

Woollooware 2230

Name and address not for publication

GPO Box 39 ,SYDNEY 2001

6TH MAY, 2012-04-29

Dear Michael Woodland,

Re: Concept Plans for Cronulla Sharks Development Woollooware
(MP10_0229 and MP10_0230)

We object to the new development plans lodged by the Cronulla Sharks Leagues Club and would like to make comment on the proponents response. Reasons-

1. It does not meet the Director Generals Key Issue Requirements
2. It does not meet guidelines for The Metropolitan Plan for Sydney 2036
3. It does not meet SEPP66 guidelines
4. It does not comply with Sutherland Shire Council Planning guidelines
5. The residential component is far too high and dense for the local Woollooware area
6. It is too far from public transport-1.6km
7. There is insufficient parking, especially on Game days and nights
8. The increase in traffic will severely impact on the already saturated local roads and the amenity of local residents
9. There will be severe environmental and ecological impacts
10. Insufficient time has been spent doing studies and assessments as required by other Government agencies
11. There is still no guaranteed provision for a public bus service and non in the near future.
12. There is still no guaranteed provision to replace the Junior Ovals

We fully support the information forwarded to you by North Cronulla Precinct on 6th May 2012 which covers all the above points in detail and supports our reasons for our objections.

Additional General Comments

Traffic Impact on Local Residents

We disagree with the traffic consultants figures for peak hour traffic. We conducted our own traffic study and found the traffic rate is almost double what the consultant measured. The movements north will increase greatly in the afternoon peak periods with people from the proposed units returning from the station. Note- Parents pick children up from school Woollooware High School at 3 – 3.30pm.

There will also be a greater increase in the morning period from 7am with people from the units driving to the station. There are also many parents dropping their children off at Woollooware High School from 8am-9am. Unfortunately we have not had time nor the resources to conduct this morning peak hour study but the numbers would be very similar, probably more with parents dropping their children at school.

People visiting and leaving the retail side of the development will increase these figures.

There is **a huge increase** in traffic on a Monday afternoon in School terms 1 and 4 due to hundreds of families attending Oz Tag Games at Woollooware High, the Council fields on Captain Cook Drive and Gannons Rd and Cronulla High between the times of 3.30pm and 6.30pm

We feel the Council or the Department of Planning should do an independent study to validate the traffic movements.

We also refer to the submission 4479 made by Jamie Maclachlan which points out there are other inconsistencies especially between Woollooware Rd and Eloura Rd.

Stationed outside Woollooware High School in Woollooware Road from 4.30 pm until 5.30 pm on Friday 4th May, 2012

Car movements from 4.30pm to 5.30 pm Total:- 861

Car movements from Captain Cook Drive up Woollooware Road Total:- 562

Car movements towards Captain Cook Drive

Total:- 299

Counting for 15 minutes from 5.30 - 5.45pm Total 212 Vehicle movements

(63 vehicles on Woollooware Rd towards Captain Cook Drive)

(149 Vehicle movements up Woollooware Road)

No Legally Binding Documents

I have read through the proponents response and there are no legally binding documents or written contracts. With regard to transport, parking and replacement of playing fields there have only been written consultations or discussions. The proponent simply states they having consultations about the above or will work out game day/night parking over the next 3-5years. This is unacceptable

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and approval should not be given until legally binding contracts are signed and the game day/night parking problems are thoroughly solved.

Covering Letter from North Cronulla Precinct- Content in separate attachment

GPO Box 39 ,SYDNEY 2001

6TH MAY, 2012-04-29

Dear Michael Woodland,

Re: Concept Plans for Cronulla Sharks Development Woollooware
(MP10_0229 and MP10_0230)

We write to you with some further comments on the Proponents PPR Response to Submissions. We write on behalf of the many hundreds of local people who objected to this inappropriate development and the manner in which the Proponent has responded, with inadequate information.

We were advised by the Premier Barry O'Farrell at a Community Cabinet Meeting held at Sutherland on the 11th July, 2011 that the only reason that this development was still being assessed under the Part 3A (which he had promised to repeal) was that the Director General's Requirements had been issued prior to his party coming to Government (The DRG requirements were signed 1 day before the election). If the Director General's Requirements are so significant, we would assume that adherence to every key issue should be paramount.

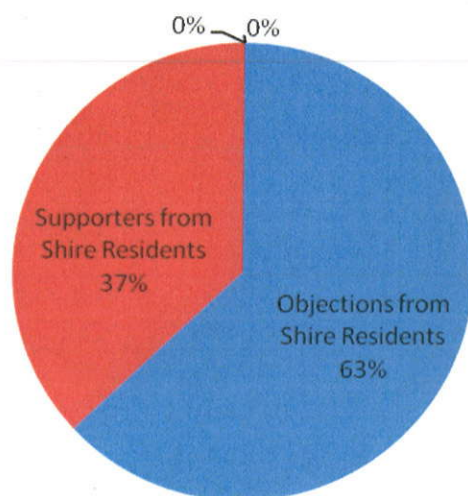
In the case of this application the Director General's Requirements are not met on almost every single issue and we would therefore request that the application be refused.

