

The Secretary  
B&BCLSP-Steering Group  
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Mr Chris Eldred  
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NSW Planning-Department of Planning and Environment  
Locked Bag 5022  
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## **RE- Vincentia Coastal Village-Project Modification 9 and Concept Plan Modification 17**

Dear Sir,

We write in relation to the above and on behalf of the Bay and Basin Community Led Strategic Plan - Reference Group who represent the communities of-

- Huskisson / Woollamia
- Vincentia / Bayswood
- Hyams Beach
- Erowal Bay / Old Erowal Bay /
- Beach/ Bream Beach
- Sanctuary Point/ Worroving Heights
- St Georges Basin / Basin View
- Tomerong
- Jervis Bay Village / Wreck Bay Village

The Bay & Basin Community-Led Strategic Plan (the Plan) was adopted by Shoalhaven City Council in September 2021 and was developed by the community to provide a foundation for future efforts to implement overarching community aspirations and expectations in a coordinated and collaborative way.

The purpose of the Plan is to be a high-level dynamic, flexible and action-orientated document that provides the opportunity for the community to be directly involved in the future of the Bay & Basin area. The Plan sets out ten (10) Strategic Themes with an overarching "Quality of Life" theme inherent to all themes and eight (8) Key Strategic Directions. The Plans' relevance to this submission can be summarised on the following page where four (4) of the Themes and two (2) Key Directions are highlighted. These require the Group to respond to this proposal.

Please note. We became aware of this application on 3/11/22 and are therefore limited in our response. So, we have concentrated on what we see as the most relevant and key issues. However, we should put on record that we welcome a Stage 2 of the development as there is a growing need for more business and retail development in the Bay and Basin area. This need is identified in the supporting documents to the proposal. However, there are several key design aspects of the proposed changes that are not satisfactory.

