

1 February 2023

Director Regional Assessments
NSW Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Via: NSW Planning Portal

Dear Sir/Madam,

OBJECTION TO WINTER SPORTS WORLD (WSW) – STATE SIGNIFICANT DEVELOPMENT APPLICATION – SSD-10475

I refer to the above application and submit herein an objection on behalf of Hometown Australia Management Pty Ltd (HTA).

EXECUTIVE SUMMARY

Nepean Shores is a residential land lease community adjoining the proposed WSW. Residents of Nepean Shores enjoy the security of owning a home within a managed community, within proximity to infrastructure, services, friends and family. All residents on long-term site agreements own their home and live permanently in the community as their principal place of residence. Residents can sell their home and transfer the permanent occupancy rights to the new homeowner, thus ensuring there will always be a permanent residential use at Nepean Shores in perpetuity.

The applicant's Social Impact Assessment characterises Nepean Shores as follows:

“At the time of the 2021 Census, the adjacent Nepean Shores residential park was home to approximately 283 people, including predominantly older people (65% aged 60 years or over), high rates of disability (11%), low incomes (44% of households earning less than \$650 weekly), and majority lone person households (69%).”

The age, health and income of most households combined with modest value of homes, means most residents would be unable to find comparable housing in this locality. This makes many residents more vulnerable to the impacts of the WSW development on their health, wellbeing and lifestyle.

The following submission seeks refusal for the proposed development.

Overshadowing

Overshadowing has a disproportionate impact on residents who are retired, elderly, have mobility issues, spend a lot of time at home and live in homes of lightweight construction.

It is our strong opinion that the application does not sufficiently assess the impact of overshadowing on residents of Nepean Shores. The application confirms some residents will face winter months with less than 1-hour of direct morning sunlight, when morning temperatures in Penrith average 10.5-degrees (bom.gov.au). During winter some homes won't receive full solar access until 12pm.

Despite this, the applicant's Environmental Risk Assessment describes overshadowing as 'unlikely', with 'minor impact' and 'low risk'; however, based on the application material we believe the impacts

are 'almost certain', with the potential for 'major impact' and 'very high risk'. A 'major impact' being a loss of physical/mental health and/or financial loss to residents in the value of their home. A 'very high risk' requires preventative action – in this instance, we believe the only way to prevent major impact on residents is to refuse the WSW development application.

Visual Impact

The Introduction to the Visual Analysis references the 'EIA No. 4 Guidelines', stating (emphasis added): *"Visual assessment addresses people's views of an area from their homes or other places of value in the community."* It goes on to say the 'determination of impacts' is based on 'sensitivity' and 'magnitude', the former relating... 'to the type of viewer and number of viewers', while magnitude... 'relates to how far the proposal is from the viewer.'

The Visual Analysis fails to analyse the number of viewers in Nepean Shores, the type of residents in Nepean Shores or the proximity of residents to the proposed WSW. In fact, the only reference to Nepean Shores is on page 3, where the 'Site Analysis Plan' refers to Nepean Shores as the 'unsightly mobile home park.'

The veracity of the Visual Analysis is significantly diminished by its failure to consider the 'sensitivity' of Nepean Shores against the 'magnitude' of WSW, while the characterisation of Nepean Shores as 'unsightly' suggests the Analysis lacks objectivity. Proper analysis would identify the number and age of residents in Nepean Shores, their current amenity / views and the significant 'magnitude' of WSW in close proximity to resident homes. We believe the absence of this analysis shows disregard for the residents most vulnerable to visual impact. An objective assessment of WSW based on sensitivity and magnitude would, in our opinion, confirm the development is inappropriate for the setting and should be refused.

Social Impact Assessment

The SIA analyses 'Strategic Context' by highlighting local, regional and State strategies related to the economy, employment, sport, recreation, accessibility and inclusion. We believe the 'Strategic Context' must equally assess strategic objectives related to housing choice, aging in place, development scale / context and the critical importance of housing security, safety and amenity.

The SIA does not assess the potential for WSW to have a direct impact on resident physical/mental health, amenity, lifestyle and/or result in financial loss or displacement of residents. Based on the resident profile, we believe the risk is very high and may have broader social impacts on housing and health. For these reasons, we believe the development should be refused.

Flooding

With recent flood events, flooding is a major concern for residents and Hometown Australia. The Flood and Stormwater Management Strategy does not clearly explain the behaviour, source and direction of flows during the range of flood events, or whether the 'flood storage' area shown on the architectural plans is of sufficient height/depth for a range of events and the potential for blockage. Based on architectural cross sections, the flood storage area appears to be approximately 1m high in part; while the flood modelling indicates post-development depths of 0.5-1m.

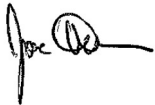
The risk of blockage and/or insufficient capacity would have significant impact on Nepean Shores. Given the potential impact to life and property, we believe no increased risk is acceptable and this warrants comprehensive assessment.

Acknowledgement

I declare that I have not made any political donations in the last two years and acknowledge and accept the Department's disclaimer and declaration.

Should you wish to discuss any aspect of this application, please contact me on (02) 9055 8631 or email jwaugh@hometownaustralia.com.au.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Joe Waugh', with a stylized flourish at the end.

Joe Waugh
Head of Planning

HOMETOWN AUSTRALIA
C O M M U N I T I E S