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Experts in Property & Planning Law

Our Ref: JBH:17410

20 October 2017

The Proper Officer
NSW Department of Planning
GPO Box 39
Sydney NSW 2001

By Email: michelle.niles@planning.nsw.gov.au

Attention: Michelle Niles

Dear Ms Niles,

Objection to Shell Cove Boat Harbour Modification Concept Plan
Ppty: Shell Cove, Shellharbour

We act for a number of local residents (set out in the appended list) concerning the proposed modification (**Modification**) of the Shell Cove Boat Harbour project (**Project**).

Introduction

1. We have been instructed to make the following objection in response to the Modification.
2. For the reasons contained in this letter, we submit that the Modification cannot be lawfully approved and, in any event, the Modification is not one to which approval would be granted on a considered assessment of the merits of the Modification (for the reasons set out in the Submission prepared by James Lovell of James Lovell and Associates enclosed).

The Minister has no statutory power to approve the Modification

3. In order for development to be the subject of Part 3A (now repealed) of the *Environmental Planning and Assessment Act 1979* (the “**EPA Act**”) it must have been declared to be a project to which Part 3A applies. The Project was so declared by clause 6 (now repealed) of *State Environmental Planning Policy (Major Projects) 2005*.
4. Pursuant to section 75F of the EPA Act, the Director General’s requirements for the Project were issued in October 2007 (the “**DG Requirements**”). The DG Requirements (in section 2) required consideration of, amongst other matters, issues surrounding visual impacts of the Project.

5. The Environmental Assessment Report (the “**EAR**”) which accompanied the application for the Project set out the Project more fully, including that it proposed 1,238 dwellings and that the hotel would be 8 or 9 storeys as well addressing the DG Requirements, in particular at Part 4 in so far as visual impacts and built form are concerned. Nowhere however in the EAR does it appear that view impacts external to the Project site have been considered.
6. The Director General’s Assessment Report of February 2011 (the “**DG Assessment Report**”) dealt with views and built form. However, like the EAR, nowhere in the DG Assessment Report did it address view impacts external to the Project site having been considered.
7. On 15 February 2011, the Minister’s Determination was issued (the “**Minister’s Approval**”) and described the terms of the Minister’s Approval in Schedule 1 Part A and Schedule 2 Part A Condition 1 as being, amongst other things, up to 1,238 dwellings.
8. In order for a Minister’s Approval to be one which may be modified under section 75W of the EPA Act it is implicit that the modification be within the scope of the “Minister’s approval” as defined by section 75W(1)(a) of the EPA Act.
9. The scope of the power of the Minister to modify an approval under section 75W of the EPA Act was considered in *Barrick Australia Ltd v Williams* [2009] NSWCA 275. Basten JA in the Court of Appeal stated (emphasis added):

*“53 The absence of precision in relation to what might constitute a modification of an approval has formed part of the reasoning for considering that the legislature did not intend that it be the subject of conclusive determination only by a court. As noted, the defined phrase means “changing the terms of an approval to carry out a project under this Part”. Although that is defined to include changing a condition of the approval, there is no clear dividing line between that which may constitute a condition and that which may constitute an element of the underlying project. All that can usefully be said in the abstract is that the requirement for approval of a modification must be understood in the context of three factors. The first is that the subject matter of Pt 3A is defined by reference to major infrastructure developments, as identified by the Minister (or by a State environmental planning policy), as having State or regional environmental planning significance: s 75B. Secondly, the project is required to undergo environmental assessment and public consultation, of a kind not required of a modification. **Construing s 75W in its context, it is clear that the modification of an approval was something intended to have limited environmental consequences beyond those which had been the subject of assessment.** (Given the powers of the Director-General, it cannot be said, of course, that only modifications which properly required no further environmental assessment were envisaged.) Thirdly, the ‘consent authority’ was to be the Minister. Conferring authority on a Minister may have a number of purposes. One such purpose may be to permit the decision-making authority to have regard to matters such as State and regional planning significance, being matters which stand above and beyond developments having limited local impact or insignificant impact at a regional or State level.”*