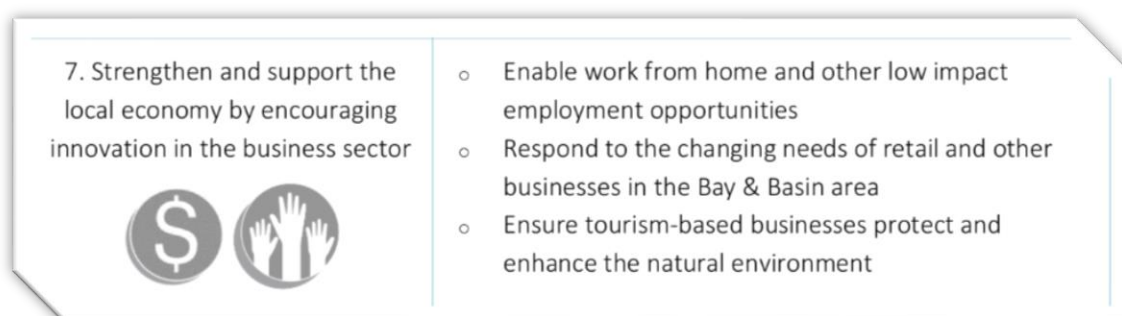


Figure 1 Strategic Direction No 7



Figure2 Strategic Direction No 8

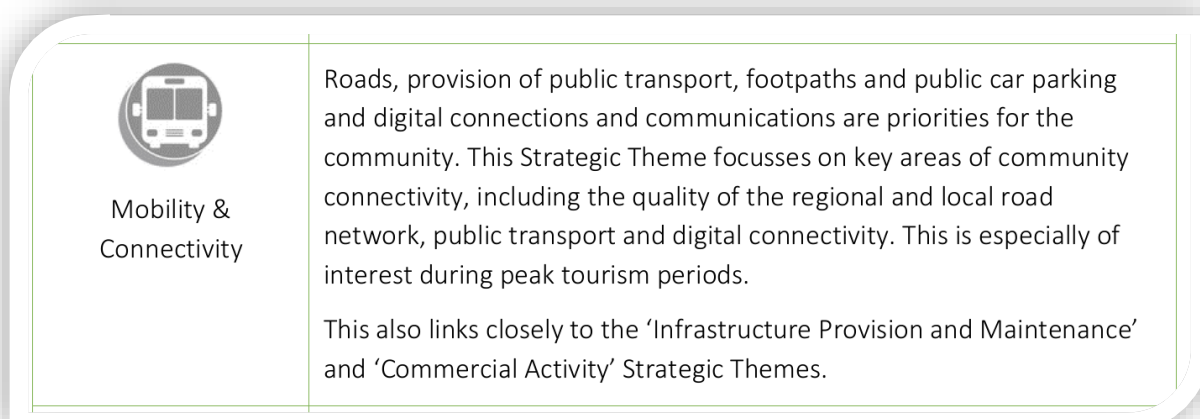


Figure3 Mobility and Connectivity Theme

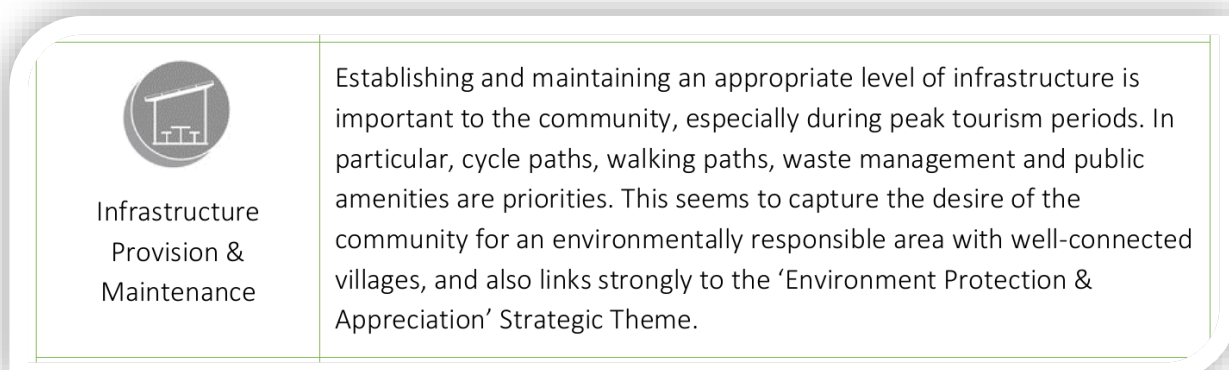




Figure 4 Infrastructure Provision &amp; Maintenance Theme

 <p>Commercial Activity</p>	<p>Creating successful low impact businesses and targeted local employment, in line with the emerging demographic needs, is an important Strategic Theme - including work from home opportunities. This Strategic Theme also captures the community desire to encourage more diverse commercial offerings, to meet local and tourist needs.</p>
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*Figure 5 Commercial Activity Theme*

 <p>New Development &amp; the Public Interest</p>	<p>Underpinning the 'Good Governance' Strategic Theme, the 'New Development and the Public Interest' Theme is integral to the community. This is particularly apparent in the context of the cumulative impact on, and preservation of, the natural environment and village character. The high priority attached to the natural environment and village character is also echoed in other strategic themes.</p>
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*Figure 7 New Development and Public Interest Theme*

#### What Our Community Wants

*The Bay & Basin area is highly valued for its natural environment and village structure. Idyllically situated on the foreshores of Jervis Bay and St Georges Basin, surrounded by a vegetated backdrop, the Bay & Basin has a calm and peaceful character, to offer permanent residents and visitors alike.*

*An engaged Bay & Basin community plan to protect and enhance the natural environment and village character, whilst ensuring adequate community and business services along with key infrastructure are provided to continue to support the balanced human settlement of the area.*

*The ongoing strategic planning for the Bay & Basin area must continue to evolve and adapt to meet changing circumstances and needs of this highly valued place.*

- The Subject Application



Department of Planning and Environment

## EXHIBITION OF STATE SIGNIFICANT DEVELOPMENT MODIFICATION APPLICATION AND CONCEPT PLAN MODIFICATION REQUEST

### Vincentia Coastal Village – Project Modification 9 and Concept Plan Modification 17

<b>Application No</b>	MP06_0025-Mod-9 and MP06_0060-Mod-17
<b>Location</b>	Corner Wool Road and Naval College Road, Vincentia (Lot 1 DP 1182358) and the Vincentia Coastal Village Concept Plan Area
<b>Applicant</b>	Homeco Pty Ltd
<b>Council Area</b>	Shoalhaven City
<b>Consent Authority</b>	Minister for Planning or Independent Planning Commission
<b>Description of MP06_0025 (approved in January 2009)</b>	
Development of the Vincentia District Town Centre over 3 stages including supermarkets, large plate retail, bulky goods store and specialty retail.	
<b>Description of proposed modification to MP06_0025 (being Mod 9)</b>	
Amendments to staging, land uses, car parking layout, plant and equipment locations, landscaping and an overall reduction in Gross Floor Area. Concept Plan: Amendments to the land uses and staging for the town centre.	
<b>Description of MP06_0060 (approved in January 2007)</b>	
The Concept Plan approval for the Vincentia Coastal Village included 603 lot residential subdivision, Residential development for an adaptable housing area; and Commercial development (District Town Centre)	
<b>Description of proposed modification to MP06_0060 (being Mod 17)</b>	
Amendments the staging of the development of the District Town Centre to reflect the changes proposed under MP06_0025-Mod-9 including design amendments to stages 2 and 3, deletion of stage 1B and changes to land uses proposed under Stage 2.	

