

Major Project 09_0166

Altitude Aspire – Stages 1-11 Parish of Terranora, County of Rous

Objection to the Project

- The subdivision design does not comply with Tweed DCP 2008. The balanced earthworks across the site do not justify the significant inconsistency with Tweed DCP 2008. *Approx 18% of the site will require earth works at greater than 5m depth – Bradlees Civil Consulting, Nov 2010.* Tweed DCP 2008 restricts this figure to !0% and up to 15% where environmental benefit can be demonstrated. In this instance the balanced earths and avoidance of importing fill could not be countenanced as a demonstrated environmental benefit, as the objective is to generate the maximum yield of allotments, not to achieve a design sympathetic to the topography – some fill areas are up to 15m.
- The layout, size and numbers of allotments do not constitute good design. Massive cut batters are designed the rear of allotments 801-810 in Stage 8. Tweed DCP 2008 recommends no sharp changes of gradient at or near interlot boundaries (presumably this includes boundaries within and between adjoining subdivisions as well)
- The allotment yield driven design imperative has resulted in massive cut and fill areas. If this factor was subjugated by good design then allotments 601-610, stage 6 and allotments 712-721, Stage 7 would be eliminated from the design. This would obviate the need for such massive quantities of fill (some of these allotments fall within the existing large farm dams, will require extensive draining, excavation and careful stabilisation if they are to provide sound building platforms). The elimination of the above allotments would allow a larger proportion of the existing drainage swale to be retained in its existing state, provide a more viable (wider) wildlife corridor between remnant vegetation in Council reserves to the south and SEPP 44 areas abutting Terranora Broadwater
- The proponents claim that the subdivision layout design has been driven by Tweed Shire Council's 'new urbanism' principles for transport (sic) connectivity throughout the development cannot be used to justify the over engineered, intrusive road connection across the existing drainage swale. This road link simply provides a cost effective solution (for the proponents) to unlock a further 135 allotments on the western side of the major drainage swale using the Fraser Drive roadway infrastructure via a proposed 'temporary' round-a-bout. A more rational design would be to provide a parallel feeder road from the intersection with the proposed Broadwater parkway to service the allotments on the eastern side of the major drainage swale, that is the allotments in stages 1-6. This would have facilitated a precinct style 'east & west' design with their own design attributes sympathetic to the topography rather than the 'cookie-cutter' layout served up by this proposal. A parallel feeder road would also move the building

envelope for residences along the length of Frazer Drive, further to the West, which would go some way to lowering noise impacts from Fraser Drive traffic. It also may reduce the need for the proposed acoustic barrier/fence along Fraser Drive which will significantly impact on high value distant landscape views (mountain & lake) afforded to motorists traversing Fraser Drive.

- The subdivision design ignores the interface between the adjoining rural-residential precinct and the proposed urban precinct. The different zonings accommodate a variety of differing activities and incorporate a range of residential values that are not always compatible. The current design concentrates amenity impacts along these boundaries, especially in the instance of lots 55 & 58 DP 792238 where each of these allotments has been subjected to an interface with no less than 5 new urban allotments each. There appears to be no consideration of how this interface should be managed. Although one of the proponents' statements/publications did suggest that each of these residences were sufficiently located away from the proposed common boundaries to mitigate any amenity impacts - at its worst interpretation this statement is contemptuous or at its best it simply fails to appreciate urban design 101 principles. A landowner's amenity is enjoyed to the extent of the boundaries, not confined to the building/dwelling exterior. No provision has been made for screened fencing, rear boundary setbacks or buffers in the new allotments to minimise impacts, instead these existing residences are relegated to the vagaries and cost of dealing with five new adjoining neighbours under the Dividing Fences legislation – a travesty of design !!
- The ecological predictive assessment seriously understates the fauna diversity on the site. Over 100 species of birds have been recorded by neighbouring residents as using both the subject site and adjoining reserves. Only 38 species were recorded through the time-limited assessment by the proponent's consultant. Indeed the predictive assessment indicated that the Comb-crested Jacana, Magpie Goose and the Wompoo fruit dove are unlikely to occur in the study area. On the contrary all these species have been observed on numerous occasions as using water bodies (farm dams) and pockets of existing vegetation remaining on the site. A population of Comb-crested Jacana have been recorded inhabiting artificial waterways opposite the South Tweed Rugby League Club on Fraser Drive. It's highly probable the Jacanas use the network of farm dams on the subject site as part of their local migratory corridor. The report does not record the wallaby population on the site, which are regular visitors to adjoining properties. Much photographic material records their presence. The removal of grassland corridors by restricting the width of the drainage swale and planting it out to subtropical species, combined with impact of feral cats and dogs will in all probability quickly decimate the remnant population of the larger marsupials on this site, as it has done in . No provision has been made for their accommodation in terms of vegetation or connecting grassland corridors. A family of wedge tailed eagles have used this property for generations as part of their range. A reduction of open grasslands will incrementally diminish their habitat.

- "The site is a prolific mosquito breeding area following major rain and spring tides" – Clive Easton, Tweed Shire Council Entomologist cited by James Warren in Ecological assessment – Altitude 1. Notwithstanding the historical acceptance that this is a major mosquito breeding site, the environmental evaluation report concludes that the mitigation and habitat modification measures will adequately minimise the public health and biting nuisance risk. This conclusion is not supported by the recent statistics which log the rising incidence of reported mosquito borne disease in the Northern Rivers catchment. The net effect of placing increased numbers of persons adjacent to a well-known source of prolific mosquito and biting midges will be to increase the risk of exposure, not adequately minimise it.