

Submission Objecting to Proposed 104 Apartment Development – Hawks Nest

Assessment No: SSD-82066472

HDA Housing – Tattersall Lander Pty Ltd

Mid Coast Council

I write to formally object to the proposed 104-apartment development at Sanderling Avenue, Hawks Nest.

While I acknowledge the need for appropriate housing growth and responsible development, I do not believe this proposal is appropriate for the locality, the existing infrastructure capacity, the coastal environment, or the established character of Hawks Nest.

My concerns are not based on opposition to development itself, but rather the cumulative impacts arising from the scale, intensity and urbanisation of this proposal within a constrained and environmentally sensitive coastal township.

The proposal, when considered as a whole, raises serious concerns regarding:

- overdevelopment and excessive scale;
- incompatibility with the existing coastal village character;
- infrastructure strain and service reliability;
- traffic and road safety;
- parking and congestion;
- environmental and biodiversity impacts;
- coastal and groundwater risks;
- loss of residential amenity;
- telecommunications and electricity reliability;
- public access and recreational impacts;
- emergency access and evacuation limitations;
- and long-term cumulative impacts on Hawks Nest and Tea Gardens.

1. Overdevelopment and Incompatibility with Local Character

The proposed development represents a substantial intensification of the site and is inconsistent with the existing low-density coastal village character of Hawks Nest.

The proposal includes:

- 104 apartments;
- three large residential buildings;
- four-storey built form;
- underground basement parking;
- pools and gyms;
- communal facilities;
- extensive engineering infrastructure;
- and large-scale excavation and earthworks.

The scale and urban intensity of the proposal are significantly out of character with the surrounding locality, which is predominantly characterised by:

- detached housing;
- low-density development;
- coastal vegetation;
- open streetscapes;
- and a relaxed coastal village atmosphere.

Council pre-lodgement material itself raised concerns regarding:

- overdevelopment of the site;
- excessive bulk and scale;
- visual intrusion;
- and domination of the coastal vista.

The proposal also exceeds the applicable building height controls and seeks a Clause 4.6 variation to development standards.

The development appears more consistent with a resort-style urban apartment complex than medium-density coastal housing.

Approval of a development of this scale risks permanently altering the established planning expectations, visual identity and community character of Hawks Nest.

2. Visual Impact and Coastal Character

The proposed built form would introduce significant visual bulk into a sensitive coastal environment.

The scale, height and intensity of the buildings are likely to create:

- visual dominance;
- loss of open coastal character;
- increased urbanisation;
- and substantial change to the streetscape.

Landscaping alone cannot adequately mitigate the long-term visual impact of multiple four-storey buildings within a locality otherwise characterised by lower-scale development.

The cumulative impact of:

- large buildings;
- basement infrastructure;
- extensive parking areas;
- lighting;
- and associated urban infrastructure

is inconsistent with the existing scenic and coastal identity of Hawks Nest.

3. Traffic, Road Safety and Transport Constraints

The Hawks Nest and Tea Gardens locality is serviced by a highly constrained regional road network with limited alternative access routes.

Outside of the Bombah Point Ferry operating hours, there is effectively one primary access route servicing Hawks Nest and Tea Gardens via the Singing Bridge connection.

Once across the bridge into Tea Gardens, regional access remains limited to only a small number of connecting arterial roads.

The locality has:

- no significant public transport network;
- no regular regional bus services;
- no established taxi network;
- no Uber or rideshare availability;

- and minimal transport redundancy.

As a result, residents and visitors are heavily reliant upon private vehicles.

Existing congestion and queuing already occurs at key intersections and access points during ordinary periods and peak holiday seasons.

The proposal would introduce:

- 104 additional dwellings;
- significant visitor traffic;
- trailer and boat traffic;
- service and delivery vehicles;
- construction traffic;
- and increased pedestrian activity.

Traffic reports associated with the proposal rely heavily upon assumptions regarding reduced occupancy and holiday-home style use. However, once approved, there is no practical mechanism preventing units from becoming:

- permanent residences;
- investment properties;
- Airbnb-style accommodation;
- or high-turnover holiday accommodation.

The road network may technically continue to function under engineering modelling assumptions, however planning assessment should extend beyond whether intersections merely continue operating.

Consideration should also be given to:

- cumulative congestion impacts;
- peak holiday traffic;
- pedestrian safety;
- emergency access;
- evacuation capacity;
- tourist traffic;
- and long-term transport sustainability.

Of particular concern is the limited pedestrian infrastructure throughout Hawks Nest, including incomplete and limited footpath connectivity in many areas.

This becomes increasingly relevant where substantial population growth and vehicle intensification are proposed.

The locality has also experienced multiple serious and fatal motor vehicle accidents over time on the regional access roads servicing Hawks Nest and Tea Gardens.

This reinforces the importance of carefully considering additional traffic generation and long-term road safety outcomes prior to approving a development of this scale.