- The Rationale as we see it!

The driver for the revised design appears to be that Woolworths' original plan was for a Kmart store but once that was off the agenda and the ownership changed hands, the new owners wanted/needed a different plan, but Woolworths still want their own staff carpark.

**B&BCLSP Comment:** Perhaps not a good place to start. There does not appear to be a community benefit or rational to this proposal. Indeed, the intended rationale is not well explained.

This is an important community asset and resource. As the B&B major retail center and with growing relevance as our future public transport hub a well-designed and integrated District Centre is imperative. This was promised and said to serve the whole community not just the interests of individual corporate enterprises.

- The Overall Concept

The origin of the design for the District Centre lies in a high-level design competition between three prominent architects. The jury stated:

*The jury panel concluded that while the form of the master plan prepared by Rice Daubney required some amendments, it had the potential **to provide an excellent amenity for the people of Jervis Bay and the Vincentia Coastal Village because it more sensitively addressed the unique nature of the site, related well to the existing landform and facilitated a far less disruptive staging sequence.** Rice Daubney's winning design proposal made the fundamental move of treating Moona Creek Road as the "main Street", along which local facilities will be provided. The jury panel concluded that there is logic to this approach because it **will result in a more compact centre and one that works well at each stage of the development.** The jury panel also concluded that the winning design proposal displayed a greater respect for the landform by minimising cut and fill and allowing the creek to retain a strong identity in the centre. The infrastructure needs were also considered to be more realistically distributed over the various stages of growth of the District Centre and the architecture was considered to relate more comfortably to the coastal character of Vincentia. Notwithstanding, the jury panel recommended that Rice Daubney further develop the following aspects of the design:*

- ***Combine several of the Rice Daubney concepts into one master plan to achieve a more workable retail master plan;***
- ***Improve connectivity to car parking areas and ensure convenience to the majority of customers; and***
- ***Review open air areas in key retail locations to ensure customer amenity and to enable a best practice environment for retailers***

We have highlighted some of the statements above to make the point that the Bay and Basin community have been promised a high-quality District Centre and now (after many design changes over the years) it would seem those standards and intentions are being allowed to slip.

This project is far too important for this to occur. What was Vincentia Marketplace and now Home Co is a partly built but already major community hub and central gathering place. It is where most of our community come into contact, and it is the heart of what we call the "Bay and Basin" area

To demonstrate our points the approved Master Plan and Modifications are shown on our comparison diagram Figure 1 that follows. As can be seen the approval is for a Stage 2 that involves a large DDS to the east of the existing centre and joined by way of both internal and external pedestrian facilities. This includes a continuous arcade to link all shops.

The modification is to split the renamed Stages 1 and 2 into two distinctly separate retail and business groups linked only by a narrow external partly covered pathway.

Also of concern is the location of the proposed staff parking area which will be gated. This is positioned in a prime high turnover location and will "alienate" the public areas and linkages between the existing medical centres, chemist and gym and the proposed Wellness Centre

**B&BCLSP Comment:** We consider that if the District Centre design is to meet its stated Master Plan objectives as a high quality and fully integrated centre there needs to be significant modification to proposed layout, design appeal, access, parking, and safe pedestrian movement arrangements on site. Or implement the Mod 5 Concept.

In our opinion further consideration must be given to:

- retaining the internal arcade link principle for both stages
- relocation of all proposed staff parking to non- high priority areas such as the rear of Stage 2 i.e., to the east and/or Stage 3.

## • Car Parking, Access, and Public Transport

The interaction between motor vehicles and pedestrians in the existing centre is already fraught with danger and should be reviewed. The proposed layout will only make the situation worse. There is little consideration given to public transport needs now and in the future other than to say there is a bus stop.

