

Staging Report – SSD3846

West Culburra Concept Proposal

For

Sealark Pty Ltd

Site address

***Part Lot 1 DP 1305809, Part Lot 3 DP
1279350, Part Lot 1 DP 1279350 & Part
Lot 1 DP 631825 – Culburra Road,
Culburra Beach***

Date

15/09/2025

Project Reference: N25405

Allen Price



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Table of Revisions

Initial	Rev	Date	Details
RL	P0	14 July 2025	Draft for ER review – Existing Consent
RL	A1	7 August 2025	Final to submit to DPHI
RL	A2	15 September 2025	Clarity on early works applications
SD	A3	30 September 2025	Address preliminary comments from DPHI to remove underscrubbing from early and enabling works
RL	A4	11 November 2025	Update EW DA details following DPHI feedback.



1.0 INTRODUCTION

Allen Price Pty Ltd has been commissioned by Sealark Pty Ltd (Sealark) to prepare a Staging Report for the State Significant Development (SSD) for the West Culburra Mixed Use Development at Culburra Road, Culburra (the site) approved under SSD3846 (the concept consent).

Concept Plan Approval under Section 4.22 of the Environmental Planning and Assessment Act 1979 (EP&A Act) was granted to SSD3846 by the NSW Land and Environment Court on 1 December 2021. Condition A12 of the concept consent requires the preparation and submission of a Staging Report for the approval of the Planning Secretary. This report details the order that construction is anticipated to occur during the project, including the sequence of development applications (DAs) for lodgement with the relevant planning authority. In accordance with the terms of Condition A12, Shoalhaven City Council (SCC), utility and service providers, and other relevant stakeholders have been consulted during the preparation of this report.

In accordance with Condition A13 of the Consent, no construction of any stage of the Concept Proposal is to be undertaken until this subject Report is approved, and any future works are to be undertaken in accordance with the staging specified in this Report.

The stages and layouts outlined in this Staging Report are consistent with the existing approved concept consent (SSD-3846) and are intended to illustrate the anticipated roll-out and delivery of the project. It is noted that, at the time of writing, a Section 4.56 modification application (SSD-3846-MOD-1) has been lodged with the Department of Planning, Housing and Infrastructure (DPHI) for assessment. A number of development applications (DAs) have also been lodged by Council under both the existing concept consent and the proposed modified concept consent. The modification is not expected to affect the Early Works stages of the proposal that have already been submitted to, or approved by, Council under the existing concept proposal.

1.1 PURPOSE OF THIS REPORT

This report addresses the requirements of Conditions A12 of development consent SSD3846 relating to the preparation of a Staging Report to enable the works approved under the consent to be constructed and occupied in stages. In accordance with A12 – A14, the Staging Report must:

- (a) be prepared in consultation with Council, utility and service providers and other relevant stakeholders (refer **Section 3.1**);
- (b) describe how the implementation of the Concept Proposal, would be staged to ensure it is carried out in an orderly and economic way and minimises impacts on adjacent sensitive receivers (refer **Section 3.2**);
- (c) show the likely sequence of DAs for each stage that will be lodged to develop the Site, with the estimated timing for each Stage and identification of any overlapping construction and operational activities (refer **Section 3.3**);
- (d) describe the sequencing of residential, industrial and town centre staging, including identification of any overlapping works (refer **Section 3.4**);
- (e) detail the scope and timing of any required road upgrades to service each stage



- (refer **Section 3.5**); and
- (f) include conceptual design for the provision of services, utilities and infrastructure to the Site (refer **Section 3.6**).

The role of this report is to ensure compliance with a number of conditions of consent within SSD3846. In particular, the word 'Stage' is defined in the Concept Proposal approval as: 'Any stage of the Concept Proposal as described in a Staging Plan approved by the Planning Secretary in accordance with this consent'. Several consent conditions relate to prerequisites 'prior to construction any stage of the Concept Proposal'. Accordingly, this report is submitted to the Department of Planning, Housing and Infrastructure (DPHI) to describe the relevant stages of the Concept Proposal and facilitate the delivery of the project.

Updates to this Staging Report will be made as required, particularly following the determination of any project modifications or changes to the delivery strategy (refer to Section 2.0). Where amendments to the proposed staging occur, a revised Staging Report will be prepared in consultation with DPHI and will be submitted in accordance with Condition A12.

1.2 SITE CONTEXT – LOCATION

The site consists of Part Lot 1 DP 1305809, Part Lot 3 DP 1279350, Part Lot 1 DP 1279350 & Part Lot 1 DP 631825, Culburra Road, Culburra Beach. Culburra Beach is located on the south coast of NSW, approximately 15km south-east of Nowra. The location of the development is to the west of the current township of Culburra Beach, on the northern side of Culburra Road.

Part Lot 1 DP 631825 is the Culburra Beach Sewage Treatment Plant (CBSTP). Works within this lot are limited to supporting infrastructure and associated works associated with the delivery of the Concept Proposal.



Figure 1: Location Map (Source: Six Maps)

1.3 SITE CONTEXT – LANDOWNER BACKGROUND

Part Lot 1 DP 1305809, Part Lot 3 DP 1279350, Part Lot 1 DP 1279350 are owned by Sealark Pty Ltd.

Sealark Pty Ltd is owned by The Halloran Trust. The Halloran family, specifically Henry F. Halloran, were the owners of the land that now forms the township of Culburra Beach and surrounds. The Halloran Trust is a registered charity with the Australian Charities and Not-for-Profits Commission. The Halloran Trust has a mandate to distribute its profits to several beneficiaries, including the community of Culburra Beach and other beneficiaries who mostly have a connection with the Shoalhaven LGA.

Part Lot 1 DP 631825 is owned by Shoalhaven City Council and managed by Shoalhaven Water.

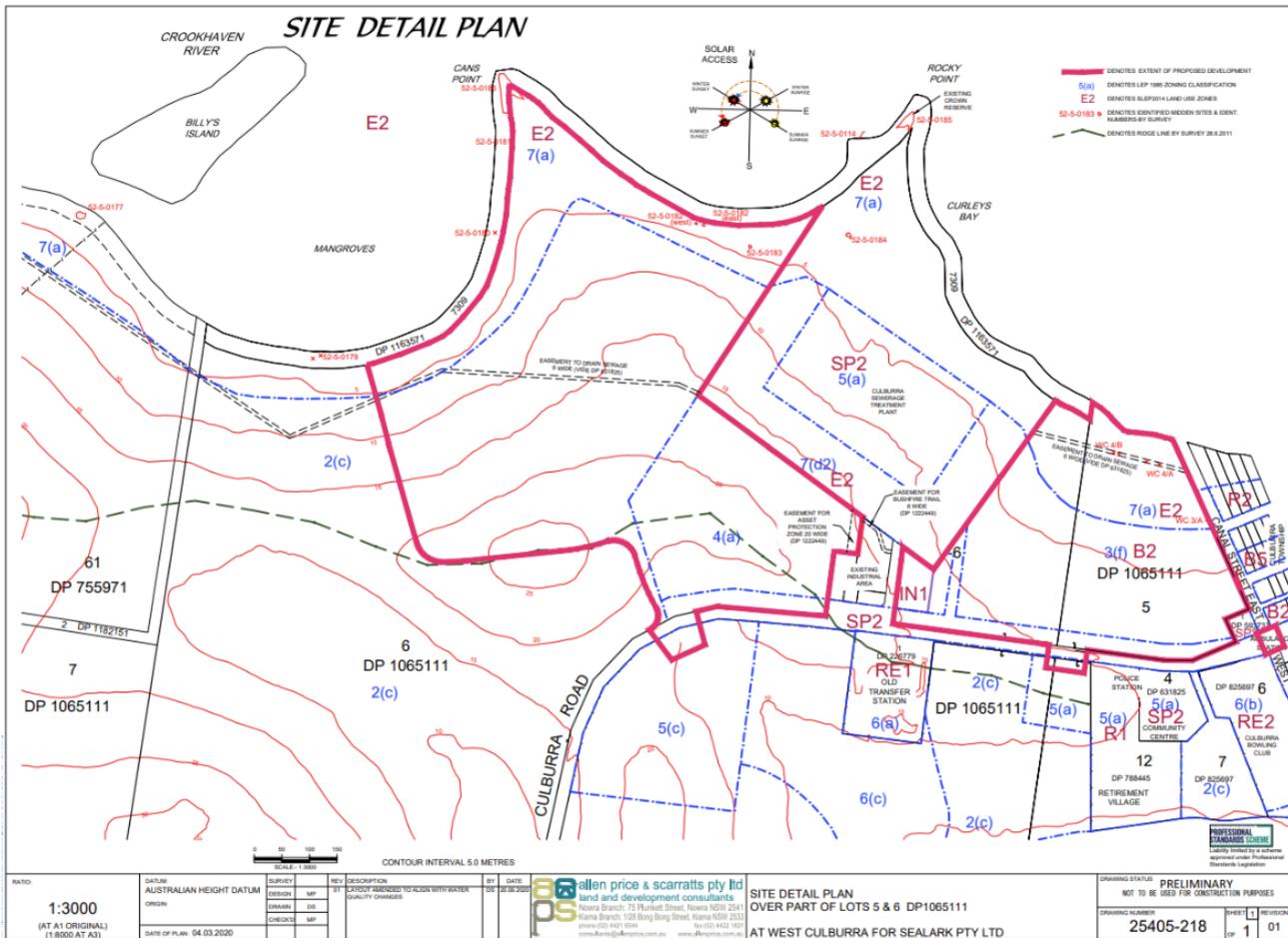


Figure 2: Approved Site Detail Plan - Dwg No. 25405-218 (Source: Allen Price & Scarratts)

2.0 PROJECT STAGING

2.1 OVERVIEW

The staging of the Concept Proposal is aligned with each the three Precincts – Residential, Industrial and Town Centre. The precincts have been determined by land uses in accordance with the concept consent.

Each precinct will be individually staged to ensure the orderly and economic delivery of the proposal, that also minimises the impacts on adjacent sensitive receivers.

Staging has considered the balance between the need to commence residential, business, sporting and industrial uses, and the need to foster overall growth for the Culburra Beach township and its community. The three precincts will be split up into the following stages:

- Residential – 7 stages
- Industrial – 2 stages
- Town Centre – 5 stages



It is also proposed to commence early and enabling works prior to undertaking these stages. These early works are not considered to be a 'stage' for the purposes of the Concept Proposal but refer to the initial activities carried out before the main construction phase begins. These works are essential to prepare the site and ensure that the primary construction activities can start smoothly and efficiently. The goal is to mitigate risks, avoid delays, and set a solid foundation for the project.

2.2 EARLY WORKS

To ensure the orderly and economic development of the subdivision, some early works are proposed to occur ahead of the main Precinct subdivision applications to ensure that the subsequent subdivisions are readily serviceable and have suitable access arrangements. These works are noted on the Staging Plans (refer **Appendix 2**).

Early works may include (but are not necessarily limited to) works such as:

- utility connections;
- lead-in works;
- service diversions;
- roundabout construction;
- access road construction - lead in/lead out road works from Culburra Road to the Residential Precinct;
- water quality facilities;
- vegetation management plan (VMP) and environmental protection works; and/or
- "superlot" subdivision of Precincts, reserves and foreshore areas to separate the development lots from the residue and reserve lots.

A number of development applications have been submitted to Shoalhaven City Council, with some approved with conditional consent in 2025. Further early works development applications will be submitted during 2025. **Table 2** below outlines these.