4. Parking and Congestion Impacts

Parking availability within Hawks Nest and Tea Gardens is already limited during peak periods, particularly throughout holiday seasons where visitor numbers, caravans, trailers, boats and beach-related traffic substantially increase demand.

Despite the proposal including basement parking, concern remains regarding:

- overflow visitor parking;
- additional on-street parking demand;
- trailer and boat parking;
- service vehicles;
- contractor vehicles;
- and cumulative congestion within surrounding streets.

Given the locality's lack of meaningful public transport alternatives, reliance on private vehicle ownership is extremely high.

The cumulative impact of:

- 104 additional dwellings;
- communal facilities;
- visitor traffic;
- and increased service demand

is likely to place further pressure on an already constrained local parking environment.

5. Noise, Residential Amenity and Coastal Character

The proposal raises significant concerns regarding long-term noise impacts and loss of residential amenity within what is currently a relatively quiet coastal environment.

While individual mechanical systems may be assessed independently within technical reports, concern remains regarding the cumulative impact of:

- air-conditioning condenser units;
- basement ventilation systems;

- sewer and pumping infrastructure;
- pool filtration and water systems;
- gym and communal facility activity;
- increased vehicle movements;
- delivery and service vehicles;
- reversing alarms;
- construction activity;
- and general urban activity associated with a development of this scale.

Of particular concern is the introduction of continuous mechanical and infrastructure-related noise into an area currently characterised by:

- lower-density development;
- natural coastal sounds;
- relative quietness;
- and strong connection to the surrounding coastal environment.

Residents within the surrounding locality presently experience and value:

- the sound of ocean waves from Bennetts Beach;
- coastal breezes;
- natural birdlife;
- and the open coastal atmosphere that contributes significantly to the character and liveability of Hawks Nest.

There is concern that the cumulative urbanisation of the site, including extensive mechanical infrastructure and increased activity levels, would materially alter the acoustic and environmental character of the locality.

The proposal also includes sewer and pumping infrastructure associated with the development. Given the locality already experiences periodic infrastructure instability and power outages, concerns arise regarding:

- mechanical noise;
- odour impacts;
- maintenance requirements;
- and long-term operational impacts associated with this infrastructure.

Even where technical noise limits may be achieved under modelling assumptions, there remains concern regarding:

- continuous low-frequency mechanical noise;
- tonal humming;
- reflected noise between buildings;
- increased night-time noise;
- and the cumulative loss of peaceful residential amenity.

The issue is not simply whether isolated noise sources comply numerically, but whether the overall intensity and urbanisation associated with the proposal is appropriate within a sensitive coastal township valued for its quieter lifestyle and natural coastal atmosphere.

The cumulative impact of:

- mechanical plant;
- increased traffic;
- communal activity;
- servicing infrastructure;
- and increased residential intensity

is likely to substantially alter the existing character and amenity of the surrounding area, including properties located several streets from the site.

6. Infrastructure Capacity and Service Reliability

The proposal raises serious concerns regarding existing infrastructure capacity within Hawks Nest and Tea Gardens.

The locality already experiences:

- electricity instability and blackouts;
- telecommunications limitations;
- unreliable mobile phone reception;
- internet congestion during holiday periods;
- and increasing infrastructure pressure during peak tourism seasons.

Residents frequently experience limited or unreliable telecommunications service throughout parts of Hawks Nest and Tea Gardens despite reliance on major national providers.

The proposal itself relies upon substantial infrastructure intervention including:

- sewer upgrades;
- pumping infrastructure;
- stormwater systems;
- infiltration systems;
- water infrastructure upgrades;
- and extensive servicing integration.

This raises broader concerns regarding whether the locality's existing infrastructure is genuinely capable of sustainably supporting a major increase in permanent and transient population.

Particular concern also arises regarding:

- emergency communication reliability;
- evacuation resilience;
- utility reliability during storms or blackouts;
- and long-term servicing burdens associated with a development of this scale.

6. Coastal, Groundwater and Environmental Concerns

The proposal is located within a highly sensitive coastal environment.

The application documentation itself identifies the need for extensive assessment relating to:

- groundwater;
- coastal hazards;
- acid sulfate soils;
- contamination;
- infiltration;
- stormwater management;
- and environmental impacts.

The proposal also involves substantial basement excavation and large-scale earthworks within a coastal sandy environment.

Concerns arise regarding:

- groundwater interference;
- dewatering impacts;
- stormwater management;
- dune stability;
- infiltration reliability;
- flooding risks;
- and long-term coastal resilience.

The proposal relies heavily upon engineered mitigation systems including:

- infiltration tanks;
- water quality devices;

- stormwater treatment systems;
- pumping infrastructure;
- and extensive underground servicing.

The need for such extensive engineered intervention demonstrates the sensitivity and complexity of the site.

While technical reports may conclude the development is technically compliant under certain modelling assumptions, there remains concern regarding:

- long-term coastal change;
- sea level rise uncertainty;
- storm intensity;
- groundwater movement;
- and future environmental resilience.