**B&BCLSP Comments:** See comments above. The rationale that Stage 2 will be a separate destination does not work. It is not a dedicated health precinct or “wellness centre”; it is simply a group of buildings that house various commercial enterprises and duplicates some services that currently exist which will potentially cause unnecessarily complex pedestrian and parking choices and decision making.

HomeCo has been recognized as the major “central bus node” for the B&B area and provides the location to satisfy the NSW Governments public transport initiatives to implement a “hub and spoke” model with a regular fast bus services to Nowra and connections to all our B&B villages. This is consistent with the NSW Governments “Future Transport Strategy 2056” and the associated “Illawarra Shoalhaven Regional Transport Plan” As stated little consideration has been given to bus stops and routing throughout and around the District Centre. Put plainly, it has become an afterthought. This must be addressed.

It is also worth noting is that there are already two medical centres in the immediate area, one in the existing centre and another in Halloran St just across Moona Creek Rd. The proposed pedestrian linkages for all these are poor particularly considering the proposed abandonment of the Arbor Pedestrian Link and Civic Space and little all-weather cover.

One of the biggest and concerning issues is mobility around the site. The narrow roadways area not designed for the traffic volumes indicated by the carparks, the movement of pedestrians between the old and new sections, the specialist traffic that will be attracted like medical transportation. We note the Traffic Report that has been provided was based on surveys in November 2021 which was during the Covid 19 restrictions. A fresh look at these issues is required.

The position of the current Pharmacy and Medical Care Centre would seem to guarantee very high levels of movement across the roadways and in all weather conditions. This is a dangerous arrangement both existing and proposed and could lead to serious incidents if not addressed.

In our opinion and noting that the competencies of some drivers visiting a medical area might be below par. Further thought should be given to dedicated drop off and collection areas associated with disability parking spaces.

We recommend:

- A review of the existing and proposed car park design and bus arrangements
- Abandon the staff car parking as proposed
- Relocate the staff car parking as discussed previously
- Include drop off areas with covered seating and time limited parking.

- Widen car parking spaces where appropriate
  - Rationalise the flow of traffic e.g., by using one-way movements
  - Widen some internal roads to give better visual access to aging drivers.
- **Environmental Impact on Moona Creek.**

**B&BCLSP Comments:** The intention is to move the new Stage 3 further to the south which widens the potential area for Moona Moona Creek environmental and WSUD works. This can be supported provided Stages 1 and 2 become more integrated. Stage 3 can work as a stand-alone bulky goods retail area, but it also needs more detailed design resolution particularly for vehicular access.

The landscaping of the new versus the old, car parking takes over all previous areas for trees and gardens suggesting the area will become a barren, hard surface discharging pollutants into the already over stretched Moona Moona Creek (which discharges directly into Jervis Bay and is currently one of the many reasons the Mussel Aquatic Farming project is closed).

We believe the current runoff catchment facilities are inadequate and mainly broken. This environmental issue requires meaningful investigation and it may well be worth asking for a detailed environmental assessment.

- **The Core Design Principles of the Original Design**

The design modifications made to Vincentia Marketplace and now HomeCo affect the intent of the “Vincentia Town Centre” competition design outcomes and the core design principles for its “Public Domain Strategy”

The proposed design modifications are discussed below benchmarked against the original design intent.

#### **The Original Public Domain Strategy**

*Extract Only: The Public Domain strategy for the development is driven by the generation of ‘spaces’ through a combination of building massing and building use. The strategies as defined in the design principles for Public Domain set by Rice Daubney are:*

1. *A Discovery – an experience through the compression and de-compression of space – a very simple rule – err on the side of tight and intimate rather than large and impersonal*

**B&BCLSP Comment:** The idea of a continuous central arcade and an outdoor Civic Space has been abandoned in favor of large open car parking areas with poor pedestrian access. The proposed public spaces have been minimised and future opportunities for them reduced or excluded.