Definition of Construction

Under the Concept Proposal, 'construction' is defined as:

The demolition and removal of buildings or works, the carrying out of works, including bulk earthworks, and erection of buildings and other infrastructure permitted by this consent, but does not include:

- a) *geotechnical or environmental investigations;*
- b) *survey works;*
- c) *archaeological investigations and testing;*
- d) *installation of mitigation measures such as erosion and sediment controls;*
- e) *connection of utilities; and*
- f) *any other activities determined by the Planning Secretary to have minimal environmental impact.*



The wording of this condition specifically carves out certain works, that have minimal environmental impact, to be completed without needing to satisfy all pre-construction conditions of consent.

Table 1 below identifies the Early Works applications that DPHI has determined meet the definition of “construction.” Early Works #4, #8, #9, and #12 are confirmed to satisfy this definition under the Concept Proposal Definitions, and the relevant conditions of consent will therefore apply. This matter has been resolved in consultation with DPHI, who have confirmed that the applicable “prior to construction” consent conditions outlined in **Appendix A** are to be applied.

Early Works #5 is worth noting. It consists of vegetation management and the Torrens title subdivision, with no construction works proposed. While the proposal includes widening of the road reserve on Culburra Road, this does not involve undertaking any actual physical works. It accordingly does not meet the definition of “*the demolition and removal of buildings or works, the carrying out of works, including bulk earthworks, and erection of buildings and other infrastructure*”.

All future and current applications proposed under different early works development applications is outlined in **Table 1**. The application status of each is at and the relevant applicable conditions of consent outlined in **Appendix A**.

Table 1. Early Works Stages – Construction Definition

Description	AP Ref.	Construction Definition
Connection of utilities and mitigation measures.	EW1	Non-construction: connection of utilities and mitigation measures
Connection of utilities and associated works on north side of Roundabout R1 (water, power and comms)	EW2	Non-construction: connection of utilities and mitigation measures
Realignment of water mains, erection of new boundary fence and mitigation measures on south side of Roundabout TC2	EW3	Non-construction: connection of utilities
Construction of roundabout R1, water quality measures, utility diversions and mitigation measures on southern side of roundabout and road	EW4	Construction
Subdivision to create foreshore reserve Lots, woodland reserve lot, residue lot and development lots, implementation of vegetation management plan	EW5	Non-construction – is not “ <i>the demolition and removal of buildings or works, the carrying out of works, including bulk earthworks, and erection of buildings and other infrastructure</i> ”
Services Diversions on northern side of Roundabout TC2 and mitigation measures	EW6	Non-construction: connection of utilities
Construction of roundabout TC1, services diversions and mitigation measures	EW8	Construction
Sewer connection to Culburra STP and mitigation measures	EW9	Construction
Construction of roundabout TC2	EW12	Construction



2.3 RESIDENTIAL PRECINCT

The Residential Precinct will be the first Precinct of the approved Concept Proposal to be delivered. As shown in **Appendix 2**, the Residential Precinct is to occur across 7 stages, referred to as R1 – R7. The total number of lots to be delivered in each stage is indicated below.

Table 2. Residential Precinct Stages – Indicative Lot Numbers

Residential Stage	Number of Lots
R1	Subdivision of the subject land to create: <ul style="list-style-type: none">• 62 Residential allotments• 1 residential development lot• 2 open space reserves
R2	Subdivision of the subject land to create 44 residential allotments
R3	Subdivision of the subject land to create 17 residential allotments
R4	Subdivision of the subject land to create 34 residential allotments
R5	Subdivision of the subject land to create 34 residential allotments
R6	Subdivision of the subject land to create 27 residential allotments
R7	Subdivision of the subject land to create 26 residential allotments
Total	244 Residential lots

Stage 1 of the Residential Precinct (R1) includes Road 01 including lots on both sides of the main spine road. Stage 1 also includes water quality infrastructure.

The delivery / hand over of the foreshore and woodland reserves, which will have VMP works and be subdivided under the early works stages, are intended to occur prior to or with the delivery of Stage R1 in line with the conditions of the Concept Proposal.

Stages 2, 3 and 4 in the eastern part of the Residential Precinct will be delivered from the lowest part of the site to the highest part of the site.

Similarly, Stages 5, 6 and 7 in the western part of the Residential Precinct will be delivered from the lowest part of the site to the highest part of the site.

The Residential Precinct will be part of the 'Stage 1 Development Application' which will include the Residential and Industrial Precincts, in addition to works along Culburra Road to provide pedestrian connectivity to the existing Culburra Beach village town centre.

The Residential Precinct will be part of the 'Stage 1' Development Application currently under assessment by Council (DA25/2276) which includes the Residential and Industrial Precincts, in addition to works along Culburra Road to provide pedestrian connectivity to the existing Culburra Beach village town centre.



2.4 TOWN CENTRE PRECINCT

Construction of the Town Centre Precinct will commence after the completion of Residential stages 1-4. This results in the concurrent construction of the Town Centre stages with Residential stages 5-7. The anticipated timing, showing overlapping of construction can be seen in Section 3.3 of this report.

As shown in **Appendix 2**, the Town Centre Precinct is proposed to occur across 3 stages, with Roundabout TC1, TC2 (and associated services diversions and mitigation measures) being delivered as part of the Early Works.

Stage 1 in the Town Centre Precinct includes all water quality measures, the various public reserves including the playing field and amenities, along with the medium density lots in the south-western portion of the Precinct and a single industrial allotment.

In a similar fashion to the Residential Precinct, Stages 2-3 of the Town Centre Precinct will be delivered from the lowest part of the site to the highest part of the site.

The mixed residential/commercial use lots intended to be delivered in Stage 3 of the Town Centre Precinct will also ensure that the integrated housing and medium density lots are completed prior to the delivery of the expanded commercial area.

By completing the Residential Precinct Stages 1-4 before beginning the construction of the Town Centre precinct, the demand for additional commercial floorspace will start to materialise. This staging has been determined following advice provided in the Economic Impact Assessment from Atlas Urban Economics dated September 2020 which states “*delivery of the expanded town centre (i.e. tavern, leisure uses) to occur once the residential component of the development has been largely delivered and established*”.

Development Consent for the Town Centre Precinct will be sought under a second major DA referred to as ‘Stage 2 Development Application’.

2.5 INDUSTRIAL PRECINCT

The Industrial Precinct will be delivered subject to market demand for industrial allotments. It is anticipated that the construction of this precinct will overlap with both the Residential and Town Centre Precincts, depending on market demand.

As shown in **Appendix 2**, the Industrial Precinct is proposed to occur across 3 stages.

Stage I1 will include all roadworks, water quality measures and the release of 7 industrial allotments.

Stage I2 will include the release of 5 industrial allotments (with all construction work occurring in Stage I1).



The Stage I1 and I2 of the Industrial Precinct will form part of the Stage 1 Development application along with the Residential Precinct.

The final industrial lot is located on the east of Strathstone Street, will be released as part of the Town Centre Stage 1.

2.6 INDICATIVE TIMING FOR DEVELOPMENT APPLICATIONS AND CONSTRUCTION

Indicative timing of each stage is set out in **Table 3** below. This Staging Report contemplates the specific staging requirements of Conditions A12 – A14 of the development consent. Further discussion on the conditions of approval is carried out in Section 3.

Table 3: Summary of Timing of Each Precinct

Stage/ Precinct	Description	Indicative Timing
Early works	Preliminary works will be carried out before the Precinct Stages to minimise disruption and ensure that adequate infrastructure is in place to support the subsequent subdivision rollout.	<ul style="list-style-type: none"> • Commence ASAP • Development applications were submitted from July 2024, with more applications currently being prepared for submission to Council. • Table 4 below outlines the DAs that have been submitted to Council.
Residential Precinct	Subdivision of the low density residential precinct, to be divided into stages <ul style="list-style-type: none"> • Stages R1-R4; and • Stages R5-7. 	<ul style="list-style-type: none"> • Development Application submitted late 2025 ('Stage 1 DA') (DA25/2276) • Stages 1-4 construction commencing 2026 • Stages 5-7 construction commencing 2030
Town Centre Precinct	Subdivision of the Town Centre Precinct, to be divided into 3 Stages, Stages T1 – T3.	<ul style="list-style-type: none"> • Development application to be submitted 2026 ('Stage 2 DA') • Construction commencing 2030.
Industrial Precinct	Subdivision of the Industrial Precinct to be divided into 2 key stages – I1 and I2. One industrial lot will be delivered concurrently with Stage T1, being the lot to the east of Strathstone Street.	<ul style="list-style-type: none"> • I1 and I2 will be proposed under the development application concurrent with the Residential Precinct in 2025 ('Stage 1 DA') • Development Application for the T1 industrial lot will be with the Town Centre Precinct in 2026 ('Stage 2 DA').



Table 4: Early Works DAs

Description	AP Ref	Development Application Ref	Application Status
Connection of utilities and mitigation measures.	EW1	DA24/1514	Approved 7 April 2025
Connection of utilities and associated works on north side of Roundabout R1 (water, power and comms)	EW2	DA24/1732	Approved 15 May 2025
Realignment of water mains, erection of new boundary fence and mitigation measures on south side of Roundabout TC2	EW3	DA24/1759	Approved 15 May 2025
Construction of roundabout R1, water quality measures, utility diversions and mitigation measures on southern side of roundabout and road	EW4	-	Proposed – not yet submitted
Subdivision to create foreshore reserve lots, woodland reserve lot, residue lot and development lots, implementation of vegetation management plan	EW5	-	Proposed – not yet submitted
Services Diversions on northern side of Roundabout TC2 and mitigation measures	EW6	DA25/1591	Undetermined. Lodged 26 May 2025.
Construction of roundabout TC1, services diversions and mitigation measures	EW8	DA25/2325	Undetermined. Lodged 21 October 2025
Sewer connection to Culburra STP and mitigation measures	EW9	DA25/1608	Undetermined. Lodged 3 June 2025.
Construction of roundabout TC2	EW12	-	Proposed – not yet submitted

2.7 STAGING RATIONALE

The Concept Proposal Staging focuses on balancing the need for construction to occur in an environmentally sensitive, safe and efficient manner, while managing constructability and environmental constraints and reducing the cumulative impacts.

Staged construction of the development is proposed to allow for early works to facilitate the development to progress, while necessary preparatory baseline studies are undertaken, as well as to ensure compliance with relevant water quality conditions of the development consent.

The development has always intended to be delivered in stages to ensure the lots are released in an orderly and coordinated manner. It is expected that the proposed staging will not result in any significant cumulative environmental impacts, but rather through sequencing the delivery of the proposal, staging will minimise overall construction impacts associated with the Concept Proposal. This ensures that infrastructure provision, traffic and water quality impacts are carefully managed, as opposed to delivery of the Concept Proposal as a single construction. Therefore, there will not be any additional construction impacts beyond those already assessed and conditions in the Concept Proposal.



2.8 AFFORDABLE HOUSING

An “Affordable Housing Strategy” has been prepared in accordance with Condition B38. Prepared by Judith Stubbs & Associates (November 2023), the strategy outlines that sufficient land to allow the construction of a minimum of 40 “affordable dwellings” will be dedicated to a Community Housing Provider (CHP), at no charge. The affordable rental housing will be distributed throughout the development, including on lots nominated as ‘residential’ and ‘medium density’ in the masterplan. The stages in which the affordable housing will be delivered will be based on the identified need in consultation with the nominated CHP.



