



North Bendalong, Bendalong, Berringer Lake, Cunjurong Point, Manyana

Email: rhva.secretary@gmail.com  
Phone (Chris Hayes) 0419 203044  
PO Box 2015 Bendalong NSW 2539

**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. You can simply email your submission to Shoalhaven City Council – [council@shoalhaven.nsw.gov.au](mailto:council@shoalhaven.nsw.gov.au) ensuring you quote the application number **SF10921** in the subject line  
Or
2. Go to the DA Tracking Page for Shoalhaven City Council <https://www3.shoalhaven.nsw.gov.au/masterviewUI/modules/ApplicationMaster/default.aspx?page=search>
3. Click on ‘Agree’
4. 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.
5. 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.

Your submissions must be with Council by **Wednesday 4<sup>th</sup> September 2024**

**What to say?**

Please spend just 15 minutes of your time 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 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 recently amended North Manyana DA include:**

**Procedural unfairness has stifled community consultation**

The Developer has avoided community consultation by lodging the amended DA with the Court. The window for lodging submissions is very short which has minimised the opportunity for informed community review of the amended proposal.

**Impact on the environment continues to be of serious concern**

The Manyana Matters Environmental Association (MMEA) has considered the new application and formed the view that there continues to be a risk of serious irreversible environmental damage. RHVA Inc supports the MMEA submission.

**The Inyadda beach lagoon is likely to become toxic**

The lagoon at Inyadda beach will, in essence become a “holding pit” for ongoing accumulation of run-off toxins such as house-hold chemicals. The Coastal Engineering Report confirms that the Lagoon will be mostly closed without flushing activity occurring. When the lagoon opens to the sea, those toxins will then pollute Inyadda Beach.

**How will Community Title sustainably protect biodiversity?**

The application proposes that the entire development will be a Community Title Scheme. A community association comprised of the owners will be expected to manage all aspects of biodiversity protection including maintenance of ‘native flora and fauna in perpetuity’, the roads, retaining walls and the bio-retention basins. This will require high ongoing management costs for the owners. There is no guarantee that protection of biodiversity on this environmentally sensitive site will be sustained by private property owners. This is unreliable and unsustainable.

**Potential for contamination unacceptable**

The contamination investigation and amendment do not satisfy the national and state guidelines to determine the contamination status of the site. A detailed site investigation is required to investigate the elevated concentrations of heavy metals and asbestos already detected in the soils and to determine the contamination status of both the soils and groundwater within the area proposed for development and outline any remediation requirements.

**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.

Despite the amendments in the design & layout of the North Manyana development, in the event of another severe bushfire it will place the surrounding communities at extreme risk.

The new estate will be the first residential area impacted by bushfire. It will then tie up the available firefighting vehicles and firefighters. As a consequence, there will be reduced resources to protect the other villages.

**No change to Bendalong Rd providing the only access from 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.

**43 large residential sites allow for multiple occupancies**

On the amended DA building envelopes from 550 to 1122 sq ms are indicated on the individual blocks. The average size of a 3 Bedroom House is 250 sq ms. The potential number of occupants and associated vehicles that could be accommodated is therefore substantially increased.

There is a real opportunity to build investment properties on a large scale. Lot 41 lends itself to a "Resort Style" residence with multiple bedrooms capable of high rental opportunities.

**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 and realistic consideration.

**Acknowledgement of Country**

We acknowledge and respect the Yuin people, the Traditional Owners of the land, sea, and country we treasure, share, and protect.