10. In order to appreciate the context in which the Modification is made, it follows that the extent of the changes to the Minister’s Approval which is sought by the Project must be truly understood. The extent of change contemplated by the Modification includes:
 - (a) Increasing the number of dwellings from 1,238 to 1,556, an increase of over 25%;
 - (b) In precinct A changing the mix of 2 and 3 storeys to 2 storeys plus attic with one block being up to 3 storeys;
 - (c) In precinct B changing the mix of 2 and 3 storeys to 2 storeys plus attic, 3 storeys and 6 storeys;

- (d) In precinct C changing the mix from 4 storeys to 5 storeys on the waterfront;
- (e) In precinct D increasing the hotel height from 8 or 9 storeys to 11, increasing the town centre apartment heights to 6 storeys with the apartments between the Harbour Boulevard and hotel being increased from 4 storeys to 6 storeys;
- (f) In precinct H changing the mix from 3 to 4 storeys on the waterfront;
- (g) Removing the maximum 150,000m² residential gross floor area limit;
- (h) Reconfiguration of the town centre layout;
- (i) Permitting the “hotel” to be changed to a residential flat building;

and, further, no environmental assessment has ever been undertaken in respect of the elements which now make up the Modification.

11. We submit that there is no power to approve the Application as it is not within the scope, object and purpose of s75W of the EPA Act. This is because the significant built form amendments to the Project have not been the subject of prior assessment. In our view, it is clear that the environmental consequences of the Project, properly assessed, will not be **“limited environmental consequences beyond those which had been the subject of assessment”** and are thus beyond power under s75W (*Barrick* at [53]). These impacts are reinforced by the assessment carried out by James Lovell & Associates included as part of this submission.
12. Further, we are of the view that that the scope of section 75W must be narrowly construed in light of the fact that Part 3A has been repealed. In our opinion, it would not be in the public interest to allow a project which is likely to have more than “limited environmental consequences” and has not been the subject of environmental assessment and public consultation under Part 3A to be in effect ‘added on’ to an approved project— particularly in circumstances where the approval process under Part 3A has now been repealed.
13. For the reasons we have given the Modification is beyond the (now repealed) power contained in s75W of the EPA Act. Accordingly, we are of the view that the Application must now be the subject of a development application under Part 4 of the EPA Act.
14. Indeed, in our opinion, any approval of the Modification under Part 3A of the EPA Act is likely to be set aside by the Land and Environment Court as beyond power.

Inadequate information of likely environmental impacts

15. In the DG Requirements, the issue of view loss was required to be addressed. Regrettably in the EAR this was only done in relation to views within the Project – it was not carried out in relation to views external to and looking over the Project. That failure was then carried through to the DG Assessment Report.
16. Similarly, the Modification has failed also to assess the impact on views external to and looking over the Project
17. It seems to us that the failure to provide an assessment of these impacts, particularly in circumstances where the DG Requirements required it, as part of the original application (and Modification) would mean that any assessment and determination would be lacking in basic and essential information for the decision maker.

18. To make a decision to grant approval to the Modification in such circumstances is again likely to be set aside by the Land and Environment Court for failure to consider relevant considerations or otherwise as the decision would be manifestly unreasonable (*Associated Provincial Picture Houses Ltd. v Wednesbury Corporation* [1948] 1 KB 223).

Conclusion

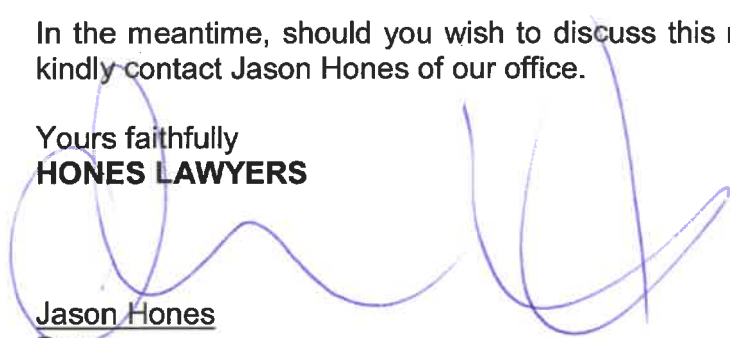
19. We submit that the Application cannot be approved for the following reasons:

- (a) The Modification does not propose something intended to have limited environmental consequences beyond those which had been the subject of assessment. This is particularly the case given the significant increase in number of dwellings and exceedances of the heights set out in the Minister Approval. In the circumstances, it proposes a fundamentally different development which must, as a matter of law, be the subject of a new and separate development application under Part 4 of the EPA Act;
- (b) The Application contains an incomplete and inadequate assessment of relevant environmental impacts arising from the development that is proposed – in particular an assessment of the visual impacts caused by the proposed increased heights of the buildings; and
- (c) The Application, in its current form, is so grossly inadequate that it must be refused.

