

BROULEE MOSSY POINT COMMUNITY ASSOCIATION
PO Box 5003, Broulee NSW 2537

The Hon. R.G.Stokes MP,
Minister for Planning,
GPO Box 5341,
Sydney NSW 2001

4 July 2015

Dear Minister

Eurobodalla Shire Council
Planning Proposal and Development Control Plan Amendments for Land at Broulee

The Broulee Mossy Point Community Association (BMPCA) is writing to you to express concerns about the above proposal that is being referred to you for a Gateway Determination.

The matter was referred to Council on 23 June 2015. The BMPCA learned of Council consideration of the proposal on 18 June 2015. At least 50 community members contacted BMPCA over that short time period to express various concerns about the proposal and nine members made presentations to Council on 23 June. As a result, Council has agreed to consult with BMPCA and the wider community in tandem with submission of the proposal to you.

Four members of the BMPCA, including the President met with officers of Eurobodalla Shire Council last week. We were briefed on the history of the planning proposal and we had limited discussion on some concerns.

The BMPCA has a number of major concerns.

- The main concern is the proposed increase in the planned population of Broulee. The Eurobodalla Settlement Strategy identifies Broulee as a coastal village with a planned population of 3000 people. The Council stressed that it was committed to a variety in the types of settlements within the Shire.

The current population of Broulee is 2300, based on an average of 2.2 people/dwelling. The permanent population is closer to about half this number as about 50% of the dwellings are holiday homes or investment properties. The planning proposal will result in a significant increase to 3700. The community is strongly opposed to any increase above 3000 people as it considers this will destroy the village nature of Broulee.

Broulee is currently a cohesive, friendly community which has raised funds for a pathway to the retirement home to integrate residents with the wider community, holds a regular Art on the Path to showcase local artists and environmental sustainability, weekly runs "Broulee Runners", school fun runs, surf and annual ocean swim competitions. There is an active Dunecare group of volunteers. As a population grows, this social cohesiveness and "sense of belonging" becomes increasingly hard to preserve.

- There is no consideration of the additional infrastructure that the development will eventually require. The existing public school is operating at capacity, yet there is no provision for its expansion. The substantial increase in population proposed will put more pressure on public land for parking and more degradation of the beach front and frontal dunes. These areas are highly valued by the community and to avoid community loss this will require stringent management which has not been addressed in the application.
- The proposed development significantly increases the density of housing compared with the other parts of the village. The concept plan as currently outlined, shows no allowance for any amenity in the area – there is no provision for green space, cycleways, walkways or linkages to the three existing schools, the existing "main" thoroughfare through Broulee Grant St/Coronation Drive) where there is a general store, petrol

station, post office, chemist and access to public transport (a limited bus service to both Batemans Bay and Moruya) or most importantly – the beach.

- The higher density of development leads to a large area of impermeable surfaces and thus increased stormwater runoff. There is concern that the developer will want the area connected to the existing stormwater system at the south end of Broulee. This drains to South Broulee beach and has already started to cause significant pollution after high rainfall events. The system was originally designed to mitigate flooding from extreme rainfall events while normal rainfall would be managed on site. Recent land developments have been connected to this system rather than managing the water on site with the result that pollution events are now much more frequent. Most of Broulee is situated on remnant sand dunes and with very high permeability is well suited to the management of storm water on site. South Broulee beach is extremely popular with both residents and tourists and is a strong drawcard for the village and its tourism oriented businesses. It should not be further degraded.
- Management of the E2 conservation zone is of great concern. It is noted that an option being considered is that it would become community title land attached to the titles of the properties in the development. It is unclear how the requirement that the land be managed in a responsible fashion could be enforced under this arrangement. BMPCA considers there should be an enforceable requirement concerning the environmentally responsible management of this area and its benefit to the total Broulee community.
- A recent beach front development in the immediate area that appears to have been very successful from the developer's perspective is the Barlings Beach development. It is noted that this development has a much lower housing density, has some open space and manages stormwater on site. Some of the better elements of this development may be worth copying

Recommendations

BMPCA recommends that any Gateway Determination relating to this application include the following conditions:

1. That the planned village population of 3000 under the Eurobodalla Settlement Strategy not be exceeded by the proposed development.
2. Provision be made to manage storm water on site with no constructed drainage to Broulee beaches.
3. Provision be made for expansion of the public school.
4. A high standard of connectivity between the development, open space, schools and beaches be provided for pedestrians and cyclists.
5. Legally enforceable conditions be put in place to ensure that the E2 Conservation zone is managed in an environmentally responsible manner.
6. Green space should be included in the proposal design which could incorporate walkways/cycleways with small vegetated areas for passive recreation and links with both the E2 Conservation Zone to the west, the schools and the main Broulee thoroughfare and the beaches.
7. Any higher density housing be spread throughout the proposed development rather than in a row close to the E2 Conservation Zone. Such a design is more in keeping with the existing Broulee village.

Yours faithfully



(Ross Hayward)

President BMPCA