

Public Submitted	Issues	Response
Philip Hodgson	<p><i>Summary: Population growth on the Eurobodalla Southern Coast is inevitable, and housing and commercial services will be necessary components of that growth. However, Australia must remain an example of planning excellence, and the current proposal to expand the Stage 1 West Rosedale subdivision is not.</i></p> <p><i>1. There should be NO agreement to the current boundary that captures the critically important wetland habitat. The Wetland should not be given torrens title under the proposal.</i></p> <p><i>2. There should be NO agreement to clear the felling of all trees and large shrubs over the subdivision lots. Instead the Developer MUST retain as many of the existing habitat trees along each primary and secondary road/street in the development area (minimum one tree per 20m of road). Existing trees should also be retained in all identified parkland/open spaces. There are many good examples of tree retention in previously developed areas on the coast, such as South Durras, Lilli Pilli, and parts of Batemans Bay district (Denhams Beach), versus poor tree retention across the expanded suburbs of Broulee and Tomakin/Barlings Beach. Heat islands from clear-felled suburban infill are not a planning design feature the Eurobodalla should support. Where a lot is over 500 square metres, the lot should retain a minimum single tree.</i></p> <p><i>3. The traffic load report is grossly underestimating the impact of 792 new residential lots and the associated number of cars on noise levels along</i></p>	<p>Planning Excellence. The modified proposal represents a careful rethinking and reduction in the developable footprint. It involves a balance between the development of much-needed housing in the natural and developed constraints applicable to the site. The development's impacts have been identified and mitigated to the extent possible, including designing with regards to complementary and/or conflicting guidelines and inputs (such as minimising Biodiversity Impacts, Mitigating traffic impacts, compliance with Bushfire Guidelines, and proposing a site-sensitive Civil Design which works with the natural topography rather than seeking to change or modify it. The development will be a safe, well-designed community where residents have access to the positive amenities and attributes of a coastal and bushland setting of South Coast living, situated and protecting natural ecosystems. The development also incorporates the provision of urban services, facilities, and amenities expected in a modern residential estate planned for the enjoyment of all residents of the Rosedale locality and achievement of the R2 – Low-Density Residential Zone objectives.</p> <p>1) Title to the Wetland - the area of the Wetland is already subdivided between two Torrens title lots (Lot 2 DP627034) & (Lot 84 DP 755902). Lot 84 is privately owned NOT by the proponent, whereas the proponent owns Lot 2. It is not proposed in this Concept Plan modification to further subdivide Lot 2.</p> <p>2) Tree retention. Detailed development requirements in and around retained canopy trees will be subject</p>

	<p><i>George Bass Drive. It will also have significant congestion t local secondary and primary roads extending in all directions to Broulee (South), Mogo (West), and Batemans Bay (North). The wheel noise generated by today's modern vehicle is high and the increase in vehicle movement will lead to constant vehicle movement noise from at minimum 7 am to 9 pm daily. This is significant. Some options would be to reduce road speeds, but this itself creates traffic flow issues that don't currently exist. There is also no consideration of the impact of the number of vehicles using the Tomakin-Mogo Pacific highway. There will be a significant impact on the intersection of Mogo/Princes Highway. No doubt leading to the need for traffic lights, another regulatory and impediment on the traffic flow currently NOT experienced. Also, NOT being paid for by the Developer. Equally, the need to increase to at least two lanes to improve flow onto the Pacific highway- is NOT borne by the Developer.</i></p> <p><i>4. The Eurobodalla Shire council MUST impose the cost to expand the quality and quantity of the current water treatment plant. The additional 792 lots will exceed the capacity of the current treatment plant. In addition, the current plan will have a significant impact on groundwater flow and risk of increased water into the Bevia Wetland, which will create a higher risk for homes along Bevia Wetland flowing under George Bass Drive and into the Barlings/Tomakin Subdivision.