

Mark Brown,

Metropolitan & Regional Projects South

NSW Planning and Infrastructure

GPO Box 39

SYDNEY 2001

Dear Mark,

**RE Objection** to Concept Plans for the Cronulla Sharks Development  
Woolooware Project Application Stage 1 -( MP10\_0230) Please accept this letter as  
my formal **objection** to the proposed development stated above.

Note I do not want my name and address published on the website.

I declare that I have not made any reportable political donations.

### **Environmental impacts**

It is clear from reading the submissions from The NSW Fisheries, Department of Environment and Heritage and the Office of Water that the proponent has failed to address the Director Generals Requirements in relation to many environmental issues, and have actually submitted **inaccurate and incomplete** information or **no information** at all. These include

- “the proposal fails to state that the adjoining mangroves are part of Towra Point Aquatic Reserve”,
- “Map presented in the EAR showing boundary of reserve is inaccurate”, does not address development affecting the Aquatic Reserve”,
- “EAR has not accurately stated DPI – Fisheries requirements from the buffer zone”,
- “insufficient ecological information especially in relation to the adjoining wetlands, flooding and Aboriginal culture”.
- “has not adequately addressed the protection and rehabilitation of the riparian land at the site and have not demonstrated compliance with DGR requirement for 40m wide core riparian zone”,
- “the location of pathways should be located outside the riparian zone”,
- “the proposed foreshore park for both passive and active recreation does not provide a fully vegetated riparian area (3.3 of EA)”.

The proponent has not met any compliance on any of these matters and the effect on the adjacent wetlands and attached eco systems has not been addressed. Human habitation of the high rise residential could lead to people having animals onsite including cats, which could have a devastating effect on the migratory birds in the Aquatic Reserve. The proponent has not attempted to comply with the DGR for the Environmental aspects of this application, as it is doubtful that

the building of such an intensive development of 700 high rise units and a shopping Centre only second in size to Westfield in the Shire, in this area could be achieved without adverse impacts on the adjacent Aquatic Reserve and Riparian buffer.

The flood impact has not been adequately addressed and I forward to you a sign which is on the gate of the Cronulla Caringbah, Junior Rugby League Football Club grounds (where the 700 high rise units are proposed) (Annexure "E") which states "IF YOU ARE HERE AND THERE IS A FLOOD GO TO HIGHER GROUND AREA" This should be telling in itself that such a sign is required on the gate of the playing fields. I also include a photo (Annexure F) from the Cronulla Leader Magazine November 2011 showing the corner of Gannons Road and Captain Cook Drive in the 1974 floods showing the site of the proposed development under water. With climate change and sea level rises imminent, the outcome for the development on these playing fields would be that they would be built not only on an old uncontrolled tip but also on flood prone land, and land subject to inundation, especially given the rise expected in sea level over the next few decades.

## **BUILT FORM**

There is no reasoned argument for the height and density of the proposed residential development. It is not in keeping the surrounding area, which is a recreational precinct, surrounded by a protected Aquatic Reserve and low scale housing 400 metres from the site. It would be out of character with the entire area, being such a dense form would have a major impact on the visual amenity of the area especially as viewed from the Bay. The visual integrity as viewed from the Bay is supposed to be maintained so as to not impact the views of the wetlands from the water. There is no justification for the impact this massive residential and retail development would have on the area. ***The highest Tower will be the highest building in the Shire.***

The extra units proposed cannot be accepted as required to meet the Sydney South Sub-region strategy as the target figure of 10,100 dwelling has already been identified within existing zonings in the Shire and this extra 700 high rise units is not required to meet this target.

Already land has been rezoned for housing at Greenhills Beach, just 1.5 kms East of this proposal, this rezoning is for 450 residential blocks which will contain large houses, this will add approximately another 2,000 people to this very area over the next year or two. Another project has just been announced at North Caringbah on the surplus land on Caringbah High School with another

development of 290 units and townhouses. The cumulative effect of these new residential estates and the proposed high rise development/large shopping complex will have huge effects on the existing infrastructure of the area, which is unable to cope at the moment.

### **Open space within residential component**

The open space component of the residential development appears to be located on top of the podium level of the units, I am not sure how public would access such "open space", which is built upon the concrete roof of the two podium levels. The other open space appears to be located in the buffer zone of the Aquatic Reserve and is not recommended by NSW Office of Water nor the Department of Primary Industries.

