

Re: Modifications to Casuarina Town Centre Concept Plan and Project Approval

I am expressing the views of my husband & I in relation to the exhibited proposal for the **Casuarina Town Centre Modifications** – Tweed Coastal Villages, Tweed Shire NSW (by Clarence Property)

- **Process:** We are concerned at the “**Approval Creep by Modification**” that has eventuated with this land over a number of years and different owners who, having received their revision, have then on-sold the land to another developer for the same process to commence again. We feel that this application is so different to the initial proposal (which surely must be the standard against which this is compared) that it should have been an entirely new development application rather than yet another “modification”.
- **Green Space:** The reduction of “green space” from a 36m wide easement to the current amendment request of an 8m open space with a 2.5m wide footpath is of great concern to residents of Casuarina and the developer should be required to revert to the original plan. The green space is not *just* green space, it is also specifically designed to provide fast run off and quick absorption of excess water in major storms in this sub-tropical region. It also provides important habitat for native animals and plants, reduces bushfire risk, and helps regulate and enhance the amenity by careful native tree plantings, of all adjoining development, which is after all being established on poorly rehabilitated sand-mining areas.

Storms such as the Pasha Bulker storm in Newcastle (specifically at the Garden City Shopping Centre) provide clear evidence that piping – even when massive and with large parkland areas nearby to absorb run-off, still results in huge damage to public and private fixed property and motor vehicles in major storms.

In an area which has not suffered a 1:100 year event in the last decade there is no proof of what is adequate - or not.

Consultant Engineers can argue that in their professional opinion this proposal is adequate and that earlier work done in developing the swales with large adjoining green areas, is “over-engineering”, but where will they be when the damage occurs and homes are swamped. Once again the taxpayers of Australia and the NSW government will be called upon to pay flood relief and these “professionals” who have argued for the downscaling of these areas will be nowhere to be found and not held accountable.

It is doubtful whether to pipe the swale and cover the area with a tar road is the most intelligent solution in a high rainfall area.

Has the developer considered a one way single lane ‘mews’ or Radburn type development with rear car-parking access, providing owners with parkland at their front boundary so that the original swale is retained as important open space? This would also minimise the amount of paving required for the rear entry road as the flaring design of the allotments facing the swale would lessen the amount of road required to provide a rear access. Importantly it would retain the privacy of residents much more than a frontal roadway and would encourage external living spaces which optimise the best solar orientation limiting heat transfer impacts from hard surface areas and improving the residential micro-climate and passive and solar performance standards, in-line with current Tweed Shire Council guidelines. The shorter roadway required and the no-through road design could also contribute (albeit in a minor way) to retaining higher air quality and minimising traffic useage.

- **Height Limit:** We prefer to see the low rise development (*no more than 4 levels IN TOTAL including carparking etc*), east of Casuarina way. Many residents who have moved to this new area over the past 10 years have come to live here for the climate, topography and the low-rise feel of the Tweed Coast. Affordability has not been a major issue for most residents choosing this area over the Gold Coast. We accept that there are less facilities available close by, simply because we feel the quality of life with cycle-ways, low-rise development, beaches and open space offered by the Tweed coastal villages is superior and simply unobtainable on the Gold Coast at any price. We see this as a buffer between the highly restrictive policies in the Byron area and the over- developed Gold Coast (*Manhattan at the Beach* as that area is oft referred to).

The tourist resorts here are filled by guests who are escaping the high rise of Sydney, Melbourne and Brisbane and who wish to holiday in a relaxed low –rise natural sub-tropical environment. Alternatively this is a location that many holidaymakers from rural Australia flock to – because they are comfortable. Within 5kms of this development are three resorts (all low rise - from 4.5 stars right through the gamut of accommodation in houses and units right down to caravan parks).

Quite simply this is a huge attraction to tourists (more recently also arriving from China and wanting a different experience), whilst offering easy access to Gold Coast facilities (such as Seaworld, Dreamworld etc) but also offering bushwalking, unspoilt beaches, Tweed Regional Gallery, the Art-deco town of Murwillumbah and the coastal village lifestyle, and adjacent to priceless agricultural land right along the Tweed River and its hinterland.

