



23/08/11

**Major Projects Assessment, Dept of Planning and Infrastructure
GPO Box 39 Sydney NSW 2001**

Re: 09_0019 Project Application

Please note: I do not wish this submission or my personal details to be made available to any other parties.

I object to this application on the following grounds:

Zoned 7d Scenic Protection

The site is currently zoned 7d scenic protection, obviously with the intention of retaining its aesthetic riparian qualities. Development here would detract from or destroy those qualities. These cabins will not have the "low profile" suggested by the proponent, first the land will be filled more than a metre above natural levels, and the floor of the cabin raised more than a metre above that. These are effectively two-storey structures. And the proponent wants to raise them still higher if the sea level increases!

Land flood-prone

The site is within 40m of the riverbank, entirely within the Macleay floodplain. The site will have to be filled and the cabins raised on stilts to clear the expected flood level. Even so, the proponent gives the cabins a shelf life of only 50 years before they'll have to be raised again to keep ahead of rising sea levels! This is clearly unsustainable.

The elevation of the site is below 2m AHD - I had understood new coastal developments below 4m AHD were being discouraged due to climate change impacts.

The fact that an emergency evacuation plan is included in the application serves to illustrate what a silly idea it is to build here.

Previous applications rejected

There have already been 2 applications for a development on this site, both were rejected by the DOP. I don't see this application as being substantially different from the previous ones.

SEPP14 Wetland and Endangered Ecological Communities (EEC)

The site is almost entirely filled with SEPP14 Wetland and EEC. At least some of this EEC will be destroyed by this development. To say that the part that is to be developed is in a degraded state is misleading -- these areas can be regenerated if cared for.

There is no information on how the "constructed freshwater wetland" will impact on the salt dependent EEC. The MUSIC stormwater data appears incomplete, I'm not satisfied that the proponent has proved that pollutants will be kept out of the wetlands.

While it is laudable that the proponent includes a wetlands management plan to offset the development footprint, the fact that this is only included at the direction of the DOP, and it wasn't included in previous applications, means that this is not a priority for the proponent and therefore I have no confidence it will be adhered to.

I also have no confidence that damage to the EEC from cumulative impacts, i.e. trampling, pollution etc will be stopped by "educational signage."

Other constraints

This site is also fire-prone, with high-risk Acid Sulphate Soils present. Combined with the flood risk, there is too much danger to human life, as well as potential threats to the EEC/SEPP 14 Wetland.

In summary, this development is intended to make a pile of money for the proponent, and will provide only modest tourist revenue for South West Rocks. Especially if the tourists only eat/drink at the proponent's tavern next door. Tourists + tavern + floodprone cabins sounds like a recipe for disaster to me.

Why is this being considered under Part 3A anyway? How is 9 cabins in South West Rocks a "state significant development" ?

Yours sincerely,