We have addressed some, (although not all as we are under resourced) of these non compliances with our attached submission. We also refer you to the submissions of the Agencies, who we believe have found the Response to Submissions by the Proponent lacking in substantial detail.

The development does not meet the requirements for Sustainable Development and the cumulative impacts on the community from this form of over development cannot be measured.

NOTE- DETAILS SHOULD COME THROUGH ON NEXT ATTACHMENT

Submissions From Planning Dept Website



The above graph is based on the figures in the copy of the email attached which was sent to Mark Brown at Planning on 19th April, 2012. The figures have been collated from the Department of Planning website.

According to this information we totally disagree with the proponent's graphs and figures.

Director General's Requirements Key Issues

The Cronulla Sharks Development Plan does not meet a number of the issues raised in this point.

Built Form/ Urban Design (DGR Key Issue 2)

The height, bulk and scale does not integrate with the local environment, including coastal wetlands and the public domain.

1. The immediate area is primarily a sporting precinct and is zoned public recreation and private recreation (club playing field) with the exception of the Sharks Leagues Club (4 storeys), Toyota Stadium, Fitness First (3 storeys), Woollooware High School (2 storeys).
 2. Neighbouring zoning (for at least 1.5 kilometres to the north, south, east and west) is low rise and low density developments. Directly north of the site is mangroves and Botany Bay.
 3. The nearest highrise buildings are –
 - * Solander Tower, 25 Burke Rd Cronulla (13 storeys) which measures **2km** away by my car trip meter (shortest route)
 - * 168-172 Willarong Rd North Caringbah (8 storeys) which measures nearly **3km** away by my car trip meter (shortest route)
- I have attached a map (on page 5) indicating the positions of these in relation to the development. (scanned from Sydney UBD 2011)

The height, bulk and scale is not compatible with the Metropolitan Plan for Sydney 2036

1. It is not “ *within the walking catchments of existing and planned centres of all sizes with good public transport*”.

The closest rail station is Woollooware Station which is 1.6 km from the proposed unit complex and at least a 1km from the retail complex. It is a long uphill walk to the station. Caringbah Station is 2.2km away. The “*walking catchment for a town centre is 800metres and a village is 400-600 metres*”

There are no plans to provide a regular bus service from the development site within the next 4 years or more. Refer to The Department of Public Transport’s submission.

2. It is not an “*area with high accessibility and amenity*” which “*are better suited for higher density living*”
3. It does not comply with Sutherland Councils design and height requirements and Council has lodged a formal submission addressing these issues. “*Each centre is unique and local councils will ultimately set height and design requirements*”
4. It does not comply with “ *smaller local centres are suited to low-medium rise medium density housing*” and “ *all centres would have minimum level of medium density, with low density reserved for heritage or physically constrained areas*”.

The development is in a physically constrained area surrounded by Botany Bay and a sporting precinct.

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5. The Metropolitan Plan says that it “ *does not provide for the establishment of stand-alone shopping centres*”
6. The retail development would be classified as a smaller local centre therefore suited to low medium rise medium density housing.

The Sharks Development does not meet the following principles of Sepp 66

1. Concentrate in centres - It is not “ *within an acceptable walking distance - 400 to 1000 metres of major public transport nodes*” It is 1.6kilometres from the closest station. There is no high frequency bus route and no plans by the Department of Transport for one.
2. Align centres within corridors – It is not “*along major public transport corridors*” and there are no future plans for this to be changed.
3. Link public transport with land use strategies- There is no “*plan to implement public transport infrastructure and services in conjunction with land use strategies*”
4. Connect Streets – It does not “ *provide street networks with multiple and direct connections to public transport services*” There is no direct connection to Woollooware Station nor is there a regular public bus service to the station or one planned.
5. Manage parking demand - The development (retail and residential) location requires people to use their cars to get to the proposed retail centre and units and there is insufficient parking for Game Nights, therefore it does not and cannot manage parking demand. It does not “ *discourage car use*” It actually encourages car use.
6. Implement good urban design – Due to the **unique** and **isolated** position of the retail and unit development it does not “*meet the needs of pedestrian and public transport users*”

Comparative Height Study

This development (particularly the residential site) cannot be compared to developments in Cronulla Business District. There are a total of **only** about 7 buildings above 9 storeys spread across a large area (North Cronulla to South Cronulla). These are more accessible to public transport and shops.

