

Submission on Culburra West Development Application: concerns and suggested improvements.

Thank you for the opportunity to comment on this application.

My name is Danny Wiggins and I am a Planning consultant (in private practice) and a long-term permanent Culburra Beach resident.

Please find below my comments on the Concept Plan Application.

References in brackets refer to pages /diagrams in the Environmental Assessment (EA).

1. Need to clarify the application

The DA Form ticks the Stage 1 box. It must be clear that this is only a Concept Plan application/ determination.

2. Environmental and heritage protection

While not my area of expertise, it is obvious that environmental protection is a prerequisite to my other comments. This is acknowledged in the EA by reference to the SEPP 14 Wetlands and to the "design challenge" the foreshore will face because it has "utility for recreation, as well as being a conservation zone". Also, by the presence of some elements of the plan in the Lake Wollumboola (the Lake) catchment, "considered unsuitable for urban development by the Sensitive Urban Lands Study".

In particular, the "leisure hub" (with "potential uses motels, hotels, cafes, restaurants" on an active waterfront) and the suggestion that zone boundaries be reconsidered. This warrants detailed scrutiny and careful coverage in any Concept Plan approval.

The EA also acknowledges the significance of native vegetation (clearance of 60 hectares), with concern expressed about the need for micro-management of the foreshore reserve and by the proponent's proposal to provide offsets.

Similarly, protection of aboriginal heritage requires careful scrutiny and handling.

3. A separate settlement – lack of serious connection to existing centre.

The proposal represents a new settlement and not an extension to the existing Town, with a “no-man’s land” separating the two – a “dogs breakfast” of a sewerage treatment plant (STP), extended industrial zone and “future development zones”. The EA acknowledges that it will be “quite distinct from the existing development” (65). I acknowledge that this “no man’s land” reflects the current zonings (and, in part, those proposed in draft SLEP). This means more car trips (even to Town).

The submission fails to acknowledge this and makes little effort to address the interface, despite the obvious constraints. For example, the clash of land-uses at Stage 2: the “centrepiece” semi-circle abutting the proposed industrial area and the STP. In addition, there is little attempt to promote active transport connections, despite the proposed cycleways and isolated dots on plan as bus stops. Active transport is now an established Planning principle. (see DOP Position Statement on Active Living, 2011). A number of Director General Requirements (DGRs) reflect this (see below).

If this is seen to be beyond the scope of the current DA, a future planning proposal should address the lack of connectivity

4. Medium density sites

I am most concerned about the three proposed medium density sites – Stage 1, south of the new neighbourhood and at the Circus in stage 2. Two of the three medium density proposals are unnecessary given the proposed future zonings in the Draft LEP 2013 (with medium density more appropriately located closer to the Town Centre).

a) Stage 1 50 units, four stories.

This would be the “entrance statement” to Culburra and is totally out of character with the town (see illustration 5 in EA). The reference in the EA to four stories in the Coastal Design Guidelines is misleading – the Guidelines refer to medium density in town, not on the approach to town.

Despite the EA claiming that there will be “negligible impact” (135), it seems to contradict/ cover for this a number of times:

- “The proposal will change the local character around the Town Centre” (125). This is despite the EA acknowledging that the community “expressed a desire to retain what is termed the village atmosphere” (134)
- Illustration 5 states that the proposed pine tree planting “screens the four storey buildings behind”
- That the buildings would be given a “seaside appearance” (65)
- “Will only be seen when entering and exiting town” (135)

The proposed height is also excessively higher than Council’s DCP 71 controls. The EA acknowledges this (130)

It is also not in the spirit of the protecting the Lake catchment.

This element threatens the character of Culburra and should be deleted from the Concept Plan.

b) Proposed medium density site, south of the subdivision

This is shown on plan but not mentioned in the EA, defies logic and is a bad idea for the following reasons:

- It is poorly located given current research and best practice on the location of higher densities ie. close to centre (and the centre needs it), close to attractions, close to usable open space. This fails on all counts. The proposed location seems only interested in possible views for future residents.
- It seems an afterthought – what to do with the remaining strip outside the Lake catchment.
- There is no connection to anything, and located on the bend in the road – another mini “no-man’s land”.

