



3rd August, 2017

The General Manager, Shoalhaven City Council  
PO Box 42  
NOWRA, NSW 2540

Dear Mr Pigg

**Re: Submission DA16/1830: Anson Street, St Georges Basin.**

The Basin Villages Forum submitted on this DA in June 2017. Our concerns have largely not been addressed in the latest version of this DA.

The recently submitted DA is still inconsistent with Section 79C of the Environmental Planning and Assessment Act, SEPP65 and SEPP71.

The community is disappointed that so little has changed, there are so many inconsistencies and that so little thought has gone into improving this DA.

### **SEPP 65 Design Verification Statement**

#### **Context and neighbourhood character**

St Georges Basin has not been identified for this type of change in any available strategic planning document such as the South Coast Regional Strategy, the Jervis Bay Settlement Strategy or the Shoalhaven LEP.

The proposed development application remains completely out of character with the existing village-style single or two-storey residential nature of the area. There is no other development of this magnitude in St Georges Basin for good reason. It is not the current or future desired character of St Georges Basin. There is no compelling demand for this height and density of housing in the area; there is almost no infrastructure to support it and the social, economic and environmental impacts have not been addressed in the Verification Statement. It sets an undesired tone and does not meet a need.

#### **Built form and scale**

The Verification Statement includes the following comment:

*"The top floor is setback further from the sides thus making it look like a 3 storey development from the neighbouring properties. This reduces the scale and bulk even more, which brings it closer to a 2 storey domestic scale."*

This is simply nonsense and can only demonstrate the architect's awareness that the development is not appropriate for this area. The proposed development is still four-storeys and will be seen from Anson Street, Island Point Road, St Georges Basin and by all the neighbours.

The site is suited to a one or two-storey medium-density housing development. There is existing demand for this style of housing and it would be more acceptable to the community.

It is an important site in the area and any development on the site should set a benchmark that really does respond to the character and future needs of the community. It could reflect excellence in design that is embraced by the community.

Instead we have a proposal that is unsuited and causing a huge amount of unnecessary angst to the community at large.

## Density

The community believes that there is neither the need nor any justification for high density living in St Georges Basin. The current population of the entire Shoalhaven City Council area is just 100,000 and is forecast to reach only 120,000 by 2036. There are 54,000 dwellings housing 41,500 permanent resident households across an area of 4567km<sup>2</sup>.

At present only 9.1% of Shoalhaven residents live in medium density housing and 0.2% in high density dwellings, which is low even when compared to Regional NSW where the average is 17%.

Clearly there is little or no need or demand for high density residential which, for good reason, is considerably less popular than low density living and only essential where there is a shortage of land available to meet population demands.

In 2016 the villages of St Georges Basin and Basin View combined contained 1977 dwellings, which represents only 3.8% of the total number in the Shoalhaven. This is forecast to increase by 754 to a total of 2731 by 2036, that is 38 new dwellings per year.

If approved, comprising 54 apartments, these two buildings alone would account for over 70% of the total dwellings needed over the next two years. More importantly, they would all be crammed into an area of less than half a hectare which, under normal planning rules for this region, would contain only seven dwellings. Also, when considered in the context of the applicant's proposed concept masterplan to build a further 326 apartments on the adjoining sites, the ludicrous scale of over-development becomes even more obvious.

This level of density cannot be sustained by existing or proposed infrastructure, public transport, access to jobs, community facilities or the environment.

Almost 90% of the residents of the Shoalhaven live in separate dwellings; in St Georges Basin it is 100%. There is a clear preference for single or two-storey homes and high-density apartment living is not needed nor wanted in St Georges Basin and is unlikely to be so in the foreseeable future.

The statement also asserts that "*The location is well suited for easy access to schools (which it is not) holiday and recreational attractions*". The primary holiday and recreation attraction in St Georges Basin is the waterway, which is mostly used for boating activities such as water skiing and fishing. These require visitors to bring their own boat on a trailer making apartment accommodation without appropriate trailer parking facilities a poor choice.

The source of the above statistics is <http://forecast.id.com.au/shoalhaven/population-households-dwellings>

## Sustainability

The statement claims that "*all apartments are provided with sufficient natural ventilation and solar access*" however the plans show that:

- 5 units have no cross ventilation
- 3 units have no sunlight
- 15 units have less than 3 hours sunlight per day.