We request that we be notified in writing about any additional information that is submitted, or amendments that are proposed, in respect to the Modification before it is determined.

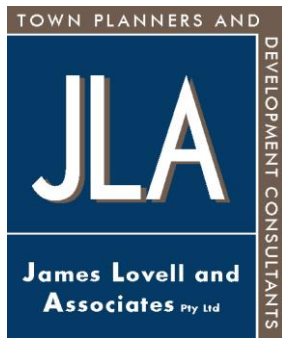
In the meantime, should you wish to discuss this matter or our submission we ask that you kindly contact Jason Hones of our office.

Yours faithfully
HONES LAWYERS



Jason Hones
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Encl.



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20 October 2017

The Director-General
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001
Attention: Michelle Niles

Dear Madam,

MP 07_0027 MOD1
MODIFICATION TO SHELL COVE BOAT HARBOUR CONCEPT APPROVAL

Introduction

I act on behalf of a group of local residents (see *Attachment A*) in relation to the abovementioned matter which comprises an Application to modify a Concept Approval for the *Shell Cove Boat Harbour* development.

My clients are the registered owners of residential properties located within the residential neighbourhoods of Shell Cove and Flinders. The properties are generally located to the west of the development site, and the topographical features of the locality are such that the properties typically enjoy ocean and foreshore views of Shellharbour South Beach to the east.

The *Shell Cove Boat Harbour* development is a substantial urban development project, deemed by the New South Wales (NSW) State Government (and Shellharbour City Council) as being important in achieving the employment and housing targets for the Illawarra Region.

The implementation of the Concept Approval will radically transform the site from essentially undeveloped farmland to a substantial urban precinct accommodating a mix of residential, commercial, retail, business and community land uses, with an associated marina and dry boat storage facilities.

On any reasonable interpretation, there can be no doubt that the proposed modifications will dramatically change the Concept Approval. The modifications are substantial in terms of

building typology, increased building height, bulk and scale, increased number of residential dwellings, increased provision of retail and commercial floor space, and changes to the size of the town centre, and the location of the “*landmark (hotel) building*”.

I have carefully examined the documentation submitted in support of the Application, and support my client’s objections to the proposed modifications on grounds relating to:

1. The absence of any meaningful analysis of the impact on existing views from my clients properties to the ocean and foreshore of Shellharbour South Beach and beyond;
2. The failure of the *Traffic Review* submitted with the modification Application to consider the full range of changes to the Concept Approval; and
3. The apparent inconsistencies between the recommendations of the *Social Infrastructure Assessment* with the modification Application.

At the outset, I note that my clients have engaged *Hones Lawyers* to provide advice in relation to the statutory power of the Minister to approve the modification Application pursuant to Section 75W (now repealed) of the Environmental Planning and Assessment Act 1979.

The advice concludes that “*the Modification cannot be lawfully approved and, in any event, the Modification is not one to which approval would be granted on a considered assessment of the merits of the Modification*”.

Irrespective, this submission has been prepared to consider the “*environmental consequences*” of the proposed modifications independent of the lawful ability (or otherwise) of the Minister to grant consent.

Background

In November 1996, the then Minister for Urban Affairs and Planning granted Development Consent (DA 95/133) for a boat harbour and marina adjacent to the foreshore of Shellharbour South Beach.

On 15 February 2011, the then Minister for Planning granted Concept Plan Approval (07_0027) for the development of a 100-hectare precinct surrounding the boat harbour and marina. The Concept Plan Approval provides a framework for the development of:

- (a) Up to 1,238 dwellings with total gross floor area of approximately 150,000m² comprising single dwellings, medium density and apartments;
- (b) a business park with a maximum gross floor area of 30,000m²;
- (c) retail/commercial/hotel/community development with a maximum gross floor area of 22,000m²;
- (d) public open space and wetlands; and
- (e) associated drainage, stormwater infrastructure and roads.