### **Economic Impact**

From the figures presented Franklins at Cronulla would lose about half their trade to the new Centre, so in terms of job creation one may say we are just shuffling the numbers around from one employment Centre to another. It should also be noted that ALDI is opening a new large store at Miranda, so somebody is going to miss out in this regard. The justification that new jobs will be created cannot be proven. There is also the fact that the Cronulla Leagues Club will be about one third the size so there will be a loss of jobs there, also during the building phase there may be no employment for local ongoing jobs, it cannot be argued that the builders will be sourced locally, in this day of fly in fly out workers they could come from anywhere. The development could be sold to a company such as Meriton who have their own preferred contractors, so there is no guarantee of local jobs.

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The size of the Retail development is out of character with the area and is not surrounded by a residential precinct. It is in an isolated recreational precinct on an arterial road which services a peninsula. Positioning a retail centre of this size in this area cannot be justified and does not meet any the criteria of the DOPI Draft Centres Policy in a number of ways, access to public transport ( see letter 25/11/11 from Transport NSW on Department of Planning website Agency submissions) where they say they have no current plans to provide a new bus service as suggested by the proponent. ,Infrastructure to support future public transport, good pedestrian access etc. The isolation of the site and environmental constraints reduce its development potential.

### **PARKING**

No game day parking is provided onsite.

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The traffic situation on Captain Cook Drive, will present the position of no way in and no way out of Cronulla /Kurnell.

3 sets of traffic lights on Captain Cook Drive – will cause traffic congestion and blockages.

Has the evacuation plan for Kurnell residents been consulted- how will residents evacuate along Captain Cook Drive with so much development concentrated there? Combined with the cumulative effect of the Australand /Breen development.

**Game day satellite parking has been glossed over, the proponent put forward** their game day parking to Sutherland Council in august, 2011 the proposed game day parking at Woolooware High School , Wanda and Seymour Shaw was refused by council ( annexure “G”) environment and planning LP/03/332127.

However these same parking proposals have been included in the game day parking with this application.

Woolooware High school confirms that no parking can take place on their grounds.

Cronulla High school confirms that there is no existing parking that can be used for game day parking.

Wanda has also been ruled out – if as the plan contained in current application was imposed and parking of 400 cars at Wanda was adopted it would take over 2 hours using 5 full size buses to bus the occupants back to their cars after the game. Who would wait that long? This is not a practical solution.

### **Public Transport**

The report dated September, 2011 submitted with this Concept Plan by McLaren Traffic Engineering States on page 5 “Create New Bus Service”

It refers to discussions with the Department of Transport who have agreed “in principle” with the provision of a new bus service that will operate between Miranda- Cronulla rail stations etc.

However in a submission received from NSW Transport for NSW dated 25<sup>th</sup> November, 2011 the Transport NSW clearly state that “TfNSW currently does not have any plans to provide a new bus service as suggested by the proponent. As advised in the letter of 18<sup>th</sup> August, 2011.”

It appears that the proponent already had advice from the Transport Department that there was **NO** in principle agreement for a bus service to service this development. before the lodgement of the Concept Plan and was trying to mislead in this regard.

Significantly the Proponent did not have their Traffic Consultant at the presentation to Council on 28/11/11 when Council was considering its report to the Department of Planning regarding this application.

## **Loss of Playing Fields**

No playing fields have been secured to replace the Junior fields.

The 500 players registered with the Cronulla Caringbah JRLFC have been led to believe that they have assured fields to go to at Cronulla High School. This is not the case there are no approvals in place with either the Education Department ( ANNEXURE " H") in fact the plans submitted for the concept plan for the clubhouse of the Junior Rugby League Football Club ,with this development application contains bars and function areas. The Deputy Director General Finance and Infrastructure Department of Education in a letter dated 14/11/11 ( annexure "I") advises that alcohol will not be allowed on the grounds of Cronulla High School nor any other Public School land.

The executive of the Cronulla Caringbah JRLFC have been led to believe that any move of grounds and subsequent facilities purpose built for them ( ANNEXURE 'J') would include their present club facilities, which include bar facilities. This cannot happen even if they could secure the playing fields at Cronulla, there is no certainty for the 500 JRLFC players.

There is a documented shortage of playing fields in the Shire and the fields to be built by Breen/Australand are already allocated and are not available for several years. There are no other opportunities to gain open space in the Eastern part of the Shire, so the loss of the JRLFC grounds cannot be offset by any additional grounds, therefore there cannot be any compliance with DGR to address the loss of active open space and detail how demands for sports fields will be met within the context of growing participation rates across all sports. The only option would be to buy residential land and turn it into playing fields which is unlikely. There is a shortage of open land especially on a Peninsula, these playing fields and facilities cannot be replaced.