There is no provision for air conditioning nor heating although the Basix statement does suggest individual air conditioning units, which will exacerbate noise problems for the neighbouring properties. A minimum ceiling height of 2.7m is provided in non-habitable areas which implies that there is no intention to include a ducted system.

There is no opportunity for residents to grow their own produce.

There is no rainwater collection for reuse.

4V does suggest storm water tanks are proposed but they are not shown on the plans. Clothes lines are provided in the most shaded space. Residents will have to have individual dryers.

## **Amenity**

The only provision for the amenity of neighbouring residents seems to be through the installation of privacy screens on the balconies and this is considered sufficient in the Verification Statement. All neighbouring residents will lose their privacy.

Basement car park vents are to the south – facing directly onto Rosevale. This is where carbon monoxide will be pumped by noisy ventilators.

The electric roller is on the western side – the noise of this going up and down would have an adverse impact on the residents on the western side as would car headlights shining directly into their properties.

The acoustic impact of this development on neighbours has not been well considered – ventilation systems, air conditioners, car movement, household noise through open windows etc. cannot be masked by privacy screens.

## **Safety**

While design measures for on-site safety may have been considered, the fact remains that this is a high-density development, which historically have the potential for higher than normal levels of illegal or antisocial behaviour and there is no police station nearby. The nearest 24-hour police station is in Nowra, 25 kms away. Policing is already an issue in the area.

## **Housing diversity and social interaction**

The statement asserts that *“The proposed unit mix appropriately corresponds with the local market demand for larger sized units.”* There is no evidence to support this. As previously stated there are no existing apartment buildings in St Georges Basin from which to draw a comparison and no market data is supplied.

The only diversity offered is the number of bedrooms. At best it is proposed that 8% of these units area adaptable. This does not address the housing needs of the community.

To suggest that a bench seat in the landscaped areas offers social interaction is poor to say the least. There is no play opportunity and the landscape does not provide space internally nor externally that fosters social interaction.

This design is not innovative. It appears to reflect metropolitan trends that too frequently result in unhappy, unhealthy housing solutions.

## **Aesthetics**

The community does not support the claim that a four-storey apartment block will make our area vibrant or interesting. We consider ourselves very lucky to live in such a beautiful place – we find this to be vibrant and interesting enough to sustain a healthy lifestyle and to attract residents and visitors that enjoy similar values. This development is likely to reduce the desirability of the area.

The verification statement further claims that the development will set a benchmark for future developments and is a high quality design. It is a concern that as a benchmark it offers the minimum or less than that required by SEPP65. The size will make it visually prominent, it does not respond to existing or future local context, offers the absolute minimum of adaptable housing, car parking, access to infrastructure, solar access and connection to the existing community.

## **Orientation**

While the building fronts Anson Street it will be seen mostly from Island Point Road. There is no attempt to minimise the visual impact of this building from the west – the direction from which it will be most obvious - and will also be highly visible from the waters of St Georges Basin itself.

The living areas and large areas of glass will undoubtedly be oriented towards the best view, to the west. The direct heat from the afternoon sun will almost certainly require the units to be air conditioned.

## **Visual Privacy**

On the southern boundary habitable rooms are located at 6m from the boundary on the ground floor. The design guidelines require an additional increase of 3m when adjacent to a different zone. This is applied to the western boundary and should be applied to the southern boundary. The visual privacy on the ground floor of the southern boundary is not addressed in the verification statement.

There appears to be no visual privacy between the communal BBQ area and the southern boundary.

## **Landscape design**

Of the 39 species of plants listed only 16 are native and of those, only five are found in the St Georges Basin area. *Angophora costata* is not a local tree and is unlikely to survive.

Only 60 out of 2,378 plants (2.5 percent) reach a height greater than three metres. This does not support the claim that plantings will ensure privacy for residents and neighbours.

On the southern boundary 30mm plant stock is to be used. This is extremely small and it is likely that 300mm was intended. The species used *Acmena* 'Sublime' as a screening plant is likely to be very slow growing in this situation – it will receive no sunlight. It will take greater than 5 years to reach a height of 3m and may never get to that. It will not provide visual privacy for many years after construction.

The plantings are only planned to be tended for three months after which, presumably, many will die.

In addition, there is no opportunity for residents to grow vegetables or compost organic waste. There is no play equipment and the clotheslines are on the southern side of the building.

