall Mount Creek has been amended to E2. Refer to the PPR and revised Zoning Plan
Public Sub 29	Housing form and mix should be detailed to ensure there will be adequate housing diversity and to demonstrate sustainable planning of house sizes.	This statement is not agreed as the matter has already been addressed – refer EA - Appendices E Illawarra Land and Housing Supply Report, AA Social and Community Planning Assessment and BB Development Control Strategy. Notwithstanding, the Development Control Strategy has been amended to provide additional guidance on the location of house types to specific geographical parts of the site. Refer to the PPR and revised DCS.
Public Sub 30	The houses are in Tullimbar are too close together, not environmentally ergonomic and struggling to sell, and this proposal may suffer the same problems.	Noted. Development of Master Planned Urban Communities is a core Lend Lease operation through Delfin Lend Lease. At present Delfin Lend Lease has 26 Projects trading in 10 major population centres across Australia and these Projects deliver a more diverse range of product than other projects in the local area.
	Visual/Scenic impact	
Public Sub 31	Calderwood should be kept a tranquil and scenic area from surrounding residential and industrial areas.	Noted. The land is identified for urban development in the Illawarra Regional Strategy. Greenfield developments (eg West Dapto, Tullimbar, Shell Cove) can incur significant change and modify the existing character of an area.
Public Sub 32	Should be careful management of the development on the slopes of Johnsons' Spur, and impact on views to the escarpment.	This issue is addressed in the EAR documentation and specifically in the Visual Impact Assessment. The VIA meets the requirements of the DGRs and identifies the visual impact of the proposed development when viewed from a wide variety of locations. Refer EA Sections 3.18, 6, 7.15, Appendix A – Concept Plan drawings, Appendix X – Visual and Landscape Assessment and Appendix CC. Notwithstanding, the Development Control Strategy has been amended to provide additional guidance on development in specific geographical parts of the site. Refer to the PPR and revised DCS.
Public Sub 33	Impact on the western part of the site, where visitors enter the city. Should be a transition from rural to urban development, which is not demonstrated in the proposal.	Noted. Calderwood will form a new western gateway to the LGA. As a result, it is important for the project to acknowledge this and provide an appropriate treatment commensurate with its role. With specific regard to the south western corner of the Calderwood project, DLL has revised the DCS to generally limit development in that location to larger residential allotments and to recognise the location's role as a "new gateway" into the LGA. Refer revised DCS and revised Statement of Commitments
	Flooding and Groundwater	

Item	Issue	Response
Public Sub 34	Most of the area is in a hundred year flood plain and should not be built on, and not supported by State or regional policy. Should only build on land not affected by flooding as it is too risky.	<p>This statement is incorrect. The DGR's require a Flood Mitigation Study to <i>be conducted in accordance with the NSW Government's Flood Prone Land Policy as set out in the Floodplain Development Manual 2005</i>. This is what has been undertaken. The DGR's also require DLL to <i>consider Shellharbour Council's Floodplain Risk Management DCP and justify any departure</i>. Where the DCP is inconsistent with the FPDM, the principles of the FPDM have been used and these instances are documented in the EA Appendix R Chapters 4 and 5 (Floodplain Risk Management Study). In all other instances the DCP is consistent with the FPDM and therefore the assessment meets the requirements of the DCP.</p> <p>It is an aim and objective of SCC's DCP to <i>deal equitably and consistently with applications for development on land affected by potential floods, in accordance with the principles contained in the Floodplain Development Manual</i>. This assessment is entirely consistent with recent Regional Project proposals.</p> <p>Flood impact issues are also addressed in detail in the Preferred Project Report and attachments. Refer to the PPR and Appendix D - Offsite Flood Impact Analysis.</p>
Public Sub 35	Insurance companies are already stating they are not prepared to take such risks in flood affected areas.	Noted. No homes will be built on land affected by the 1:100 event.
Public Sub 36	There is a high risk of river meander across the site over time, and the rivers will over time occupy all of the flood plain available.	Refer response to Item Public Sub 34 above.
Public Sub 37	Cutting and filling to the extent proposed in a clear breach of IRS and NSW Government policy and places lives at risk.	Refer response to Item Public Sub 34 above.
Public Sub 38	The urban form is fragmented and will create small urban islands surrounded by flood waters.	Refer response to Item Public Sub 34 above.
Public Sub 39	Concerns about the cumulative impacts of continued filling on the floodplains on downstream and upstream properties.	The EAR demonstrates that flood impact mitigation can be managed within the boundaries of the site, and that the proposal will not contribute to any cumulative impact in terms of flood extent or levels within the catchment. . Refer EAR Section 3.1.12 and Appendices N and R respectively.
