

3rd December, 2018.

OBJECTION TO APPLICATION NO. MP 06 0094 MOD 5
SANDON POINT RESIDENTIAL AND RETIREMENT VILLAGE DEVELOPMENT

I have spoken with other community members regarding this proposed development and according to my understanding of the proposal, I am disappointed with the care and consideration given towards our local environment and our local amenity. As such I am submitting the same objections raised by other community members.

I object to the proposal by Anglicare to modify the 2006 original concept plan

I object because the proposed modification is detrimental to our community based on issues of amenity, capacity, safety and environment.

I object because:

- Anglicare has NOT provided any staging for the Tramway Creek bridge to create another north/south road for the northern illawarra
- Anglicare has NOT provided an accurate assessment of the road network and vehicular connectivity, site coverage, character and scale
- Anglicare has NOT demonstrated that the revised development will be wholly contained within the approved footprint. They have NOT demonstrated that there will be no encroachment on the Turpentine Forest
- Anglicare has NOT accurately assessed the impacts of their layout of the proposed changes on the Turpentine Forest and Aboriginal areas because they insist that the recommended 20 metre Asset Protection Zone is not at all important and insist that 6 metre buffer zone will be more suitable for their proposed changes
- Anglicare has NOT maintained perimeter roads around their proposed development (and has completely encroached on these perimeter roads due to providing no internal roads to cope with vehicular traffic in their proposed development). Anglicare has NOT provided appropriate buffer areas to riparian corridors
- Anglicare has NOT provided an indicative layout to accommodate the revised built form and has in fact significantly deleted an important part of the original road network ie Cooksons Creek vehicle Bridge
- Anglicare has NOT provided any measures to minimise land use conflicts and in fact has maximised land use conflict because Anglicare insist that the recommended 20 metre Asset Protection Zone is not at all important and insist that 6 metre buffer zone will be more suitable for their proposed changes
- Anglicare does NOT maintain any permeability through the site and do not maintain any of the current safe linkages/connections to the beach because

Anglicare's proposed changes include in excess of 12 driveways crossing Wilkies Walk along Wilkies Street, which is the current safe pedestrian/cycle way and east/west link to the beach. Anglicare's proposed boardwalk across Cooksons Creek, in fact, confirms that Wilkies Walk will not be a safe linkage to the beach. The boardwalk across Cooksons Creek will create and adversely impact further on flora, fauna and biodiversity

- Anglicare proposed changes do NOT minimise potential for vehicle, bicycle and pedestrian conflicts and in fact CREATES massive risks to community safety
- Anglicare does NOT provide an accurate assessment of the impact of their proposed 55 residential townhouses. Anglicare has not demonstrated how their proposed 55 townhouse development fits in with the current height, bulk and scale of the current McCauleys Beach housing estate which contains 180 free standing homes and only 6 adjoined townhouses
- Anglicare does NOT demonstrate compliance with the provisions of Planning for Bushfire Protection 2006 as they propose to reduce the 20 metre Asset Protection Zone to just a buffer zone of 6 metres (ie. the width of a two car garage)
- Anglicare has complete IGNORED the heritage listing of the Turpentine Forest and Aboriginal sites due to the fact they wish to disregard the recommended 20 metre Asset Protection Zone and reduce it to just a 6 metre buffer zone
- Anglicare does NOT address the required road/intersection upgrades to manage all the additional traffic generated by the proposal. Anglicare has not demonstrated that the current narrow roads which were designed by Stocklands for McCauleys Beach housing estate, will be able to comply with Anglicare's proposed 55 residential townhouse traffic. ALL of which Anglicare will require to flow into narrow Wilkies Street across Wilkies Walk. Wilkies Street is ONLY 6.5 metres wide, when two cars are parked opposite each other, the road is completely blocked to traffic. Lives are at risk because no emergency vehicles will be able to access Wilkies Street.
- Anglicare has not addressed timing for the delivery of vehicular connectivity between Wrexham Road and Point Street, the bridge over Tramway Creek and has not addressed any changes to pedestrian and cycle ways
- Anglicare has NOT identified how best practice Ecologically Sustainable Development (ESD) will be incorporated. In fact Anglicare has identified how best practice ESD will NOT be incorporated due to the fact the 20 metre Asset Protection Zones are to be reduced to just a 6 metre buffer zone
- **Ethos Urban letter dated 12th December, 2017**, aerial photo (Figure 2) of the site clearly shows the size of the northern portion of bushland, containing the heritage listed Turpentine Forest. This aerial photo clearly shows the narrow width of Wilkies Street. It clearly shows that Wilkies Street will be unable to cope with all the traffic from Anglicare's proposed 55 residential townhouses. Figure 3, clearly shows the bulk of the heritage Turpentine Forest. Due to the depicted size of the Turpentine Forrest, Figure 3, clearly shows that there is no possibility of building the proposed townhouse blocks of E, D and C which Anglicare are

