



**Huskisson Woollamia  
Community Voice**  
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(9 May 2013)

**General Manager  
Shoalhaven City Council  
PO Box 42  
NOWRA NSW 2541**

**Dear Sir,**

**SLEP 2013: Huskisson Woollamia Community Voice submission**

The HWCV makes the following submission on the re-exhibited draft, and we provide background technical detail in the attachment key issues summary.

**Overview:**

- ◆ In our view, Huskisson (and only Huskisson) is being prepared for an influx of Shaolin Temple associated, and international including backpacker visitors, with a metropolitan skyline to make them feel at home.
- ◆ Community recommendations look set to be eclipsed by: **i)** what NSW Planning (DoP&I) will allow, and **ii)** what developers say they 'need'.
- ◆ Heights in our view, and against community advice, are at real risk of going to 13m (4-storey) in medium density zones - once the (as yet unseen) city-wide DCP is prepared. In the background, recent larger apartment developments in Huskisson are not selling - very questionable commercial viability.
- ◆ Permissible land uses are too broad, and need to be reined in.
- ◆ Residential amenity for existing ratepayers seems to be a secondary consideration, while rates are likely to increase.

**NSW planning changes Green Paper/White Paper:**

Under forthcoming state level planning changes, where community consultation and neighbour recourse is severely restricted, it becomes even more important to have appropriate strategic plans in place at the local level. We feel that draft SLEP2013 falls short in many areas.

**We request ratifications, revisitations and updates - as dot pointed in sections below:**

- ◆ **R2 zones** (single dwellings) should as promised, be height mapped to 8.5m max
- ◆ **The draft E2 environmental zone at Berry St-Currumbene St** crown bushland should be ratified
- ◆ **DCP54 (Huskisson commercial centre)** should be height mapped at the extensively consulted height of 10m (north side Owen St) and 13m (south side Owen St), with consolidation height bonuses managed via the DCP.
- ◆ **Huskisson Airstrip -Huskisson Road**, Rural Landscape RU2 zone: we request the removal of Air Transport facilities as a permissible use. It could continue to operate as currently, just not be turned into an airport, which notion we understand would be unlikely to gain planning consent anyway.
- ◆ **R3 Medium Density zones should respect existing DCP71 - Medium Density Housing**, and be height-mapped to 8.5m, with consolidation height bonus managed via the DCP. Further analysis and consultation is needed on R3 zones.

- ◆ **Permissible uses: the range of uses is now ridiculously wide** in all zones, and especially in R3 zones, and this removes much certainty for all residents, an effect magnified by the draft increase in heights and the reduced consultation inherent in the NSW planning changes. Further analysis and consultation is needed on the range of permissible uses.
- ◆ **The single R1 block to the west of the Bowling Club should be zoned E2** (environmental) and used as a fire break. This would complement the other two E2 zoned areas to the south, in providing a fire barrier for the village.
- ◆ **Some tourism and infrastructure constraints** relevant to Huskisson's growth require closer analysis.
- ◆ **Reinstate principles of environmentally sustainable development (ESD) in the Aims** section of the SLEP. We were stunned that the principles of ESD were removed from the plan Aims.
- ◆ **The opportunistic re-zoning of 15 Field Street, Huskisson to B2 should be reversed**, and an application for re-zoning should be exhibited separately for community comment. The majority of the block is zoned R2 residential, with a minor portion zoned commercial, due to a 'deal' between landowners and Council, dating from the 1960s. Being a foreshore block, 15 Field St should be mapped to building height max 7.5m.

### **Building heights:**

The NSW Department of Planning & Infrastructure (DoPI) has noted the inconsistency of building heights management in SLEP2013, and advised it is a matter for the community and Council to resolve. The simplest solution is to:

- ◆ **return Clause 4.3 of SLEP2013 to a maximum height of 8.5m and remove the statement "and desired future character"** from the Objective of the clause

**Council makes a rod for its own back** (and for ratepayers and neighbours) **if it creates unrealistic expectations for developers.** Better to specify 8.5m heights and a realistic range of permissible uses, thus retaining an element of local control, and **placing the onus back onto developers to demonstrate compliance** with performance criteria of residential amenity, shading, privacy and overlooking.