3.0 RESPONSE TO CONDITION REQUIREMENTS

Table 5: Summary response to consent condition requirements

Condition A12: Consent condition requirement	Report reference	Supporting documents
(a) be prepared in consultation with Council, utility and service providers and other relevant stakeholders;	Section 3.1	Appendix 3
(b) describe how the implementation of the Concept Proposal, would be staged to ensure it is carried out in an orderly and economic way and minimises impacts on adjacent sensitive receivers;	Section 3.2	Appendix 2
(c) show the likely sequence of DAs for each stage that will be lodged to develop the Site, with the estimated timing for each Stage and identification of any overlapping construction and operational activities;	Section 3.3	Appendix 2

3.1 CONDITION A12 (A) - BE PREPARED IN CONSULTATION WITH COUNCIL, UTILITY AND SERVICE PROVIDERS AND OTHER RELEVANT STAKEHOLDERS

This staging report has been prepared in consultation with Shoalhaven City Council (SCC), Shoalhaven Water, Endeavour Energy, NBN and Transport for NSW. The extent of this consultation is detailed below, with further information provided in Appendix 2.

3.1.1 SHOALHAVEN CITY COUNCIL (SCC) AND SHOALHAVEN WATER

Regular consultation with SCC has been undertaken since the approval of the Concept Proposal regarding the delivery of the development, including the future DAs, staging plans, water quality measures, staging of the pressure sewer system and relocation of the existing sewer rising main and upgrade of the CBSTP. The feedback from SCC has been positive with consultation continuing as the project progresses.

With regard to the staging of the proposal, a project meeting was held on 11 May 2023 where the Staging Plan was presented to SCC. Following this, formal advice was received from Council in response to the Staging Plan on 23 November 2023 (included at **Appendix 3**). The following **Table 6** outlines how Council feedback has been considered.

Table 6: Council Feedback & Response

SCC Comment – 23/11/23	Response
Stormwater	
Given that the consent requires that the stormwater treatment measures be established at the outset in each component of the development, the staging plan should consider how the stormwater treatment measures, such as water quality ponds and biofiltration areas, will be	SEEC have reviewed the proposed staging and designed the soil and erosion sediment control devices for each stage of the construction of the development to ensure construction related impacts are mitigated.



SCC Comment – 23/11/23	Response
<p>protected from erosion and sedimentation during the construction phase and other construction-related impacts.</p>	<p>A Soil and Water Management Plan (SWMP) has been prepared which will be submitted with the Residential Precinct DA (based on the proposed modified proposal).</p>
<p>Regarding the staging plan, it is noted that the permanent stormwater quality devices are proposed to be installed at stage 1 of the residential, town centre and industrial lots respectively.</p> <p>Clarification regarding when these devices are intended to go online after being constructed is required.</p> <p>Normally, Council requires that 90% of the upstream catchment has been developed prior to devices coming online to ensure no damage occurs to the treatment devices from the construction activities. This needs to be considered in the staging plan</p>	<p>Details of compliance with this will be submitted with the Residential Precinct DA in accordance with conditions of the Concept Approval.</p> <p>The SWMP has been specifically designed in order to meet the erosion and sediment control requirements of the consent under Conditions B11 and B12. The SWMP depicts the sequential delivery of stages and demonstrate how permanent water quality devices serve as treatment devices during construction and when they come online as permanent devices. This is a matter that can be further reviewed at DA / SWC stage in accordance with the conditions of the Concept Approval.</p>
<p>It is noted that the ICWMS report includes a sediment basin and other erosion and sediment controls for each stage.</p> <p>How will these devices interact with the permanent stormwater quality devices and what measures will be taken to ensure both the ongoing water quality targets are met and that the devices are not damaged by the construction activity from sediment transportation?</p>	<p>This is a matter for further consideration with the Residential Precinct DA. MOD1 currently under assessment by DPHI, contains significant additional detailed design work to address ongoing water quality targets as required by the Concept Approval.</p>
<p>AP&S informed Council in a meeting held on Thursday 20 October 2022 that they have engaged SEEC to develop their Soil and Water Management Plan. Furthermore, AP&S suggested that they will ask SEEC and Martens to work collaboratively to develop the SWMP and IWCMs for the site which is supported by Council. Documentation is required outlining the interaction between the Soil and Water Management Plans for each stage and the permanent stormwater quality devices.</p>	<p>Noted. As identified above, this will be provided with the Residential Precinct DA.</p>
<p>Roads/Traffic/Access</p>	
<p>The applicant needs to demonstrate how bus servicing and bus stops will be provided for each stage and which routes will be available for use until the permanent arrangement can be utilised (refer Condition C27 and Statement of Commitments).</p>	<p>The staging plans depict the roll out of bus stops within the development and ensure that suitable bus stops are available within required distances for each stage. A bus stop is proposed to be constructed with Stages 1, 4 and 5 of the Residential Precinct Stage 1 of the Industrial Precinct, and Stage 1 of the Town Centre Precinct.</p>
<p>It is noted that the first bus stop is not installed until Stage 3, and this is on a temporarily dead end road.</p>	<p>The proposed staging has been amended to include bus servicing with the first residential stage with a temporary turning head provided for bus and waste vehicle access. The roundabout in Stage 1 has been designed to enable a bus to do a</p>

SCC Comment – 23/11/23	Response
	U-turn to ensure safe access to the new subdivision. Details will be submitted with the stage 1 DA.
<i>Bus stop locations must be clearly identified on staged subdivision plans and consideration must be given to timing of bus stop locations to ensure that 85% of dwellings on future lots are within 500m walkable distance to a bus stop within all stages as the development progresses.</i>	The bus servicing plan demonstrates that all residential lots are within 400m walking distance of a bus stop. The staging has been selected to ensure that all lots have access to a bus stop a maximum of 400m away through the staging and delivery of the development.
<p>A master plan must be submitted to identify the overall proposed public transport route which must be resolved up front prior to any individual stages being lodged, and appropriate turnaround facilities at each stage.</p> <p>Note: Within appropriate stages of the development bus stops are designed and located to:</p> <ol style="list-style-type: none"> 1. Prevent vehicles from overtaking stationary buses; or 2. Vehicle speed is reduced to ensure safe pedestrian crossing. 3. Provide shelter, seats, adequate lighting and timetable information. 4. Be overlooked from nearby buildings (where they exist). 5. Minimise any adverse impacts on the amenity of nearby dwellings 	<p>This has been submitted with the prelodgement application for Council consideration. The Stage 1 DA will include a Transport and Traffic Assessment that addresses these items.</p> <p>All bus stops are adjacent to proposed residential lots to allow suitable passive surveillance of bus stops. The bus stops are to be located on the outer perimeter of roads to minimise conflicts with nearby residential dwellings.</p> <p>Vehicle passing bays are proposed in the location of the proposed bus stops.</p> <p>Requirements such as shelter and lighting requirements are capable of conditioning as part of any development consent for a Stage 1 DA.</p>
Public Open Space	
<i>Drawing N25405-233 illustrates Public Reserves 1 and 2 are to be delivered concurrently with stage 1 residential lots. However, the plans indicate Public Reserve 1 will be located least 150m isolated away from Stage 1 dwellings. The plans do not clearly illustrate how Public Reserve 1 will be connected to Road 1.</i>	The staging plan has been amended to deliver lots along the northern perimeter road 'Road 2' at the same time as Park 1.
<i>There is therefore no way to adequately service Public Reserve 1 (or for that matter proposed bio-filtration areas and the proposed water quality pond).</i>	Suitable locations for access and parking for maintenance of the Park 1 and associated water quality devices are included with Stage 1.
<i>Passive surveillance to Public Reserve 1 (during Residential Stage 1) must be considered.</i>	Residential lots are to be released concurrently with the delivery of the adjoining Park 1.
<p>The following updates are recommended:</p> <ol style="list-style-type: none"> 1. Amended plans be developed clearly illustrating proposed pedestrian and service vehicle infrastructure to connect Reserve 1 with Road 1 during Residential Stage 1. 2. Alternatively, provide amended staging plans 	Road 1 is proposed to be constructed adjoining the Park 1 to provide pedestrian and vehicle access as part of Stage 1.



SCC Comment – 23/11/23	Response
<p>showing the provision of public road infrastructure (currently proposed in Residential Stage 2) within Residential Stage 1 to provide vehicular and pedestrian connectivity to Reserve 1 during Residential Stage 1.</p>	
<p><i>Bushfire Management:</i></p>	
<p>All APZs should be located on the Staging Plans (including widths and areas required).</p>	<p>An APZ plan has been prepared. This depicts the widths and areas required on each plan.</p>
<p><i>Shoalhaven Water:</i></p>	
<p>The developer needs to show they can service the lots with reticulated water and sewer as part of the proposed staging plan. This is particularly the case for sewer as the initial pressure may not be enough with the initial stages. I.e., only a few new dwellings discharging into a long sewer rising main can cause septicity in sewers, damage, hydrogen sulphide & foul odours.</p>	<p>AP has been in consultation with Shoalhaven Water to ensure that the reticulated water and sewer can serve the proposed development and meet the relevant conditions of consent. Early works include the sewer rising main and ensure the connections to the CBSTP sewer can adequately service the proposed Residential Precinct roll out through the initial stages.</p> <p>The CBSTP upgrade works for several operational improvements to increase the capacity of the current plant have received co-contribution of grant funding from the NSW Government's Accelerated Infrastructure Fund and Council, and the relevant planning assessments have been undertaken. Shoalhaven Water have advised that the design phase is expected to commence later in 2024, and progress for 6 to 12 months. Orders have also been placed for items with long-lead times.</p> <p>Following this, the construction phase is planned for 2025/26. The proposed works are expected to alleviate the current constraints which will address the requirements identified in the consent by the Department.</p>

A Prelodgement Meeting was also held on 20 June 2024 (Council ref: 75459E/4) to discuss the Residential and Industrial Precinct DA (Stage 1). Minutes were provided by Council on in October 2024. A copy is appended to this Staging Report (**Appendix 11**). These comments are in relation to the future DA, as opposed to the Staging of the development. No additional matters of relevance to the Staging of the development were identified.

3.1.2 ELECTRICAL - ENDEAVOUR ENERGY

Appendix 7 details the consultation that occurred with Endeavour Energy (EE). Engagement has occurred on several occasions and will be ongoing as the subdivision is planned for and delivered. Recent correspondence includes the following to confirm supply to the development:

- technical enquiry lodged with EE prior to consent issued by the Land and Environment Court.



- a meeting was held with EE following approval of the Concept Proposal.
- an application for supply was submitted and a supply offer was received.
- a proposed method of supply was issued to EE.
- a design brief outlining agreement with the proposal has been received.

Consultation also occurred with Gavin De Hosson, Endeavour Energy's Network Planning Manager, to discuss the staging plans and future locations of a zone substation site, or similar.

3.1.3 TELECOMMUNICATIONS – NBN AND OPTICOMM

Consultation with NBN has taken place, and a senior account manager confirmed no concerns with the proposed staging plans. Additionally, Opticomm, a private provider of high-speed broadband, has been consulted regarding the development. Opticomm delivers telecommunications services to end-users through their service providers. Details of correspondence and support from Opticomm are provided in **Appendix 6**.

3.2 CONDITION A12 (B) – DESCRIBE HOW THE IMPLEMENTATION OF THE CONCEPT PROPOSAL, WOULD BE STAGED TO ENSURE IT IS CARRIED OUT IN AN ORDERLY AND ECONOMIC WAY AND MINIMISES IMPACTS ON ADJACENT SENSITIVE RECEIVERS

3.2.1 ORDERLY AND ECONOMIC DEVELOPMENT

The proposed staging as outlined in Section 3.3 of this report, enables the sequencing of the development to be coordinated to minimise impacts – including the economic, social and environmental impacts of the development in accordance with the conditions of the Concept Proposal.