now proposing. Plus Figure 3 clearly shows that the traffic associated with the Hilltop Precinct flows into the large arterial Geraghty Street and traffic from Ocean View Precinct circulates through Anglicare's own internal road network designed specifically in the 2006 Concept Plan and thereby does not impact on narrow Wilkies Street. This is further demonstrated in Figure 4.

- Anglicare's proposed changes clearly demonstrate that Anglicare has not provided any internal road network to cope with their current proposed changes and merely wish to take complete advantage of the external roads of McCauleys Beach housing estate which were designed by Stocklands for 180 free standing residences and just 6 x 2 townhouses.

It has been 12 years since approval of the Anglicare 2006 concept plan.

HERITAGE LISTED TURPENTINE FOREST

During this 12 years the heritage listed Turpentine Forest has grown significantly with each heritage listed tree growing upwards and outwards as evidenced by the report dated July, 2018, from the arborist Moore Trees, page 17. Specifically, page 23 of the report states that 'safety should also be considered for the residential dwellings that will surround the E2 (protected Turpentine Forest) area. The E2 boundary line is quite clear however trees do not grow based on a zoning line. ' The effect of wind forces on trees and tree canopies is well researched and we can confidently say that a sudden exposure to wind forces, can often lead to sudden limb failure (James, 2005) This fact has not been respected by Anglicare who now propose to build 55 townhouses which severely encroach on this heritage listed forest because Anglicare want to disregard the recommended 20 metre Asset Protection Zone. Anglicare's proposed 6 metre buffer zone will have a severe detrimental impact. **I object** to the building of Townhouse blocks A, B, C, D, E, F and G as they are proposed to be built too close to the heritage listed Turpentine Forest which requires a 20m APZ.

The heritage listed Turpentine Forest will be under threat with the proposed modifications. The addition of townhouses D and type E along the western end of Wilkies Street will effectively enclose the small Turpentine Forest with 2 to 3 storey buildings, whereas on previous plans, the forest would retain the existing northern green buffer zone the 20m Asset Protection Zone which meets Wilkies Street. Since 2006, The Turpentine Forest has grown significantly as evidenced by the arborist report. For this reason, I object to Block D and E and A, B, C, F and G as these buildings actually are shown by Anglicare's proposed amended plan to encroach Anglicare's proposed 6m inadequate buffer zone.. There is no recognition by Anglicare that the forest has grown significantly in the last 12 years, Each tree has grown by height and width. **I object** to the Anglicare proposal to the replacement of Asset Protection Zones with defendable zones particularly because of the heritage listed remnant Turpentine Forest located on the Anglicare site. Stockland, in their modified concept plan had these replaced, however, a heritage listed Turpentine Forest was **not** in existence in the Stockland residential site of McCauleys Beach Estate. For this reason **I object** to Anglicare's proposal for the replacement of Asset Protection Zones with defendable zones . The heritage listed asset of the remnant Turpentine Forest must be protected by at least a 20m APZ (Asset Protection Zone).

TYPE D AND TYPE E TOWNHOUSES

I object to Type D and Type E townhouses that front narrow Wilkies Street. These developments D and E are new plans, not modifications. On the 2006 Concept Plan, there were no plans to have townhouses fronting narrow Wilkies Street. In fact, the Hilltop Precinct depicted in the 2006 concept plan had access and egress to and from Geraghty Street, the wide arterial road. And, Townhouse Block D did not exist in the 2006 Concept Plan. Due to the 20m Asset Protection Zone encircling the heritage listed Turpentine Forest.