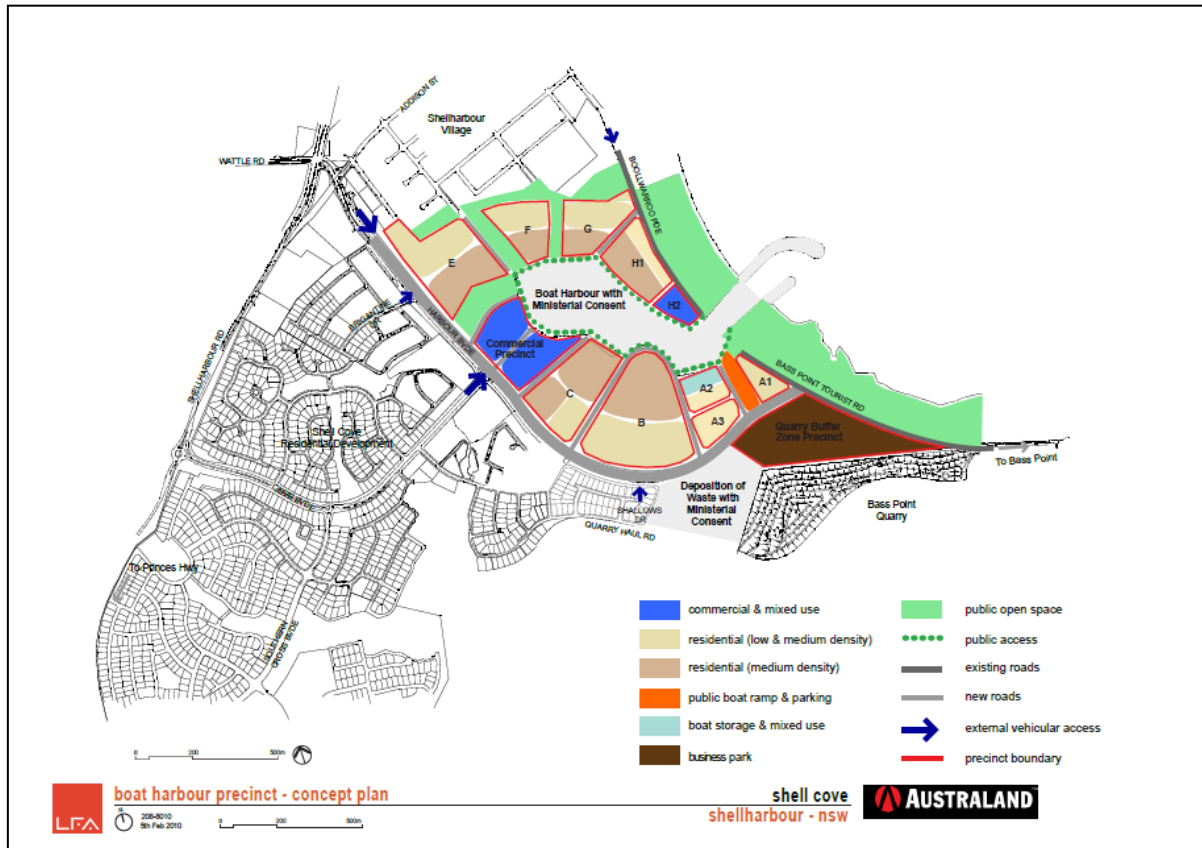


Figure 1: Approved Concept Plan

A series of Development Applications (DA's) have subsequently been lodged and approved by either Council or the Joint Regional Planning Panel (JRPP) for the detailed development of elements of the Concept Plan. A number of further DA's remain undetermined at this stage.

Importantly, I note that the various Development Consents essentially relate to preparatory and servicing works, subdivision of residential allotments for the purposes of attached, detached and semi-detached dwellings, and some retail facilities within the "town centre".

At this stage, the Development Consents are generally consistent with the Concept Approval, and there have been no consents granted for any residential flat buildings, or multi-storey buildings of any type.