The Sharks playing fields are approximately **8 times smaller** than the Cronulla area the proponents are comparing it to. **Therefore, this is an unrealistic comparison for height and density.**

Visual View Analysis

The new photomontages are from selected points which do properly show the negative impacts on many community members. The photos tend to be taken from angles which diminish the full impact of the height and bulk of the development.

Castlewood and Fairs Avenues, and Church Street are prime examples of this. From Castlewood Avenue the photos have been taken from a position east of the development site. Residents further west are severely affected and the height and bulk of the buildings is much greater in appearance than the photomontage displays. This is also true of the Captain Cook Drive photomontages. If taken from a more central position the views from Captain Cook Drive will appear much worse.

The larger apartment building to the left of the proposed unit development in the photomontage taken from Taren Point Bridge is Solander Tower at 25 Burke Rd Cronulla. This building appears tall as it is built on the top of a hill. If it was built on a level the same as the Sharks development units it would not be seen above the ridgeline. **Therefore, this is not a legitimate comparison.**

Land Use (DGR Key Issue 3)

The development has not achieved the key issue of loss of open space detailing how the loss of active open space, detailing how existing and future demands for sports fields will be met within the context of growing participation rates across all sports.

There is a documented shortage of sporting fields within the Sutherland Shire, The Shire is the No1 Sporting area in Australia according to Michelle Ford Olympic swimming champion and member of the IOC Athletes Commission.

The proponent has no contracts signed with any party to replace the existing Junior fields or club house. There have been discussions with the Water Polo Club and the Department of Education and Communities but there is no firm commitment nor any necessary approvals for the use of the fields and the building of improved facilities for the Junior Rugby League.

The current Junior Rugby League fields in a Works Committee Report 3/11/08 states "The Club estimates during the 2008 season it catered for over 2,500 training sessions and 228 games on the ground". The report went on to recommend the allocation of \$100,000 towards renovations /improvements of fields 2 and 3 outside of Shark Park on the proviso that these fields are added to the list of fields that are available for community use and come under Council sporting allocations. We have been advised that this money was forthcoming from the Council and the works completed.

Since in principle agreement for the Water Polo to have a Water Polo facility on the land at the rear of Cronulla High School was given, the land surrounding the fields has been rezoned residential by the State Government. The plan submitted with this Concept Plan shows access to the site through a roundabout on Captain Cook Drive which has been built to service the residential estate, it also shows access to the Water Polo facility through a block of land which belongs to this Estate. The owner Tom Breen has said that no approval has been given for access into the rear of the school grounds through his land. The traffic issues in relation to relocating the sporting fields and Water Polo with access off Captain Cook Drive, Kurnell would deemed extremely dangerous and would be unlikely to be approved.

The fields at the rear of Cronulla High School are already used on weekends by Oz Tag teams cricket teams and others so there would be a net loss of active open space.

The Proponent is unable to demonstrate the loss of active open space can be provided or how future demand can be met.

(Please refer to copies of letters received by a local resident (attached) from Tony McCabe dated 2nd May 2012.

"The Department expects that the existing arrangements for community uses such as Oz Tag will also be included as part of this formal proposal."

"On 19 April 2012 I wrote to Mr John Watkins, President of the Cronulla Sutherland Water Polo Club advising that leagues club like arrangements with TABS, poker machines and the serving of alcohol on Cronulla High School site will not be permissible under any circumstances.")

NOTE – The Junior Club currently has existing bar facilities which it uses and leases out for private functions where alcohol is sold and served. Under the Department of Education's alcohol and drug regulations the Junior Club will be unable to have this facility.

Economic Impact Assessment (DGR Key Issue 4)

There have been many recent media reports stating that retail businesses are suffering in the current economic climate. One only has to walk down the main streets of Cronulla and Caringbah CBD to see concrete evidence of this. Many shops are vacant and have been for quite some time. Many retailers say they are just making ends meet. More retail outlets would put further financial strain on these businesses.

The Shire already has 3 large shopping centres Miranda Westfield, Southgate at Sylvania and Caringbah Village.

As far as providing employment, it would really only be replacing the jobs lost from existing businesses closing down or laying off staff **because of the increased financial strain which would be caused by a new retail development.**

The proponent strongly promotes the fact that the development will provide a first class Medical Centre yet has not shown any evidence of interested parties investing in the medical centre. A medical centre will cost hundreds of thousands of dollars to set up and maintain. There are no details to confirm who is paying for this or setting it up. What will happen if the development cannot get a medical company willing to invest? Will it become just another retail shop? Kareena Emergency Out Patients ward closed the other year with Mayne Health citing it was too expensive to keep it running. The Kareena After Hours GP surgery remains open.