This element is half-baked and should be deleted from the Concept Plan.

c) Stage 2, at the Circus

Illustration 7 gives the impression that the scale of this poorly sited centre will be greater than the existing Town Centre. Most misleading. It is poorly located in the half circle (shown as a full circle in many of the illustrations), proposing three storey buildings immediately adjacent to the industrial area and close to the Sewerage treatment works. Poor interface treatment. See 2 and 6.

Despite such concerns the EA refers to the half-circle as “the centrepiece of Stage 2”. It could be.

This element should be reconsidered by the proponent before any Concept Plan approval.

5. Viability of the proposed local mixed-use centre

While a positive longer-term suggestion, the short to medium term viability of the proposed centre is questionable for the following reasons:

- The dominance of Woolworths (already dominating local behaviour)
- Existing commercial vacancy rates in Town – we should be boosting the current Centre
- Lack of a walking network within the subdivision layout (see No. 6 below)
- Location (in Stage 2) immediately adjacent to the industrial area, with little apparent effort to deal with that tricky interface

The EA acknowledges that the rate of development for commercial and industrial sites is “unpredictable” (16).

6. The subdivision layout: the new neighbourhood

Some aspects of the layout are positive. For example:

- creation of axial vista focussing on Mt. Coolangatta and Orient Point
- Vista park, acknowledging proximity to the water
- the Griffin-esque circles, with the possibility of a Bath (UK) style “Circus” in Stage 2 (see 3 above)
- View corridors from the proposed Collector Road
- Avenue planting (though it should not be pine trees).

Having said that, there is little evidence in the Reports on the claim that the proposal is based on “Healthy by Design” (DGR 12.2), “NSW Guidelines for Walking and Cycling” (DGR 5.1) and “Integrated land-use and transport” (DGR 5.3). I have worked with these documents for the Heart Foundation, the Premier’s Council for Active Living and the UNSW Healthy Built Environments Program.

The “Transport and Accessibility Impact Study” pays scant regard to this. As it stands the proposal will promote (rather than reduce) car dependency, as required by DGR 5.3. Similarly, the Social Impact Scoping Study mentions “Healthy by Design” but does not address the content.

There are a number of specific issues with the layout:

- Walkability, within the subdivision. Walkable neighbourhoods promote everyday activity, not satisfied by “fitness apparatus” in the Reserve” (70). The Traffic Report is misleading in suggesting that the layout is permeable, with “many similarities to the perfect street pattern”. The “perfect” pattern (shown diagrammatically in the Guidelines for Walking and Cycling) has an active centre as the focus. This is a misleading claim, especially for Stage 4, but also given the uncertain viability of the mixed-use proposal in Stage 2.
- The lack of an internal open space network. It should not be assumed that the proposed public reserve satisfies the open space needs of the future residents. Quality open space should be provided within the subdivision, not just the reserve. A network, with a variety of passive and active recreation/ social options should be provided. While the proposed vista park is a welcome element, its isolation is further evidence of the lack of an open space network.
- The street network lacks fine-grained permeability (see above), discourages walking and encourages “rat runs” for cars, with excessively long unbroken streets. For instance, the south-western-most lots – a continuous strip of dwellings with no relief and reminiscent of the worst of continuous strips in other local subdivisions. This will also promote a lack of streetscape variety.
- All up, the subdivision is an overdevelopment, aiming to maximise lot yield at the expense of open space/ walking connections for all lots. This is seen in the poor location of some lots (ie. packing them in) and the dinky culs-de-sac.

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, improve the excessively long, unbroken streets and address the poor interface with the industrial area/STP.

Conclusion

A few general comments:

- Care needs to be taken that some of the indicative elements in the EA and plans are acknowledged as such in any concept plan approval.
- Deletion of some elements from the proposal should not be seen as a negotiation/ compromise point – all elements

require careful scrutiny. Ambit claims are not new with this proposal (eg. 14 storey flat buildings originally suggested)

In summary Concept Plan approval should not be granted until:

1. The proposed medium density developments on the Culburra Road and the proposed collector road are deleted.
2. A revised subdivision layout is provided, deleting the poorly located lots (and many of the culs-de-sac), building in internal open spaces and a pedestrian/ green network, improving the excessively long unbroken streets and addressing the poor interface with the industrial area/SPS.

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