Public Sub 40	Impact of the fill proposed such as leaching of foreign material including soluble salts into ground water tributaries and systems and modification of floodwater flow patterns affecting livestock and property downstream. Existing floodplain RLs should be retained.	<p>The EAR demonstrates that groundwater issues are adequately addressed (eg requiring further analysis at the detailed design stage) - Refer EAR Section 3.13 and Appendix S</p> <p>Notwithstanding, the Statements of Commitment have been amended to provide additional guidance on groundwater issues. Refer to the PPR and revised Statement of Commitments.</p>
Public Sub 41	Impacts off site and in Lake Illawarra, including run off into Lake Illawarra in an extreme weather event while fill is being deposited.	<p>There are no flood related impacts to Lake Illawarra. For the Concept Plan, these are clearly documented in the EA – Appendix N Water Cycle Management Study, Section 5. Full results of this modeling are contained in Appendix C of the same report.</p> <p>The EA Section 4.11 – and Appendix N – Water Cycle Management Study detail the water sensitive urban design measures to apply to the Project, including during construction.</p>
Public Sub 42	Filling the flood plain will affect Tullimbar, make flooding worse and affecting roads and possibly homes.	Refer response to Item Public Sub 39 above.

Item	Issue	Response
Public Sub 43	Concern about increased flooding events for residents in Pollock Crescent backing onto what is now farmland.	Refer response to Item Public Sub 34 above. In addition, there is no increased flood impact as a result of the Calderwood Project for residents in Pollock Crescent. Refer to the PPR and Appendix D - Offsite Flood Impact Analysis.
Public Sub 44	Concern about impacts on downstream properties, including properties to the east that rely on Reach 16 and 17 for water during non-flood periods.	Refer response to Item Public Sub 34 above. In addition, the Statements of Commitment have been revised to respond to this specific issue Refer to the PPR and revised Statements of Commitment.
Public Sub 45	The street behind Albion Park Public School floods now and is often closed, will this get worse as a result of the proposal.	Refer response to Item Public Sub 34 above. In addition, there is no increased flood impact as a result of the Calderwood Project behind Albion Park Public School. Refer to the PPR and Appendix D - Offsite Flood Impact Analysis.
Public Sub 46	Traffic impacts including road access blocked for Calderwood and North Macquarie Roads periodically by floodwaters during heavy rain.	DLL confirm that all proposed roads in the Calderwood Project will exceed the requirements of the Floodplain Development Manual and SCC's Subdivision Guidelines. By way of example: <ul style="list-style-type: none"> • All proposed roads in the Stage 1 PA are trafficable in the 1% AEP flood event and the development is never isolated; • All sub arterial and collector roads in the Stage 1 PA are above the PMF mainstream flood level; and • All estate roads in the Stage 1 PA are above the PMF mainstream flood level Existing flash flood behaviour in the vicinity of the Calderwood Project make many State, Regional and local roads outside of the project boundaries periodically impassable during flood events. This would occur with or without the Calderwood Project.
Public Sub 47	Concerns about impacts on groundwater flow patterns and potential contamination, as a number of properties use boreholes.	Refer response to Item Public Sub 40 above.
Public Sub 48	Safety issues during flooding eg. risk of children drowning during flood events.	This statement is not agreed. The EAR documentation relating to public safety in times of potential flooding was prepared in accordance with the requirements of the SES – refer EAR Section 7.6. Refer also to response to Item Public Sub 40 above.
	Traffic	
Public Sub 49	Proposal should be deferred until it has direct access to the proposed F6 extension and Albion Park bypass due to existing traffic problems in Albion Park, especially the single traffic lane through the town centre in peak times, as well as heading north and west.	The RTA has stated, in a letter dated 15 th June 2010 to the Department of Planning, that the Government is currently considering the preparation of an Illawarra State Infrastructure Contributions Plan (SIC) to cover the land releases of West Dapto, Tallawarra and Calderwood and that the apportionments are outlined in a letter dated 15 October 2009 to DOP. The Department of Planning has confirmed this. Therefore it is assumed that the SIC will be utilised to provide appropriate level(s) of state infrastructure and Calderwood will contribute to these as will all other development in the region.
Public Sub 50	Existing capacity in the road network will be taken up by other approved developments including Tullimbar, and planned developments at Marshall Vale.	Refer response to Item Public Sub 49 above.