Conclusion - A new retail centre would have a further negative impact upon facilities and services in existing centres.

DGR 5 Public Domain/Open Space

The proponent submits that the Foreshore Park is a community facility adding to the benefit of the Open Space in the Shire. This has been dismissed by the Sutherland Shire Council Report.

The facts are that the open space which is being provided is at the expense of the DGR minimum for a riparian zone of 40 metres, and would only be enough open space for the requirements of the residential component of the development.

The “pocket park” referred to be included within the residential buildings is actually 2 storeys above ground level and therefore inaccessible by the general community and the public.

The linkages and bicycle Plan can only be implemented by sacrificing the 40 metre riparian zone and cannot be achieved in a sustainable manner.

The Proponent is unable to demonstrate that this proposal for Public Space can be achieved without sacrificing Sustainable Development Principles. The proposed Foreshore Park will only benefit the residential component of the development, but the sporting fields that the development is replacing cannot be replaced so there is a net loss to the community.

Environmental and Amenity Impacts (DGR Key Issue 6)

1.Views of the bay and the city will be lost by a great many residents either totally or partially. These include people living in Bate Bay Rd, Woollooware Rd (North and South), Castlewood Ave, Fairs Ave, Church St, Caringbah Rd, Kingsway (Cronulla to Miranda), Banksia Ave, Woodlands Rd, Willarong Rd North, Edinburgh Crescent, Judd St, Gurrier Pde (Miranda), Sylvania Rd (Sylvania). There is no doubt there are some streets I have overlooked.

Residents of Gannons Rd and Woollooware Rd will be forced to look at inner city high rise style apartment blocks instead of the open space they currently have.

The view driving north down Woollooware Rd which was once an open bay and mangrove view is still a bland concrete wall suited to a heavy commercial / industrial area not a residential area.

2. Residents amenity will be severely affected with unit owners parking in nearby residential streets and in playing field car parks. Captain Cook Drive is a No Standing zone so residents and visitors will be forced to park in these areas. The Council fields are used all year round on weekends and during the week by local sporting teams and these people will have nowhere to park because unit overflow will take up these spaces. It is a fact that most households with 2 or more driving age people each own their own car. There is only one car space per unit.

Game Day parking will further impact on local residents. This issue is raised in a separate section of this submission.

DGR 7 Transport and Accessibility

Under the heading of "Transport and Accessibility" in the Director General's requirements are the following points:

- 1 Provide details on transport and accessibility, traffic generation, access, loading areas, car parking arrangements, pedestrian and bicycle linkages.
- 2 Provide a Traffic management and accessibility plan, (TMAP) prepared in accordance with RTA guide for TMAPs.
- 3 Demonstrate the appropriate provision of on-site parking with regard to Council and RTA guidelines and including "game day" parking arrangements.
- 4 Provide assessment of implications for non-car travel modes
- 5 Provide measures to improve public transport accessibility and demonstrate how users of the development will be able to make sustainable travel choices.
- 6 Address the potential for implementing a Workplace Travel Plan for workers.

We make the following comments on the Proponent's responses to the Director General's requirements.

No Public Transport

The development fails to meet basic transport and accessibility standards as there is no existing public transport and the residential site is 1.6km from the nearest station.

The Director General requirements (Point 5) states "Provide measures to *improve* public transport accessibility and demonstrate how users of the development will be able to make sustainable travel choices". The site does not have any existing public transport to *improve*. NSW Transport response to the Proponent of 25th November 2011, clearly states it does not have any plans for a new bus service as suggested by the proponent.

Generally a high density 600 unit residential development, with 26,500m² of retail/club component, could be only planned around ***existing*** public transport. It is not an established "Town Centre" as the report seeks to prove. Unlike other Town Centres in Sutherland Shire such as Cronulla, Miranda, Sutherland and Caringbah, it does not have existing transport routes, but is simply an outlying site amongst a recreational zone.

Residents inability to make "sustainable travel choices"

Residents cannot easily "make sustainable travel choices" (ie excluding cars) when the nearest railway station (Woolooware) is 1.6 kilometres walking distance from the centre of the residential site. The traffic report erroneously states "the site is located within a one kilometre walking distance from the football field to Woolooware railway station". In fact the proponent neglects to state the residential site is half a kilometre from the corner of Woolooware Road North and Captain Cook Drive.

The PPR also states that the Transport for NSW submission considers the Concept plan is within walking distance of Woollooware Station, when it is above Transport NSW guidelines of acceptable walking distances to be under one kilometre distance.

Woollooware station could expect an almost doubling of cars looking for a parking space affecting the amenity of the area for residents.