The cumulative urbanisation of the site appears inconsistent with the environmental sensitivity of the locality.

7. Biodiversity and Wildlife Impacts

The Sanderling Avenue locality supports a range of native wildlife and biodiversity values.

Residents regularly observe native fauna throughout the area, including:

- dingoes;
- black cockatoos;
- kookaburras;
- native birdlife;
- reptiles including snakes;
- and other coastal wildlife species.

The proposal would introduce substantial urban intensification into an area that presently retains significant natural and semi-natural coastal characteristics.

Concerns arise regarding:

- habitat disturbance;
- vegetation impacts;
- increased lighting impacts;
- traffic impacts on wildlife;
- fragmentation of wildlife movement corridors;
- increased human activity;
- noise impacts;
- and cumulative ecological pressure.

The cumulative impact of:

- 104 apartments;
- extensive construction activity;
- excavation;
- increased traffic;
- artificial lighting;
- and ongoing urban intensity

is likely to place additional pressure on the ecological values of the locality.

8. Public Access and Community Amenity

Sanderling Avenue functions as an important access corridor to Bennetts Beach, including one of the primary access points used for permitted beach driving activities within the Hawks Nest and Tea Gardens locality.

Alternative access routes via Mungo Road are substantially less practical for many residents and visitors due to:

- increased travel distance;
- fuel costs;
- time impacts;
- and accessibility limitations.

Beach access forms an important part of the local lifestyle, tourism economy and community identity of Hawks Nest and Tea Gardens.

Bennetts Beach also represents one of the only recognised off-leash dog exercise areas servicing the locality.

Concerns arise that the scale and intensity of the proposed development may contribute to:

- increased congestion along Sanderling Avenue;
- reduced accessibility during peak periods;
- parking overflow;
- trailer congestion;
- pedestrian and vehicle conflict;
- and reduced ease of access to important public recreational areas.

These impacts should be considered not only from an engineering perspective, but also regarding the practical accessibility, usability and enjoyment of important community recreational infrastructure.

9. Construction Impacts

The scale of the construction phase itself is also concerning.

Application documentation identifies:

- major excavation works;
- piling works;
- significant truck movements;
- concrete pours;
- up to 100 construction workers onsite;
- extensive earthworks;
- and multi-year construction activity.

This has the potential to generate:

- prolonged disruption;
- construction noise;
- dust;
- vibration;
- traffic congestion;
- heavy vehicle impacts;
- and loss of amenity for nearby residents.

The scale of the construction operation appears inconsistent with the surrounding low-density coastal residential environment.

10. Precedent and Long-Term Planning Consequences

One of the most significant concerns associated with this proposal is the precedent it may create for future development within Hawks Nest.

Approval of a development of this scale risks:

- normalising excessive building bulk and height;
- increasing pressure for further high-density development;
- altering community expectations regarding future development intensity;
- and progressively eroding the existing coastal village character of the locality.

The value of Hawks Nest lies precisely in its:

- relaxed coastal identity;

- lower-density character;
- open space;
- natural vegetation;
- environmental sensitivity;
- and community atmosphere.

The proposal appears inconsistent with those qualities.

Conclusion

When considered cumulatively, the impacts associated with this proposal raise significant planning, environmental, infrastructure and community concerns.

While individual technical reports may attempt to demonstrate compliance within isolated assessment categories, the broader cumulative impact of:

- 104 apartments;
- increased urban intensity;
- infrastructure strain;
- traffic generation;
- environmental pressure;
- visual bulk;
- and long-term character transformation

appears inconsistent with the existing scale, environmental sensitivity and infrastructure capacity of Hawks Nest.

I respectfully request that Council and the relevant assessment authorities give careful consideration to:

- the cumulative impacts of the proposal;
- the long-term planning consequences for Hawks Nest;
- infrastructure and transport limitations;
- environmental and coastal sensitivity;
- community character;
- and the broader public interest.

For the reasons outlined above, I object to the proposed development.

Documents Reviewed

In preparing this submission, consideration has been given to publicly exhibited application material including, but not limited to:

- Environmental Impact Statement (EIS)

Suzie Shipley 13 Kurrawong Avenue Hawks Nest NSW 2324

- Traffic Impact Assessment
- Social Impact Assessment
- Acoustic and Noise Assessments
- Coastal Hazard Assessment
- Stormwater and Civil Engineering Reports
- Landscape and Visual Impact Material
- Accessibility Reports
- Council Pre-Lodgement Meeting Minutes
- Supporting Technical and Infrastructure Assessments

This submission also reflects local knowledge and lived experience regarding the existing infrastructure limitations, traffic conditions, environmental characteristics and community amenity of Hawks Nest and Tea Gardens.

Yours faithfully,

A handwritten signature in cursive script that reads "S M Shipley".

Suzie Shipley

13 Kurrawong Avenue

Hawks Nest NSW 2324