Proposed Modification

The *Section 75W Modification Report* (8 August 2017) submitted with the Application suggests "The amendments proposed in this modification generally reflect the concept plan's evolution over time as it has been developed in greater detail". The proposed modifications are described in more detailed as:

- (a) removing the maximum 150,000m² residential gross floor area limit;

- (b) increasing the maximum number of dwellings from 1,238 to 1566;
- (c) revising the housing densities and typologies across the site;
- (d) reconfigurations to the town centre layout including relocating the landmark (hotel) building to the northern gateway;
- (e) increasing the maximum building height in certain areas to permit:
 - a mixed use landmark (hotel) building up to 11 storeys in the town centre;
 - residential flat buildings up to six storeys in the town centre and on the promontory, and
 - residential flat buildings up to five storeys in other harbour waterfront locations;
- (f) including 'serviced apartments' and 'residential accommodation' as permissible uses within the town centre landmark (hotel) building;
- (g) removing the community and hotel uses from the maximum 22,000m² gross floor area cap;
- (h) introducing an additional 6,000m² land (the northern lands) within Precinct E;
- (i) refinements to the road pattern and layout; and
- (j) an administration amendment to reflect Frasers ongoing negotiations with Council to execute a voluntary planning agreement for the site.

The primary concerns of my clients relate to the substantial increase in the number of dwellings, the changes in building typology to include multi-storey residential flat buildings, increasing the building height throughout the majority of the site by (generally) 1 – 2 storeys, increasing the height of the hotel building by 2 – 3 storeys, excluding the hotel from the calculation of approved floor space, and extending the development site to the north to include an additional 6,000m² of site area.

In general terms, the number of dwellings are being increased by 26%, the building heights are increasing by 25% – 40%, and the retail/commercial/hotel/community floor area is effectively being increased by the floor area of the whole of the hotel.

Finally, it is noted that the proposed modifications include allowing the hotel to be used for "serviced apartments", and permitting "the use of the hotel building to accommodate residential apartments". The modifications are proposed "to enable flexibility to adjust and respond to demand for tourist and visitor accommodation in the Illawarra region". In effect, such a change would convert the hotel to a residential flat building.

View Loss

The Director-General's Environmental Assessment Requirements issued in respect of the Concept Approval required an assessment of "the visual impact of the proposal in the context of surrounding development and relevant mitigation measures. In particular address impacts on the amenity of the foreshore, overshadowing of public reserves, loss of views from public places and cumulative impacts".

Further, the “Plans and Documents to accompany the Application” included “View analysis – artist’s impression, photomontages, etc of the proposed development in the context of the surrounding development”.

The “Concept Plan Application and Environmental Assessment” prepared in relation to the Concept Approval includes the following comments in relation to view loss:

The Boat Harbour Precinct development will have minimal impact on existing views to and from the coast. Shellharbour Village will retain its existing relationship to the ocean, the foreshore and the hinterland.

In my opinion, it is difficult (if not impossible) to understand the accuracy of that statement. The residential neighbourhoods of Shell Cove and Flinders to the west of the site include (from many properties) expansive views of the ocean and foreshore. The introduction of the 2 – 8 storey buildings in the Concept Approval will quite obviously have an impact on the existing views.

I note the documentation submitted with the Application did not include any artist’s impressions and/or photomontages depicting the (then) proposed development from anywhere in the vicinity of my client’s properties.

Further, the Director-General’s Environmental Assessment Report prepared in respect of the Concept Approval did not assess the potential view loss associated with the development, and makes no reference to the existing views from anywhere in the vicinity of my client’s properties. In my opinion, that is a curious (and concerning) omission in circumstances where the issue of potential view loss was previously raised in the Director-General’s Environmental Assessment Requirements.

The *Section 75W Modification Report* submitted with the Application includes the following comments in relation to view loss:

The Shell Cove Town Centre will provide an important visual landmark in the coastal landscape and establish an opportunity for a vibrant and interesting urban environment in a marine setting. The proposed increase in heights in the town centre and the residential precincts are unlikely to have any real impact on views across Shell Cove from the surrounding areas as views to the water are primarily down view corridors. The view corridors providing visual connections from the perimeter of the concept plan to the water proposed under the original concept plan are generally maintained. The alignment of view corridors has been modified in certain locations, however, the corridors will still provide visual connections to the boat harbour and the coastal dunes (refer to Figure 15).

The site is proposed modifications are unlikely to have any additional impact on Shellharbour village’s existing relationship to the ocean, the foreshore and the hinterland beyond those contemplated during the previous assessment of the concept plan.

Figure 15 (referred to above) is an image which identifies certain view corridors said to be available to future dwellings within the development site. The image does not include any analysis of (or reference to) the views available from the existing residential neighbourhoods of Shell Cove and Flinders to the west of the site.