The only option for transport provided in the PPR is for the proponent to offer a Shuttle bus service until such time as a transport operator may provide a service in future years. There is no detail on the Shuttle bus service mooted to run for several years filling a huge transport service gap. The PPR simply states "detail of the capacity and frequency of the shuttle bus serviceshall be submitted with each Project application/DA."

- Will the shuttle service meet every train arriving at Woollooware station?
- Will it operate from other town centres such Cronulla and Miranda when trains cease operations overnight?
- What security will the \$2 development company provide up front to ensure the service operates adequately for some years until public transport picks up the responsibility?

TMAP

The PPR states that the TMAP (Transport Management Accessibility Plan) can only be based on the provision of a shuttle bus service, and therefore it is not necessary to consider the implications of a bus service not being provided.

Again this proves the development cannot be considered a Town Centre as Town Centres already have public transport available. Again we are asked to rely on the assurances of a \$2 company proponent making long term and expensive assurances of standing in the place of a public transport operator for a number of unknown years. And again on this topic, we are assured that Transport NSW states the site is within walking distance, erroneously provided by the proponent to be 1 kilometre when it is 1.6 kilometres from the residential site.

Severe lack of Car parking in both the Club/Retail centre and Residential

Club/Retail Centre – 693 spaces allowed

- **Club spaces.** Proponent assumes the rejuvenated club will only attract one third of the patrons it currently does! The traffic report states that peak current demand for the existing club of 8,500 m² is 180 spaces. The reduced club size will be 3035 m² and therefore the proponent is reducing the "Peak Parking Demand" accordingly in the same ratio to 64 spaces. The club parking area has been viewed to have around 200 cars parked at the left side near the club at peak times. By only allowing 64 spaces for the club, many patrons will not be able to find a park, thereby reducing the club patronage and cash flow to far less than it is now. Has the club released this information to club members? **Likely shortage 140 spaces.**
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- **Page 13**
- **Retail spaces.** Proponent allows 564 spaces for retail of 26,500 sm. Proponent is silent on the exact size of the retail centre in the PPR, however the McLaren Traffic Engineering report, states in several places *"Notwithstanding the above changes that achieve a reduced development outcome, that reduced scheme is indicative only. In terms of the retail/club component, approval is sought for the Concept Plan for the overall GFA proposed in the original submission, (ie @ 26,500 m2) which is an upper limit"*.
- Westfield Miranda corporate information states a total retail space of 107,860 sm and has parking spaces for 4320 cars. At the same ratio of floor area, the Sharks retail centre of 26,500 sm comprising of retail, leisure and medical should require 24.5% parking ie 1061 spaces. **Likely shortage 500 spaces.**
- Staff parking – Nil. There is an assumption that all 540 retail/hospitality workers (as provided by club in the Leader April 30 2012), will not utilise any parking at their place of work as there is no allowance for staff parking at all in the breakup in the parking report, page 27 of McLaren report. Westfield Miranda currently allows staff to park on the roof car park. Sharks club currently allows car parking for staff. 2006 census showed 81% of working population drive to work (75%) or in car as passenger (6%). Only 2% actually walked to work. The proponent should explain how over 500 staff are going to get to and from work without cars!
- By comparison, it is worth noting that PPR states that Roselands is almost double the size of the proposed Sharks shopping centre, and has 5 to 6 times more parking (3465 to 4148 spaces). Therefore by floor area, to be well serviced with parking, Sharks shopping centre at half the size would require **1730 to 2080 spaces**. Roselands is also well served by State Transit and private bus services, and train services accessed by these buses at 1.7 kilometres.
- Not considered in the report are the Fitness First club patrons who overflow park in the Sharks parking area to the right side to around 50 spaces. These patrons may then seek to park in the retail space and may well be purchase from the centre as well as visiting their gym for 30 to 60 minutes. **Likely shortages 50.**
- The PPR admits that Sharks parking has been utilised by the patrons of Solander and Captain Cook grounds as their own parking areas are unable to cope with demand at peak periods. Pressure on the retail car park will also come from these patrons when parking is not available at their grounds at peak periods, or when residential users or visitors may take their spaces. These users may well shop and then visit the sporting fields for an hour or so, making it very difficult to gauge out who are retail shoppers and who are sporting precinct visitors. **Likely impacts of extra parking in retail club parking area - say 50 spaces.**
- Visitors to the residents will park at the centre perhaps to purchase some food or items connected with their visit and then walk to the residential complex rather than risk not getting a visitors park. **Likely impacts 25 spaces.**
- Residents who can't access parking in their allocated space may park in the retail area for short visits home rather than park in surrounding streets where they normally park. **Likely impact say 20 spaces.**

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- Game day parking will be an ongoing issue as there is no parking allowed for at the premises and game goers will try to park early in the retail area which has to continue operations during the game day. This has not been satisfactorily addressed in the reports.

