

17 April 2020

Nick Thistleton
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Goulburn Mulwaree Council
Locked Bag 22
GOULBURN NSW 2580

Contact: *Stuart Little*
Telephone: *02 9865 2449*
Our ref: *D2020/29375*

Dear Mr Thistleton,

RE: B6 Enterprise Corridor and Currawang Planning Proposal

I refer to your email of 27 March 2020 requesting WaterNSW's comment on the Draft B6 Enterprise Corridor and Currawang Planning Proposal.

The Planning Proposal concerns five parcels of land, two in Goulburn, two in Marulan, and one at Currawang. We have no comment to make on the Currawang land as it occurs outside the Sydney Drinking Water Catchment (SDWC). Our comments on the Goulburn and Marulan lands are provided below.

Overview

WaterNSW is generally supportive of the Planning Proposal, which reduces the potential for intensive commercial and semi-industrial development across four parcels of land in Goulburn and Marulan through rezoning from B6 Enterprise Corridor, and introducing minimum lot sizes (MLS) where there are currently none.

WaterNSW understands that:

- For Goulburn, one area will be rezoned to R1 General Residential with a 700m² MLS and the other to RU2 Rural Landscape with a MLS of 20,000m². These two areas were identified for rezoning in the 2016 Employment Land Strategy (pages 126-127).
- For Marulan, one area will be rezoned to RU6 Transition and afforded a MLS of 100 hectares while the other will be rezoned to R1 with a MLS of 700m².

Development Potential for Proposed R1 General Residential Land

The Proposal notes that the proposed zonings are generally in keeping with the current residential and rural residential uses associated with the various lands. Claims that the proposed zoning and MLSs will not lead to development intensification (pages 13-24 and 28) warrant further justification as the 700 m² MLS for the proposed R1 land appears to offer significant subdivision potential for several allotments based on existing lot sizes.

In addition, the Proposal would benefit by recognising the range in lot sizes currently present in the proposed R1 lands. That said, the potential for subdividing the largest lots at 2-26 Long St Goulburn is limited by existing uses and environmental constraints. For Marulan, the potential for subdivision appears to be limited to one larger lot. In further describing the capacity of the R1 zonings for residential subdivision, consideration should be given to the capacity of, and pressure on, the existing sewage treatment plant and existing sewage infrastructure in the area.

State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011

The Planning Proposal responds to the SDWC State Environmental Planning Policy 2011 by noting that those developments in the SDWC that require consent need to demonstrate a neutral or beneficial impact (NorBE) on water quality. The supporting discussion could be clarified by noting that overall the proposed change from B6 zoning to R1, RU2 and RU6 zones will reduce the potential intensity of development that could occur on the subject land.

We also note and support Council's approach of only applying R1 zoning to land that has ready access to reticulated sewerage. The wording at the bottom of page 22 would benefit by minor modification to clarify that that B6 allows more intensive uses (e.g. commercial and semi industrial uses) which can present a greater '*risk*' to water quality than the residential and rural zonings proffered under this Proposal, rather than '*threat*'.

Section 9.1 Direction 5.2 Sydney Drinking Water Catchment

The Planning Proposal comprehensively responds to the section 9.1 Direction 5.2 Sydney Drinking Water Catchment. We agree with the Statements made and note that the Proposal includes the Strategic Land and Water Capability Assessments (SLWCAs) prepared by WaterNSW and provided to Council for this Proposal. The Proposal specifically takes due account of the Extreme water quality risk presented along the drainage features for the proposed unsewered RU2 land in Goulburn.

The proposed MLS of 20,000 m² and other controls (e.g. the prohibition of septic tanks within 40 m of a watercourse) will reduce the risk to water quality presented by unsewered development in this location. Site-specific lot designs can be addressed at DA stage and respond to the requirement for a NorBE on water quality.

Other – Goulburn NE Enterprise Corridor Area

The NE Enterprise Corridor of Goulburn area has been subject to a recent series of planning instruments designed to change various planning controls for different parcels of land in this area. This includes a 2019 Planning Proposal to rezone a separate B6 parcel in the NE Enterprise Corridor Area to IN1 and the more recent exhibition of a Draft Development Control Plan (DCP) for the wider Common Street area.

Council clarified the sequence of events leading to this approach in an email (dated 31 March 2020). However, it appears that members of the public have been inquiring about the potential to rezone other land in the NE Enterprise Corridor area. The B6 land that is the subject of this Proposal was not identified in the 'Precincts and Opportunities for Development' under the Draft Housing Strategy and it is unclear if further B6 land in the NE Enterprise Corridor Area is intended for rezoning and new planning controls.

To minimise the number of further individual Planning Proposals coming forward for land in this area, we request that Council consider preparing a strategic study for NE Enterprise Corridor area. Council could also extend the neighbour notification of this Proposal to include all the owners of the B6 land in the NE Enterprise Corridor area and possibly other zones in the surrounding lands covered by the Common Street DCP. The intent should be to either consolidate additional rezonings (if any) into this one Planning Proposal, or have another dedicated Planning Proposal to cover all remaining proposed rezonings in the NE Enterprise Corridor area.

If you have any questions regarding the issues raised in this letter, please contact Stuart Little at stuart.little@waternsw.com.au.

Yours sincerely



CLAY PRESRAW
Manager Catchment Protection