I object to the current proposed amendments, that all access to D and E townhouses to be via narrow Wilkies Street, this is just poor urban design.

20 METRE ASSET PROTECTION ZONE FOR HERITAGE TURPENTINE FOREST

JBA Urban Planning Consultants provided a Preliminary Environmental Assessment Report in September, 2007 which was submitted to Department of Planning on behalf of Anglican Retirement Villages. Part of this report is a letter dated 22nd January, 2007 from BES (Bushfire and Environmental Services). This letter was in connection to bushfire hazard and asset protection zones (APZ). A copy of this letter is attached. The letter states 'Planning for Bushfire Protection Guidelines 2001 makes a provision for a minimum 20m APZ for development adjacent smaller forest remnants. Smaller forest remnants are described within the PBP Guidelines as being a forest less than 1 hectare in size and can also be narrow corridors of vegetation as guided by consultation with the NSW Rural Fire Service'. The letter goes on to state – 'Asset Protection Zones less than 20m have been approved by the NSW Rural Fire Service (RFS) for integrated developments, and local councils for other developments based on the merits and risk at each site and in consultation with the RFS. The remnant Turpentine Forest is one such area where the APZ needs to be 20m. **I object** to Anglicare proposing only a 6m buffer zone. A two car garage is 6m wide. For a heritage listed site such as the remnant turpentine forest, clearly a 20m APZ buffer zone is the minimal requirement.

On 4th September, 2000, Office of Environment and Heritage lists the Remnant Coastal Turpentine Forest as a **'rare example of coastal wet sclerophyll forest dominated by Syncarpia glomulifera trees possibly in excess of 100 years of age. 'Very few examples of this coastal vegetation are now found in Illawarra.'** **'The item has group, landscape and aesthetic value. 'The item has scientific and natural value.'** **The item has rarity.'** **The item has representative value.'** **'The site is recommended to be a public flora reserve.'** (1991 City of Wollongong Heritage Study by McDonald McPhee Rogers Conacher Fullarton. Data source is from Local Government database number 2700056.

The site plan of January, 2007, clearly shows the Hilltop Precinct access and egress to take place from Geraghty Street. The proposed townhouse Block D is not possible due to the fact that the Asset Protection Zone for the Heritage listed Remnant Turpentine Forest prevented any such building. The APZ extends to Wilkies Walk. **I object** to the proposed townhouse Block D because the 20m APZ protecting the Remnant Turpentine Forest must be respected and maintained by Anglicare.

55 TOWNHOUSES

Since 2006, Stocklands has completed the northern side of the estate including 2 bridges and a housing estate of 180 free standing houses and 6 duplex type attached buildings (ie a total of 12) which appear as single duplexes scattered amongst free standing homes.

In this same 12 years, Anglicare has built nothing. No north south link bridge over Tramway Creek or any accommodation for aged care. Conversely, Anglicare now proposes to build 55 townhouses. Anglicare state that this is because there is less need for aged care now in 2018 as opposed to what Anglicare said was required in 2006. In my opinion, this is just a convenient statement for Anglicare to make so that they can profit by building then selling off 55 townhouses. I am not an expert in the ageing population, however, in my personal experience, the ageing population is actually increasing ie the statistics on baby boomers alone is proof that good aged care is what is definitely required by not only New South Wales, and specifically the Northern Illawarra.

I object to 55 townhouses being built. Anglicare proposes 55 townhouses however, does not wish to provide the roads and infrastructure for their OWN development. Instead, they want to crowd the associated traffic from these into current inadequate infrastructure of narrow Wilkies Street and surrounding narrow streets of McCauley Beach Estate .

Stockland created a careful master plan with less than 200 dwellings to ensure an easy beachside mood and one which seamlessly integrates and blends with the current Bulli and Thirroul existing houses and community. Stockland designed McCauleys Beach to provide a superior lifestyle for residents. Stockland has over 50 years in residential development and has created award winning communities all over Australia. They have a commitment to ground breaking architecture and unique urban design solutions to bring high standards to residential living . Stockland designed McCauleys Beach Estate for nature to be a part of the streetscape. To be able to safely walk from our homes to the beach ie Wilkies Walk. Stockland has proven its commitment to ensure an easy beachside mood incorporating pedestrian and cyclist safety. Anglicare's proposal of 55 townhouses is in complete contradiction to Stockland ethics. **I object** to this proposal.