The likely shortages outlined above in the Retail/club parking spaces are such that a parking area of double the capacity for the club and retail/service/leisure areas and allowing for staff parking should be at least double what is allowed for ie around 1400 spaces.

Residential parking for 597 units.

- The McLaren Traffic Report in Table 7 “Residential Site Parking Demand” states the residential site parking rate to be 665 (1 x 144 1 bed, 1 for 385 2 bed, and 2 for 68 3 bed) for residents allotted spaces, and 75 visitor parking spaces (1 in 8 units). Comments below this table state that the Proponent seeks to “borrow” 25 from the commercial office area when the commercial offices are closed. This makes visitor parking 100, confirming the statement of the PPR that the residential has 100 spaces, or 1 in 6. Further the comments say that *“Councils rates require the residential development to have 29 wash bays. It is proposed that 29 residential visitor spaces be designed to have dual use as a wash bay”*. **Total spaces 765**
- This conflicts with the insert of Residential amongst Commercial in “Peak Parking Demand” Table 6. Residential is stated to be 857 when a half car space is added to 385 two bedroom units. However the table states there is parking for visitors of 1 in 4 units, or 150 spaces, which conflicts with the information related only to Residential to Table 6. We assume 29 of the visitor 150 spaces are wash bays but this is unclear. **Total spaces 1007**
- The PPR is silent on any break up in residential parking rates other than to say there is 1 in 6 visitor spaces.
- Proponent says has reduced parking rate from Councils rate due to “improved public transport provision with a new service provided along Captain Cook Drive where no service currently occurs”. However there is no “improved public transport” available and none proposed from Dept of Transport. Also the proponents reliance that the development is a Town Centre and therefore parking rates to be adequate for that type of development is rejected by Sutherland Shire Council as they do not consider the development to be a Town Centre.

It is important to clarify exactly what the unit and visitor and wash bay spaces are as shortages in visitor/residential parking will end up in the sporting parking areas in Solander and Cook parks, and in the retail centre. The PPR

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and the traffic report are lacking in detail or are conflicting on the specific break up of residential parking.

Game day parking –no parking allowance at the site

- Currently there is no parking available on Captain Cook Drive between Gannons Road and Woollooware Road.
- Work is commencing from May 2012 on the widening of Captain Cook Drive between Woollooware Road and Elouera Road. Cars currently park on both sides of this sector of Captain Cook Drive on game days/nights. There will be a loss of at least 200 car spaces once the widening of this road is available 500 overflow parking spaces on left of club are now lost to the club by the residential high rise development.
- Council has refused game day parking at Wanda car park, Cronulla and Woollooware High schools and Seymour Shaws.
- There will be no parking space available in retail complex due to pressure of retail clients, club patrons who may come early to use the club and see the game, and staff parking.
- If all game day patrons came by bus, an estimated 200 buses would be required!
- Again proponent relies on “strengthened public transport connections to reduce the need for local parking. Also points to a “subregional transport approach for major events with connections to Engadine, Gymea Menai, Sutherland, Caringbah and Miranda”. This is not in place either. In fact the existing community support offered by Sharks to major events such as the Easter Show or major sporting activities in the region will be withdrawn when the 500 additional spaces on the left of the club disappear to the 600 unit residential highrise. How can Sharks expect other space to become available with the pressure of increasing Sydney population soaks up any excess land spaces?
- The proponents only response is to add further shuttle bus services for game days, but there is no quantum on what additional buses may be required. If all game day patrons were to travel by bus, 200 buses would be required!
- Obviously there will be placed an unacceptable strain on the general community for parking spaces and Woollooware, Caringbah and Cronulla streets will be completely parked out.



Caption: Captain Cook Drive blocked by Police as the game crowd leaves the Eastern Carpark. After Sunday afternoon match 15th April 2012, nobody could travel along Captain Cook Drive, with all traffic diverted up Woollooware Rd North, and Gannons Road. This is the chaos without a major shopping centre and 600 units, Kurnell traffic and an extra 450 homes up Captain Cook Drive at Greenhills Beach!

The DGR requirements were not met on major issues of Transportation and Accessibility, car parking arrangements, Game Day parking, TMAP and on site car parking, public transport accessibility, sustainable traffic choices and a Workplace travel plan for workers. On these fundamental and essential inadequacies and the severe and long lasting effect on the local community.

Noise and Vibration (DGR Key Issue 8)

Objection is made to the noise and vibration this development will cause for the local normally quiet neighbourhood.