A recent survey by Tweed Shire Council indicated that retention of existing height restrictions were a major issue for residents of the Shire. We have great concerns that increasing height limits will have a flow on with each new development potentially seeking to increase height limits on all new projects to line developers' pockets, to the exclusion of our highly prized lifestyle. We consider that all buildings east of Casuarina Way should be limited to 11.6 Metres from the existing ground level (not the cut level) as the proposed height of this application is incompatible with current topography and existing built form that defines the area (such as the adjacent Santai Resort with its stylish roofline and 'island' feel).

- **Density:** the various changes (including the request to increase the current height limit) that have occurred, provide little comfort that the density of the development will not put strains on existing infrastructure including roads, public transport and the environment. The lack of off-street carp-parking is an issue now at holiday times due to holiday makers bringing sailing boats, trailers of all types, jet skis and other equipment. The proclivity to rent houses with friends and family can exasperate the problem with multiple cars parked outside a 2 bedroom unit, or outside a 2, 3 or 4 home with limited off-street parking.

Additionally we are unsure whether when counting this "reduced density" claimed by the developer it incorporates the lower density of other sites in the immediate area that are not the subject of this application to bolster their case. Certainly the Developer's architect who recently attended our residents' meeting was very unclear about the facts of whether the

developer is using the under-utilisation of sites outside the land in question, to come up with his claim of lower density in the whole area. The developer is certainly using existing parking already built and in use, to amplify his claims concerning provision of car-parking. If in fact, he is using the other sites nearby where 3 and 4 storey units have been replaced by townhouses and the like, due to the purchasing preferences of buyers in the area, then the developer is simply 'double dipping'. - *Not on Planning NSW*.

The residents of the Casuarina area accept that the area is a desirable place for people to live and holiday and we fully expect this to increase in popularity as areas such as Tweed Heads become high rise cities. The mix of residents is testament to the attraction to people of all cultures, ages and lifestyles. We also accept and welcome growth in the area; such growth provides additional services to existing residents and enhances the prospects of employment for all residents – but not growth at any cost.

- Earlier plans had provision for Surf Life Saving Australia and we believe this aspect should be reinstated as part of any approval. This is a purposeful omission (from the original and subsequent plans) and means that ambulance and lifesaving access to the beach and life-saving treatment and storage facilities have been removed. This is senseless on a beach that is hazard rated as a 10 – the most dangerous beach type for low skill or non-swimmers, that will be utilised by many more people if this development proceeds as conceived. The developer should be required to re-instate this small low cost item to the complete satisfaction of Life Saving Australia.
- Where is there discussion about the quality or purpose of landscaping, the retention of views, access to breezes, solar access, facilitation of visual and acoustic privacy and adequate separation between dwellings/units. Aspects such as site orientation, sunlight sharing with neighbours, potential overlooking and privacy impact have really not been addressed. Frankly the elevations of the larger buildings are not compatible with the character of the surrounding residential and resort development.

In fact the proposed unit blocks facing Casuarina Way have very little architectural merit in the concept plan, with little immediately adjacent open space, a busy road servicing a new shopping centre at the front, balconies facing west onto the main vehicular access way to the resorts and the Casuarina/Salt area.

They will also overshadow and block prevailing sea breezes to the new townhouse development nearing completion opposite and will be larger than the adjacent Santai Resort and will be as close as possible to the boundary of that complex. Setbacks help create the proportions of the street and contribute to the public domain by unifying streetscape character and the continuity of street elevations. Adequate separation between holiday makers and permanent residents is essential for after-hours harmony.

We also note this proposed development will tower above the whole area, giving little privacy to residents in their homes and outdoor areas between there and the beach. The buildings will also be visible from the beachfront. It is a pleasure and privilege to sit on a beach and not look at, or be overlooked by large buildings. This is a huge enticement to purchasers in the area and is another reason that this particular part of the development

should not be approved.

Where is this design compatible with the Tweed climatic context and the consequent liveability for residents, particularly in the hot humid months?

Where will the reduction in the buildings' carbon footprints be achieved and how will the greenhouse gas emissions of heating and cooling systems be achieved in such sterile box shaped buildings more at home in suburban Sydney or Melbourne and, only designed to maximise the number of units on the land?

We submit this list items for the consideration of the officer of Planning NSW, realising that they pose more questions than answers, but hopefully will ensure that the development ultimately approved, considers and addresses the matters raised herein to the satisfaction of all residents and the prospective purchasers who will choose to make this place their home.