## **Universal design**

At this time there is no provision for adaptable housing. The parking only provides six disabled car spaces – suggesting that at best only six apartments could house disabled and disabled or mobility restricted residents, which in any case is more adequately provided by single storey dwellings.

## **Water management and conservation**

No water storage tanks are shown on the plans. There is a mention of a storm water tank, however the verification states that no detention tank is required. We regularly have rainfall in excess of 100mm and this causes substantial runoff that needs to be managed. The lack of a water detention facility is likely to impact on the health of the lake.

## **Waste management**

No on-going waste management plan has been provided. It seems that the waste will be removed by manually moving 660-litre bins up a slope to a truck as there is no truck access to

the basement. The nominated contractor has expressed concerns about this arrangement. The garbage room ventilation is to the west – towards residents on that side – and there is no provision for temporary storage of large bulky items.

## **Conclusion**

The community is asking for common sense to prevail.

Four storeys is allowed on the site (now considered a mistake in LEP review 2012).

Four storey buildings will be out of context and not appropriate to the setting. The development does not articulate with the desired character of the area. It does not fill a housing need and it is not supported by community infrastructure.

Common sense points to a sustainable single or two-storey, medium-density approach that is better suited to the setting, more in tune with market demand and can be accommodated within the existing infrastructure. It would relieve tension and ill-will in the community.

It's a win win option for everyone.

## **Extracts from Submission June 2017**

### **1. Height**

While it is permissible in the SLEP2014 for a maximum height of 13m on this land, it does not equate to good town planning.

The height permissible was a decision made by the elected councilors on the floor of Shoalhaven City Council, against staff recommendation and community support. The height remains inappropriate for the area, it generally being an 8.5m limit across the precinct.

The height of 13m is out of character in this area. All areas in this precinct are a maximum of 8.50m. The proposed development will be seen from the water and all local view - points. It will stand as an inappropriate blight on the landscape. All previous developers have respected the visual amenity of the area and not sought to gain an increase in height.

Rosevale Village contains 54 homes with approximately 90 residents, many of whom will have their solar access and privacy severely compromised. The older residents have chosen this village for their retirement years and are now faced with a large development proposal that will greatly impact on their lives. The over shadowing and possible impact the construction will have on their homes, with the requirement to dig out 7 metres for underground parking on a site in close proximity, is creating a great deal of stress for these homeowners.

### **2. Storm Water Management SEPP71**

#### **Part 4 Clause 16 Stormwater**

The consent authority must not grant consent to a development application to carry out development on land to which this Policy applies if the consent authority is of the opinion that the development will, or is likely to, discharge untreated stormwater into the sea, a beach, or an estuary, a coastal lake, a coastal creek or other similar body of water, or onto a rock platform. The community therefore request on these grounds (and others stated) that this application be refused.

This application lies within the catchment of St Georges Basin, sitting on sloping land within 300m of the foreshore. Every large development this close to St Georges Basin has resulted in a major pollution requiring emergency responses. St Georges Basin has suffered repeated siltation inundation events from developments in the catchment.

It is therefore appropriate that at this DA application stage there is a comprehensive site construction management plan that addresses any likelihood of a pollution event that will affect St Georges Basin waterway. An isthmus has developed on the foreshore as a result of repeated siltation events. The community is happy to provide photos that show the change over time from badly managed developments.

This proposal includes digging 7m below natural ground- level and there will inevitably be water issues. These have not been addressed and are of major concern to the community.

The community is also concerned about the long-term management of the storm water. There is only a minimum of soft landscaping and it is therefore only reasonable that adequate storm water detention is managed on site.

The community does not believe this important issue has been suitably addressed in the DA application.

### **3. Traffic**

Anson Street is in parts a very narrow carriageway. It does not have the capacity to cope with development at this concentration. There must be a cumulative approach to assessing the traffic impact in this residential area. There are several developments in the area that will impact on the road network. These include the recently subdivided area of Links estate and the approved subdivisions at both 74 and 92 island Point Rd.

There will be a substantial increase generated by this application and added to subdivisions in progress the road infrastructure will be overstretched. Anson St in particular will be adversely affected by any increase in traffic.

### **4. Carparking**

In the DA there is provision for **100 carparks for 54 units**. This is less than 2 per unit and does not provide any storage for boats or trailers etc.

Yours sincerely, David Reynolds,

A handwritten signature in black ink that reads "David Reynolds". The signature is written in a cursive, flowing style with a large initial 'D'.

Chair, Basin Villages Forum