

**Dr. Danny Wiggins (BTP, LFPIA)**

**Culburra Beach 2540**

## **Objection**

### **Submission on West Culburra Concept Proposal: concerns and suggested improvements (Application No. SSD 3846)**

**February 2021**

Thank you for the opportunity to comment on this amended application.

My name is Danny Wiggins, and I am a town planning consultant (in private practice) and a long-term permanent Culburra Beach resident. I have made no political donations.

Please find below my comments on the Amended Concept Plan Application under the following 6 headings:

1. General comments
2. Precinct 3 New Residential Area
3. Precinct 2 Industrial Centre Expansion
4. Precinct 1 The Town Centre Extension
5. Building form
6. Concluding comments

References in brackets refer to pages /diagrams in the Environmental Impact Statement (EIS).

#### **1. General comments**

Comparing the amended application with the original, it seems that the applicant proposes to make-up for the loss of development potential adjacent to the waterways by proposing major medium density (low and medium rise) developments adjacent to the town centre. This is acknowledged in the EIS (10).

The Court should consider whether such intensive residential development (especially the medium-rise component) is appropriate for the coastal town of Culburra Beach. This was never envisioned in the numerous State Inquiries and Reports. It is contrary to the council's Local Strategic Planning Statement (LSPS), the council's draft character statement for Culburra Beach and the State Governments Urban Design Guidelines (as well as the GANSW Urban Design Guidelines for Non-metropolitan areas). The LSPS is not mentioned in the EIS Table of Contents, despite it being the major development in strategic planning in NSW in 40 years. Please see Planning Priority 1 of the LSPS which, while acknowledging 'residential subdivisions of existing zoned land' at Culburra, clearly nominates Nowra and Ulladulla as appropriate places for 'increased residential density (town houses and apartments' (LSPS: 25)

Similarly, the proposed industrial area and retail component far exceeds current (and possible future) local area needs. The draft Illawarra Shoalhaven Regional Plan and Council's LSPS favour South Nowra for industrial growth. The LSPS adds the Jervis Bay-St. Georges Basin area and Ulladulla as areas for industrial growth (LSPS, Planning Priority 9: 41). In terms of additional retail development, the EIS acknowledges the current vacancy rate in Culburra.

As per my previous Submission, while stressing their significance, I will leave questions of the impact on water quality and aboriginal heritage to others.

#### **2. Precinct 3 New Residential Area**

I support a western extension for Culburra. In principle, it is supported by the Council and the State Government. The fact that future residential development is limited to the north of the main road

reflects years of debate, public inquiries and compromise (to protect Lake Wollumboola). As some of this land is a 'deferred matter' in the 2014 LEP, residential zoning from the 1995 LEP remains.

Having said that, the proposed subdivision layout is contrary to current urban planning thinking, the current State Government priorities and the DGRs for the original DA. There is little evidence in the Reports on the requirement that the proposal is to consider the Heart Foundation's "Healthy by Design" publication (Director-Generals Requirements – DGR – 12.2). This is a guiding document across Australia for 'Healthy Planning' (an area that I have been deeply involved in for a decade). In fact, the EIS states that '...this assessment has not specifically addressed the design considerations within' Healthy by Design (61). It is not true that the revised plan 'has incorporated optimal design approaches that encourage active living' (61), particularly within the subdivision. In these COVID times walkability and active living are paramount.

The subdivision is bland, old-fashioned and mono, especially given the current wealth of advice provided on the 'green web', 'urban heat island' effects and walkable neighbourhoods from, among others, the NSW Government Architect. Why is it so bland?

As a result, there are a number of specific issues with the subdivision layout:

- This is not a walkable neighbourhood. Walkable neighbourhoods promote everyday activity, not satisfied by the waterfront park or minimal through-site links shown on the plans. Consider the southern-most lots. Cars will dominate.
- There is no central 'hub' as a community meeting place
- The lack of an internal open space network. Quality open space should be provided within the subdivision, not just the reserve. A network, with a number of passive and active recreation/ social options should be provided. There is not one open space area within the subdivision. Council's LSPS Planning Priority 1 promotes 'new suburban areas with high quality open space ....' (LSPS: 25).
- All up, the subdivision is an overdevelopment, aiming to maximise lot yield at the expense of open space/ walking connections for all lots.

At least, prior to any concept plan approval, the proponent should delete the poorly located lots (and many of the culs-de-sac), build-in internal open spaces and a pedestrian/ green network.

Also, I raise the implications for traffic at the roundabout during peak hour. 222 (or more) dwellings. One road in one road out (with strong memories of the bushfires).

### **3. Precinct 2 The Industrial Centre Expansion.**

The draft Illawarra Regional Plan and Council's LSPS favour South Nowra for industrial growth. The LSPS adds the Jervis Bay-St. Georges Basin area and Ulladulla (LSPS, Planning Priority 9: 41).