### **Permissible land uses:**

**The following Land Uses are inappropriate** for the zones they are allocated and should be removed

- ◆ **R1** - remove Registered Clubs, Tourist & Visitor Accommodation, Veterinary Hospitals
- ◆ **R2** - remove Exhibition homes and Exhibition Villages, Emergency service facilities
- ◆ **R3** - remove Shop Top Housing, Registered Clubs, Veterinary Hospitals, Hostels & Residential Flat buildings, Hotels & Motels, Sewerage Systems and Boat Sheds.
- ◆ **RU5** - remove Group Homes, Residential flat buildings, Tourist & Visitor Accommodation, Air Transport facilities, incl Helipad
- ◆ **RU1 & RU2** - remove Backpackers' accommodation, Boat repair facilities, Crematorium, Depots, Group homes, Hazardous industries, Offensive industries, Places of public worship, Recreation facilities (indoor), Air Transport facilities, and Caravan Parks.

**Likely increase in rates:** in our view the combination of draft extra height and draft widened permissible uses, will inevitably lead to increased land valuations for rate purposes, with no guarantee of matching increases in retail property valuations.

**Tourism and infrastructure constraints:**

**Persistence with development at all costs ignores the fundamentals of the village**, and will totally change the tourism value. Huskisson has its future in tourism. Research has shown that visitors like the low-key, village character of the place. **Huskisson was recently rated 69<sup>th</sup> out of 100 “hidden gems” in Australia by Australian Traveller magazine.**

**Our infrastructure will not cope**

From our water supply in aging pipes, our aging phone system that won't support high speed internet access, to our over-loaded roads and our stretched sewage system and power supply.

Parking is inadequate. Use of the narrow nightcart lanes to access underground car parking (R3 zone) will not relieve the current grid lock let alone allow passage of additional vehicles.

**Huskisson does not have good access to the waters of Jervis Bay**

Parking near beaches is very limited. The recent allocation of street parking lots to a commercial development has set a precedent for more loss of this very limited parking

There is no boat access to Jervis Bay for the purpose of launching boats. The Woollamia boat ramp has limited capacity.

**R3 Medium Density zone - under attack:**

The R3 zone comprises 30% of Huskisson lots. Having already done their bit for urban consolidation, R3 lots are not to be rewarded, but penalised further, with draft increased height and widened permissible uses. These changes would **comprise a significant change to the character of Huskisson**, as the R3 zone is the central spine of the village.

**Draft 3 to 4 storeys (i.e. default height 11m) for R3 zones, exceeds the design criteria within the NSW Coastal Design Guidelines 2003**, which inform SEPP71, for a coastal Village of less than 3,000 permanent residents - Huskisson has closer to 800 residents. Under the *Coastal Design Guidelines* (CDG), two storeys is the appropriate maximum for residential areas surrounding the village centre. Even if Huskisson were a Town in size, the CDG say '*generally heights of two storeys in suburban areas*'.

Medium Density zones, eg 1985 SLEP zone 2(b)2, are conditioned by **DGP71 Medium Density Housing**, which specifies a building envelope of max height 8.5m, and Shoalhaven City Council **Policy to Control Building Height and Amenity in Residential Areas** (1990) which further elaborates upon Siting/Overshadowing/Privacy/Overlooking. For solar access, this policy also specifies the period between 9:00am and 3:00pm in winter as an accepted measure of reasonable solar access.

**Let's properly plan the future:**

**The SLEP2013 as it impacts Huskisson is self-defeating and contrary to the needs of tourism and a community tired of its local amenity being usurped for the benefit of developers**

♦ **The Huskisson community has sought the development of a Master Plan** for the village, with the involvement of all stakeholders. This should be a priority.

- **Attachment:** Huskisson Key Issues summary

Yours sincerely,  
**Garry Kelson**  
**Chair,**  
for  
**Huskisson Woollamia**  
**Community Voice**

9 May 2013