The proposed staging facilitates the roll out of the development in an economically efficient manner, beginning with lead-in and enabling early works, and followed first with the Residential Precinct. This ensures that essential public infrastructure associated with the development, such as road upgrades, open space and servicing connections are undertaken early, while also ensuring economic feasibility of the project.

The conditions within Schedule 3 of the Concept Proposal relate to conditions for future Development Applications. The staging of the development in the nominated stages will enable the logical and coordinated review and compliance of these conditions as they relate to the respective stormwater catchments, aboriginal heritage and biodiversity conditions, economic assessment and delivery of infrastructure.

3.2.2 MINIMISES IMPACTS ON ADJACENT SENSITIVE RECEIVERS

The Concept Plan approval defines 'sensitive receivers' as:

'A location where people are likely to work, occupy or reside, including a dwelling, school, hospital, office or public recreation area'.

The 'adjacent sensitive receivers' are identified as those locations in a 400m distance from the site. The Concept Proposal has been staged to ensure that it minimises the impacts on adjacent sensitive receivers. These sensitive receivers include the police station, retirement village,



Culburra Bowling Club, ambulance station, the existing industrial area, sewerage treatment plant, oyster farmers, other river users and the residents along Canal Street East and Culburra Road opposite the site.

To minimise the impacts, this development will be staged and will occur over multiple years, ensuring that site disturbance is carefully managed. The staging of the concept proposal has taken into consideration the effects on all adjacent sensitive receivers and as a result the large Residential Precinct is located away from the majority of the adjacent sensitive receivers. The surrounding roads, such as Culburra Road, Regmoore Close and the intersection at Canal Street East and Culburra Road will be upgraded to ensure that the development has the least impact on the road network.

Environmental monitoring, in line with the consent, will occur to ensure the impacts are minimised. A Soil and Water Management Plan will also be implemented early in the development process and maintained throughout construction as a means of avoiding impacts on the estuarine environment, as well as other adjacent sensitive receivers.

The consent and regulatory framework that is already in place will require consultation with the adjacent sensitive receivers throughout the development. The Community Engagement Strategy that will be implemented will also continue the dialogue by facilitating communication during all stages of the development.

3.3 CONDITION A12 (C) - SHOW THE LIKELY SEQUENCING OF DAS FOR EACH STAGE THAT WILL BE LODGED TO DEVELOP THE SITE, WITH THE ESTIMATED TIMING FOR EACH STAGE AND IDENTIFICATION OF ANY OVERLAPPING CONSTRUCTION AND OPERATIONAL ACTIVITIES

The likely sequencing of staging is shown in the supporting plans at Appendix 2 and estimated timing is described at **Table 7**.

Table 7 below outlines the overlapping construction and operational activities. The development applications for the Precincts are expected to be divided into two phases: Stage 1 DA and Stage 2 DA. Additionally, the delivery of stages within each Precinct will occur concurrently, with overlapping construction activities across the stages. The relevant conditions of consent that are applicable for each stage is included at **Appendix A**



Table 7: Sequencing Timeframes

Expected Date of Completion/ Registration of Lots	Precincts and stages (DA Lodgement timeframe)	No. of lots released	Other deliverables
2026	Early Works (EW DAs – 2024/2025)	Services, Utilities and Infrastructure	<p>EW1. Utility Connections and Mitigation Measures at Regmoore Close (sewer, water and power);</p> <p>EW2. Utility Connections and Mitigation Measures at the Roundabout R1 only (water, comms and power);</p> <p>EW3. Utility Deviation and Road Dedication at the Roundabout TC2 (water on southern side of Culburra Rd);</p> <p>EW4. Roundabout R1 at Culburra Road (including other services diversions).</p> <p>EW5. Superlot subdivision of Precincts, reserves and foreshore areas and implementation of vegetation management plan on foreshore and woodland reserves.</p> <p>EW6. Services Diversions on northern side of Roundabout TC2 and mitigation measures</p> <p>EW8. Construction of roundabout TC1, services Diversions and mitigation measures</p> <p>EW9. Sewer connection to Culburra STP and mitigation measures</p> <p>EW12. Construction of roundabout TC2</p>
2027	Residential Stage 1 (Stage 1 DA – 2025)	<ul style="list-style-type: none"> - 62 residential lots, - Residue residential development lot, - 2 open space reserves. 	<ul style="list-style-type: none"> • Implementation of the Soil and Water Management Plan; • Under scrubbing of residue development lots; • Site clearing for construction and permanent APZ's (including long term APZ maintenance on private lands); • Construction of a footpath and kerb and gutter from the new roundabout on Culburra Rd to the Town Centre; • Construction of new internal roads, roundabouts, drainage works, and footpaths; • Construction of temporary fire trails and emergency bushfire egress; • Construction of utility services (water, sewer electricity, telecommunications); • Construction of permanent water quality measures; • Embellishment of public reserves.



Expected Date of Completion/ Registration of Lots	Precincts and stages (DA Lodgement timeframe)	No. of lots released	Other deliverables
			<ul style="list-style-type: none"> Subdivision of the subject land to create 62 residential allotments and two open space reserves.
2028	Residential Stage 2 (Stage 1 DA - 2025)	44 residential lots	<ul style="list-style-type: none"> Implementation of the Soil and Water Management Plan; Site clearing to facilitate construction and permanent APZ's (including long term APZ maintenance on private lands); Construction of new internal roads, drainage works, and footpaths; Construction of temporary fire trails and emergency bushfire egress; Construction of utility services (water, sewer electricity, telecommunications); Subdivision of the subject land to create 44 residential allotments.
2029	Residential Stage 3 (Stage 1 DA - 2025)	17 residential lots	<ul style="list-style-type: none"> Implementation of the Soil and Water Management Plan; Site clearing to facilitate construction and permanent APZ's (including long term APZ maintenance on private lands); Construction of new internal roads, drainage works, bus stop, and footpaths; Construction of temporary fire trails and emergency bushfire egress; Construction of utility services (water, sewer electricity, telecommunications); Subdivision of the subject land to create 17 residential allotments.
2030	Residential Stage 4 (Stage 1 DA - 2025)	34 residential lots	<ul style="list-style-type: none"> Implementation of the Soil and Water Management Plan; Site clearing to facilitate construction and permanent APZ's (including long term APZ maintenance on private lands); Construction of new internal roads, drainage works, and footpaths; Construction of temporary fire trails and emergency bushfire egress; Construction of utility services (water, sewer electricity, telecommunications); Subdivision of the subject land to create 34 residential allotments.



Expected Date of Completion/ Registration of Lots	Precincts and stages (DA Lodgement timeframe)	No. of lots released	Other deliverables
	Industrial Stage 1 (Stage 1 DA - 2025)	industrial lots	<ul style="list-style-type: none"> • Implementation of the Soil and Water Management Plan; • Site clearing to facilitate construction and permanent APZ's (including long term APZ maintenance on private lands); • Construction of Regmoore Close extension • Construction of new internal roads, drainage works, bus stop, and footpaths; • Construction of utility services (water, sewer electricity, telecommunications); • Construction of permanent water quality measures; • Subdivision of the subject land to create 8 industrial allotments, an industrial development lot and open space reserve.
2031	Residential Stage 5 (Stage 1 DA - 2025)	34 residential lots	<ul style="list-style-type: none"> • Implementation of the Soil and Water Management Plan; • Site clearing to facilitate construction and permanent APZ's (including long term APZ maintenance on private lands); • Construction of new internal roads, drainage works, bus stop, and footpaths; • Construction of temporary fire trails and emergency bushfire egress; • Construction of utility services (water, sewer electricity, telecommunications); • Subdivision of the subject land to create 34 residential allotments.
2032	Residential Stage 6 (Stage 1 DA - 2025)	27 residential lots	<ul style="list-style-type: none"> • Implementation of the Soil and Water Management Plan; • Site clearing to facilitate construction and permanent APZ's (including long term APZ maintenance on private lands); • Construction of new internal roads, drainage works, and footpaths; • Construction of temporary fire trails and emergency bushfire egress; • Construction of utility services (water, sewer electricity, telecommunications); • Subdivision of the subject land to create 29 residential allotments.



Expected Date of Completion/ Registration of Lots	Precincts and stages (DA Lodgement timeframe)	No. of lots released	Other deliverables
	Town Centre Stage 1 (Stage 2 DA - 2026)	A number of medium density lots (to be determined at a later date) 1 industrial lot	<ul style="list-style-type: none"> • Implementation of the Soil and Water Management Plan; • Site clearing to facilitate construction and permanent APZ's (including long term APZ maintenance on private lands); • Construction of all lead-in/lead out roadworks noting TC1 Roundabout construction under EW8; • Construction of sports ground, amenities and parking bays; • Construction of new internal roads, drainage works, bus stop, and footpaths; • Construction of temporary fire trails and emergency bushfire egress; • Construction of utility services (water, sewer electricity, telecommunications); • Construction of permanent water quality measures; • Subdivision of the subject land to create 6 medium density allotments (subject to change), 1 industrial allotment, a town centre development lot and 2 open space reserves.
2032	Residential Stage 7 (Stage 1 DA - 2025)	26 residential lots	<ul style="list-style-type: none"> • Implementation of the Soil and Water Management Plan; • Site clearing to facilitate construction and permanent APZ's (including long term APZ maintenance on private lands); • Construction of new internal roads, drainage works, bus stop, and footpaths; • Construction of temporary fire trails and emergency bushfire egress; • Construction of utility services (water, sewer electricity, telecommunications); • Subdivision of the subject land to create 26 residential allotments. • Completion of Residential Precinct.



Expected Date of Completion/ Registration of Lots	Precincts and stages (DA Lodgement timeframe)	No. of lots released	Other deliverables
	Industrial Stage 2 (Stage 1 DA - 2025)	5 industrial lots	<ul style="list-style-type: none"> • Implementation of the Soil and Water Management Plan; • Site clearing to facilitate construction and permanent APZ's (including long term APZ maintenance on private lands); • Construction of utility services (water, sewer electricity, telecommunications); • Subdivision of the subject land to create 5 industrial allotments. • Completion of Industrial Precinct.
	Town Centre Stage 2 (Stage 2 DA - 2026)	23 integrated housing lots	<ul style="list-style-type: none"> • Implementation of the Soil and Water Management Plan; • Site clearing to facilitate construction and permanent APZ's (including long term APZ maintenance on private lands); • Construction of all necessary lead-in/lead out roadworks noting TC2 Roundabout construction under EW12; • Construction of parking bays; • Construction of new internal roads, drainage works, and footpaths; • Construction of utility services (water, sewer electricity, telecommunications); • Subdivision of the subject land to create 23 integrated housing allotments.
2033	Town Centre Stage 3 (Stage 2 DA - 2026)	22 integrated housing lots	<ul style="list-style-type: none"> • Implementation of the Soil and Water Management Plan; • Site clearing to facilitate construction and permanent APZ's (including long term APZ maintenance on private lands); • Construction of new internal roads, drainage works, and footpaths; • Construction of utility services (water, sewer electricity, telecommunications); • Subdivision of the subject land to create 22 integrated housing allotments.