The initial approval of the estate, in 2006, was based upon the construction of a southerly link road to Point Street, Bulli. This link road has not been built and the Sturdee Avenue Bridge was identified as a temporary alternative. However, Wollongong City Council, permanently closed this bridge to vehicular traffic and made it a permanent pedestrian bridge because the safety of residents and community members is of great importance. Sturdee Street pedestrian bridge links with Wilkies Walk as current safe access to the beach. However, with all Anglicare's proposed driveways crossing Wilkies Walk, there will be no further safe access to the beach for pedestrians and cyclists. **I object** to Blocks D and E.

The traffic from Sections D and E all flow to narrow Wilkies Street. Townhouse developments D and E will be completely new developments NOT modifications. In the original concept plan there was no proposal to have building developments fronting the shared path to the beach of Wilkies Walk and narrow Wilkies Street. The objection is based on concern for the natural environment of the heritage listed Turpentine Forest

and for habitat which provides life to the birds and animal of this forest. I am concerned for the integrity and safety of the pedestrian/cycle way which is Wilkies Walk. I am concerned that the bulk and scale of 55 townhouses will dramatically change the amenity of Wilkies Street and surrounding streets, which is currently peaceful, quiet and safe. Wilkies Walk is the east /west link to beach and is not only used by local residents, it is used by residents who live west of the highway as a direct walk to the beach, because it is so much easier for those residents to walk to the beach due to the gridlock and overloaded traffic on Lawrence Hargrave Drive. Residents further away actually drive and park in Wilkies Street and then walk down Wilkies Walk to the beach and specified dog beach located at McCauleys Beach.

SAFETY, TRAFFIC, CAPACITY

Townhouses D and E will put 12 driveways across just 200 metres of Wilkies Walk effectively decimating as a pedestrian and cycle way. It will be very dangerous to walk, cycle on the Walk. In addition, this proposed development would place numerous additional parked cars on very narrow Wilkies Street, making it equally dangerous for driving along the street. This proposed development is NOT in public interest.

12 townhouses (type D and E) fronting Wilkies Street is NOT in keeping with the current street amenity of individual and free standing homes on blocks not less than 450 square metres. These homes all had to comply with specific Stocklands building covenants as well as Council DCP. There are no townhouses or duplexes on Wilkies and there is one duplex in Air Avenue in the street behind Wilkies Street. Our street amenity will be significantly and detrimentally altered by multi townhouse developments which Anglicare are currently proposing.

This additional development of townhouses D and E should not be approved when the potential devastating impact on the heritage listed Turpentine Forest, Wilkies Walk and Wilkies Street safety, amenity is so great. This proposed development is not in public interest at all.

Recently, Michael Vail Design on behalf of developer High Dune P/L has submitted a pre approval lodgement for Lot 101 DP268549, located in the wetlands behind the residences in Panmills Street at the eastern end of Wilkies Street. In letter dated 26th October, 2017, Michael Vail Design requested Wollongong City Council for a follow up pre lodgement meeting for Lot 101 DP268549. A pre lodgement meeting was held prior to this date to discuss plans for medium density housing of 8 apartments. Part of the frontage of Lot 101 is McCauleys Estate. Legal advice had been obtained which confirmed that part of Lot 101 has legal road access to the extension of "Wilkes Way" which is currently the shared footpath to the beach, adjacent to narrow Wilkies Street. High Dune P/L has the option to re-design the current boardwalk to the beach located at the eastern end of narrow Wilkies Street, thereby enabling High Dune P/L to extend Wilkies Street into Lot 101 to provide vehicle access to their proposed medium density development. This will then funnel more vehicles into narrow Wilkies Street in addition to the traffic associated with the additional 55 residential townhouses, currently proposed by Anglicare. I object to the 55 townhouses and I object specifically to the vehicles and traffic forced into narrow Wilkies Street by Anglicare's proposal.

