

Rep 12

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The General Manager
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10/05/2023

**Representation opposing 155 Rheban Road -SA 2022/046
proposed development and rezoning application**

Dear Greg,

As a permanent resident at East Shelly beach, Orford, I object to the proposed 91 block subdivision and rezoning at 155 Rheban Road, Orford, SA 2022/046, and urge council to reject it.

INTRODUCTION

The proposed development cites population growth to support its proposal.

The methodology used for projected population growth and therefore need for 91 blocks is questionable.

The ABS 2021 Census states that Orford has 67.2% of its private dwellings unoccupied, the result of Orford being primarily a retirement and holiday locality. Blocks are more likely to be bought for holiday homes or Airbnb's, but with interest rates increasing and building costs continuing to rise, the second home is now less affordable.

It is important to note that development will not increase the permanent population of the area as Orford needs more businesses to create jobs to encourage families to live here. The influx of holiday makers is seasonal and does not contribute to the local community year-round. Services in the area are stretched in many areas, particularly health.

This is not an objection to Development or the developer per se, I question the need for it at this present time and subsequently the rezoning from future urban to general residential.

If the application is to be considered, now or into the future then my objection is based on its lack of vision and high standards to which we should expect a development within our municipality to aspire.

We need developments which are sensitive to identity of place, which focus on high standards for:

- Maintaining the amenities and identity of place.
- Effluent, storm water and water infrastructures, to cope with forecast population growth and the future forecasts for heavier rainfall due to climate change.
- The treatment of our natural environment, determent of foreshore erosion, protection of our marine environment and waterways.

Am inspection of the plans for this development find of these lacking.

BASIS FOR APPEAL

Aesthetics & Amenities:

This development proposed is high density suburban sprawl, particularly Development Stage 5 and Stage 6 which does not reflect the aesthetics of East Shelly Beach area.

The East Shelly settlement is a low-density layout incorporating larger blocks allowing for arboreal growth and Flora and Fauna diversity. Small blocks are not conducive for tree planting and present a sterile landscape.

Cycle paths and public access to neighbouring areas is absent from the plans.

Infrastructure:

Flooding and effluent overflow is a significant problem in the East Shelly beach area causing damage to property, foreshore, some coastal erosion and contamination of the marine environment. Infrastructure fails to cope with this at present and the impact another 91 blocks will have in the area is a major concern.

According to the Flussig Report provided in the development application 'significant flooding occurs through the proposed development area.'

This applicant is relying on outdated climate change research from 2012, which understates the current risk of flooding. We need up to date data to help evaluate the risk of flooding in an already flood prone site.

Over the last few years, we have seen extreme flooding events across the country, evidence that La Nina cycles result in extreme rainfall events which are predicted to increase in frequency and intensity into the future. On a personal note, the damage created to personal property from the floods of 2016 were the worst in 50 years (1966), and since then we have had two more within that range of severity.

The Development application is relying on Flood mitigation measures instead of sustainable development practices. The council is exposing itself to potential liability and the property owner's future expense.

Coastal erosion.

I see no mention of the effects of coastal erosion supported in the documents, and the developer's failure to address section C10 of the Tasmanian Planning scheme means that council could not have confidence in the claim that there are 'no environmental constraints' on the site.

Coastal erosion has become increasingly problematic at East Shelly which can only be exacerbated with the addition of a high-density build. A map on LIST shows East Shelly Beach as being a potential erosion hazard in the future.

In ordinary council meeting minutes from Tuesday March 28th, 2023, under Environment Management 11 (page 21) it says, "All work must be **generally** done in compliance with the Tasmanian Coastal Works Manual.' 'Generally,' is a very loose word and I find it quite concerning. This terminology allows for movement outside the parameters of the compliance code.

Flora and Fauna

This Development applicants have neglected to present a flora and fauna report.

The creek line and roadside vegetation are important areas for biodiversity, supporting endemic flora and fauna. I note that the developers intend to keep the creek line as POS and propose to remove most of the vegetation on Rheban Road for access. It is important that the varieties of tree here need to be recorded to prevent any potential loss of protected species and endangered species habitat.

All attempts must be made to retain on site any Eucalyptus Ovata which is a protected species under the Threatened Species act, and remnant habitat trees for the critically endangered Swift Parrot and Forty Spotted Pardalote, hence the importance of a Flora and fauna report.

Recommendations

Substantive analysis is lacking and new independent analysis and data supporting this proposal is needed to give confidence in this proposal. Storm water runoff from this development will only exacerbate the already high risk of coastal erosion at East Shelly beach.

A Flora and Fauna report is needed before any decision is made.

I suggest increasing the number of larger blocks into the development layout, interspersing them amongst the smaller 'Lego block' style rows (as seen in stage 5 & 6 of the development) thereby decreasing the total number of blocks but creating a more aesthetics appeal, and more in keeping to the aesthetics of the area.

Conclusion

There is little vision for the future with this proposal.

This is a standard urban subdivision, meeting minimum standards for design, use of the land and layout.

It is negligent in the recognition of its coastal location and fails to reflect the character and amenity of the area.

It is a one size fits all approach, more akin to residential development on the fringe of larger urban settlements.

Do we really want more of the same here? An extension to the great eastern seaboard suburbia?

A large percentage of the population who live in Orford are retirees who left suburban sprawl to move here for the amenities Orford provides. To build a development in this design will ruin the very landscape and amenities which people move to Orford to enjoy.

As someone who has been visiting the area annually since I was born, I admit I don't want the area to change dramatically, but I also accept growth is inevitable. However, I have seen evidence in other countries that it is possible for rural and regional areas to grow sustainably and sympathetically without damaging the very heart of what makes it unique.

Council needs to employ world's best practice when it comes to future planning for the Glamorgan Spring Bay area. Then future generations will thank the council and the State planning Scheme for visionary, quality developments, which include protecting and preserving our beautiful landscape and environment which is unique to us.

I urge council to reject the proposal.

Yours sincerely,

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