Expected Date of Completion/ Registration of Lots	Precincts and stages (DA Lodgement timeframe)	No. of lots released	Other deliverables
2034	Town Centre Stage 4 (Stage 2 DA - 2026)	A number of medium density lots (to be determined at a later date)	<ul style="list-style-type: none"> • Implementation of the Soil and Water Management Plan; • Site clearing to facilitate construction and permanent APZ's (including long term APZ maintenance on private lands); • Construction of utility services (water, sewer electricity, telecommunications); • Subdivision of the subject land to create 6 medium density allotments (subject to change).
2035	Town Centre Stage 5 (Stage 2 DA - 2026)	3 mixed use (residential/commercial) lots	<ul style="list-style-type: none"> • Implementation of the Soil and Water Management Plan; • Site clearing to facilitate construction and permanent APZ's (including long term APZ maintenance on private lands); • Construction of utility services (water, sewer electricity, telecommunications); • Subdivision of the subject land to create 3 mixed use allotments. • Town Centre Precinct Completed. • West Culburra Concept Proposal completed.



3.4 CONDITION A12 (D) DESCRIBE THE SEQUENCING OF RESIDENTIAL, INDUSTRIAL AND TOWN CENTRE STAGING, INCLUDING IDENTIFICATION OF ANY OVERLAPPING WORKS

The sequencing and overlap of construction of the Residential, Industrial and Town Centre precincts can be seen in **Appendix 2** and is addressed at **Table 7** earlier in this report.

The staging of roadworks has been determined from transport analysis provided by Stantec which can be seen in **Appendix 4**.

The staging plans at **Appendix 2**, identify that stage 1 of the Residential Precinct will commence from the 'spine' access road (Road 01) and along the northern perimeter road with 58 residential lots, and includes the public reserve (Park 1), stormwater management infrastructure including the water quality pond and bio-filtration areas and the dedication of both the foreshore reserves and the woodland reserve to Shoalhaven City Council.

The following Residential Precinct stages 2, 3, and 4 are then expected to be completed north to south direction. These stages include construction of roads, footpaths, residential lots, and the utilities required to service them. Stages 5, 6 and 7 on the western side are expected to occur from north to south to complete the Residential Precinct.

The Industrial Precinct is intended to be released in two stages. Stage 1 Industrial includes the water quality pond, public reserve (Park 2), bio-filtration areas, stage 1 lots, and the new road network, along with the upgrade of the existing Regmoore Close. Stage 2 of the Industrial Precinct will be the release of the remaining lots.

Stage 1 of the Town Centre Precinct, as shown on the staging plans, includes:

- Stage 1 lots (6 medium density lots and 1 industrial lot).
- the public reserve (Park 2).
- sports ground, and community recreation facilities including the club house, amenities, and car park.
- the water quality pond and bio-filtration areas.
- new roundabout on Culburra Road required to service the Town Centre Precinct.
- required roadworks in the Town Centre Precinct.

Stages 2, 3, 4 and 5 of the Town Centre Precinct occurs in a clockwise direction with each stage's lots and required roadworks included as shown on the staging plans. Town Centre stage 2 includes the upgrade of the existing intersection on Canal Street East, West Crescent, and Culburra Road and the additional car parking in the road reserve to ensure residents have appropriate amenities.

3.5 CONDITION A12 (E) - DETAIL THE SCOPE AND TIMING OF ANY REQUIRED ROAD UPGRADES TO SERVICE EACH STAGE

Road upgrades

Existing roads requiring upgrade include Culburra Road, Regmoore Close and the intersection of Canal Street East, West Crescent, and Culburra Road.

The required road upgrades can be seen in **Appendix 2**. The staging of the required road networks has been determined following a staging assessment conducted by Stantec, refer



technical memo at **Appendix 4**. Some of these works will be undertaken as early works to facilitate the delivery of the subsequent Stage 1 and Stage 2 DAs.

The required road upgrades on Culburra Road are to be delivered under early works stages under separate DAs (refer Section 2.2 of this report). These include:

- the Residential Roundabout R1 proposed to be delivered in 2026
- the Town Centre Roundabout TC2, this is expected to be completed in 2030; and
- the Town Centre Roundabout TC1 located at the intersection with Canal Street East and West Crescent, this is expected to be completed in 2030.

Other applications for the associated road works and service adjustments to enable these roundabouts to be built are also proposed to be undertaken partially under early works applications (refer **Table 4**).

The extension of Regmoore Close to provide access to the Industrial Precinct and increase vehicle queuing capacity will be included in Stage II of the Industrial Precinct, resulting in Strathstone Street no longer connecting directly to Culburra Road.

Speed limit change

A change in speed limit has been approved and introduced by Transport for NSW (TfNSW) to reduce the speed of Culburra Road approaching the westernmost roundabout (Residential Roundabout R1) and through to Culburra Beach Village (refer **Appendix 8**). This Concept DA required the speed limit along Culburra Road from 350m west of Canal Street to 720m west of Strathstone street to be reduced in both directions to 80km/h (from the previous 100km/h limit) to accommodate the road upgrades and ensure the safety of all users, however the whole of Culburra Road has since been reduced to 80km/h. This reduction in speed occurred in late 2024 with the whole of Culburra Road 80km/h from 350m west of Canal Street onwards.

Pedestrian connectivity and bus stops

A footpath to promote non-car travel modes will also be constructed along Culburra Road from the Residential Precinct to the existing Culburra Beach township with the Residential Stage R1.

Bus stops can be seen in **Appendix 2** and **Appendix 9** also promote non-car travel, with the first bus stop being delivered with Stage R1 of the Residential Precinct. Bus stops along Culburra Road will also be proposed.

3.6 CONDITION A12 (F) - INCLUDE CONCEPTUAL DESIGN FOR THE PROVISION OF SERVICES, UTILITIES AND INFRASTRUCTURE TO THE SITE

3.6.1 CONCEPT DESIGN OF SERVICES AND UTILITIES

The conceptual design for the provision of sewer, water, stormwater, telecommunications, electricity, and infrastructure has been designed for this staging report. It is noted that these are conceptual and subject to change through the assessment process of SSD-3846-MOD-1 and future DAs.

The design of these services can be seen in the relevant appendices below:



Table 8: Conceptual design of services and utilities location

Services and utilities	Relevant appendices demonstrating conceptual design
Sewer, Stormwater, and Water	Appendix 5
Telecommunications	Appendix 6
Electricity	Appendix 7
Infrastructure (e.g. development for the purposes of roads, stormwater management systems, waterway or foreshore management activities, public parks or reserves management, etc)	Appendix 2 Appendix 5 Appendix 9

3.6.2 STAGING OF COMMUNITY RECREATION FACILITIES

Condition B41 – B47 require the construction and delivery of community recreation facilities and reserves throughout the Concept Development. **Table 9** outlines the stage in which these are proposed to be delivered.

Table 9: Staging of Community Recreation Facilities

Community Infrastructure	Planned Staging
Foreshore Reserve (adjacent to Residential Precinct)	Subdivision and vegetation management works to be sought under Early Works DA, with works completed in Stage 1 of the Residential Precinct.
Foreshore Reserve (adjacent to Town Centre Precinct)	Subdivision and vegetation management works to be sought under Early Works DA, with works completed in Stage 1 of the Town Centre Precinct.
Woodland Reserve	Subdivision and vegetation management works to be sought under Early Works DA, with works completed in Stage 1 of the Residential Precinct.
Park 1	DA Approval and development to be completed in Stage 1 of the Residential Precinct.
Part 2	DA Approval and development to be completed in Stage 1 of the Industrial Precinct.
Park 3 (sportsground/park) including community recreation facilities and parking per Condition B46 and B47	DA Approval and development to be completed in Stage 1 of the Town Centre Precinct.



4.0 CONCLUSION

This Staging Report has addressed the requirements of Condition A12 of development consent SSD 3846 outlining the overall staging, sequencing and strategy of the proposal.

It sets out the proposed staging of construction and early works. Staging has considered the balance between the need to commence residential, business, sporting and industrial uses, and the need to foster overall growth for the Culburra Beach township and its community.



APPENDIX A. APPLICABILITY OF CONDITIONS OF APPROVAL TO EACH STAGE

Table 10 has been based on the SSD3846 conditions of approval as issued by the Land and Environment Court on 1 December 2021. This document is attached at the end of this table.

Items listed as “Not Applicable” have been identified as conditions of approval that will not be triggered under the scope of the relevant project stage. As identified in Section 1.1, should a project modification be undertaken that requires a change to the conditions, the following table will be updated, following approval of the modification, to reflect any changes to the condition allocations.

Table 10: Applicability of Conditions of Approval to each Stage

Schedule 1 Summary of Condition		Early Works Construction: EW4, EW8, EW9 & EW12	Early Works Non-Construction: EW1, EW2, EW3, EW5, EW6	Residential	Industrial	Commercial
Part A – Administrative Conditions						
Future Development Consents						
A 1	All physical works and each stage of the Concept Proposal is subject to future DA's	Noted	Noted	Noted	Noted	Noted
A 2	Future DA's cannot be inconsistent with this Development Consent	Noted	Noted	Noted	Noted	Noted
A 3	Subsequent stages are to be determined by the relevant Consent Authority and the development ceases to be SSD	Noted	Noted	Noted	Noted	Noted
A 4	This Concept Proposal does not permit the construction or operations of any development on the site	Noted	Noted	Noted	Noted	Noted
Statutory Requirements						
A 5	The applicant must ensure other approvals etc in place at all times	Applies	Applies	Applies	Applies	Applies
Terms of Consent						
A 6	The Applicant must carry out the Concept Proposal in accordance with	Applies	Applies	Applies	Applies	Applies
a	the conditions of consent					
b	all written directions of the Planning Secretary					
c	the EIS for the West Culburra Revised Concept Plan					



Schedule 1 Summary of Condition		Early Works Construction: EW4, EW8, EW9 & EW12	Early Works Non-Construction: EW1, EW2, EW3, EW5, EW6	Residential	Industrial	Commercial
	d the plan in Appendix 1; and e the Applicant's Management and Mitigation Measures in Appendix 2					
A 7	The Planning Secretary may make written Directions	Noted	Noted	Noted	Noted	Noted
A 8	Inconsistency, ambiguity or conflict in documents	Noted	Noted	Noted	Noted	Noted
Lapsing of Consent						
A 9	Lapsing in 5 years	Noted	Noted	Noted	Noted	Noted
Limits of Consent						
A 10	Limits of consent - areas	Noted	Noted	Applies	Applies	Applies
A 11	Limits of consent - other rules	Noted	Noted	Applies	Noted	Applies
Staging Plan						
A 12	The Applicant must prepare a Staging Plan	Applies	Applies	Applies	Applies	Applies
A 13	The applicant to comply with the staging plans and the consent	Applies	Applies	Applies	Applies	Applies
A 14	The Planning Secretary may require other matters to be addressed	Noted	Noted	Noted	Noted	Noted
Evidence of Consultation						
A 15	Consultation requirements	Noted	Noted	Applies	Applies	Applies
Compliance						
A 16	The Applicant to advise all employees, contractors/sub-contractors comply with conditions of consent	Applies	Applies	Applies	Applies	Applies
Applicability of Guidelines						
A 17	Policies/standards etc apply as at the date of the consent	Noted	Noted	Noted	Noted	Noted
A 18	The Planning Secretary may require compliance with an updated policy/standard	Noted	Noted	Noted	Noted	Noted
Environmental Representative						
A 19	ER to be appointed to oversee the implementation of the conditions of this consent	Applies	Not applicable	Applies	Applies	Applies