2. *A variety of places and spaces rather than a variety of materials and elevation*

**B&BCLSP Comment:** See comment above. This also applies to the residential component

3. *It's all public domain – from the car park, as a pedestrian, shopping, going to the library – there is no distinction between inside and outside and the quality of the space*

**B&BCLSP Comment:** See comment above. This has been abandoned.

4. *The town 'mediates' between the resident function and the commercial functions*

**B&BCLSP Comment:** See comment above. This has been partly abandoned.

5. *Activity is created at points*

**B&BCLSP Comment:** See comments above.

6. *The site and its attributes, the bush and water are continuously viewed and referenced*

**B&BCLSP Comment:** See comment above. This has been partly abandoned.

7. *The form of the buildings responds to a pedestrian point of view, lowering to create more intimacy and uplifting where more volume is desired. The buildings form a 'container' for the activity or life of the town.*

**B&BCLSP Comment:** See comment above. This has been partly abandoned with a reduced internal arcade.

- **Moona Creek Road Frontage**

*Extract: The Moona Creek Road frontage forms the primary address and gateway to the new town centre. The challenge for the town centre is to create an atmosphere of 'town' utilising the Moona Creek Road frontage, which has now been constructed partially with the rear fences of facing low scale residential development. The concept design set in place principles of the gateway buildings either side of the arbor walk. The mass and scape of these buildings being formed through double height main roof and facades to the street, and overhanging street awnings along the active shopfronts.*

**B&BCLSP Comment:** Moona Creek Road was to become a significant commercial frontage for the District Centre. It would appear this design concept is to be abandoned.

- **The Arbor Walk**

*Extract: The Arbor Walk link into the site is retained and developed as a key pedestrian connection in the first stage of the project development. A scenic line of trees will be incorporated as an avenue leading into the site from this direction.*

*At stage 1 a temporary roadway will follow the alignment of the Arbor Walk into the site providing for additional connection into the site.*

*At the completion of the development, the roadway will be closed, and the full width of Arbor Walk will be paved and landscaped as the primary civic entrance precinct.*



**B&BCLSP Comment:** The Arbor walk is a “Core” feature of the original design and is to be abandoned. As indicated above it occupies a location which is currently used as a temporary road, and this becomes the “**Primary Civic Entrance Point**” This is a fundamental change to the concept approval and begs the question whether or not the proposed modifications truly represent “Substantially the Same Development” To change a primary element directed at community benefit into a staff car parking area for commercial gain without an equal public benefit offset is not supportable.



*Figure 8 Applicants image of the proposed Stage 2 showing a large car parking area with very poor pedestrian facilities and disconnection to the existing shopping centre.*

## Summary and Conclusions

The B&BCLSP-Steering Group contends in this submission that the circumstances including climate, population and post-pandemic lifestyle have changed significantly since 2009. Therefore, the modification submitted in 2022 should not be allowed without question to use 2009 decisions and those applied to subsequent Modifications as grounds on which to justify this proposed **Modification – 06\_0025 MOD 9**.

The rewriting of rainfall records, the increase in population serviced by Marketplace and the dramatic upturn in Shoalhaven tourist visitors alone invalidate these earlier studies the Developments approval on which it was based. In fact, the conducting of a new traffic survey for a few hours in the middle of the Pandemic lockdown experience is perhaps an indicator of the quality of this proposal.

Further, the failure of the submission to incorporate any appreciation of or attention to the increased impact of the proposed amended development on the downstream environment of Moona Moona Creek, and associated natural fish hatchery, Jervis Bay National Park and Jervis Bay Marine Sanctuary make the claims to meeting the Objectives of the Illawarra Shoalhaven Regional Plan unsustainable. For example:

<p><b>Objective 11: Protect important environmental assets</b></p> <p><i>The 'avoid, minimise and offset' hierarchy will be applied to areas identified for new or more intensive development. This requires development to avoid areas of validated high environmental value and consider appropriate offsets or other mitigation measures for unavoidable impacts. Where it is not possible to avoid impacts, councils must consider how impacts can be managed or offset through</i></p>	<p>The Site has received concept approval under <b>MP 06_0060</b> and <b>MP 06_0058</b>.</p> <p>Notwithstanding, an ecological review of the Site, which has been cleared of vegetation and comprises significant earthworks which have already been undertaken a Biodiversity Development Assessment Report has been undertaken which assesses the impact of the proposal on the existing ecological environment. The report is contained within <b>Appendix G</b> and includes mitigation measures.</p>
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Note: This refers only to the immediate site environment whereas the Regional Plan takes a wholistic approach to catchment areas affecting environmental assets, let alone the interests of those whose livelihood depend on maintaining a pristine environment downstream from this development.

#### Further details of our concerns:

As a community group we can see many problems that will arise from this Modification of the Development. These are concerns about safety of pedestrians, vehicle congestion and the effects on the environment.