In that regard, the photograph below depicts the existing view from one (1) of my client's properties at No. 18 Tasman Drive Shell Cove. The photograph is indicative of the existing views available from the west of the site, and demonstrates the extent to which increases in building height will inevitably impact on the existing views.



Photograph 1: Existing Views from Main Living Areas of No. 18 Tasman Drive Shell Cove

Finally, I am instructed that the owner of No. 18 Tasman Drive has separately (and recently) communicated with Mr Glenn Colquhoun (Development Director, Frasers Property Australia) in relation to the potential view loss from their property. On 6 October 2017, Mr Colquhoun advised my client as follows:

We appreciate that the community is concerned about their views and are currently reviewing the best way to be able to graphically present the visualisation of the proposed concept plan changes. It is fairly simple for properties closer to the Waterfront but more complex for those like yourself with more distant views. In this regard we are looking to engage an expert in this field and hope to be able to have some representations for you and the rest of the community in approximately 3 to 4 weeks' time.

It is noteworthy that the time-frame provided by Mr Colquhoun (3 – 4 weeks from 6 October 2017) would extend well beyond the end of the exhibition period for the modification Application.

It is also noteworthy that a view loss assessment would ordinarily form part of a proper site analysis, and inform the overall design process. In my opinion, it is of some considerable concern that the Applicant has proceeded to this point without any clear or precise understanding of the impacts of the proposed modifications.

Further, I note that Precinct D accommodates the tallest buildings (6 – 11 storeys) proposed within the modification Application. Precinct D is centrally located within the overall development site when viewed from the west.

On 10 July 2017, the Joint Regional Planning Panel (JRPP) granted Development Consent (DA 12/2016) *“to construct 4,623m² of retail floor space comprising 3,670m² supermarket with adjoining liquor tenancy, and 9 specialty shops (including a kiosk), with on-grade and basement car parking for 256 vehicles, 7 motorcycles and 44 bicycles”*.

The *“Shell Cove – Precinct D – Urban Design Guidelines”* prepared to accompany the DA (as required by Schedule 3 of Part D of the Concept Approval) includes the following comments in relation to nature and extent of changes proposed within Precinct D:

Notwithstanding the discussion above, the design of Precinct D has evolved over the 6 years following the Concept Approval in 2011. The evolution has resulted in some fundamental changes to the layout, built form and floor space proposed within Precinct D.

The locality of Shell Cove is generally characterised by two (2) storeys buildings. The Concept Approval involves introducing a built form that will visually dominate the locality when viewed from the surrounding area.

The proposed modifications include substantially increasing the number of dwellings, changing the building typology to include multi-storey residential flat buildings, and materially increasing the height of buildings. As a consequence, the proposed modifications will significantly increase the visual dominance of the Boat Harbour precinct, and contribute to an abrupt change in bulk and scale between the development site and the surrounding locality.

The views from surrounding properties such as No. 18 Tasman Drive are highly valued, and of significant importance to the amenity of those properties. In the circumstances, the *“fundamental”* nature of the changes are such that the Application should be (at least) deferred until such time as the Applicant has been able to properly identify and consider the view loss impacts from surrounding properties, including in particular, those beyond the development site itself.

Traffic Assessment

The modification Application was accompanied by a *Traffic Review* (20 July 2017). The Review identifies the proposed modifications as comprising the addition of 318 dwellings, relocation and reclassification of the hotel to permit serviced apartments, and refinement of the road pattern.

On the basis of the identified modifications, the Review concludes that *"the level of traffic generation of the S75W results in only minor increase in traffic generation (some 2%) and thus the S75W road network will operate satisfactorily"*.

The *Traffic Review* appears to be based (originally) on the *Shell Cove Boat Harbour Precinct Traffic Study* (Maunsell 2009). Whilst reference is also made to subsequent traffic assessments prepared in 2015 and 2016, it is not clear whether the increased traffic volumes in the locality (that are unrelated to the proposed development) have been incorporated in the more recent assessment.

Further, the proposed modifications are not limited to the addition of 318 dwellings and the relocation and reclassification of the hotel. The proposed modifications also include removing the community and hotel uses from the maximum limit of 22,000m² for the retail/commercial/hotel/community component.