</i></p> <p><i>If ESC adheres to its strict policies on the management of driveways and street design, tree protection orders, and wildlife protection (i.e. Ramsar Treaty) and imposes more stringent design</i></p>	<p>to detailed assessment during the Development Application in each Stage of this development.</p> <p>3). Traffic Impacts have been re-considered with regard to contemporary traffic circumstances, the latest traffic generation guidelines, and current and future intersections have been re-assessed in relation to modern-day (2024) circumstances. The impact of wheel noise on George Bass Drive is not a reasonable objection when living adjoining a main road or a new urban release area. The intersection with the Princes Highway and Tomakin Road has been re-assessed, and there is no warrant to widen the Princes Highway or install traffic lights.</p> <p>4). Sewer and Water Contributions. All stages of the development are expected to be charged water and sewer contributions in accordance with the current Water and Sewer contribution plans. The Council has already planned to upgrade the capacity of the Tomakin STP from 10,000 ET to 25,000 ET in partnership with NSW Public Works. The proponent will contribute its fair and reasonable contribution in accordance with the current Water Supply and Sewerage Developer Servicing Plan. With regard to water supply, the development will be serviced with water supply from Burri Point reservoir (existing) and a new reservoir at Tomakin Heights (to be developed by the proponent at the northern end of Barlings Drive).</p> <p>All driveways and street designs within the residential subdivision must be approved for construction by the Council, and those designs will be subject to the</p>
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	<i>practices and delivery by the Developer, then perhaps the communities surrounding this proposal may get a model of urban planning that addresses livability and practicality with stronger and ready environmental outcomes (unlike sunshine bay).</i>	<p>standards contained in the Council's Infrastructure Design Standard.</p> <p>Under the current water and runoff modelling for the development there will be an equivalent amount of runoff entering the Wetland and Saltwater Creek catchments. Runoff will be detained on-site in a system of WSUD basins that will be sized to accommodate a variety of rainfall events. Runoff entering the Wetland will be of higher quality than the wetland water quality.</p> <p>With regard to Groundwater, it is not expected that the development will require excavation to the depth of existing groundwater flows (refer to the <i>Integrated Water Management Plan</i> in Appendix 6).</p>
Name withheld	We live at 6 Thomsen Place Tomakin, and our eastern boundary meets this development. We have concerns about the water flow to the wetlands and access to wildlife. In previous years, we have seen plans showing a wildlife corridor along our boundary, which has reduced size in each subsequent plan. We would like to know if such a corridor is planned and if it will be along our boundary or if there will be building blocks there. We would like to see an updated plan or Map showing what is planned for along our boundary.	No 6 Thomsen Place is uphill of the western boundary of the site (in the vicinity of Stage 7B. There is a riparian zone that is planned to follow the natural watercourse that is to be aligned and adjoins the north and east of the submitter's property. Detailed design will be subject to a future DA design. Given the topography and the opportunity to eliminate such nuisance flows onto neighbour's properties A riparian corridor is proposed to follow that watercourse and forms part of the Bevan Wetland catchment. The submitter's common boundary will be shared with the rear boundary of proposed large lots (min 100 metres deep and min area of 2,000m ² + situated in Stage 7B
Barend Peter Haantjens, Rosedale	The shire already suffers from water restrictions with the heavy influx of visitors and holidaymakers, adding pressure to the supply of services. Also, the number of lots is prohibitive for the supply of sewer, power and traffic demands.	With regard to water supply, the development will be serviced with water supply from Burri Point reservoir (existing) and a new reservoir at Tomakin Heights (to be developed by the proponent at the northern end of Barlings Drive).