1. **It is unreasonable** to expect the local community to put up with the noise and vibration of pile drivers, heavy construction machinery and vehicles from the building of this development, which **the developer estimates will take up to 8 years at least**. The noise **from pile driving is quite unbearable**. If built, the greater noise levels from the greatly increased traffic, loading bays and outdoor entertaining and restaurants will further impact on the existing residents.
- 2 .Many medical studies have proven that constant **noise is one of the major causes of stress which results in numerous physical and mental health illnesses**.
- 3 .Woollooware High School currently attains excellent results in the HSC. Constant noise from building and vibration will result in lack of concentration and focus for the students of Woollooware High, **thus leading to lowered academic results**.
- 4 .Vibration caused by the pile drivers over such a long period of time **will definitely cause damage to nearby houses**.

DGR Key Issue 11

Flooding, Drainage and Stormwater

The proponent has not demonstrated that they are able to deal with the flood prone nature of the site, the photos below from the Local Leader show a recent storm event which flooded Captain Cook Drive , the playing fields and the Leagues Club. It is noted in Sutherland Shire Council Report 30/4/12 that the Club was required to implement a range of flood mitigation works (refer DA06/1007 & 1008). This work has never been satisfactorily completed and no approvals should be forthcoming until these approvals are fully complied with. The proponent has not supplied any modeling for dealing with the flood events that are occurring on the land at present and these issues are only going to worsen in the coming years with Sea Level rises.

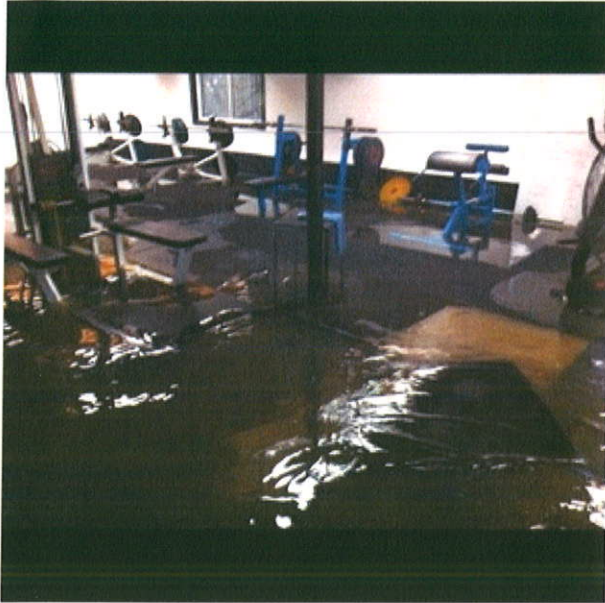
Sutherland Shire Leader

Surf's up but there are still weather warnings

BY EMMA PARTRIDGE
08 Mar, 2012 09:04 AM



Shark soup: Flooding on Captain Cook Drive outside Toyota Stadium. Picture: Troy Van Ryan



Sharks swim: Cronulla Sharks player Ben Ross tweeted this picture of the club's gym at Woollooware.

DGR Key Issue 12

Sea Level Rises

The above events happened at high tide during storms, the future impacts from sea level rises have not been addressed as per DGR Requirement. The proponent has not provided any modelling based on updated data and are relying on out of date data collected from previous Development Applications.

DRG Key Issue 14 :-Flora and Fauna

The Proponent has continued to disregard the DGR Specific Requirement for a 40 metre wide core riparian zone.

The Georges River catchment is relevant to the site and specifies a minimum of 40 metres wide riparian buffer. It is not good enough to state that the Minister is not bound by the provisions of the REP, this Government was elected to withdraw such powers that were meant to override the set provisions and it is unacceptable that not only is the proponent not complying with the DGR requirements for 40 m buffer but also those of other statutory Agencies.

The proponent is still planning to set boardwalk pathways, turf areas and pontoon decks, gabion wall terraces within the non complying riparian buffer, further eating into the buffer zone.

The provision of boardwalks within the riparian zone do not allow trees and shrubs to grow which promote a healthy wetland environment.

The Proponent has not completed important habitat studies especially those recommended to be undertaken over a continuous year.

Data from the Ecological Report dated 17/2/12 show a number of concerning details.

The survey data from the migratory bird survey shows it was completed over a 11 week period and data collected over 21.45 hours during this time. Although this was a very short period and the time frame less than 24 hours in observations, it is noted that 4 species of migratory birds protected under the JAMBA and CAMBA Agreements were recorded on the mudflats adjacent to the development site. These birds include the Little Tern which was observed more than 100 times in this short number of hours.

In this regard the proponent has not shown adequate consideration of the proximity to the Towra Point Aquatic Reserve and the species protected within.

The riparian zone must be protected and complied with and extended to 60 metres as required when protected species are recorded.

All other non compliances mentioned in the Public Agency submissions stand and have not been addressed.