Schedule 1 Summary of Condition		Early Works Construction: EW4, EW8, EW9 & EW12	Early Works Non-Construction: EW1, EW2, EW3, EW5, EW6	Residential	Industrial	Commercial
A	20 For the duration of construction works, ER to liaise with Planning Secretary	Applies	Not applicable	Applies	Applies	Applies
Access to Information						
A	21 The Applicant must make the following documents publicly available	Applies	Applies	Applies	Applies	Applies
Water Quality Requirements						
B	1 Ensure NorBE by implementation of the IWCMS	Applies	Applies ¹	Applies	Applies	Applies
B	2 Ensure the additional documents are complied with	Applies	Applies ¹	Applies	Applies	Applies
Stormwater Treatment Design and Implementation						
B	3 Stormwater Infrastructure must be located outside Foreshore Reserve	Applies – however all works are not within vicinity of Foreshore Reserve	Applies – however all works are not within vicinity of Foreshore Reserve	Applies	Not applicable	Applies
B	4 Stormwater treatment measures must be sufficient to:			Applies	Applies	Applies
	a comply with B1 (i.e. NorBE)	Applies	Not applicable			
	b NorBE with parameters runoff volumes, frequencies and hydrographs' largely mimic pre-development flows	Not applicable	Not applicable			
	c pathogens lower than pre-development	Noted	Noted			
	d maintain groundwater flow regimes	Noted	Not applicable			
B	5 The Applicant shall demonstrate compliance with:					
	a surface water quality based on MUSIC	Not applicable	Not applicable	Applies	Applies	Applies

¹ Erosion and sediment control only



Schedule 1 Summary of Condition		Early Works Construction: EW4, EW8, EW9 & EW12	Early Works Non-Construction: EW1, EW2, EW3, EW5, EW6	Residential	Industrial	Commercial
B 6	b groundwater quality based on MODFLOW/M3T3DMS	Not applicable	Not applicable	Applies	Applies	Applies
	Stormwater control devices to be generally in accordance with: (unless a better outcome can be achieved):					
	a 5kL min rainwater tanks	Not applicable				
	b GPTs upstream of stormwater treatment structures	Not applicable				
	c bio basins + back up irrigation system	Not applicable	Not applicable	Applies	Applies	Applies
	d stormwater ponds	EW4 & EW12 - Applies EW6 & 9 - Not Applicable				
	e irrigation of sporting fields and parkland areas	Not applicable				
B 7	Consider the potential to reduce number of devices	Not applicable	Not applicable	Applies	Applies	Applies
B 8	Monitor irrigation water usage	Not applicable	Not applicable	Applies	Applies	Applies
Transfer of Stormwater Quality Infrastructure						
B 9	The transfer of stormwater infrastructure subject to a testing & commissioning program + satisfactory performance	Not applicable	Not applicable	Applies	Applies	Applies
B 10	No trigger events in previous 3 months	Not applicable	Not applicable	Applies	Applies	Applies
Erosion and Sediment Control						
B 11	SWMP required to satisfaction of SCC	Applies	Not applicable ²	Applies	Applies	Applies
B 12	Implementation of SWMP	Applies	Not applicable ¹	Applies	Applies	Applies

² Conditions B11 and B12 relate to 'construction activities' and 'prior to subdivision Works Certificate' and doesn't strictly apply. However erosion and sediment control is relevant for each DA under Council's DCP.



Schedule 1 Summary of Condition		Early Works Construction: EW4, EW8, EW9 & EW12	Early Works Non-Construction: EW1, EW2, EW3, EW5, EW6	Residential	Industrial	Commercial
Aboriginal Heritage³						
B 13	Formal consultation required as per cl 60 of the NPW Regulation 2019	Applies	Applies	Applies	Applies	Applies
B 14	Consultation to occur prior to construction	Applies	Applies	Applies	Applies	Applies
B 15	The ACHMP to be prepared for					
	a The Crookhaven River Middens	Applies	Applies	Applies	Applies	Applies
	b Other identified places					
B 16	The ACHMP to be prepared:					
	a in collaboration with the Aboriginal Community					
	b in accordance with conservation of cultural significance as identified by the Aboriginal community					
	c minimum 40m buffer to middens	Applies	Applies	Applies	Applies	Applies
	d detail the practical measures for management and conservation of the middens (Incl responsibility) + monitoring and maintenance					
	e include details of how the maintenance program would be funded over the long-term and support ongoing Aboriginal engagement					
B 17	All contractors to have cultural inductions run by local Aboriginal people	Applies	Applies	Applies	Applies	Applies

³ The Aboriginal Heritage conditions of the Consent must be observed for all stages of the Consent, however not all stages or applications will require implementation of the condition or undertaking any action. An [ACHMP](#), prepared by Austral Archaeology (23/07/2024, v.2.0) has been completed in accordance with the Consent. The ACHMP has been developed in consultation with the Proponent and registered stakeholder parties, and includes a series of management conditions for the study area and all Aboriginal sites within its immediate vicinity (refer Section 7.4 of ACHMP). These management conditions relate to: (i) the Establishment of an Advisory Group; (ii) Conditions in advance of the proposed development; (iii) and Monitoring and reporting. Some management conditions apply to all stages of development, including Early & Enabling Works, while others relate to specific types or stages of work, for instance works within the vicinity of certain AHIMS site, or vegetation clearing works.



Schedule 1 Summary of Condition			Early Works Construction: EW4, EW8, EW9 & EW12	Early Works Non-Construction: EW1, EW2, EW3, EW5, EW6	Residential	Industrial	Commercial
B	18	Archaeological testing of soil	Applies	Applies	Applies	Applies	Applies
B	19	Archaeological testing should be undertaken with the local Aboriginal community	Applies	Applies	Applies	Applies	Applies
B	20	If impacts are outside previously assessed areas, the Planning Secretary to be involved	Applies	Applies	Applies	Applies	Applies
B	21	If unexpected finds are discovered, Heritage NSW to be advised and works to cease. Planning Secretary involvement too	Applies	Applies	Applies	Applies	Applies
B	22	Report on consultation with Aboriginal community to be provided to SCC	Applies	Applies	Applies	Applies	Applies
B	23	AHIP to be obtained where required	Applies	Applies	Applies	Applies	Applies
B	24	Protective fencing needed to protect areas from harm	Applies	Applies	Applies	Applies	Applies
Flooding							
B	25	Concept plan must comply with SCC Flood Planning levels as per Appendix 16 or as updated	Not applicable	Not applicable	Applies	Applies	Applies
B	26	Each stage must have flood-free emergency egress	Not applicable	Not applicable	Applies	Applies	Applies
Bushfire Protection							
B	27	The Concept Proposal must comply with:					
	a	the relevant provisions of PBP2019	Applies	Applies			
	b	the APZ requirements in ELA's report	Not applicable	Not applicable	Applies	Applies	Applies
	c	AS2419.1 Fire hydrant installation	Applies	Applies			
B	28	APZ must be located outside foreshore and woodland reserves	Not applicable	Not applicable	Applies	Applies	Applies



Schedule 1 Summary of Condition		Early Works Construction: EW4, EW8, EW9 & EW12	Early Works Non-Construction: EW1, EW2, EW3, EW5, EW6	Residential	Industrial	Commercial
Roadwork and Access						
B 29	Roads to comply with Austroads and SCC requirements + s138 Approvals are needed	Applies	Applies ⁴	Applies	Applies	Applies
B 30	Access roads and intersections at no cost to SCC or TfNSW	Applies	Applies ³	Applies	Applies	Applies
B 31	Speed zone reduction required from TfNSW	EW 4 & EW 8 – Applies EW9 & EW12 – Not applicable	Not applicable	Applies	Not applicable	Not applicable
B 32	The main roundabout on Culburra Rd to:	EW 4 & EW 8 – Applies EW9 & EW12 – Not applicable	Not applicable	Applies	Not applicable	Not applicable
a	meet the requirements of TfNSW for design speed and sight distance consistent with B31					
b	include measures to signal the change from a rural road environment to an urban environment including street lighting, K&G, etc					
B 33	Roads to be maintained by Sealark to SCC requirements	Applies ³	EW8 – Applies Others – Not applicable	Applies	Applies	Applies
B 34	Road reserves to be dedicated to SCC	Applies ³	Applies ³	Applies	Applies	Applies
B 35	The applicant must re-design the laneway within the integrated housing lots to meet SCC requirements	Not applicable	Not applicable	Not applicable	Not applicable	Applies
Sewerage						
B 36	Sewerage system to be in accordance with IWCMS etc.	EW 8 & EW9 – Applies EW4 & 12 – Not applicable	EW1, – Applies Others – Not applicable	Applies	Applies	Applies
B 37	Sewer overflow protocol	Not applicable	Not applicable	Applies	Applies	Applies

⁴ When relevant work undertaken in road reserve.



Schedule 1 Summary of Condition		Early Works Construction: EW4, EW8, EW9 & EW12	Early Works Non-Construction: EW1, EW2, EW3, EW5, EW6	Residential	Industrial	Commercial
Affordable Housing Strategy						
B 38	Prepare and Affordable Housing Strategy	Not applicable	Not applicable	Applies	Applies	Applies
Retail and Commercial Premises						
B 39	Retail must be restricted to the ground floor of the 3 mixed use lots only	Not applicable	Not applicable	Not applicable	Not applicable	Applies
B 40	Bldgs on 501 and 502 adjoining Canal St should comprise shop top housing with retail/commercial on ground level	Not applicable	Not applicable	Not applicable	Not applicable	Applies
Community Recreation Facilities						
B 41	The proposed foreshore reserve (located in both the residential & town centre precinct) must be completed in Stage 1	Not applicable	Not applicable	Applies	Not applicable	Not applicable
B 42	The 1,300m2 park must be completed in Stage 1 of the residential precinct	Not applicable	Not applicable	Applies	Not applicable	Not applicable
B 43	The 10,000m2 park must be completed in Stage 1 of the residential precinct	Not applicable	Not applicable	Applies	Not applicable	Not applicable
B 44	The 16,850m2 park must be completed in Stage 1 of the industrial precinct	Not applicable	Not applicable	Not applicable	Applies	Not applicable
B 45	The 25,650m2 park must be completed in Stage 1 of the town centre precinct	Not applicable	Not applicable	Not applicable	Not applicable	Applies
B 46	Community recreation facilities including a club house, amenities and carpark must be completed in Stage 1 of the town centre precinct	Not applicable	Not applicable	Not applicable	Not applicable	Applies
B 47	The 7,700m2 park must be completed in Stage 4 of the town centre precinct	Not applicable	Not applicable	Not applicable	Not applicable	Applies
Community Engagement Strategy						
B 48	Community Engagement Strategy must be prepared	Applies	Applies	Applies	Applies	Applies
B 49	The CES to facilitate communication during design, construction and operation between Sealark, SCC and the community including special interest groups	Applies	Applies	Applies	Applies	Applies
B 50	The CES to be approved prior to construction and implement the CES during each stage of the Concept Proposal	Applies	Applies	Applies	Applies	Applies



Schedule 1 Summary of Condition			Early Works Construction: EW4, EW8, EW9 & EW12	Early Works Non-Construction: EW1, EW2, EW3, EW5, EW6	Residential	Industrial	Commercial
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Ecologically Sustainable Development

B	51	DA's must be consistent with ESD Controls in Table 2	Not applicable	Not applicable	Applies	Applies	Applies
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Schedule 2 - Conditions to be Satisfied Prior to Construction

Water Quality Monitoring

C	1	Undertake WQ Monitoring as nominated in the IWCMS	Applies	Not applicable	Applies	Applies	Applies
C	2	Pre-construction monitoring shall occur once a month for 18 months and must include 2 x wet weather events	Applies	Not applicable	Applies	Applies	Applies
C	3	Construction Phase Monitoring shall occur at least once a month	Applies	Not applicable	Applies	Applies	Applies
C	4	Post-construction phase monitoring shall occur at least once every three months	Applies	Not applicable	Applies	Applies	Applies
C	5	Annual report for on-going water quality monitoring + submit to SCC within 2 months	Applies	Not applicable	Applies	Applies	Applies