	<p>The proposed protection of a green corridor on the old Bevia road site is compromised by the proposed access road.</p> <p>The already cleared areas from adjoining subdivisions (saltwood, elements) have created a wind corridor from Tomakin through to Rosedale, and more clearing will only exacerbate the problem.</p> <p>Construction on a main road below the sewerage treatment works where the dams are open to seepage and spillage is extremely foolish.</p> <p>Lack of ecological protection zones and potential damage to wetland areas due to stormwater and runoff.</p> <p>Looking at the coloured drawing labelled 'concept subdivision plan (AA_03) showing the roads, i am drawn to the red area. This commercial area is not included in this application. However, I want to comment anyway because I might not have this chance in the future. Are the blocks large enough to handle car parking, deliveries, cardboard boxes and extra traffic when the new road is constructed to pass the Tomakin sewage plant? There is no mention of when this road was built to allow owners to access their property. I travel to either Batemans Bay or Moruya for my shopping. Too many shops are empty in these two towns. How will 792 residential lots support over 110 commercial stores?</p> <p>How is the central zone different from the general zone other than it is on listed development three</p>	<p>With regard to sewer services, the planned upgrade of the Tomakin STP will accommodate the additional loads created by this and other residential developments. The proponents will be required to pay contributions towards that upgrade project in accordance with the current Development Servicing Plans.</p> <p>Traffic impacts of this development have been modelled with regard to the latest data and generation guidelines, and apart from a new roundabout at the intersection of George Bass Drive and the proposed southern access road to the estate, no other intersection and road upgrades have been recommended by the traffic experts, nor the local and State road authorities.</p> <p>There are several "green" corridors incorporated into the modified design, principally based on natural watercourse corridors and existing riparian environments. The green corridor, which is proposed to be subject to realignment and restoration of a "riparian zone" between the Wetland and the Mogo State Forest, is replicated in the modified design.</p> <p>All proposed public roads will be subject to a detailed Council approval process, and their design will typically informed by geotechnical investigations and expert recommendations dealing with the variety of local soil conditions.</p> <p>The latest amendment sot the Concept Subdivision Plan further protects the environmental and ecological values of the Bevia Wetland through a proposed 100-metre-wide wetland buffer zone, which will be subject to environmental restoration and</p>
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	<p>while the general zone will be constructed in the 4th?</p> <p>Again, looking at stage 1 completion on the concept plan (AA_03): Does "completion" refer to infrastructure such as roads, water, sewerage and nbn with power underground, or does it include completed constructed houses? Some houses in the Barlings Road area have no wifi. People travel to Tomakin Hill for reception or connect to nbn drive to either library.</p> <p>When it rains, water runs down Barlings Drive, and some of it continues through my land, flowing in the small gully, turning along my boundary and continuing into the Rosedale subdivision. Will the river course be changed so it ends up in the Pocket Park? There is an area of blue with no label, so I assume it is water nearby. Will this be an artificial reservoir?</p> <p>The foreshore shared trail will be very popular for painters, photographs and birders. But i do not see any parking facilities for about 10 cars.</p> <p>Since the water supply is up the hill from my home, I am wondering whether the proposed reserve will be bigger and better than what Tomakin has now.</p>	<p>rehabilitation and natural regrowth processes. This zone would remain protected as a "non-developable" area under the modified concept Plan.</p> <p>The Concept Subdivision Plan (AA_03) referenced does not identify any red area or a commercial area nor reference 110 shops.</p> <p>A mixed retail and residential precinct is, however, proposed in Stage 3, which will be subject to a DA within which relevant detail issues such as parking, loading and waste management will be examined in the normal course of DA assessment and subject to applicable guidelines and policies.</p> <p>The naming of the zones has no practical implications in the subject modified Concept Subdivision Plan.</p> <p>Stage 1 has been "completed" insofar that the lots have been legally created, and each lot has access to relevant infrastructure such as completed public roads, water, sewer services, and electricity services.</p> <p>The Development's Stormwater Strategy proposes a network of basins to detain and improve runoff before it is discharged to the Wetland or Saltwater Creek.</p> <p>The foreshore shared trail (when/if developed) will be subject to a detailed design and approval process.</p> <p>With regard to water supply, the development will be serviced from Burri Point reservoir (existing) and a new reservoir at Tomakin Heights (which will be 0.88ML and thus substantially bigger than the current 0.18ML reservoirs at the northern of Barlings Drive).</p>
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B. Submissions from State and Local Authorities

Entity	Issues	Addressed where?
