

Tallawarra Lands Major Projects Preferred Project

A response by Concerned Residents of East Dapto (CRED)

Important Note: This document is a response compiled by private research and public comment. Any facts and statements contained herein are believed to be true but should not be relied upon without independent verification. Our requests are listed by topic and compiled in a master list at the end of the document.

Our top 2 requests are:

1. TRU be compelled to release the results of all community surveys.
2. That no residential lands be developed until the employment lands are verified as safe, viable and the necessary infrastructure developed.

Background: CRED is a group of residents who live in the eastern half of Dapto (East of the Highway). It comprises of a mixture of dwellings from the original townships, highly disadvantaged communities born of Department of Housing developments in the 1970's and ongoing freehold developments. More information is available at <http://eastdapto.wordpress.com/> CRED has developed a number of major submissions and has been actively involved in the formal community "consultation" process as well as engaging in grass-roots consultation.

Members of CRED recognise the corporate contributions by TRU through support of sailing and foreshore improvements. However we also recognise that this is occurring as a component of a wider public relations campaign aimed at maximising TRU's economic gains from land obtained as a result of a non-mandated NSW State Government asset fire sale. The details of this grubby piece of political history are detailed at <http://eastdapto.wordpress.com/the-issues/the-horse-farm/>

TRU and State Planning's response to CRED concerns

Issues raised by CRED previously and the response detailed in the Preferred Project (from here on described as "the proposal") are summarised below in our investigation to date. CRED acknowledges that we have not had the time or access to expertise within the narrow time frame to be 100% confident in this summary.

Issues	
Employment Lands	Recognised but not acted upon
History of bad faith	Not addressed
Affordable Housing	Not addressed
Endangered Ecological Communities	Deferred and ignored
Visual/Scenic Aspects	Not addressed
Staging – how to transform employment lands into a residential development.	Not addressed
Hermetically Sealed Boxes to deal with noise.	Noise in Northern sector OK (just) – but what about the southern.
Water Quality	Deferred
Evading Social Responsibility	Deferred
Overland Flow	Deferred
Contamination	Deferred
Due Process	Ignored

Recommendations	
· An independent survey of the communities preferred uses for this land is undertaken.	Ignored
· An independent inquiry into alternative uses for this land is undertaken.	Ignored
· If this application is approved, that TRU be compelled to undertake remediation, infrastructure and development of employment lands prior to any residential development.	Appears to be taken seriously
Our priority	Serious economic modelling of total Dapto development

Due process:

As detailed in our previous submissions, CRED believes that the so called transparent community consultation is a public relations smokescreen. The proposal states *“Throughout the LES process and during preparation of the EA, Elton Consulting has carried out extensive and ongoing community consultation. The feedback provided in relation to social infrastructure needs has been incorporated into the Concept Plan proposal.”*

Community consultation has been disingenuous at best where dissenting view has been ignored, obfuscated and deliberately misrepresented in the pursuit of commercial interests. The depth of community feeling is evident from the number of submissions received. During our door knocking campaigns, opposition to residential development on the Tallawarra Lands was almost universal, however most people surveyed expressed a high degree of hopelessness, saying things like “it doesn't matter what we do – they'll get their way”. A petition of over 2,000 signatures was presented to NSW State Parliament – a significant achievement in a small and disengaged community.

TRU has made repeated comments regarding public support of this proposal and in the early stages conducted a detailed community survey. The results of this survey have NEVER been made available for public scrutiny. When requested, TRU respond that it is “Commercial in Confidence” (CIC). How can public opinion in a supposedly transparent community consultation process be CIC? There is no economic competitor in this development. The implication is that the information has been deemed CIC because it would be extremely damaging for NSW State Planning to know the depth of community opposition and concern about this proposal. At every public forum where this proposal is discussed, the community have a range of alternative suggestions about ongoing economic and ecological use of this land which would have far less environmental and social impact. Dapto Neighbourhood Forum recently moved a motion of support for designation of the iconic Tallawarra Headland as a Regional Park and recreational facility (similar to the area of Cooks Park¹ and Towra Point Nature Reserve² in Sydney).

¹ http://www.lpma.nsw.gov.au/trusts/trust_managers/cook_park

² <http://goo.gl/maps/VQeYZ>

Also, the limited time frame has not allowed adequate scrutiny of the associated documentation by all concerned parties.

