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Submission in relation to The Proponent's Response to Submissions re-

MP 07\_0027 MOD 1 – Modification to Shell Cove Boat Harbour Concept Plan

Boollwaroo Parade, Shell Cove.

26 March 2018

NSW Dept. Planning & Environment

Dear Sir/Madam,

I wish to relay my concerns as to the complete disregard shown by the proponent for the community's input into the planning process and their failure to adequately address the key issues raised. They have publicly stated that they will not make any changes to their planning to address our concerns. We have encountered a complete lack of transparency in the planning modification process, that has excluded the community from its inception and continues to generate angst. Twice a motion has been put before Council to discuss this major project and on both occasions it was not supported and therefore no public discussion has been allowed to take place. This is a joint development between Shellharbour City Council and Frasers Property, from whom they have borrowed funds in order to be able to move ahead with the project. As such, most will probably see this as a done deal and not even bother to make further submissions, but with NSW Planning literally being our last bastion of hope for a well-planned liveable community that provides not only for our current needs but is fit for the future I can only hope that you are genuine in valuing our input into the planning process and will fully investigate our original concerns. Most have lived community experience of the matters raised in the initial submissions and this should not be discounted. We did not require an additional community consultation session in February to tell us that we must have all misunderstood the planning modifications. I do understand the impacts of these changes and that predominantly they are not being made for the community's benefit.

There are four main areas that I believe require considerable further investigation on your part as to the validity of claims made by the proponent and their reports associated with traffic, parking, social infrastructure and the planning process.

To increase the number of dwellings from 1238 to 1556 (25%) and then conclude that the traffic within The Waterfront will only increase by 2% does not sound like a reasonable assumption and any planning modification that generates any increase in the already troublesome traffic conditions in the area cannot be supported.

The original *Shell Cove Boatharbour Precinct Traffic Study Final Report* of 24 March 2009, prepared by Maunsell Australia Pty Ltd, was a comprehensive report of 34 pages that considered the concept plan for the Boat Harbour Precinct in the context of planning for Shell Cove as a whole and its inter-relationship with existing adjoining development, but only until 2018, so is now obsolete.

I believe we need a new, independent study done that can make projections for the area for the next twenty+ years that incorporates the expected population increases and land-use changes alongside genuine forecasts of the tourist numbers that this development will bring to the area. The current traffic review by Colston Budd Rogers & Kafes Pty, five pages in total, including an assessment of parking requirements is grossly inadequate and unacceptable for a development of this magnitude.

This development is not happening in isolation and will draw considerable traffic from surrounding areas. It will incorporate the closest shopping precinct with a Woolworths supermarket for parts of Shellharbour Village, Flinders, the ever-expanding Dunmore estate and Shell Heights developments alongside Shell Cove

and The Waterfront residents, as well as large tourist numbers. We are a growing population with a large younger cohort that will live at home for much longer than previous generations and are moving to driving age. Car ownership and use will greatly increase in the foreseeable future. Traffic projections and planning for adequate parking must incorporate ALL these factors.

The proponent states that residential parking will be provided in accordance with Council's DCP rates. The problem with this is that current rates are too low and are NOT relevant to the type of development and dwellings being constructed at The Waterfront. This type of development is completely new to our area, seeing the inclusion of a large number of apartments and particularly townhomes that have garaging but NO driveways to cater for the overflow of family cars or visitors. Such reduced rates of on-site parking alongside very little on-street parking to be made available is not typical of development within Shellharbour LGA, and is a recipe for disaster and disharmony as residents and their visitors fight for parking spaces. I cannot get any relevant response from Frasers nor Councillors as to where people are going to park if for example, just one family within the apartment block or in a townhome on The Promontory Drive should have a small gathering that is attended by only six to ten family members and friends that need to park their vehicles. There is simply nowhere to go. It is completely absurd to think that people can genuinely live in this manner and this scenario will be replicated in each precinct that is predominantly townhomes and apartments with inadequate on-site and on-street parking available. Our current DCP is not a suitable planning instrument in this instance.

I was advised that in Shellharbour Council's councillor briefing meeting re- proposed amendments to The Waterfront on 21 February 2018, Mr Nigel Edgar of Frasers assured councillors that every 2-bedroom apartment will have 2 dedicated parking spots. This is the sort of blatant lies that our councillors are basing their decision making on. The planning documents and recent apartment sales clearly show that not all 2-bedroom apartments will have 2 resident car spaces, nor will they all get 2 spaces even if you were to include the 0.5 visitor car spaces that will be allocated to each dwelling. The parking requirements are totally inadequate and must be raised to reflect the actual car ownership of the local demographic, the future needs of families as their children move to driving age and a realistic appraisal of visitor numbers within each residential precinct at any given time.

As the developer has made no commitment to the provision of any public transport, i.e. buses, to be made available until the project is complete, and there are people increasingly moving into The Waterfront, it will be many years before they will have any access to public transport. I believe that modifications should include the requirement for appropriate provision of bus access, within 400m walking distance of all dwellings, to each PRECINCT as it is completed, not when the whole project is complete. This could otherwise see my own and numerous other families living with no direct access to public transport for ten or more years.

The current Social Infrastructure Assessment of January 2018 uses the same estimated population figures as the original *Shell Cove Boatharbour – Review & Assessment of Social Infrastructure by MACROPLAN AUSTRALIA PTY LTD Final Report of January 2008*, even though planning modifications propose a 25% increase in dwelling numbers. This is not the only inconsistency to be found within this dubious report.

The original report noted there may be an inadequate supply of ambulance and police services within the catchment area and this has not changed, with inaccurate reporting to be found within the latest report as to the increases related to all current levels of community infrastructure, particularly fire, ambulance and police services. Both reports have projected a future undersupply of secondary schools and the state government has made it clear for many years that they have no intention of providing another high school

for this catchment area. To continue to increase the population within Shell Cove, knowing that infrastructure does not meet current needs and will not meet future needs is reprehensible.

When asked why these planning modifications were necessary (as no valid explanations were given in planning documentation, outside of the proposed repositioning of the hotel - which appears to be beneficial), Frasers Property cited that, "the housing market has evolved over the past six years and one of the most significant trends has been the heightened demand for single-level living in the area. Demand for single-level homes at Shell Cove is extremely strong, so we need to provide as much single-level housing as possible, and as wide a variety of housing choice as possible." (The Waterfront, Shell Cove, Facebook, February 14, 2018) If this is the case for change, then they could have chosen to include an increase in single-level housing in this development in numerous ways other than increasing building heights, dwelling numbers, traffic and parking problems. This is the choice that benefits the developers financially but does nothing except further negatively impact residents and the wider community.

In regard to the planning process, I do not know if it is within your jurisdiction to do anything about the unethical manner in which many purchasers of homes and land were not provided with the requisite knowledge of the proposed modifications at the time of purchase, in order that they could make an informed decision, as well as the fact that most did not receive written notification of the submission period and process like other home owners within the notification area; but I do believe there is something rotten in the state of Shellharbour and further inquiry into Council is in order.

I cannot support the proposed modification of increasing dwelling numbers that will result in increased traffic and parking woes and further burden available infrastructure. I can only conclude that this is being proposed for financial gain for Shellharbour City Council and Frasers Property as it will bring nothing but pain for residents. Any modifications to planning should be in order to enhance the liveability of The Waterfront, not detract from it.

Yours faithfully,

Concerned Resident.