Eurobodalla Shire Council	Subdivision type – open space costs	Section 4.2.1
	Sewer buffer area – corrected on plans	Section 4.3 & Amended plans in Appendix 5
	Stormwater –Capacities of basins	Appendix 8
	Traffic impacts - Relocate roundabout	Section 4.5.1
	Water Supply	Section 4.2.2
	Stage biodiversity credits	Section 4.1.2
	Assess water quality impacts.	Section 4.1.4
	Reserves cannot be APZs	Section 4.5.3
NSW Rural Fire Service (RFS)	Perimeter roads	Section 4.7.1 & Appendix 7
	Insufficient traffic corridor width;	Section 4.7 & Appendix 7
	Unclear access arrangements to the south;	Section 4.7 & Appendix 7
	Compliance with Tables 6.8a&b in PBP 2019, and consider operational response for emergency services)	Section 4.7 & Appendix 7
TfNSW	TIA must analyse Princes Hwy-Tomakin Rd Mogo intersection (i.e. suitability for traffic generated, and identify any necessary upgrades)	Section 4.6.1 & Appendix 9
Department of Primary Industries (DPI) Agriculture	Explain the use of rainfall data from 2001; Recommended conditions (VMP, riparian buffers, WSUD, Stage works, basins, sediment & erosion controls, material stockpiles)	Appendix 6 & Section 4.1.2
DPI Fisheries	Quantify water take, Assess impacts if take >3ML pa, and Demonstrate sufficient water entitlement); Obtain sufficient Water Access Licence, and Comply with Waterfront Land guidelines	Section 4.10
	Biodiversity & Hydrology - address BC Act avoid & minimise, Include 100m wetland buffer zones, Flood mitigation measures size - address SEAR/Policy,	Section 3.2 & Appendix 3

NSW DCCEEW Biodiversity, Conservation and Science (BCS)	Correctly identify TEC extent & assess drainage/landfill/ASS impacts & recalculate offsets;	Appendix 3
	Make isolation assessment & consult SES;	Appendix 4 & Section 4.1.5
	Address SEPP R&H coastal zone, Including LEP 10m riparian buffers,	Section 4.1.4, Appendices 6 & 11
	Consult NRAR and DPI Fisheries on stream mods / riparian corridor widths/offsets,	N/A – (DPIE email 12/11/24) Fisheries requirements' will be satisfied via the Controlled Activity Approval process with NRAR. & Section 4.10.1
	Condition stringent neutral or beneficial pollution reduction targets)	Appendix 6 & Section 4.4
NSW DEECW Water	No further comments on top of what was provided in Sept 2023 regarding the scalability of existing water and sewer infrastructure	Section 4.2.2 & 4.3
Crown Lands	Crown roads within the dev must be closed & purchased by the proponent (if not being constructed as roads) or transferred to Council prior to CC.	Section 4.11.1
Heritage NSW	Conditions (Avoid harm, No impact to HS10 1870s selectors house, worker heritage inductions, Unexpected finds procedure, Interpretation plan)	N/A – to be addressed in future conditions to future DAs
Heritage NSW (ACH)	Demonstrate continuous RAPs consultation, Map & address soil landscapes, Clarify Fig 4.1, Provide 2004 test excavations results, Map survey areas & test excavations, Justify proposed harm	Appendix 10
Environmental Protection Authority (EPA)	Recommends Council be made aware that proposed increased no. of lots may impact STP future capacity; Recommends consent conditions (Remedial Action Plan (asbestos), site validation report, and Unexpected Finds Protocol).	N/A - not an action for proponent &/or conditions for future DA's