



13 December 2018

The General Manager, Port Stephens Council

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OBJECTION TO DA2013-790-3 - PROPOSED S.4.55 (1A) MODIFICATION OF DA-2013-790-2 CARAVAN PARK 4011 NELSON BAY ROAD, BOBS FARM

TRRA Inc. has had a longstanding interest in this and other manufactured home estates in the Anna Bay-Bobs Farm area and made submissions on earlier applications for this site.

We wish to specifically object to the proposed change to site depth and consequent re-balancing of open space between common roadway and verges and what is effectively private space occupied by the individual home units.

The application is unclear as to whether the distance from dwelling to dwelling across the road will be reduced from the information provided. We are not persuaded by the applicant's assertion that *'The overall physical amendment will be imperceptible as it merely involves including this additional green space within the dwelling site as opposed to the access road reserve'*. It appears that the proposal will result in a road width of 5.5m plus a verge of 1.5m plus 1.5m within the site giving a total distance of 11.5m dwelling to dwelling. From the cross section on page 17 the distance between dwellings is shown as 5.5m plus 1.5m plus 2.5m resulting in a total distance of 13.5m.

It is difficult to assess if originally the dwellings were proposed to be located right on the front boundary of the site, however it appears that there may be a reduction of at least one metre between the front of the dwelling and the road.

We note that the applicant has already secured a reduction in the road width from standard of 6m to 5.5m. We fear that the overall effect of the proposed modification will be a further reduction in open space and communal landscaping. One of the so called benefits of reducing the road width was to *'to improve streetscape aesthetics and increase available space for provision of services and stormwater management'*.

TRRA is also aware of concerns raised by another objector to the apparent non-enforcement of existing conditions on this development. We are very concerned that this (and other) manufactured home estates in the area are consistently and repeatedly 'pushing the boundaries' of their approvals, and of conditions, both by possible non-conforming works and by repeated modification applications which on their own may seem minor and innocuous but which cumulatively result in much higher density developments with less amenity.



We urge Council to refuse the application for changes to site depth and verge width, on the grounds that it does not meet the criteria for a s451A modification, having much more than a 'minimal environmental impact' and clearly not being 'substantially the same as the original development'.

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