



ERM Mitchell McCotter Pty Ltd A C N 002 773 248 A member of the Environmental Resources Management Group.

3 January, 1996

General Manager
Shoalhaven City Council
P O Box 42
NOWRA NSW 2541

Attention: Mr E Royston

Dear Sir

SHOALHAVEN CITY COUNCIL	
RECEIVED	5 JAN 1996
FILE	92/3242 <i>GR</i>
REFERRED TO	<i>ER</i>

Our Ref:93152L1

RE: PACIFIC PASTURES LOCAL ENVIRONMENTAL STUDY (LES)

ER We are responding to your letter of 14 November 1995 which raised six issues in relation to the above-mentioned study. Our responses to each issue are given below.

1. Habitat Value

The draft Jervis Bay Regional Environmental Plan deals only with issues or areas of regional significance. The Pacific Pastures study was specific to that area and conducted at a greater degree of detail. The areas of vegetation and habitat identified are considered to be locally significant and worthy of conservation for this reason.

It is not possible to say with certainty that the nominated endangered fauna species will occur on the site until species specific studies are undertaken. Such studies were not part of the brief for the LES. However, the available information on habitat type and species distribution, suggests the nominated species could occur on the site. For this reason and until more detailed studies are undertaken retention of the habitats identified is warranted.

2. Land Clearing

The point made is correct; land that has been cleared is of lower conservation value than that which is vegetated.

3. Habitat Retention Within Allotments

Experience has shown that retention of natural areas within residential allotments is generally not effective because areas are not properly managed, are not continuous or they are cleared over time. Viable alternatives are usually dedication to an appropriate body, like a council or the National Parks Service, or creation of a community lot and management body under the Community Titles legislation.

4. Water Quality Management

In theory it is correct that an area of about 470 square metres per lot is needed for irrigation of treated effluent. However, in practice there would be potential problems with such a system. A significant issue would be ensuring regular and proper maintenance of the 150 or so systems installed. This would be a major undertaking for Council at Pacific Pastures and could be an excessive responsibility if the precedent were extended to other areas. Without proper maintenance the systems would not be effective and water quality would not be maintained.

A second issue is the size of the area involved, 470 square metres. This is a significant part of most lots and it would have to be set aside for effluent irrigation purposes which would preclude many other potential uses.

5. Lot Pooling/Pump Outs

The creation of a much smaller number of rural residential lots by land pooling might make on-site disposal systems practical. However, the need for regular maintenance and inspection would remain.

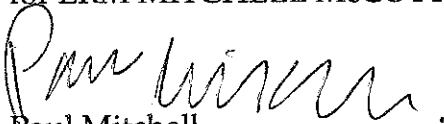
The introduction of a large number of new pump-out systems would be undesirable. Such systems are not normally suited to residential areas because of odour and servicing difficulties. The question of precedent and Council's ability to effectively service a large number of additional pump-outs would also be significant considerations.

6. Future Options

Questions of future zoning and use of the area are examined in Chapter 7 of the report and specific recommendations are given in Section 7.4. We believe these options are still appropriate for the area.

We trust the above responses address all of the questions raised. However, if any clarification is needed please contact the undersigned.

Yours faithfully,
for ERM MITCHELL McCOTTER PTY LTD

A handwritten signature in black ink, appearing to read 'Paul Mitchell', written over the printed name.

Paul Mitchell
Principal