



13 February 2019

Independent Planning Commission NSW

The Panel

**re: Shell Cove Boat Harbour Precinct Concept Approval**

Level 3, 201 Elizabeth St

SYDNEY NSW 2000

Dear Independent Planning Commission NSW:

I wish to make comment on the Department's assessment report in regards to the proposed changes to the Shell Cove Boat Harbour Precinct.

I do not feel that this report has adequately addressed the concerns as submitted by myself and other community members in relation to the negative impacts these changes will have on the liveability of the area that my family will soon call home.

All the objectives stated as reasoning for the plan modifications were actually capable of being met within the original approved concept plan which allowed for a diversity of dwelling types and a variety of building heights as considered desirable. The only exception would be the repositioning of the hotel to which there has been no objection and the inclusion of serviced apartments. The only benefit to allowing these modifications will be more profit to the developers, Shellharbour City Council and Frasers. The Department's report also fails to show how these modifications would have any substantial increased benefits for long-term employment which is claimed to be a priority.

I would like your careful consideration as to the purported need for increased building heights, particularly with townhomes to be allowed to 4 storeys when the developer in contrast claims that there is a need for more single level living and the inclusion of additional levels to the hotel purely because of the lack of interest during the tender process with the hotel not being considered financially viable. The community should not be punished for this with impacts to views, increased overshadowing to public spaces, further pressure on parking availability and increased traffic generation alongside a building hideous in scale and out of character for the area.

The lack of parking will most certainly become a major issue for residents and ultimately deter visitors. I am most concerned as to the Planning Departments inability or unwillingness to impose any appropriate parking or design guidelines on this development. Our Council's current development control plan for Shellharbour is completely unsuited to this development. The density of this development is unprecedented. Nowhere within Shellharbour currently has townhomes nor apartments that have such extreme limitations in onsite and on-street parking with the exclusion of driveways to many home designs and narrow rear laneways that cannot take any overflow of all the homeowner's vehicles, never mind their visiting friends or family. With parking requirements to be assessed and determined as part of our Council's UDGs and DAs we will never see adequate parking levels, particularly with many apartments being allocated only one parking space and 0.5 visitor spaces.

The Department's report fails to address the question I previously posed – what happens when just one family in an apartment on The Promontory Drive has a modest gathering of six guests attending a function at their home? WHERE do these people park when there will be no street parking available as residents are already fighting for this limited space with our car ownership rates being above average, no driveways, and garages required for purposes other than just car parking? It is nonsensical to state in practical terms of how we actually live that the parking for residents and guests will be adequate under our Council's DCP. We are a regional area with demographics that show our car ownership and use is particularly high. We do not have direct access to public transport, having to use cars to even access local buses and trains with the bus stops shown in planning not having been delivered and Council unable to confirm that these ever will be.

Our Council has previously disregarded its own development controls in relation to lot sizes, garage design and distressingly the design guidelines that require space be provided for bins, with narrow laneways within this development being full of rubbish bins with residents not having been provided anywhere to store them with rows of adjoining garages with no side access. There is a clear conflict of interest here, with Council being the developer and therefore making decisions based on profits over functionality and acting in the best interests of their constituents. It is not only resident parking that is poorly considered, but the lack of inclusion of parking for visitors to the marina and a complete lack of detail for the sportsfield and business park parking requirements.

The traffic impacts of increasing the number of dwellings by a hefty 26% must also be considered more carefully. Any increase above the already gross original estimates, made

no matter how small by alteration of RMS assessment figures is unacceptable. I do not believe that the cumulative impacts of traffic that will be generated from other developments have been considered. With Dunmore and Shell Heights developments also placing a burden on Shellharbour Road, alongside the neighbouring existing suburbs, any further increase in traffic is untenable.

The intersections of Cove Boulevard and Shellharbour Road as well as Wattle Road, Addison Street, Harbour Boulevard and Shellharbour Road will be further negatively impacted with the latter already identified in a previous traffic report as being unable to cope with the increased traffic demands of the original concept plan. This has been ignored and the planning and execution of the changes to this intersection that have been made are currently causing great anxiety within the community as they are unsafe and causing delays. This is not just an issue of light phasing needing correction. I myself will no longer use this intersection having been involved in two near misses of a collision as drivers are unable to maintain their lanes heading out of Shell Cove and reportedly the situation is much worse for those attempting to enter Addison Street from Wattle Road. Safety issues may be able to be mitigated with corrective works but this will not alleviate the other increasingly reported problem of people being unable to turn onto Shellharbour Road in a timely fashion as the traffic build up at this intersection is so vast at peak times; this is even with very little of the overall development of the Harbour Precinct having taken place.

Lastly, my other major concern was that the Department's report failed to address the infrastructure needs that must be developed alongside population increases and the false figures supplied in modification reports. There was no correction to the facts in relation to the police and ambulance facilities and school numbers built within the catchment area. Reports stated that we had additional facilities built for police and ambulance but failed to mention this included the closure of existing services that were replaced, NOT added to.

Unfortunately, we do not live in a 'swinging seat' and are unlikely to see any investment in infrastructure in this area by the State Government anytime soon. We have seen a considerable escalation in crime within the Harbour Precinct area of late with police unable to effectively meet the increased demands placed on them. The local hospital is short on beds and appropriate services, the local primary school is full of demountables and the high school is regularly narrowing the borders of its catchment area to cope with increased student numbers.

The Shellharbour LGA has enormous potential for increasing housing, employment opportunities and income generating facilities in areas bordering the city centre and elsewhere that should also be incorporating the integration of new public housing, but this confined space with poor accessibility is not the place to inflict a further increase in what is already proposed as comparatively very high density living. A council with imagination and vision in long term planning could and should be doing so much more to enhance the region as a whole.

This is not the last bastion for increasing housing and employment in the Shellharbour LGA but it has sadly become our Council's only cash cow and they are trying to milk it for all it is worth with a complete disregard for those that have to call this place home. The proposed modifications are quite simply unwanted, unneeded and unjustified. This is a proposal that puts profits before people and can only negatively impact our community.

Sincerely,

Concerned Resident.