TOWNHOUSE TYPE C, D and E

In the previous 2006 concept plan, Section D did not exist. The residents in Wilkies Street at 23, 21, 19, 17, 15, 13 and 11 specifically bought their blocks of land because Stockland specifically advised and promised that it would be impossible for any future development to be built across from 23, 21, 19, 17, 15, 13 and 11 due to the size and location of the heritage listed Turpentine Forest and the 20m Asset Protection Zone which encircled it. On this surety provided by Stocklands, we and our neighbours purposefully and specifically purchased our blocks of land.

Please see the attached brochure provided to prospective land purchasers in 2012/2013. As you will see, the size of the Turpentine Forrest and APZ depicted in the Stockland brochure, would prevent any buildings being built there. Section D currently shown in Anglicare's amended concept plan is in absolute contradiction to the surety provided by Stocklands that no buildings could be built in this location (across from Nos. 23,21,19,17,13 and 11 of Wilkies Street). **I object** to townhouse Block D.

In the proposed amended concept plan, all traffic from Blocks D and E flow directly into narrow Wilkies Street. Previously, in the 2006 concept plan, Block D and Block C was not shown at all due to the bulk of the heritage listed Turpentine Forest. Traffic from site of Block E flowed into the much larger arterial road of Gerraghty Street. **I object to** Townhouse Blocks C, D and E.

When considering urban design and planning, the proposed modification diminishes the original concept plan.

In good urban design, high volume townhouses such as the 55 wanted by Anglicare, are most appropriately placed close to the services of railway, major highways, large shopping precincts and schools. Aged care facilities are more appropriately placed in quiet and serene locations as they do not require frequent access to the services. McCauleys is such a quiet and serene location and 55 townhouses will diminish the peaceful location. The 2006 concept plan appropriately determined that the ARV site was appropriate for aged care accommodation.

HILLTOP and OCEANVIEW PRECINCT

The Hilltop precinct that fronts on to narrow Wilkies Street, is inappropriate for townhouse development because:

- It is the most distant part of the Sandon Point site from railway stations, main roads, shopping centres and schools (there will be no vehicle access across the closed Sturdee Street Bridge)
- ABS 2016 census confirms that more than 60% of Bulli dwellings have 2 or MORE, motor vehicles. As the proposed Hill Top and Oceanview townhouses will not be close to any services or transport links, then the townhouses WILL have 2 or more motor vehicles
- Future residents of the proposed townhouses will be dependent on private motor vehicle transportation to access services, employment, entertainment, sport etc through adjacent narrow streets – containing detached dwelling homes on land no less than 450 square metres

- The developer is reneging on the commitment to provide road egress and access to the Oceanview present via construction of Cookson Creek bridge which would enable all of the Anglicare development traffic to circulate within the ACTUAL Anglicare development. However, Anglicare have deleted this Cookson Creek bridge and now proposes to use narrow Wilkies Street as the access road for all their townhouses

A modification to a previously assessed and approved concept plan should improve rather than diminish the plan. It must be for the benefit of all the community and residents NOT just for the benefit of the developer. This current developer's proposal will impact significantly on existing community in terms of amenity, pedestrian and cyclist safety and traffic flow and congestion. It changes good urban design into bad urban design and should be rejected. This proposed development places developer profit ahead of community well being

Leaving the natural environment undisturbed by stopping development of the proposed townhouses immediately surrounding the endangered Turpentine forest that is listed in Wollongong's LEP as a heritage item and the site is of significance to the local Aboriginal community.

Reasons:

Objection 1: The townhouse blocks B-F are under the immediate threat of fire danger due to their close proximity to the reserved forest.

The residents in Wilkies Street have fresh memory of a bush fire that happened in the early summer in 2017 at the area of block B, C of the planned townhouses. The fire service was called in to put down the bush fire. Therefore, to ensure the safety of the townhouse residents in the above blocks, 20 metres of defendable space is required. Mechanical removal of vegetation for bushfire protection, mowing and encroachment issues including under-scrubbing and clearing are proven risk factors for the Turpentine forest.

