

## **RED HEAD VILLAGES ASSOCIATION (Inc)**



North Bendalong, Bendalong, Berringer, Cunjurong, Manyana

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Red Head Villages Association Inc (RHVA) Submission

SCC Medium Density Amendment (No. 51) Shoalhaven Development Control Plan 2014

### **Background:**

Recent Shoalhaven City Council planning actions have realised a critical time for the five Red Head Villages. With more and more people wanting to visit, relocate and buy holiday homes in the area, there is an unprecedented appetite for development. While we will always welcome new arrivals to our community, we must also ensure that sustainable development occurs in harmony with the unique character and desired future character of our coastal hamlets and protects both our built form and natural environment.

Over the past two years, multiple development applications have been lodged before Shoalhaven City Council (SCC) to build Sydney-style dual occupancy residences in Manyana, including a proposed two, double-storey four-bedroom town houses comprising four car-parks on a small residential block. Aside from being out of character with the surrounding streetscape and impacting negatively on the neighbouring properties the RHVA views developments like this have the potential to impact detrimentally on existing infrastructure and amenity such as sewerage, access roads including emergency management, on-street parking and social infrastructure. A second, similar dual occupancy development and a new Sub-Division application for Manyana were also being considered by SCC at that time.

While the current outcome for these particular cases was agreeable to the community, without a longer-term solution to this situation we will be left fighting this inappropriate planning on a proposal-by-proposal basis well into the future. That scenario is untenable including becoming exhausting for both the RHVA Inc, community advocates, our elected Councillors and SCC Officials.

Therefore, the RHVA membership and interested persons continue to research and debate a longer-term solution in the form of an amendment to the SCC planning instrument (Dual Occupancy permissible at 500 square metres) currently facilitating widespread urban densification across its jurisdiction, albeit in the absence of coastal villages community support and civil and social infrastructure, in addition to facilitating tourist-commercial precincts developing by stealth.

Consequently, the RHVA membership and interested persons view the current planning instrument SCC administers to assess all development applications across its diverse rural and regional areas as both blunt and unsophisticated. It is simply not fit for purpose. In this instance, the same set of criteria that apply to a proposal in the Nowra CBD or suburbs of Bomaderry also apply to SCC coastal villages.

The RHVA view the critical need to update and rationalise the planning processes to reflect and support the diversity of communities across the Shoalhaven. The SCC need a planning instrument that recognises the unique qualities of our coastal villages and surrounding environment and maintains a community voice in decisions that impact on the character and desired future character of our community, built form and natural environment.

We believe it is important to work collaboratively, constructively and in good faith with our elected Councillors, SCC Officials and other groups in the SCC community to achieve this outcome and welcome the proposed Medium Density Amendment (No. 51) Shoalhaven Development Control Plan 2014 consultation process.

### **Overview:**

Therefore, the RHVA, endorsed by its membership, acknowledges and supports the SCC community consultation process for amending the Shoalhaven Development Control Plan 2014; Medium Density Amendment (No. 51) through collaboration and local representation, working with us toward improving the current planning instrument to help protect the character and future desired character of our unique villages from inappropriate and unsustainable development.

The RHVA notes the proposed DRAFT Amendment seeks to address key themes raised by the community, 'through improving the function of the controls that apply across the City, address gaps in policy and support good quality medium density development outcomes.'

While we are open to debate a range of possible resolutions the RHVA views the first issue, in relation to the proposed planning amendment process as retaining a 'one size fits all' methodology with the SCC DRAFT Amendment not acknowledging or distinguishing the unique nature of its coastal villages character and desired future character as determined by their communities.

While the RHVA acknowledges and values the proposed amendments with respect to, 'the impact of a proposal on the amenity of adjoining properties is to be a principal consideration of applicants when preparing a development application,' the RHVA membership and interested persons view the context as 'not going far enough' in relation to assessing the holistic nature of the complete coastal village, its unique character and desired future character as determined by its community.

In essence, to address this anomaly it would seem the SCC emphasis on Controls 5.1 reflects the proposed planning methodology mandating a 'site analysis plan' which is a welcome addition to the planning process supporting urban densification throughout developed areas characteristic of supporting civil and social infrastructure, like Nowra, Bomaderry, Ulladulla and Mollymook.

However, when applied to the context of the Red Head Villages, in the absence of supporting civil and social infrastructure, such as sewer, water, power, storm water management, pathways, car parking, curb & gutters, waste management, heavy vehicle access and emergency services a 'site analysis plan' would seem to reflect 'trying to bang a square peg into a round hole' when applied to assessing urban densification in unique communities without appropriate supporting infrastructure.

In the spirit of the critical need to update and rationalise the planning processes to reflect and support the diversity of communities across the Shoalhaven, the RHVA membership and interested persons propose an amended planning instrument defining minimum lot sizes supporting dual occupancy as a potential solution toward sustainable development, community harmony and good planning outcomes in SCC coastal villages.

The RHVA membership and interested persons view this amendment as redefining minimum lot sizes and minimum lot size provisions in RU5 Villages zones for medium density development in the Shoalhaven Local Environmental Plan 2014. Importantly this potential resolution, 'will ensure that the character and context of Shoalhaven's existing towns and villages will be adequately considered

during the complying development process and where appropriate, maintained into the future.' A mandated minimum lot size definition for coastal villages would benefit both developers and SCC officials assessing applications through establishing clear guidelines, cutting 'red tape' and limiting appeals in addition to engendering community trust in SCC planning processes.

### **Conclusion:**

The RHVA membership and interested persons request SCC adhere to and include in the Medium Density Amendment (No. 51) Shoalhaven Development Control Plan 2014;

- Current and future Development Applications of duplex and dual occupancy adhere to the R2 zone objective; "To provide an environment primarily for detached housing and ensure that other development is compatible with that environment," to maintain the existing village character and desired future character.
- Planning, assessment and suitability of any new dual-occupancy dwellings impacting the five Red Head Villages R2 residential zone be relative to the existing and surrounding dwellings, infrastructure and social amenity.
- Urban densification not compatible with the surrounding housing and environment not adhering to the low-density residential zone requirements set out under the Local Environmental Plan (R2) sets a course for inappropriate and ad-hoc development facilitating potential commercial-residential precincts including Air B&B businesses in the absence of critical SCC infrastructure and services.
- The potential for poor planning reflecting densification through 'spot-rezoning' not appropriately modelled through Site Analysis Controls 5.1 will result in congested streets, illegal parking, damaged nature strips and consequential negative impacts on village harmony and amenity resulting in the costly retro fitting of supporting infrastructure necessary for mitigating unregulated urban densification.
- Unregulated urban densification of the five Red Head Villages through potential tourist-commercial developments poses significant safety concerns during catastrophic bushfire events, including the capacity to manage and evacuate a much larger transient population.

On behalf of the Red Head Villages Association Inc Executive Committee, Members and many constituents interested in this planning debate we respectfully ask you consider our submission including accepting our invitation to meet, discuss and assess our proposed minimum lot size amendment for all proposed SCC coastal village urban densification.