Item	Issue	Response
Public Sub 51	Yallah Rd, Marshall Mount Road and Calderwood Rd were built for rural traffic and will not cope with the increased traffic volumes. Road upgrades should be done prior to people moving in due to existing congestion.	Agreed that these roads are built for rural traffic. Transport impacts have been assessed in detail - refer EAR Section 3.14, 7.4 and Appendix T - Concept Plan Transport Accessibility Study and Transport Management and Accessibility Plan (TMAP) .
Public Sub 52	Road infrastructure improvements required especially a road from "Tates Farm" corner directly across to the Illawarra Highway as Calderwood residents will drive up to the Yellow Rock intersection and then through town.	Transport impacts have been assessed in detail - refer EAR Section 3.14, 7.4 and Appendix T - Concept Plan Transport Accessibility Study and Transport Management and Accessibility Plan (TMAP) .
Public Sub 53	Residents will also cut along Calderwood Road and turn onto Taylor Road to try to miss the traffic lights in town.	Refer response to Item Public Sub 52 above.
Public Sub 54	Upgrade works should not be at significant cost to Council.	Refer response to Item Public Sub 52 above.
Public Sub 55	Proposal will result in heavy car dependence and distant travel to/from employment centres, shops and services, especially as the high order jobs in the region will be located in the employment lands in Stages 1 and 2.	Refer response to Item Public Sub 52 above.
Public Sub 56	Parking is already a major issue in the Albion Park town centre.	Refer response to Item Public Sub 52 above.
Public Sub 57	Public transport is poor, and is far from a rail link, with peak hour rail travel already stretched.	Refer response to Item Public Sub 52 above.
Public Sub 58	Traffic issues are being addressed in West Dapto and Marshall Vale, so these developments should proceed before Calderwood.	Refer response to Item Public Sub 52 above.
Public Sub 59	Traffic impacts from construction, especially as there will be many carrying fill for the site.	Refer response to Item Public Sub 52 above.
Public Sub 60	The Illawarra highway floods in high rainfall events and has on occasion been closed and traffic detoured.	Refer response to Item Public Subs 40 and 52 above.
Public Sub 61	Calderwood would impact, and may close off, the potential for a bypass.	The Preferred Project Report addresses the Albion Park Bypass / Tripoli Way Extension in detail. The Concept Plan and Statements of Commitment has been revised to take greater account of this proposed road. Refer to the PPR and revised Statements of Commitment.
Public Sub 62	Already significant traffic issues on Bong Bong Road that could be made worse by the proposal.	Refer response to Item Public Sub 52 above.
Public Sub 63	Traffic impacts on Calderwood Road, including safety and noise due to the proximity of some dwellings to the road, as well as stock crossing the road daily.	Refer response to Item Public Sub 52 above.
	Ecology	
Public Sub 64	The site is adjacent to environmentally sensitive lands and may negatively affect these.	<p>The Calderwood project results in a balanced outcome between development and sustainable land management. The Flora and Fauna Assessment identifies that over 90% of existing vegetation of value is retained on site and protected via various land use zones and an ESL layer. Refer EA Section 6.10.</p> <p>Further, DLL notes that this comprehensive assessment was submitted to the Australian government for determination under the EPBC Act. On 30th March 2010 the Commonwealth decided that the proposed action (the Project) is not a controlled action under the Act and it does not require further assessment before it can proceed.</p>
Public Sub 65	Impacts on the Yallah Calderwood Fauna Linkage between Macquarie Pass NP and the south of Dapto which is high conservation values (in the NPWS Bioregional	Refer response to Item Public Sub 64 above.

Item	Issue	Response
	Assessment Studies 2002/3).	
Public Sub 66	Impacts on the Yallah to Marshall Mount Habitat and Biodiversity Corridor.	Refer response to Item Public Sub 64 above.
Public Sub 67	Impact on the Southern Rivers CMA's 'Escarpment to the Sea' program and the control of Weeds of National Significance.	Refer response to Item Public Sub 64 above.
Public Sub 68	EA indicated these corridors will not be planted and enhanced and therefore unacceptable. In the current state these corridors are poor, degraded and provide a poor connection and therefore must be enhanced.	Refer EAR pp 142 and 143 and Appendix CC Landscape and Open Space Master Plan.
Public Sub 69	Once built and populated, all sorts of chemical and organic matter would run off and affect Lake Illawarra.	The EA Section 4.11 – and Appendix N – Water Cycle Management Study detail the water sensitive urban design measures to apply to the Project, including during construction.
Public Sub 70	Has not adequately addressed impact on species known to inhabit the areas, including, quoll, platypus, echidnas, macropodids, reptiles, amphibian, and native fish (including bass). Wedge tail eagles are established on the foothills surrounding the Illawarra Escarpment.	Refer response to Item Public Sub 64 above.