The proposed Stage 2 development at Vincentia Marketplace incorporates an additional 5,016m<sup>2</sup> mixed use comprising specialty retail (bulky goods), Pet Store, Vet, medical centre and gym and a 120-place childcare centre. The key issues we are concerned about are:

- 1) **Vehicle congestion** – the traffic report provided to support this development was conducted in November 2020 at a time when the Covid Pandemic restricted tourists and visitors to the area and the movement of residents. In fact, the NSW Government was so concerned about the low level of commercial activity they announced on November 17, the week prior to the traffic survey,

*the "Out and About" economic stimulus voucher scheme. NSW residents over 18 years-of-age will be eligible to receive four A\$25 vouchers through Service NSW. Residents will need to have a Service NSW account to receive their vouchers. Two vouchers are for dining, the other two are to be spent on entertainment. After trials in Sydney and regional areas, full rollout was scheduled for March.*

To base future planning on a 2-day, 4-hour study in this situation, when schools were not operating as normal, is misleading. It is not a true representation of the volume of traffic and should be rejected as a basis for this Modification.

The permanent population of the area has also increased since the pandemic. Presently there is congestion at the Moona Creek Rd and Naval College Rd roundabout to enter Home Co. Moona Creek Rd is too narrow.

Further, the type of traders proposed for the area will attract clients who will be vehicle dependent – the childcare centre will see a regular flow of cars transporting children to the centre; the vet will require animal transportation to have access; the wellbeing centre will attract people dependent on transport to the front door. The Modification does not appear to cater for this high level of vehicular movements. The risk of injury to pedestrian, and motor vehicle traffic incidents seems inevitable in the traffic flow information presented.

A new traffic survey is essential to demonstrate the volumes of traffic the area experiences particularly during peak holiday periods, that is, in late December and January. Traffic includes trucks, buses and delivery vans. The existing roads will not be able to process the traffic without chaotic delays and safety issues. Associated with this survey there needs to be further attention given to traffic flow noting the unique needs of the proposed businesses included in the Modification documentation.

When Stage 3 of the development is completed, it will draw a significant extra volume of traffic including large trucks. We note the turning circle in the plan for large trucks. The access to Stage 3 is not adequate and will cause traffic problems on The Wool Rd where children will be walking to attend Vincentia Primary School, Vincentia High School and the Bay and Basin Leisure Centre. It is very close to the roundabout at Naval College Rd and The Wool Rd which is a major intersection with traffic entering from all directions.

- 2) **Safety of pedestrians** – this development will increase traffic volume on the site and put the safety of pedestrians at risk. Pedestrians will have no choice but to interact with the vehicles. There have been accidents where pedestrians have been hit by vehicles on the pedestrian crossing at the main entrance of the current building, near the Post Office. Requests to Home Co have been made to divert traffic around the periphery of the carpark to improve pedestrian safety.

The situation will be exacerbated with the development of both Stage 2 and the Specialty Retail area in Stage 3.

- 3) **Effects on the environment** – the increased hard surfaces to accommodate buildings and parking will create increases in temperature and water runoff into Moona Moona Creek and Jervis Bay. We note the environmental comments draw heavily on the fact that proposals in the original plan were approved for Stage 1 and therefore continue to be valid. Anecdotal evidence indicates that the downstream impacts of water run offs and wind dispersed littering, in recent months, have created unacceptable impacts to the environment and Jervis Bay National Park. Considering the amount of rainfall, we have experienced and recognition of the effects of climate change a new environmental assessment is essential.

The claim under *Fisheries Management* that “the development does not involve impacts to Key Fish Habitat, does not involve harm to Act 1994 marine vegetation, dredging, reclamation or obstruction of fish passage” ignores the consequences of significant polluted water being discharged by the site into the catchment that contains a fish hatchery and whose flows directly affect the Jervis Bay commercial Aquaculture Farming.

Within the Flood study there is no consideration of the increased risk of these flows and their rate of flow on housing developments along Moona Moona Creek, where building DA have been approved by the Shoalhaven City Council prior to this Modification.

#### In Summary

- There are too many fundamental design departures and flaws from the approved Concept Master Plan for this proposal to be approved. There is also the question of whether the proposal/s represent substantially the same development.
- By reversing the layout for Stage 2, retaining the internal shopping centre arcade throughout Stages 1 and 2 and reinstating the Arbor Street concept a better design outcome can be achieved.
- By reversing the layout there will be only two main access points off Moona Creek Rd and the central point will just serve the loading area behind Woolworths. Opportunities for one-way traffic should then be explored
- Public bus services and stops to and from the centre must be looked at in far more detail. This is a critical functionality issue.
- Subject to the above, the concept of a “wellness center” is supported particularly if it incorporated the potential for a major Health Care Facility of a type that would service the needs of the Bay and Basin area. E.g., a Medicare Urgent Care Clinic.
- The principle of further separating Stage 3 can be supported provided access and design issues are resolved.

