

RHVA SUBMISSION GUIDE – INYADDA RD, NORTH MANYANA

PROPOSED INTEGRATED DEVELOPMENT - SF10921

Land and Environment Court Appeal

Case Number 2023/00263435

Red Head Villages Association Inc (RHVA) has sought and received expert advice on a pro bono basis. Below are the topics that have arisen for consideration. Now is the time for you to consider the issues and make an objection via a submission to Council. Please also share this information with your friends, relatives and neighbours who are also affected.

1. Go to the DA Tracking Page for Shoalhaven City Council
<https://www3.shoalhaven.nsw.gov.au/masterviewUI/modules/ApplicationMaster/default.aspx?page=search>
2. Click on 'Agree'
3. Enter Application Number: **SF10921** and click on Search. On the next screen, click on Show, and the status of the application and all previous submissions will be shown.
4. Go to the last subheading "Email" and click on "Contact us about this application". Complete the form and paste or type your comments in the Details section. Click on Submit.
5. Or simply email it to Shoalhaven City Council – council@shoalhaven.nsw.gov.au quoting the application number **SF10921** in the subject line

Your submissions need to be with Council by **Sunday 4 February 2024**.

What to say: We encourage you to prepare something that is unique to you, as long or as short as you like. You might want to draw from the following points. Start by explaining in simple and personal terms why the proposal concerns or is important to you.

If you made a submission previously: You could add that you stand by it, saying why, if you want to.

Remember, a "submission" can just be a sentence or two – it's up to you

Some of the Issues for consideration in respect of the North Manyana DA include:

The community has been ignored

The Developer has avoided community consultation by lodging the amended DA with the Court and has refused to engage with the community.

The DA is at odds with the existing nature of the Five Villages community. The development effectively presents as a gated community. The DA will have a destructive effect upon the social and environmental fabric of the community.

Impact on the environment continues to be of serious concern

The Manyana Matters Environmental Association submission dated 27 January 2024 accurately sets out the position of the RHVA on these issues.

The Inyadda beach lagoon is likely to become toxic

The lagoon at Inyadda beach will, in essence become a "holding pit" for the substantially increased toxic contamination which will be caused by the development. If and when the lagoon opens to the sea, those toxins will then pollute Inyadda Beach.

Biodiversity plan is fatally flawed

There is no information about how the Community Title lot will be established and managed. It is highly likely that the lot will not be properly managed by the individual lot owners and that it will become degraded. A bland statement that the lot is for “biodiversity protection purposes” is of no assistance. No information is given about ownership of stormwater infrastructure and roads within that lot and how this will be managed.

Flooding risks ignored

The land is within a known flood zone. The development will increase the potential population density in that area, whilst providing only restricted evacuation access. There is no flood free emergency vehicle access for emergency service vehicles in the proposed DA. There are no appropriate evacuation routes in the event of a flood.

Stormwater treatment inadequate

The proposed stormwater treatment solution is wholly inadequate. It relies on individual lot owners regularly inspecting and maintaining stormwater treatment devices. The risk of this not happening satisfactorily is high.

Earthworks and retaining walls effect on environment and neighbours

The proposed extensive earthworks and retaining walls will have a significant effect on the environment, neighbouring properties, safety and the flow of water.

Vehicular access unsuitable

The DA does not allow for suitable vehicular access and intersections.

The DA continues to rely upon a completely unsuitable traffic report which was prepared using information obtained during 2021 when COVID restrictions continued to apply. No regard has been made to the actual volume of traffic generated during peak holiday time.

The impact of increased traffic flows on the safety of Bendalong Rd, already pot- holed and dangerous, has not been considered.

Remediation and contamination unacceptable

The proposed DA does not have any appropriate reports or remediation plans to deal with contamination and/or remediation.

There has been no detailed site investigation undertaken to identify potential contaminating activities. A desktop review is out of date and is simply inappropriate.

Unacceptable bushfire risks

The proposed DA does not properly address bushfire risk.

The development site is situated in an historical fire path from the north-west as demonstrated by the mega fire of 2019/20 and the fires of 1968, 1988, 1991, 1994, 2000/2001 and 2012/2013.

This development will put a huge drain on already limited fire-fighting resources. Resources are already inadequate and stretched as demonstrated in the catastrophic 2019/20 fires. More houses overall demand more resources, and to make matters worse, houses on the large blocks as proposed need more fire trucks and crew to defend them.

Bendalong Rd provides 'one road in/one road out' access to the 5 villages. With greatly increased population numbers at peak times, exit from the community in an emergency is highly risky. It took 3 days in January 2020 during the Currowan fire emergency to get all holiday makers and residents out of the villages via Bendalong Rd.

Not 65 lots, actually 65 potential 'mini motels' or 300 houses

The nature of the proposed blocks will incentivise lot owners to build high - cost temporary rental properties. House sizes are anticipated to be 600 sq metres, which is twice the average 4 - bedroom house size. There is a real possibility of the development of "mini motels" on the large blocks. This will exacerbate population pressure on already inadequate local infrastructure. The development has nothing at all to do with easing housing affordability issues. It is designed to allow the developer, and subsequent owners, to maximise profits at the expense of the local community.

In the event that the above strategy does not provide a sufficient return to the developer or owners, there is nothing to stop many of the owners of large blocks which are zoned R1 (general residential), to seek to subdivide their lots into 500 sq m blocks, potentially leading to 299 lots, not 65. This will exacerbate all of the other issues associated with the development by 400%.

High sale and building costs may see Development site abandoned

There is a real possibility that if the DA is approved, that the very high sale, building and compliance costs, and costs of monitoring and maintenance may lead to a lack of sales and potentially to an abandonment of the site. The prospect of a long - term wasteland is a very concerning consideration.