## **Traffic**

The introduction of 3 sets of traffic lights along this strip of Captain Cook drive will lead to massive traffic congestion. The residents of Kurnell are often evacuated from their homes when incidents happen at Kurnell. The bottleneck that would ensue from this development on this single road out of the Peninsula could have disastrous results. The Kurnell Evacuation Plan should be consulted (see also Land Use Safety Study Kurnell Peninsula Feb 2007 Department of Planning) in relation to any increase in traffic in this area. The siting of this mega development would be akin to putting a potential "road block" on this only Road that services Kurnell and the Northern end of Cronulla. This could lead to

devastating consequences if evacuation of the Peninsula is required and this has happened in the past few years, with a Chemical Fire on 25/3/11 causing the evacuation of 250 residents and the blocking of Captain Cook Drive at Elouera Road, causing traffic chaos.

Captain Cook Drive services Cronulla , Wooloware, North Cronulla, Kurnell, South Cronulla and during the summer the roads are at peak capacity. We are talking about the road infrastructure servicing four surfing beaches, there are regular surf carnivals and other activities that take place at the beach on a regular basis.

This one road is was not designed to carry capacity vehicle load, it has restrictions, the Towra Point Aquatic Reserve on one side and the golf course on the other, there is very little room to widen the road without encroaching on the wetlands, this will lead to a road with no way in and no way out and could be catastrophic if a major event occurred at Kurnell.

The current intersections are at peak load in the peak times for travel including the intersection of Taren Point Road and Captain Cook Drive which would have to be upgraded to accommodate any further traffic.

## **SUBMISSIONS LODGED BY AGENCIES WITH THE DEPARTMENT OF PLANNING IN RELATION TO THIS APPLICATION**

### **Department of Primary Industries (Fisheries)**

Comments:- proposal fails to state that the adjoining mangroves are part of Towra Point Aquatic Reserve.

Map presented in the ear showing boundary of reserve is inaccurate.

Does not address development affecting aquatic reserves

EAR has not accurately stated DPI- Fisheries requirements for buffer zone.

### **Sydney Water**

Existing water mains to be enlarged from Kurnell and Hume roads current wastewater system does not have sufficient capacity to service the proposed development

Trade waste – Sydney Water does not guarantee that it will accept trade waste to its sewerage system.

### **Office of Environment and Heritage**

OEH considers the Environmental Assessment does not adequately address the Director General's requirements – insufficient ecological information especially in relation to the adjoining wetlands, flooding and aboriginal culture.

#### **NSW Office of Water**

The Environmental Assessment has not adequately addressed the protection and rehabilitation of the riparian land at the site and have not demonstrated compliance with the DGR'S requirement for a 40m wide core riparian zone.

#### **Roads and Traffic**

Captain Cook Drive is currently at capacity during weekdays pm peak period. the committee advises that this intersection should be upgraded to mitigate the traffic impact of the proposed development to be paid by developer.

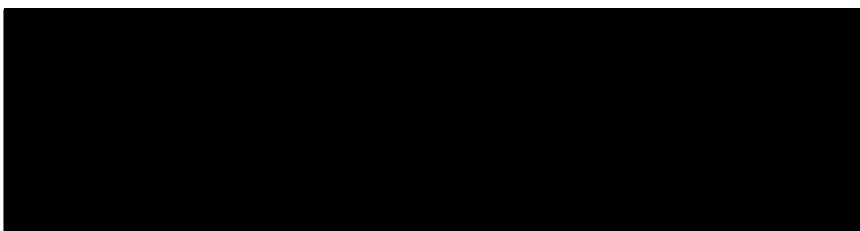
#### **NSW Transport**

States" The Transport for NSW does not have any plans to provide a new bus service as suggested by the proponent. As advised in the letter of 18<sup>th</sup> August, 2011."

#### **Sutherland Shire Council**

The report submitted to the Environment and Planning Meeting of the 28/11/11 (Annexure "K") and endorsed to be submitted to your Department by the Council, this was in keeping with the Letter to the Council by Planning NSW (Annexure "L" in relation to ensuring that the Department worked closely with the Council in assessment of this project and to ensure that Council's views are fully considered. In light of the damning assessment of the proposal on all aspects we hope that the Department will take this submission very seriously as it also expresses the issues that the "local" residents have in relation to this massive overdevelopment. The local residents will be impacted upon in a massive way.

Yours faithfully,



WOOLLOOWARE NSW 2230