Why would tradesmen and residents outside of Culburra access this area in preference to South Nowra (e.g. the brand-new mega Bunnings). Is it to cater for the needs of the various trades as the staging of the project unfolds? If taken-up, will it be dominated by self-storage units.

### **4. Precinct 1 The Town Centre Extension**

I question the need for additional retail space, given the proximity to Nowra, the Council and State Government's priority to revitalizing the Nowra City Centre and the local impact of the Woolworth's Supermarket. As noted above, the EIS (and the accompanying Report) acknowledges the current oversupply of some 3,000sqm of retail space in Culburra (34).

While the LSPS supports the supply of housing types to allow people to change homes, it is the extent and the relative location of the medium density area that is a problem. Also, as mentioned above, Council's LSPS clearly nominates Nowra and Ulladulla as appropriate places for 'increased residential density (town houses and apartments' (LSPS: 25). While limited and well sited medium density would be appropriate, the extent is an ambit claim and should be scaled-back from the west.

I do not believe that, as claimed in the EIS, 'the proposal has been designed to align with the existing urban character of Culburra Beach and provides a similar layout (i.e. height controls, scale and lot size)' (90)

The relative location of the housing-types needs to be considered:

- a) In particular, the massing of unbroken two-storey medium-density development backing onto Culburra Road. This is shown as a continuous strip in the aerial view (Appendix 11). Once constructed, there will probably be continuous fencing along the Culburra Road. This would be a poor urban design outcome and a negative 'entry statement' to the coastal village, as would the roundabout (suggested in the EIS). This problem is acknowledged in the EIS by numerous references to 'hiding' this by tree planting (and the aerial photos, appendix 11).

'The proposal is to enhance the local character around the town centre and minimize the visual impact of future built form to be minimized with the use of street tree plantings and large foreshore buffers' (15)

'The built form (**to be considered in future DAs**) will be visible where it extends to the existing town centre and the industrial precinct will be mitigated with street planting' (90)

'The visual and indicative aerial interpretation (Appendix 11) of the proposal demonstrates that the site is suitable, and that likely future development (**subject to separate approval**) will be located behind a sustainable vegetation buffer ....' (95)

The proposed lot layout in this precinct is a constraint on innovative design. It appears from the staging plan (Appendix 10) that concept plan approval is proposed for this layout (see below).

- b) The medium density element would be more appropriately located adjacent to the town centre, perhaps surrounding a new park, or town square, rather than a continuous strip along Culburra Road.
- c) Similarly, the integrated housing area (while supported as a way to increase affordable housing) should not be an island, but subject to an overall, well-conceived masterplan for the precinct (see below).

Reconsidering this precinct may provide potential for innovative mixed housing, better linkage to the existing town centre, and allow for an attractive and appropriate welcome to the town from Culburra Road. Why not treat the precinct, in concept, as a mixed-use zone and allow the market to be innovative, with a masterplan for the area, and an emphasis on the public domain? Perhaps a town square.

## 5. The built form

**'The exact layout of individual lots, roads, public reserves, etc. will be addressed in subsequent DAs' (11)**

As highlighted (**in bold**) in the excerpts in 4. (above), the EIS claims that the built form/ urban design will be subject to future DAs. Yet, the proposal specifies lot layouts and building heights. Both of these measures have a major influence on layout (the 'skeleton' of a place) and built form. Once again, the wealth of recent and current guidance on urban design from the Government Architect NSW is evidence of good practice.

Further, the staging plan uses the lot layout as a guide. This contradicts the claim that building form will be left to later DAs.

## 5. Concluding comments

In conclusion, I hope that the Court will consider the following matters:

- a) Acknowledging the contradiction, in the EIS, between the numerous statements that the built form/ urban design will be subject to future DAs and the EIS:

- describing the proposed stages by plan-based reference to lot layouts (Appendix 10)
  - delineating low and medium rise areas and height limits as part of the concept plan approval
- b) Clarifying the level of detail that will be included in any 'concept plan approval'. Will it lock-in the:
- subdivision layouts?
  - height limits X sub-precinct?
- c) The impact of traffic build-up at the intersection of the residential subdivision with Culburra Road. One road in one road out.
- d) Improving the residential subdivision layout as per good urban design principles and practices, and the DGRs
- e) The extent of medium density development as part of the Town Centre Extension
- f) The impact of the unbroken streetscape of future medium density development (11metre height limit), and possible back fences as an entry statement to the sea-side town – as noted in the EIS by numerous references (and the aerial photos) to 'hiding' this by tree planting.
- g) Shoalhaven Council's LSPS and draft character statement for Culburra Beach, and other council and state-level documents i.e. Coastal Guidelines, the various GANSW publications.
- h) The need for the extensive industrial area

Once again thank you for the opportunity to comment on the future of our town.