Corrective Action and Trigger Levels

C	6	If unacceptable water quality is found, implement corrective actions as per the IWCMS	EW4 & EW12 - Applies EW8 & EW9 - Not applicable	Not applicable	Applies	Applies	Applies
C	7	When a trigger event occurs, SCC shall be notified immediately + a report to follow with proposed corrective action	EW4 & EW12 - Applies EW8 & EW9 - Not applicable	Not applicable	Applies	Applies	Applies
C	8	Interim trigger values to be taken from Table 55 of the IWCMS	EW4 & EW12 - Applies EW8 & EW9 - Not applicable	Not applicable	Applies	Applies	Applies
C	9	Sealark to submit updated trigger values as part of Stage 1 DA	EW4 & EW12 - Applies EW8 & EW9 - Not applicable	Not applicable	Applies	Applies	Applies
C	10	Updated trigger values shall be reviewed again prior to construction	EW4 & EW12 - Applies EW8 & EW9 - Not applicable	Not applicable	Applies	Applies	Applies
C	11	Updated trigger values shall be approved by SCC	EW4 & EW12 - Applies EW8 & EW9 - Not applicable	Not applicable	Applies	Applies	Applies
C	12	Sealark shall be responsible for undertaking corrective	EW4 & EW12 - Applies	Not applicable	Applies	Applies	Applies



Schedule 1 Summary of Condition		Early Works Construction: EW4, EW8, EW9 & EW12	Early Works Non-Construction: EW1, EW2, EW3, EW5, EW6	Residential	Industrial	Commercial
actions		EW8 & EW9- Not applicable				
Stormwater Management Plan						
C 13	Sealark to prepare a Stormwater Management Plan in accordance with the IWCMS	EW4 & EW12 – Applies EW8 & EW9- Not applicable	Not applicable	Applies	Applies	Applies
a	be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Council					
b	detail the design of all components of the stormwater management system					
c	demonstrate the Stage and all preceding stages can satisfy the requirements of Condition B4					
d	confirm design and efficacy of stormwater treatment measures based on the performance of treatment measures built in prior stages in accordance with Condition B6					
e	address condition B7 in relation to the ability to reduce the number of treatment devices and use non-proprietary devices and provide the asset life cycle costs to SCC					
f	be in accordance with applicable Australian Standards					
g	design as per AR&R 2016 and the Blue Book					
h	detail the monitoring and maintenance regime					
C 14	Obtain SCC approval to each stage's SMP	EW4 & EW12 – Applies EW8 & EW9- Not applicable	Not applicable	Applies	Applies	Applies
C 15	The ER must conduct audits of the stormwater management system	EW4 & EW12 – Applies EW8 & EW9- Not applicable	Not applicable	Applies	Applies	Applies
Receiving Water Quality						
C 16	Water Quality Monitoring Program to be prepared	EW4 & EW12 – Applies EW8 & EW9- Not applicable	Not applicable	Applies	Applies	Applies
a	be designed by a suitably qualified and experienced independent expert whose appointment has been endorsed by SCC					



Schedule 1 Summary of Condition		Early Works Construction: EW4, EW8, EW9 & EW12	Early Works Non-Construction: EW1, EW2, EW3, EW5, EW6	Residential	Industrial	Commercial
b	include baseline monitoring of surface waters for a period of no less than 18 months with sampling every 2 months + 3 wet weather events					
c	include sampling at 8 sites within Curleys Bay + 2 control locations					
d	2 replicate samples for metals and organics, bacteria and suspended sediment					
e	include sampling within the Catchment of Lake Wollumboola for 18 months					
f	reports at 6-monthly intervals					
g	report at completion plus forwarding to various Govt agencies					
h	the design of ongoing monitoring during and post-construction must be determined on the basis of the information required					
Aquatic Ecology						
C 17	Aquatic Ecology Monitoring Program to be prepared be designed by a suitably qualified and experienced independent expert whose appointment has been endorsed by SCC					
a	include baseline monitoring of aquatic ecology for a period of no less than 18 months with sampling every 2 months + 3 wet weather events					
b	include sampling at 6 sites within Curleys Bay + 2 control locations					
c	replicated, quantitative sampling of flora and fauna required	EW4 & EW12 – Applies EW8 & EW9 – Not applicable	Not applicable	Applies	Applies	Applies
d	include sampling within the Catchment of Lake Wollumboola for 18 months					
e	reports at 6-monthly intervals					
f	report at completion plus forwarding to various Govt agencies					
g	the design of ongoing monitoring during and post-construction must be determined on the basis of the information required					
h						



Schedule 1 Summary of Condition		Early Works Construction: EW4, EW8, EW9 & EW12	Early Works Non-Construction: EW1, EW2, EW3, EW5, EW6	Residential	Industrial	Commercial
Oyster Aquaculture						
C 18	Oyster Aquaculture Monitoring Program to be prepared be designed by a suitably qualified and experienced independent expert whose appointment has been endorsed by SCC	EW4 & EW12 – Applies EW8 & EW9 – Not applicable	Not applicable	Applies	Applies	Applies
a	include baseline monitoring of aquatic ecology for a period of no less than 18 months with sampling every 2 months + 3 wet weather events					
b	include sampling at necessary leases + 2 control locations					
c	replicated, quantitative sampling required					
d	include sampling of 6 oysters					
e	reports at 6-monthly intervals + final report					
f						
Biodiversity						
C 19	Retire required ecosystem credits	EW4 & EW12 – Applies EW8 & EW9 – Not applicable	Not applicable - not 'construction'	Applies	Applies	Applies
C 20	Evidence required to SCC	EW4 & EW12 – Applies EW8 & EW9 – Not applicable	Not applicable - not 'construction'	Applies	Applies	Applies
Flooding						
C 21	Flood certificate + FPL and lots/access etc above flood level	Applies	Not applicable - not 'construction'	Applies	Applies	Applies
Schedule 3 – Conditions for Future DAs						
Development Contributions						
C 22	Future DAs must identify Contributions payable	Not applicable	EW1 & EW5 – Applies Others – Not applicable	Applies	Applies	Applies
C 23	Payment before Subdivision Certificate	Not applicable	EW1 & EW5 – Applies Others – Not applicable	Applies	Applies	Applies
Aboriginal Heritage³						
C 24	Future DA's to be supported by subsurface testing	Applies	Applies	Applies	Applies	Applies



Schedule 1 Summary of Condition			Early Works Construction: EW4, EW8, EW9 & EW12	Early Works Non-Construction: EW1, EW2, EW3, EW5, EW6	Residential	Industrial	Commercial
C 25	Future DAs to include ACHMP		Applies	Applies	Applies	Applies	Applies
Groundwater							
C 26	Future DAs to include groundwater modelling		Applies	Applies	Applies	Applies	Applies
Transport and Roadworks							
C 27	Future DA's must		Applies	Not applicable	Applies	Applies	Applies
a	roads to comply with Aust Standards and relevant roads authority;						
b	include measures to promote non-car travel modes						
c	Provide adequate parking						
Bushfire Protection							
C 28	Future DA's must comply with:		Not applicable	Not applicable	Applies	Applies	Applies
a	PBP2019						
b	APZ requirements prepared by ELA						
c	AS2419.1-2005		Not applicable	Not applicable			
Odour							
C 29	Future DAs must include an Odour Impact Assessment		Not applicable	Not applicable	Applies	Applies	Applies
Infrastructure and Services							
C 30	Future DAs must demonstrate sewer requirements		Not applicable	Not applicable	Applies	Applies	Applies
C 31	Shoalwater DA Notice needed for each Stage		Applies	Applies	Applies	Applies	Applies
C 32	A Certificate of Compliance needed for each Stage		Applies	Applies	Applies	Applies	Applies
Economic							
C 33	Future DAs for mixed use and retail/commercial stages must include and Economic Impact Assessment must demonstrate sewer requirements		Not applicable	Not applicable	Not applicable	Not applicable	Applies



APPENDIX B. APPLICABILITY OF MITIGATION MEASURES

Item	Commitment AND/OR Mitigation Measure	Timing	Early Works		Residential	Industrial	Commercial
			Construction: EW4, EW8, EW9 & EW12	Non- Construction: EW1, EW2, EW3, EW5 & EW6			
1. General							
1.1.	The developer will carry out the development in accordance with the conditions of the Concept Plan approval.	For the duration of the subdivision process and any maintenance period.	Applicable	Applicable	Applicable	Applicable	Applicable
2. Legislative Controls/Requirements							
2.1	<p>At a minimum, the developer will obtain and maintain the following licences, permits and approvals for subsequent staged subdivision that forms part of the Concept Plan:</p> <ul style="list-style-type: none"> • Shoalhaven City Council - Development Consent for the subdivision of land. • Shoalhaven City Council / Certifier - Subdivision Works Certificate approval for engineering works related to each stage of the subdivision. • Shoalhaven City Council - Section 138 Consent for roadworks (Roads Act 1993); • Endeavour Energy - Design Certification; • Endeavour Energy - Notification of Arrangement; • NBN / Telstra / Telecommunications Provider - Compliance Certificate; • Shoalhaven Water - Certificate of Compliance; • Shoalhaven Water - Design and Construction Approval; • Shoalhaven City Council/ Principal Certifying Authority - Subdivision Certificates for each stage; • Department of Land and Property Information - registration of the subdivision. 	For the duration of the subdivision process and any maintenance period.	Applicable	Applicable	Applicable	Applicable	Applicable



Item	Commitment AND/OR Mitigation Measure	Timing	Early Works			Residential	Industrial	Commercial
			Construction: EW4, EW8, EW9 & EW12	Non- Construction: EW1, EW2, EW3, EW5 & EW6				
3. Staged Subdivision								
3.1	The developer will carry out the preparation and lodgement of Development Applications for the proposed staged development in accordance with the conditions of any Development Consent for the Concept Plan and give consideration to requirements of the Shoalhaven Development Control Plan 2014.	For the duration of subdivision applications and any maintenance period.	Applicable	Applicable	Applicable	Applicable	Applicable	Applicable
4. Plan of Subdivision and s88B Instrument								
4.1	The developer will prepare a Plan of Subdivision and Section 88B Instrument for each stage of the development.	Prior to the release of each Subdivision Certificate.	Not applicable	EW 5 - Applies Others - N/A	Applicable	Applicable	Applicable	Applicable
5. Natural Environment								
5.1	The developer will "offset" the impacts of any clearing of native vegetation in accordance with the proposed Biodiversity Offset Strategy as outlined in the Terrestrial and Aquatic Ecology section below.	Prior to clearing works being commenced.	Not applicable	Not applicable	Applicable	Applicable	Applicable	Applicable
5.2	The developer will minimise the impact to the natural environment by completing all works in accordance with the documents supporting any Development Applications and any Development Consents issued by Consent Authorities.	For the duration of subdivision applications and any maintenance period.	Applicable	Applicable	Applicable	Applicable	Applicable	Applicable
6. Built form and urban design								
6.1	The developer will seek approval for subsequent subdivision stages in accordance with the Concept Plan which informs built form and urban design of the site.	For the duration of subdivision applications.	Applicable	Applicable	Applicable	Applicable	Applicable	Applicable
7. Public Open Space								
7.1	The developer will design and embellish public reserves in accordance with the Concept Landscape Plan and conditions as part of the Concept Plan approval.	Prior to release of Subdivision Works Certificate for each stage containing a public reserve.	Not applicable	Not applicable	Applicable	Applicable	Applicable	Applicable
7.2	The developer will seek approval for the detailed landscape design and embellishment for all public reserves as part of future subdivision applications.	As part of future subdivision applications.	Not applicable	Not applicable	Applicable	Applicable	Applicable	Applicable