OUR REQUEST:

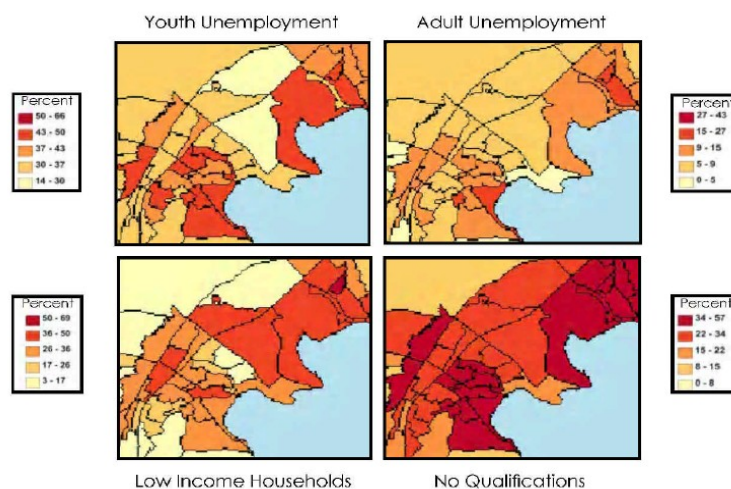
1. The time period of the exhibition is extended and a conjoint public workshop involving NSW State Planning, TRU and Wollongong City Council and interested parties are organised.
2. Concerning genuine community consultation:
 - a. TRU be compelled to make public the results of its community survey for scrutiny by the Dapto community, Wollongong City Council and NSW State Planning.
- Failing that:
 - b. An independent survey of alternative uses and the community's preferred uses for this land is undertaken.

New Issues arising from the preferred Project Documentation

Employment Lands

The primary goal of the privatisation of these public assets by the former Carr State Government was to secure power generation and employment lands for the Illawarra in perpetuity. This is recognised by State Planning and Wollongong City Council. The proponents (TRU) claim that this objective will be achieved by this project and provide some “back of a napkin” figures based on ludicrous assumptions as detailed in UOW Academic Scott Burrows' submission.

What is clear is that there has been no reliable economic modelling done to ascertain whether this project will really improve employment prospects for the Illawarra region, Dapto and most particularly the already horrendously disadvantaged youth and long-term unemployed. In the most recent figures available (2008) – youth unemployment in the areas surrounding Tallawarra was over 44% and despite improvements in Australia's economy since then, this does not appear to have “trickled down” to this population.³



³ <http://www.iris.org.au/system/files/f1/o308/Youth%20Unemployment%20in%20the%20Illawarra-FINAL%20REPORT-JUNE%202008.pdf>

TRU have been evasive in discussing the staging of this project, but in CLG meetings have hinted that the residential areas (scheduled on the least challenging lands) “need” to be developed first to raise the required capital for the employment lands. May I remind NSW State Planning that TRU are in the Energy business – not Real Estate Development, Land Speculation or Community Development.

As indicated in the documentation surrounding the proposal there are significant geotechnical and contamination issues surrounding the employment lands. CRED’s concern is that the residential areas will be developed and the Employment Lands then developed minimally or abandoned totally. This would be a disastrous outcome for Dapto and the wider Illawarra. This concern has not been addressed.

CRED believes none of this project should proceed unless there is a clearly demonstrated social and economic benefit to the Illawarra and particularly the Dapto community. If the economic gains are absorbed or negated by the increase in population in the proposed residential areas, they should be deleted or minimised so that there is a net gain to the Dapto Community and the Illawarra as a whole.

OUR REQUEST:

1. That detailed economic modelling of the impact of the proposal on Dapto and Illawarra’s economy be conducted by a partnership between IRIS (The Illawarra Regional Information Service) <http://www.iris.org.au/> and NATSEM (The National Centre for Economic Modelling) <http://www.natsem.canberra.edu.au/> Depending on the outcomes of these studies, the proposal be adjusted to provide the maximum social gain with the minimum environmental cost.
2. Should the project proceed that TRU make a commitment to engage with Job Services Australia and Warrigal Employment⁴ (and any other relevant Aboriginal employment services) to ensure maximum employment and economic benefits to the most disadvantaged residents of Dapto and the wider Illawarra region.

Endangered Ecological Communities

The Appendices provided by Eco-Logical indicate a “minimal” 11% loss of endangered ecological communities. This does not include the impact by predation of pets (already problematic) and human impacts. This land is an important and significant part of the Yallah-Calderwood corridor and deserves better than the tokenistic preservation of a narrow corridor as detailed in the proposal.

I also wish to highlight the submission made by Rosemarie Bartlau – identifying many species of fauna not noted in the Environmental Assessment. This has been reported by several members of CRED including Christine Stephens and Lisa Barrington as well as by renowned local botanist Anders Bofeldt⁵ who sadly died before being able to make a submission – but addressed a local public meeting.