In the circumstances, the *Traffic Review* has understated the additional traffic generating potential of the proposed modifications by at least the traffic generating potential of the hotel. In my opinion, the Application should be deferred until such time as the traffic implications of the proposed modifications have been properly considered.

Social Infrastructure

The modification Application was accompanied by a *Social Infrastructure Assessment* (April 2017). The Assessment describes the project as providing *"development of over 3,000 residential dwellings"*, but immediately thereafter refers to *"1,556 residential dwellings"*.

The Assessment also makes reference to an *"18 hole championship golf course"* which does not form part of the modification Application, and *"community facilities"*, the nature and type of which are not disclosed in the modification Application.

The Assessment provides an analysis of the existing and future demand for a range of social infrastructure facilities, with comparisons made between the demand and supply in 2008 and 2017. The necessary supply of certain social infrastructure is based on recommendations of the *Growth Centres Commission* (2006).

It does not appear that any surveys or investigations have been made in relation to the actual availability of places within the existing schools within a 5km catchment radius of the site, either primary or secondary schools.

Irrespective, the Assessment (based on the generic recommendations of the *Growth Centres Commission* (2006)) has identified a pending shortage of secondary schools within a 5km catchment radius of the site by 2026, with the shortage becoming progressively larger (or worse) as the population continues to grow from 2026 and onwards. In the circumstances, the Assessment *"recommends no less than 6,000m² should be allocated for one high school at the subject site"*.

The modification Application does not make any reference to the provision of a high school on the site, or identify a potential location/s. In that context, there can be no certainty that a high school site will be provided, or that any such school would be constructed and operational by 2026, when the shortage of supply arises.

Finally, the Assessment has identified a relatively significant shortage of after school care facilities (places) within a 5 – 10 km radius of the site, with the existing shortage increasing (or becoming worse) from 2016 onwards. Further, the additional dwellings proposed within the modification Application make the existing and future shortage worse.

Irrespective, the Assessment suggests that *"Although there is identified demand for after school facilities to be constructed in the short term within the 10km catchment radius, the existing arrangement as Shell Cove Primary Schools for after school care will meet this demand within the development site"*.

I have been unable to reconcile the existing and future shortage of after school care facilities (places) with the statement that the *"existing arrangement ... will meet this demand"*.

Conclusion

In my opinion, the modification Application raises a number of significant concerns that have not been adequately considered or assessed at this stage. In particular, it is clear that little (if any) assessment has been made of the likely loss of views from residential properties beyond the development site.

It would appear that the Applicant has more recently become aware of the need to undertake that assessment (refer to the comments of Mr Colquhoun to the owner of No. 18 Tasman Drive). A view loss assessment should form part of a proper site analysis, and inform the design process, including building heights and location. Unfortunately, it appears that exercise has been overlooked.

Finally, there remain outstanding concerns in relation to the *Traffic Review* and *Social Infrastructure Assessment*, all of which should be addressed before the modification Application is further considered.

I trust this submission is of assistance, and ask that I be kept informed prior to any determination being made, and/or in relation to any request to the Applicant to provide additional information/clarification in relation to matters raised in this submission. In the

meantime, should you require any further information or clarification please do not hesitate to contact the writer.

Yours sincerely,



James Lovell
Director
James Lovell and Associates Pty Ltd

ATTACHMENT “A”

| NAME | ADDRESS |
|-------------------------------|-----------------------------------|
| Guy Formica | 18 Tasman Drive, Shell Cove |
| Foong Theng Leong | 18 Tasman Drive, Shell Cove |
| Liliana Formica | 4 Banks Street, Monterey |
| Emma and Charles Grimmer | 16 Lord Howe Ave, Shell Cove |
| Peter Messer | 27 Ragamuffin Circuit, Shell Cove |
| Nanette and Alan Ryrie | 10 Lord Howe Ave, Shell Cove |
| Katie Dansey | 144 Harbour Boulevard, Shell Cove |
| Maringo and Janja Pavlovic | 31 Torres Circuit, Shell Cove |
| Jason Goodes | 21 Larkin Crescent, Flinders |
| Corrie Rankin | 20 Tasman Drive, Shell Cove |
| Simon Jarochohicz | 11 Dillon Road, Flinders |
| Ed Parkinson | 6 Cowries Avenue, Shell Cove |
| Lorenzo and Giovanna Andleone | 4 Oxley Way, Shell Cove |