Public Sub 71	There will be increased invasion of weed species and undesired edge effects.	Refer response to Item Public Sub 64 and 69 above.
	Impact on agriculture	
Public Sub 72	Much of the site is prime Class 2 agricultural land, including 80% of Stage 1, is close to rail and should be used for food growing for local food production in the future, with especially when there are still development sites available such as West Dapto and Tullimbar.	Refer EAR Section 2.5, 3.6 and Appendix K Agricultural Land Study.
Public Sub 73	The IRS identified the Calderwood site as rural and agricultural land with important economic, environmental and social benefits and value as a food producing source to be protected in the long term. It should not be considered as an 'urban land bank' in waiting and reduces the incentive for current owners to invest in further agricultural activity.	<p>These statements are not agreed. As demonstrated in the EA – Section 2 and Appendix F – Illawarra Regional Strategy Sustainability Criteria, and confirmed by the Department of Planning on 7th June 2010, Calderwood is consistent with the Regional Strategy. The Strategy states with regards to agricultural land as follows::</p> <ul style="list-style-type: none"> • <i>“the Regional Strategy will promote the economic, food production and community values of existing agricultural lands and protect them from inappropriate urban expansion (other than that identified under this Strategy or in accordance with the Sustainability Criteria) [our emphasis]...” (p36); and</i> • <i>“New residential (other than those identified in Chapter 6 Housing and Settlement) [our emphasis] or rural residential zones will only be supported where they meet the Sustainability Criteria (Appendix 1)...” (p37).</i> <p>The Calderwood project is identified for development in the IRS and in Chapter 6 in accordance with the above.</p>
Public Sub 74	It is SEPP policy to protect Rural Lands.	Refer response to Item Public Sub 73 above.
Public Sub 75	Conflicts with the COAG plan in 2006 which indicated the natural environment in the Illawarra supporting agriculture should be protected to ensure food producing lands are close to large populations. This is also reflected in the IRS.	Refer response to Item Public Sub 63 above.
Public Sub 76	The site is virtually 100% agricultural uses rather than 30% as stated.	Not agreed. Refer EAR Appendix K Agricultural Land Study.
Public Sub 77	EA fails to state that the site is currently used for grazing and harvesting of fodder.	Refer EAR Appendix K Agricultural Land Study.

Item	Issue	Response
Public Sub 78	Some farms may have scaled back production as they were told in 1996 that this area was earmarked for future development. If they are assured that farming can continue on the site and recognising farming to our local market is the sustainable thing to do, then farming will continue and increase in productivity.	Refer response to Item Public Sub 73 above.
Public Sub 79	Dairy farming is counted as worthwhile, but the land could be used for so much more including vegetable production in glasshouses.	Refer response to Item Public Sub 73 above.
Public Sub 80	Impact on downstream farms from increased flows and bank erosion.	Refer response to Item Public Sub 69 above.
Public Sub 81	Increased risk in toxins in the water through normal household chemical use, the same water used for stock downstream.	Refer response to Item Public Sub 69 above.
Public Sub 82	The state needs farmers and what they produce, and need assurance they can farm and build up their business.	Refer response to Item Public Sub 73 above.
Public Sub 83	Impact on existing farmers in the area, such as land use conflicts.	Refer EAR Appendix K Agricultural Land Study.
Other		
Public Sub 84	Concern that the low attendance at the information evening meant people were satisfied with the proposal.	<p>There were ample opportunities to comment on the proposal. Invitations were sent to all relevant local community organisations and groups to contribute their views at the Community Information and Feedback Session and several attended and did so. Opportunities for consultation were widely advertised through invitations, letterbox drops and press ads for both Community Information and Feedback Session and web-based consultation.</p> <p>DLL is unable to comment on the capacity of the community to respond to the proposal but notes that the opportunity to do so was extensive. It is also noted that the DOP extended the timeframe for comment by one month.</p>
Public Sub 85	Inadequate consultation by DLL with landowners who would be adversely affected by the proposal.	Refer response to Item Public Sub 84 above.
Public Sub 86	It has not had relevant studies done by independent experts but supplied its own.	Refer EAR Sections 1.0, 1.1, 1.2, 1.3 and 1.4.
Public Sub 87	Concerned the Water Management Act does not apply because it is a Part 3A application.	Refer response to Item Public Sub 84 above.
Public Sub 88	Increased noise effects from the airport.	Refer EAR Appendix Z - Noise Assessment.