Item	Commitment AND/OR Mitigation Measure	Timing	Early Works		Residential	Industrial	Commercial
			Construction: EW4, EW8, EW9 & EW12	Non- Construction: EW1, EW2, EW3, EW5 & EW6			
7.3	The developer will dedicate all public reserves and sportsground facilities to Shoalhaven City Council.	Prior to release of Subdivision Certificate and dedicated upon registration.	Not applicable	Not applicable	Applicable	Applicable	Applicable
7.4	The developer will provide Shoalhaven City Council with an Operations and Maintenance Manual/Plan for any Water Sensitive Urban Design (WSUD) measures in the subdivision which will be transferred to SCC ownership.	Prior to release of Subdivision Certificate.	Not applicable	Not applicable	Applicable	Applicable	Applicable
8. Terrestrial & Aquatic Ecology							
8.1	The developer will provide a vegetated foreshore reserve that exceeds 100m in width between the edge of the foreshore road reserve and the Mean High Water Mark and the Crookhaven River adjoining the Residential Precinct.	As part of the Stage 1 Residential Precinct subdivision registration or earlier.	Not applicable	Not applicable	Applicable	Not applicable	Not applicable
8.2	The developer will provide a vegetated foreshore reserve that exceeds 100m in width between the edge of the foreshore road reserve and the Mean High Water Mark and the Crookhaven River adjoining the Town Centre Precinct.	As part of the Stage 1 Town Centre Precinct subdivision registration or earlier.	Not applicable	Not applicable	Not applicable	Not applicable	Applicable
8.3	The developer will provide a vegetated woodland reserve which provides a natural entry feature to the Culburra Beach village.	As part of the Stage 1 Residential Precinct subdivision registration or earlier.	Not applicable	Not applicable	Applies	N/A	N/A
8.4	The developer will prepare a Vegetation Management Plan for the foreshore and woodland reserves to guide future management of this land.	Prior to the release of the Subdivision Works Certificate for that stage of the development.	Not applicable	EW5 - Applies Others - N/A	Not applicable	Not applicable	Not applicable
8.5	The developer will provide a sewer system to current industry standards and in accordance with any Concept Plan requirement and Shoalhaven Water criteria and obligations.	Prior to the release of the Subdivision Works Certificate for the relevant stage of the development.	Not applicable	Not applicable	Applies	Applies	Applies
8.6	As part of new sewer line commissioning, the developer will test for leaks or potential stormwater ingress and to minimise the potential for future wet-weather ingress.	Prior to the release of the Subdivision Works Certificate for the relevant stage of the development.	Not applicable	Not applicable	Applies	Applies	Applies



Item	Commitment AND/OR Mitigation Measure	Timing	Early Works		Residential	Industrial	Commercial
			Construction: EW4, EW8, EW9 & EW12	Non- Construction: EW1, EW2, EW3, EW5 & EW6			
8.7	The developer will provide staged retirement of relevant ecosystem credits required by the revised Concept Plan which can be met primarily by credits already registered and owned by the developer (Sealark Pty Ltd) and are available at the Lake Wollumboola Biobank Site.	In accordance with the requirements of Condition C19.	Not applicable	Not applicable	Applies	Applies	Applies
8.8	The developer will prepare a Construction Environmental Management Plan for subsequent staged subdivision approval by Shoalhaven City Council including education of workers in the approvals and conditions requiring compliance (including soil erosion and sediment controls, flora and fauna and aboriginal archaeological considerations).	Prior to the commencement of construction and for the duration of the development.	Applies	Applies	Applies	Applies	Applies
8.9	The developer will prepare a Development Operational Environmental Management Plan for subsequent staged subdivision approval by Shoalhaven City Council to oversee future management and maintenance of the development site.	Prior to the commencement of construction and for the duration of the development.	Applies	Not applicable	Applies	Applies	Applies
9. Bushfire Management							
9.1	The developer will deliver each stage of the Concept Plan incorporating Asset Protection Zones in accordance with the approved Bushfire Protection Assessment and in accordance with Planning for Bushfire Protection 2019.	Prior to the release of the Subdivision Certificate for each stage.	Not applicable	Not applicable	Applies	Applies	Applies
9.2	The developer will install relevant infrastructure as required, including public roads, fire hydrants and fire trails.	Prior to the release of the Subdivision Certificate for each stage.	Not applicable	Not applicable	Applies	Applies	Applies
9.3	The developer will impose a Section 88B Restriction on residual lots to be developed in future stages which are in accordance with the staging plans shown in the Bushfire Protection Assessment and in accordance with Planning for Bushfire Protection 2019.	Prior to the release of the Subdivision Certificate for each stage.	Not applicable	EW5 - Applies Others - N/A	Applies	Applies	Applies
10. Water Quality Management and Soil Control							
10.1	The developer will design, construct and dedicate water quality control measures to the requirements of Shoalhaven City Council which are in accordance with the Concept Plan's Integrated Water Cycle Management Strategy and Concept Plan approval requirements.	Prior to the release of the Subdivision Certificate for each stage.	Applies	Not applicable	Applies	Applies	Applies



Item	Commitment AND/OR Mitigation Measure	Timing	Early Works		Residential	Industrial	Commercial
			Construction: EW4, EW8, EW9 & EW12	Non- Construction: EW1, EW2, EW3, EW5 & EW6			
10.2	The developer will maintain the water quality monitoring and control measures as outlined in the Concept Plan's Integrated Water Cycle Management Strategy and Concept Plan approval requirements.	Until such time the respective assets specified in the IWCMS are handed over to Council.	Applies	Not applicable	Applies	Applies	Applies
10.3	The developer will design, implement and maintain a soil and water management plan to control sediment and erosion during construction in accordance with the Blue Book and requirements of Concept Plan's Integrated Water Cycle Management Strategy.	Prior to release of the Subdivision Works Certificate for each stage.	Applies	Applies	Applies	Applies	Applies
10.4	The developer will maintain a logbook during the operational phase of all sediment and erosion measures. The logbook will record the date and time of inspection, observations made during the inspection, recommendations for remedial works, and a sign-off for when such works were completed and who completed the works.	For the duration of relevant stages of subdivision works.	Applies	Applies	Applies	Applies	Applies
11. Ecologically Sustainable Development							
11.1	The developer will provide ecologically sustainable development outcomes in accordance with the Ecologically Sustainable Development report that supports the Concept Plan.	As required for relevant components of the development.	Applies	Not applicable	Applies	Applies	Applies
12. Aboriginal Heritage							
12.1	The developer will implement relevant recommendations of the Aboriginal Cultural Heritage Assessment dated May 2012.	For the duration of subdivision works.	Applies	Applies	Applies	Applies	Applies
12.2	The developer will liaise with the Aboriginal Community when earthworks are being undertaken in close proximity to a known Aboriginal Heritage item.	Ongoing through the construction of the subdivision.	Applies	Applies	Applies	Applies	Applies
13. Traffic							
13.1	The developer will provide dedicated pedestrian and cycle routes proposed as part of the Concept Plan.	Prior to the release of the Subdivision Certificate for a relevant stage.	Not applicable	Not applicable	Applies	Applies	Applies
13.2	The developer will provide all new bus stops identified in the Concept Plan with shelter, seating, lighting, and an area for timetable information.	Prior to the release of the Subdivision Certificate for a relevant stage.	Not applicable	Not applicable	Applies	Applies	Applies



Item	Commitment AND/OR Mitigation Measure	Timing	Early Works		Residential	Industrial	Commercial
			Construction: EW4, EW8, EW9 & EW12	Non- Construction: EW1, EW2, EW3, EW5 & EW6			
14. Infrastructure							
14.1	The developer will provide footpaths as approved in the Concept Plan in future subdivision approvals and in accordance with the requirements of Shoalhaven City Council.	Prior to the release of the Subdivision Certificate for each relevant stage.	Not applicable	Not applicable	Applies	Applies	Applies
14.2	The developer will provide street signs for future subdivision approvals in accordance with the requirements of Shoalhaven City Council.	Prior to the release of the Subdivision Certificate for each stage.	Not applicable	Not applicable	Applies	Applies	Applies
14.3	The developer will provide underground power to each residential lot in future subdivision approvals in accordance with the requirements of Endeavour Energy.	Prior to the release of the Subdivision Certificate for each stage.	Not applicable	Not applicable	Applies	Applies	Applies
14.4	The developer will provide underground telecommunications infrastructure to each lot in the future subdivision approvals in accordance with requirements of the telecommunications provider.	Prior to the release of the Subdivision Certificate for each stage.	Not applicable	Not applicable	Applies	Applies	Applies
14.5	The developer will install street lighting in future subdivision approvals in accordance with the requirements of Endeavour Energy.	Prior to the release of the Sub-division Certificate for each stage.	Not applicable	Not applicable	Applies	Applies	Applies
14.6	The developer will install street and interallotment drainage as necessary in accordance with future subdivision plans approved by Shoalhaven City Council.	Prior to the release of the Subdivision Certificate for each stage as applicable.	Not applicable	Not applicable	Applies	Applies	Applies
14.7	The developer will provide reticulated water and sewerage services to each lot in the future subdivision approvals in accordance with the requirements of Shoalhaven Water.	Prior to the release of the Subdivision Certificate for each stage.	Not applicable	Not applicable	Applies	Applies	Applies
14.8	The developer will provide a stormwater re-use system in accordance with the Concept Plan's Integrated Water Cycle Management Strategy and Concept Plan approval requirements.	Prior to the release of the Subdivision Certificate for each stage.	Not applicable	Not applicable	Applies	Applies	Applies
14.9	Within the proposed public reserves, the developer will provide access to a stormwater re-use system and a single connection to the reticulated water supply.	Prior to the release of the Subdivision Certificate for each stage/s containing public reserve.	Not applicable	Not applicable	Applies	Applies	Applies



Item	Commitment AND/OR Mitigation Measure	Timing	Early Works		Residential	Industrial	Commercial
			Construction: EW4, EW8, EW9 & EW12	Non- Construction: EW1, EW2, EW3, EW5 & EW6			
15. Geotechnical							
15.1	The developer will carry out the subsequent subdivision in accordance with the geotechnical report that supports the Concept Plan.	Prior to the release of the Subdivision Certificate for each stage.	Not applicable	Not applicable	Applies	Applies	Applies
16. Contamination							
16.1	The developer will carry out the subsequent subdivision in accordance with the Stage 1 Land Contamination Assessment report that supports the Concept Plan.	Prior to the release of the Subdivision Certificate for each stage.	Not applicable	Not applicable	Applies	Applies	Applies
17. Waste Minimisation and Management							
17.1	The developer will prepare a Waste Minimisation and Management Plan in accordance with Shoalhaven Development Control Plan 2014 for approval by Shoalhaven City Council in subsequent subdivision applications.	Prior to the release of the Subdivision Works Certificate for each stage.	Applies	Applies	Applies	Applies	Applies
18. Developer Contributions							
18.1	The developer will pay Section 7.11 developer contributions in accordance with Shoalhaven City Council's Contributions Plan and any other relevant polices on a "per ET" basis for each stage of subdivision.	Prior to the release of the Subdivision Certificate for each stage.	Not applicable	EW5 -Applies Others - N/A	Applies	Applies	Applies
18.2	The developer will pay Section 64 water and sewer developer contributions in accordance with the development servicing plan applicable and other relevant policies at the time of payment.	Prior to the release of the Subdivision Certificate for each stage.	Not applicable	EW5 -Applies Others - N/A	Applies	Applies	Applies