OUR REQUEST:

1. That the proposal be modified to preserve all endangered ecological communities.

⁴ <http://www.warrigalemployment.com.au/about.html>

⁵ <http://www.anbg.gov.au/biography/bofeldt-anders-tony.html>

2. That Eco-Logical consult with experienced local residents to add local knowledge to the data obtained by limited observational studies.
3. That residential development is not allowed unless it can be clearly demonstrated that the native fauna and flora of Tallawarra will be preserved in perpetuity.

Environmental Degradation and impact on water quality

CRED, LIA and NSW State Planning all recognise the potential harmful impact on Lake Illawarra – the “jewel of the Illawarra”. Tourism related to Lake Illawarra is a potentially vital aspect of future employment as ongoing structural adjustment occurs in the Illawarra economy. The proposal recognises the importance of “best practice” in the management of storm-water, overland flow and groundwater.

CRED’s concern is that so-called “best practice” has failed dismally to protect the foreshore of Purrah Bay⁶ and Mullet Creek from significant degradation under the impact of development in Forest Grove, Kanahooka Point and upstream in Horsley. In the matter of a few years, the last sandy beach on the western shore of Lake Illawarra has degenerated to the putrid black mud and slime now well familiar to all residents and users of the Lake Illawarra foreshore.

OUR REQUEST: That no development proceed unless it can be clearly demonstrated that water quality AND foreshore quality will be protected and improved.

Scenic Impact:

Residents of Kanahooka, Koonawarra, Shellharbour LGA (and many other foreshore suburbs around the lake) as well as foreshore users view the Tallawarra Headland as iconic and of critical scenic importance. TRU make occasional reference to “preserving the ridge line” – whatever that means but have completely failed to grasp (or deliberately ignore) the social and cultural importance of the visual aspects of this land. All documents to date have shown no geometric and artistic modelling to demonstrate the impact of this proposal on an Illawarra icon.

TRU's statements about visibility seem disingenuous (see Appendix 15, p 59). Plate 44 suggests that “There will be views of parts of the residential development” - which really means – the existing views of green space from Koonawarra and Kanahooka will be replaced by scenic vistas of houses (as demonstrated in View 7). Plate 45 suggests that “none of the proposed development will be visible in this view”. This appears to be demonstrably false.

OUR REQUEST:

1. That detailed geometric and photorealistic modelling is made public before any further progression of this proposal.
2. That a Visual Impact Study and Urban Design Strategy be developed that minimises the visual impact on the visual connection between the foreshore, headland and escarpment⁷ both locally and from viewpoints around the lake.

⁶ <http://goo.gl/maps/fKH9t>

⁷ One recommendation is Steve Thorne <http://designurban.com/team.html> but CRED have no specific knowledge of his work and are unable comment.

Noise

The previous environmental assessment states the following proposed residential areas would be affected:

- Properties in the first row of houses adjacent to the southern boundary of the Northern Residential Precinct;
- Properties in the first row of houses adjacent to the northern and western boundaries of the Central Residential Precinct; and
- Properties in the first row of houses adjacent to the western boundary of the Southern Residential Precinct, in addition to numerous properties in the south-western area.

The responses in the preferred project appear to only refer to the affected lots in the Northern precinct. CRED suspects that this is indicative of TRU's hidden intent to only develop this aspect, then abandon the rest of the site, particularly the employment sectors.

OUR REQUEST:

- That TRU provide detailed information regarding noise mitigation and implications for all proposed residential areas.
- As previously indicated TRU develop sectors designated for employment purposes before residential development be allowed.

Flooding

TRU have indicated in the proposal that they wish to be granted approval before appropriate flood studies are completed in approximately 5 years time. The likely flood impacts are almost entirely on lands designated for employment. Since employment is the rationale for this development, CRED has major concerns that this is further indication of TRU's true intention for these lands.

OUR REQUEST:

- That all flood studies be completed before allowing development of these lands.
- That the implications of the flood studies be fed into economic modelling to determine that this proposal will genuinely improve employment prospects for Dapto and the wider Illawarra before allowing further development of this site.

Traffic

Traffic is a major concern to Dapto residents. CRED believes the main areas of concern are impacts on F6 transport to Wollongong/Sydney, access to the Dapto CBD and Rail Station (for commuters). There is also concern about the impacts on residents of the Gilba/Fowlers Rd route and the Cormack/Comptom/Emerson Rd route. Whether intentional or by design, it is almost impossible for the average resident to extract the impact of the proposed traffic strategy from the Traffic Report.

OUR REQUEST:

1. That Dapto residents be invited to a traffic workshop to:
 - Have the impacts of the proposal explained in plain English,
 - Express their concerns and

- Be engaged in the formulation of strategies to address their concerns.
2. That development not be approved until there is an adequate public transport strategy for the wider Dapto area.

