

18 December 2019

Contact: *Alison Kniha*  
Telephone: *02 9865 2505*  
Our ref: *D2019/141609*

Ms Kate Wooll  
Business Manager Strategic Planning  
Goulburn Mulwaree Council  
Locked Bag 22  
GOULBURN NSW 2580

Dear Ms Wooll

**RE: 59 – 61 Hovell Street Goulburn (REF: REZ0005-1819)**

Thank you for your email of 13 November 2019 seeking comments from WaterNSW regarding the rezoning of 59-61 Hovell Street (Lot 8 DP 832816) Goulburn from RE1 – Public Recreation to R1 General Residential under the Goulburn Mulwaree Local Environmental Plan 2009 (the LEP). Additionally, it is proposed to specify a 1,000m<sup>2</sup> minimum lot size (MLS) for the site. I understand that a separate process is underway to re-classify the land from Community to Operational under the *NSW Local Government Act 1993* to enable the land to be on-sold and developed for residential use.

Preliminary comments on this Proposal were provided by WaterNSW to Council on 25 March 2019 (our ref: D2019/26196) prior to the Planning Proposal document being prepared. The Proposal largely responds to those issues. However, the Proposal would benefit by clearly recognising that the objective of the s9.1 Direction 5.2 Sydney Drinking Water Catchment, to protect water quality in the catchment.

The Proposal also responds to Direction 5.2 by including extracts from the underpinning layer maps that inform the Strategic Land and Water Capability Assessment (SLWCA). However, the actual outcome of the overall SLWCA for Sewered Development – that the water quality risk for the site is Low to High with the majority of the site having a Moderate risk – still needs to be stated. The Proposal would also benefit by including the relevant SLWCA map (see Map1 attached) to support the statement made.

The Planning Proposal gives due recognition to State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011, noting that consent for future development can only be granted if there is a neutral or beneficial effect on water quality and that larger scale subdivision will require the concurrence of WaterNSW. These statements are supported.

**Sewer, Stormwater and Water Services**

The subject land is within an existing urban area which is services (Figure 18). However, the site itself will need connection to services such as water and sewer and stormwater drainage network. The Planning Proposal would benefit by clarifying that the existing sewer and stormwater network has sufficient capacity to cater with the 29 lots expected for the rezoning and expected subdivision of this site and the adjoining land (Lot 9 DP 832816).

## **Applicable Land**

An indicative master plan for future subdivision is provide in Figure 5, suggesting that the land is capable of delivering 29 lots. The map is predicated on the incorporation of Lot 9 DP 832816 which adjoins the site in the north-west. Correspondence from Council (email dated 4 December 2019) has confirmed that Lot 9 is already owned by Council and zoned R1, and that the Planning Proposal does not apply to Lot 9.

It would be useful for the Proposal to a reference to Lot 9, along with the MLS for Lot 9 given the inclusion of the lot in the subdivision design. The Planning Proposal would also benefit by stating the actual land size of the existing allotment (Lot 8) and combined lots (Lot 8 and 9) to help substantiate the projected lot yield against the 1,000m<sup>2</sup> MLS requirement. This information is also relevant to the capacity of existing stormwater and sewerage infrastructure as described above.

## **Other**

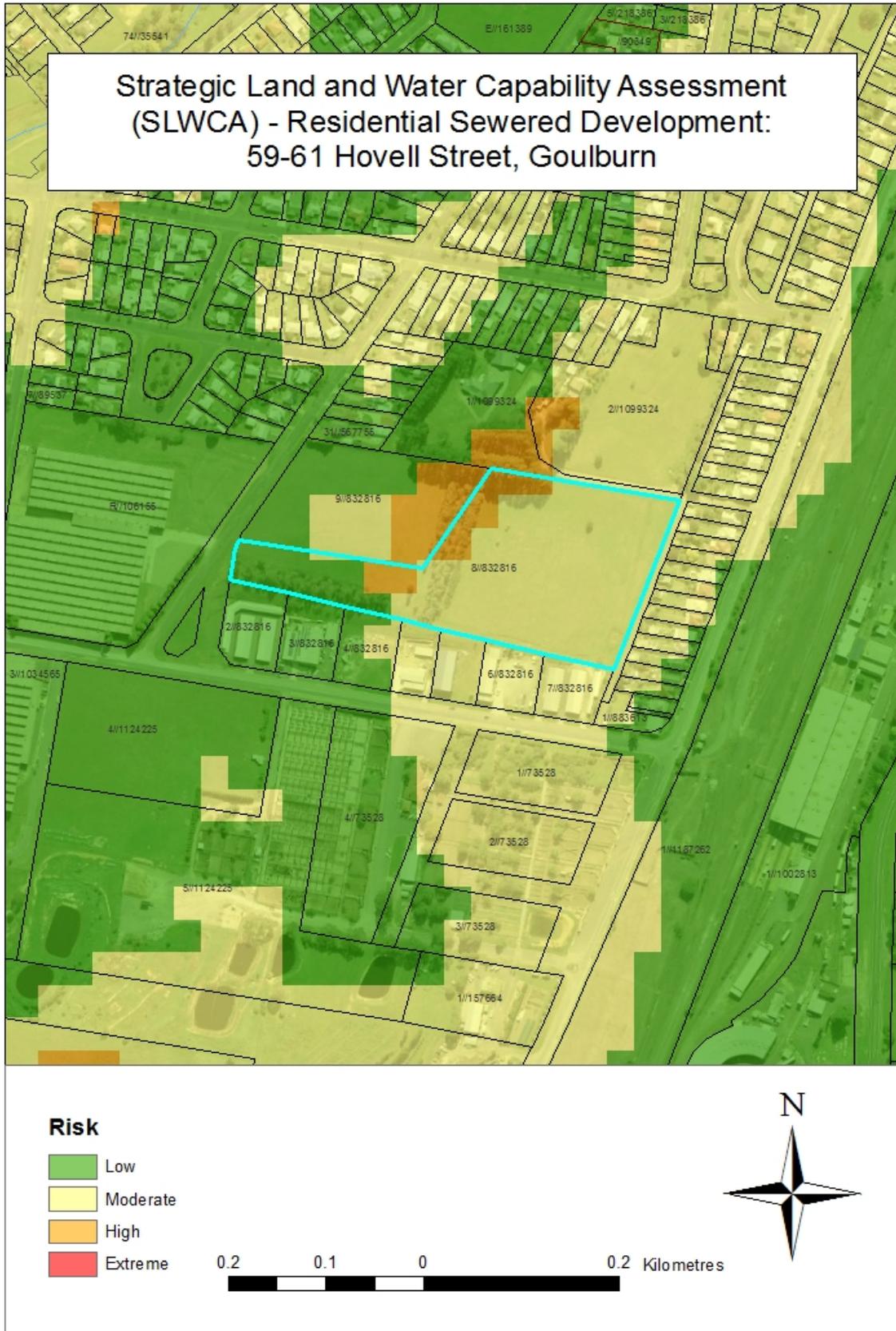
The sentence that the 'site is not identified as an area of High Conservation Value (HCV) within the SLWCA Maps' (page 14) should be modified or removed. The SLWCA considers water quality risk not conservation values.

If you have any questions regarding the issues raised in this letter, please contact Stuart Little at [stuart.little@waterNSW.com.au](mailto:stuart.little@waterNSW.com.au).

Yours sincerely



**CLAY PRESHAW**  
**Manager Catchment Protection**



**Map 1.** Water Quality Risk for 59 – 61 Hovell Street Goulburn as based on Strategic Land and Water Capability Assessment (SLWCA) for Residential Sewered Development.