According the Best practice guidelines Sydney Turpentine-Ironbark forest published by Department of Environment and Climate Change NSW in 2008, the main threat to Turpentine Forest is clearing and loss of vegetation for development, which is exactly what the new development does. The forest size is already small. It cannot afford increased edge effects inevitable by the townhouses. Other threats include fringe area moving and clearing, urban run-off, leading to increase nutrients and sedimentation, garden refuse dumping, leading to weed invasion, building structures, including sheds and cubby-houses, fires caused by arson. All these threats are inevitable with the planned townhouses surrounding the turpentine forest which is why the defendable asset protection zone must by 20 metres surrounding .

Objection 2. The townhouses block the connection of the aboriginal archaeological site at the beach front with the other one that is close to the Turpentine forest. It is a direct offence to aboriginal culture and heritage.

Objection 3. The townhouse development diminishes the important habitat for many beautiful Australian birds that use the bushes and shrubs at the proposed townhouse site as habitat. This will reduce the scenic and recreational value of one of the most

beautiful regions in Wollongong, and damage the tourist value of Sandon Point and Bulli Point.

Objection 4: Using the narrow Wilkies street as main access to the blocks of townhouses.

The new development does not even build the basic road infrastructure for the townhouses and utilises the narrow Wilkies Street as the main road for access. Wilkies Street is only 6.5 m wide, it does not have the capacity as the main road to provide access to the proposed new development. It is the main path for many beach goers, pedestrians and cyclists. Over-crowded traffic will put the safety of the community at risk. Over-crowded cars parked on the road not only creates risk however, also disturbs the existing resident's amenity by blocking access to their own houses.

Objection 5: The design and layout of the 55 residential townhouses do not fit with that of the Wilkies Street, the broad McCauley Beach housing estate nor the adjacent Sandon Point housing estate. The huge bulk and scale of the townhouse style is in conflict with the current design of housing which displays diversity and choice, an important residential development consideration at McCauley Beach. To ensure adequate building standard and harmony of housing and the surrounding environment, the new development needs to apply the same building standard as that of the McCauley Beach and Sandon Point. The proposed 55 residential townhouses is in adversely impacts the current amenity for residents

Objection 6. The residential aged care facilities and retirement villages are built at the low area that is subject to flood risk. Given the vulnerability of the community at risk, it is not appropriate to locate them at the low side, but locate them at a higher position.

Sites B, C, D should not be cleared for the proposed townhouse development for the reason of protecting the heritage listed Turpentine Forest and retaining safety of residents, pedestrians and cyclists from bushfire danger by imposing a 20 metre Asset Protection Zone around the Turpentine Forest.

TRAMWAY CREEK BRIDGE TO CREATE A NORTH/SOUTH LINK ROAD

It is imperative that Anglicare build the bridge over Tramway Creek PRIOR to any construction taking place. I am very concerned that Anglicare will NOT build the bridge over Tramway Creek if the bridge is not built first. Currently, the only access to the Anglicare site is via Wrexham Road, Thirroul. So all vehicles connected to their development would need to travel north via heavily congested Lawrence Hargrave Drive to Thirroul, turn into Wrexham Road, then navigate back south through McCauley Beach Estate to get to the Anglicare site. This is going to create more vehicles on an already overloaded Lawrence Hargrave Drive and many more vehicles through McCauleys Beach Estate. This will provide increased risk and hazards to the community.

I am very concerned that Anglicare may exhaust their budget for this development (if approved), and then not be able to fund the Tramway Creek bridge, if it is not built first as an absolute priority. Therefore, enabling an extra north south link road which is desperately required by Bulli and Thirroul.

I urge NSW Planning to ensure that Anglicare build the Tramway Creek bridge prior to any construction at the Bulli site.

In my opinion, communities are sick and tired of being overlooked by developers. And, further, in my opinion, community safety and interest is being disregarded in favour of financial benefit for commercial developers who have no interest in our community other than potential profit.

It seems that no matter what is approved, the developer then can just change their mind, make amendments again and squeeze more and more in creating crowded facilities and no infrastructure to cope with the new demand.

I implore NSW Planning to enforce the conditions of this development.

Yours sincerely