DRG Key Issue 15 Contributions

Councils Report dated 28/11/11 states the development is likely to generate a Section 94 contribution of around \$6.5 million dollars. The Proponent indicates that they would be willing to enter a VPA for works in kind including dedication of the domain areas of the project.

Having regard to Councils further Report 30/4/12 where it indicates that any public domain space is required for the residents of the proposed residential component and should be part of any Strata Plan.

It is hardly appropriate that open space required for the development should constitute a Section 94 contribution. Such contributions should benefit the other residents of the Shire and to compensate for the loss of the irreplaceable playing fields .

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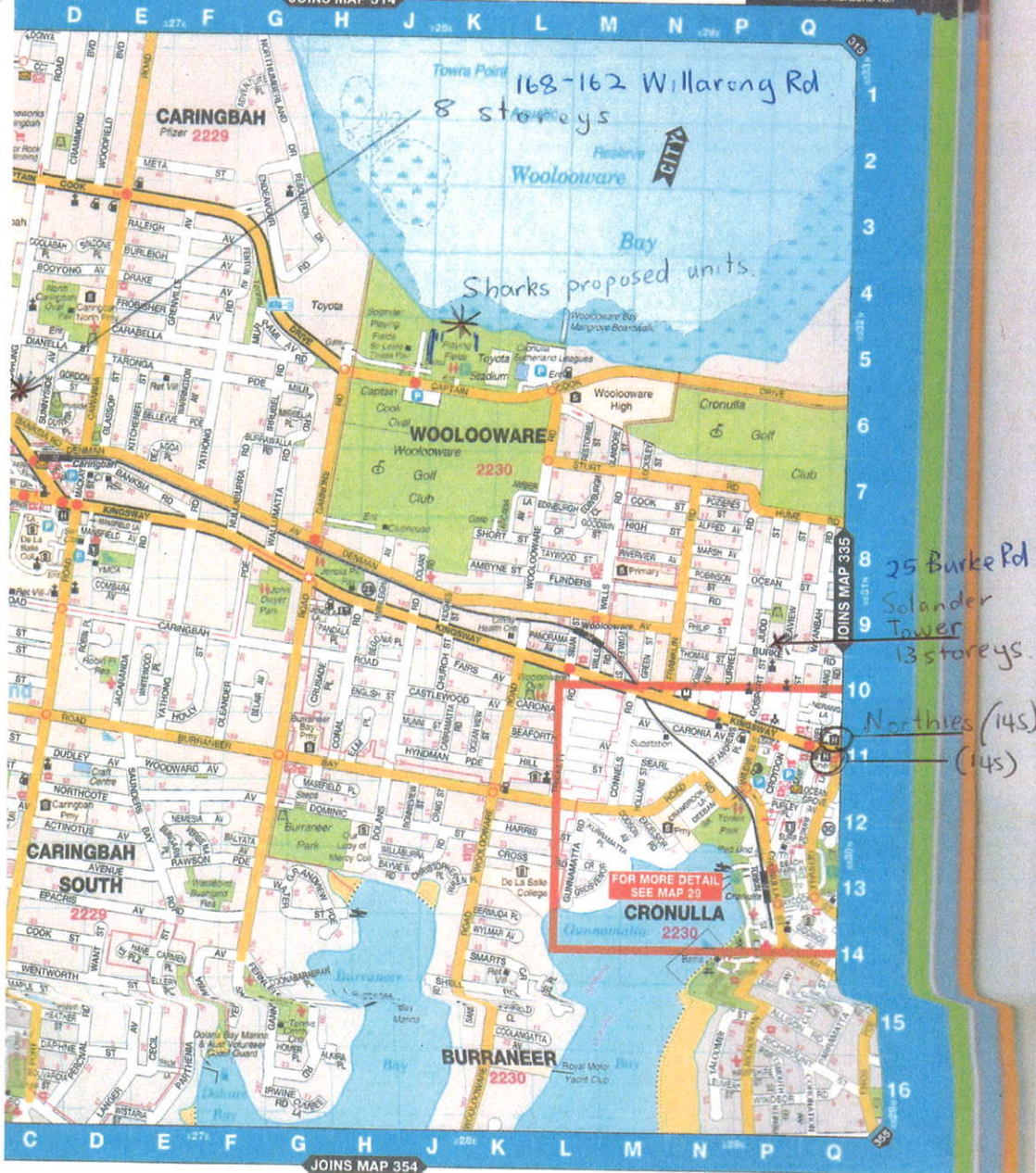
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MAP 334

JOINS MAP 314

4 GRID SQUARES MEASURE 1km



Mark brown 7 This map goes with built urban design
Page 5- sorry it came out upside down