#### Conclusions:

This modification proposal will result in a project that is a long way from its exciting and award-winning origins. Sadly, what was to be special is now becoming ordinary.

The B&BCLSP-Steering Group and the listed community groups below call for this Modification to be rejected and request that Home Co be directed to consult with the community before they submit any new documentation which in our opinion should incorporate and demonstrate how future modifications will satisfy the concerns raised in this submission.

- The Basin Villages Forum-BVF
- Vincentia Residents and Ratepayers Association-VRRA
- Vincentia Matters
- Huskisson and Woollamia Community Voice
- Sanctuary Point Community Champions-SPCC
- Hyams Beach Villagers Association

Prepared by the Bay and Basin Community Led Strategic Plan-Steering Group

7 November 2022

**Contact Details:**

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**Bay and Basin Community Led Strategic Plan**



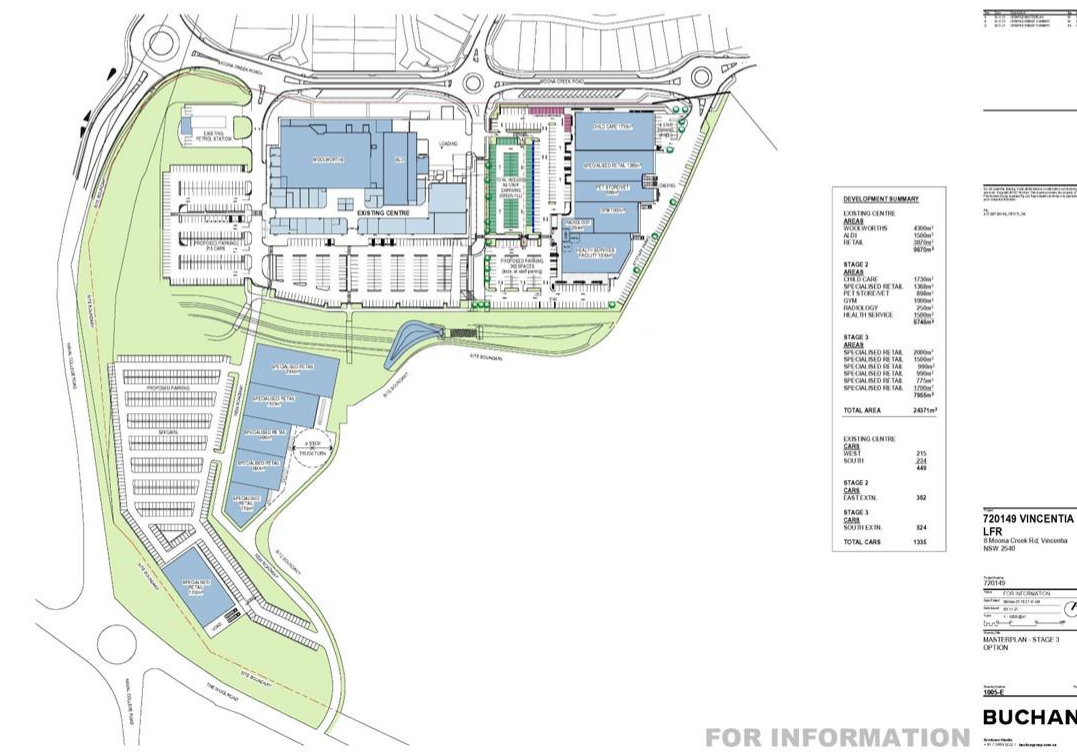


Figure 9 Above: Mod 5 the Approved Concept Master Plan and Below: The current proposal.