Aboriginal Issues

In the time frame allowed, CRED has not been able to analyse all previous submissions to determine whether all Aboriginal issues have been incorporated in the proposal, but recognises TRU's commitment in section 17.

OUR REQUEST:

That a summary and index of all previous submissions be compiled to allow adequate public scrutiny of community concerns and responses by TRU and Government agencies.

Horse Riding

Several submissions indicated concern about the loss of access to historical and culturally important recreational activities. This is an aspect of growth based economic models where ongoing development impoverishes the surrounding community by a series of small cuts. In Dapto we have seen this happen with the loss of pool access to disadvantaged residents through thoughtless application of user pays principles and is also threatening the Dapto Gun Club (a training ground for Olympian Michael Diamond). Concerns of horse riders (and residents who love living in a community where horses are visible) have been completely ignored. The response of *“This is a commercial consideration for the landowner and is not a pertinent planning issue applicable to the Department’s assessment of the Concept Plan proposal.”* is simply a way of saying “your community's wants are not our concern, even though our plans will eradicate your way of life”. This is completely unacceptable.

OUR REQUEST:

That TRU enter into a VPA which guarantees the future of horse riding in the Dapto area.

Cycling

CRED supports the requests by Illawarra Bicycle Users Group to make all foreshore cycleways to the 3m width standard due to the likely high volume of mixed cycle and pedestrian traffic.

OUR REQUEST

That all foreshore cycleways/shared paths be a minimum of 3m width.

Summary of proposals

1. The time period of the exhibition is extended and a conjoint public workshop involving NSW State Planning, TRU and Wollongong City Council and interested parties are organised.
2. Concerning genuine community consultation:
 - c. TRU be compelled to make public the results of its community survey for scrutiny by the Dapto community, Wollongong City Council and NSW State Planning.
- Failing that:

- d. An independent survey of alternative uses and the community's preferred uses for this land is undertaken.
3. That detailed economic modelling of the impact of the proposal on Dapto and Illawarra's economy be conducted by a partnership between IRIS (The Illawarra Regional Information Service) <http://www.iris.org.au/> and NATSEM (The National Centre for Economic Modelling) <http://www.natsem.canberra.edu.au/> Depending on the outcomes of these studies, the proposal be adjusted to provide the maximum social gain with the minimum environmental cost.
4. Should the project proceed that TRU make a commitment to engage with Job Services Australia and Warrigal Employment⁸ (and any other relevant Aboriginal employment services) to ensure maximum employment and economic benefits to the most disadvantaged residents of Dapto and the wider Illawarra region.
5. That the proposal be modified to preserve all endangered ecological communities.
6. That Eco-Logical consult with experienced local residents to add local knowledge to the data obtained by limited observational studies.
7. That residential development is not allowed unless it can be clearly demonstrated that the native fauna and flora of Tallawarra will be preserved in perpetuity.
8. That no development proceed unless it can be clearly demonstrated that water quality AND foreshore quality will be protected and improved.
9. That detailed geometric and photorealistic modelling is made public before any further progression of this proposal.
10. That a Visual Impact Study and Urban Design Strategy be developed that minimises the visual impact on the visual connection between the foreshore, headland and escarpment⁹ both locally and from viewpoints around the lake.
11. That TRU provide detailed information regarding noise mitigation and implications for all proposed residential areas.
12. That all flood studies be completed before allowing development of these lands.
13. That the implications of the flood studies be fed into economic modelling to determine that this proposal will genuinely improve employment prospects for Dapto and the wider Illawarra before allowing further development of this site.
14. That affected residents be invited to a traffic workshop to:
 - a. Have the impacts of the proposal explained in plain English,
 - b. Express their concerns and
 - c. Be engaged in the formulation of strategies to address their concerns.
15. That development not be approved until there is an adequate public transport strategy for the wider Dapto area.
16. That a summary and index of all previous submissions be compiled to allow adequate public scrutiny of community concerns and responses by TRU and Government agencies.
17. That TRU enter into a VPA which guarantees the future of horse riding in the Dapto area.

⁸ <http://www.warrigalemployment.com.au/about.html>

⁹ One recommendation is Steve Thorne <http://designurban.com/team.html> but CRED have no specific knowledge of his work and are unable comment.

18. That all foreshore cycleways/shared paths be a minimum of 3m width.

Submission compiled by Ken Davis on the basis of contributions by concerned residents of East Dapto. CRED wishes to acknowledge the efforts of Maureen Magee in establishing CRED and energetically engaging in grass roots community consultation.