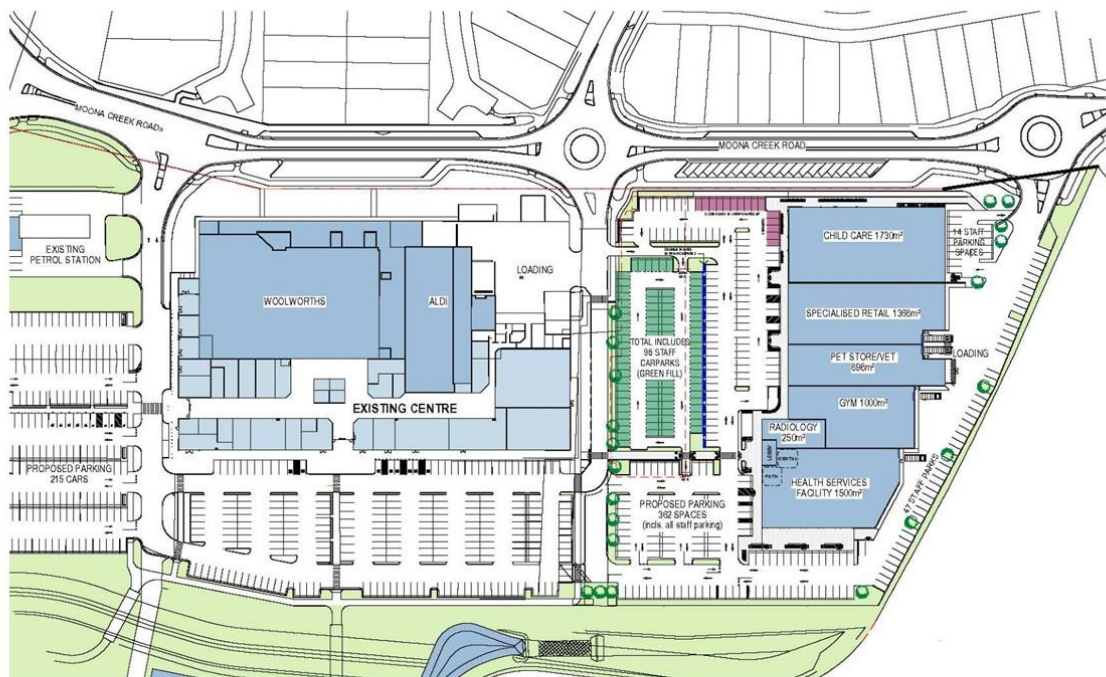
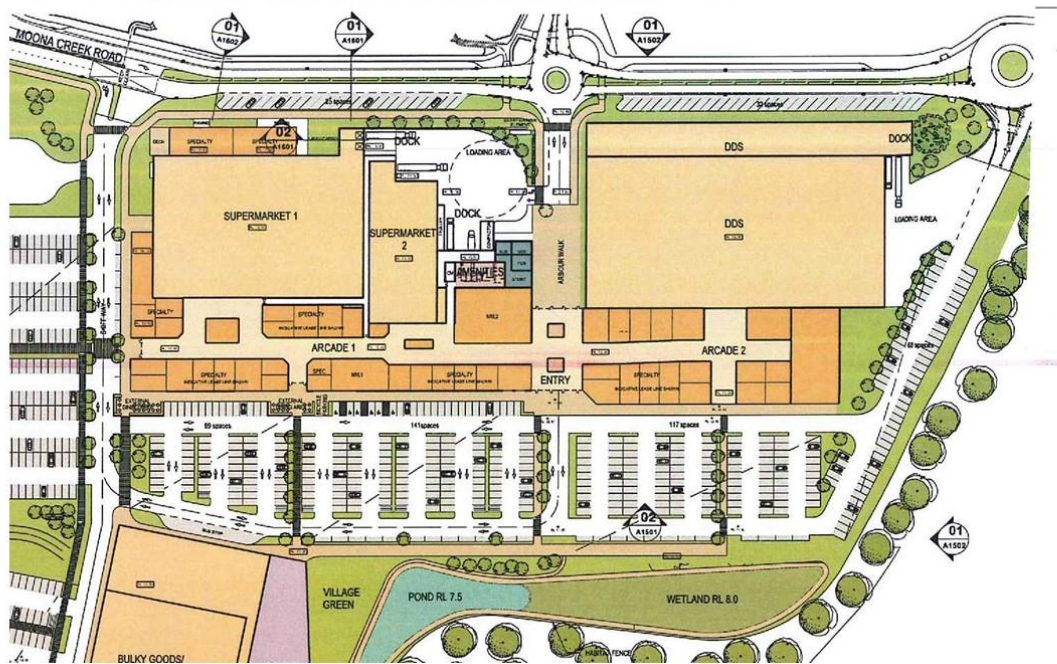


Figure 10 Stage 2 Comparison. Above: Approved. Below: Proposed.





Figure 11 Stage 3 Comparison. Left Approved. Right Proposed.