

# **Submission Opposing West Culburra Mixed Use Subdivision (SSD-3846)**

**To:** Mr Patrick Copas  
Senior Environmental Assessment Officer  
Department of Planning, Industry and Environment

**From:** Bryce Dickes  
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**Date:** [Insert Date]

## **Introduction**

I strongly oppose the West Culburra Mixed-Use Subdivision (SSD-3846). This proposal represents a large-scale, poorly considered development that would permanently alter Culburra's fragile environment, overwhelm its limited infrastructure, and erode the unique village character that residents and visitors value. It is out of step with contemporary planning principles, fails to safeguard critical environmental assets, and disregards unresolved concerns consistently raised by independent experts, Shoalhaven City Council, and the community over many years. If approved, this development will cause irreversible harm—to the environment, to public safety, to Aboriginal heritage, and to the social and cultural fabric of Culburra.

## **1. Environmental Impacts**

### **Water Quality and Oyster Industry**

The proposed subdivision sits within the catchments of Lake Wollumboola and the Crookhaven River—both environmentally sensitive, both vital to commercial oyster farming. Stormwater runoff from hundreds of dwellings and sealed roads would significantly increase pollutant loads, sediment, and nutrients entering these waterways. The oyster industry, already under pressure from climate and water quality fluctuations, cannot withstand this scale of risk. One contamination event could devastate oyster leases, threatening jobs, families, and a regional industry that depends on clean, healthy water. This is not hypothetical—it is a predictable outcome that experts, including the UNSW Water Research Laboratory, have already flagged.

### **Lake Wollumboola – Ecological Significance**

Lake Wollumboola is listed as an important bird area and has been recognised by the Independent Planning Commission as unsuitable for large-scale urban development. It supports migratory species, saltmarsh, seagrass, and mangroves—all under direct threat from altered hydrology and degraded water quality. Once disturbed, these systems do not recover.

### **Bushland and Threatened Species**

The site contains significant patches of bushland—habitat for threatened species and

crucial refuge following the 2019–2020 fires. Clearing will fragment ecosystems, destroy corridors, and further reduce the region’s biodiversity resilience.

## **2. Infrastructure and Public Safety**

### **Single Road Access**

Culburra is accessible by only one road. Adding thousands of additional vehicle movements each day will choke traffic, cripple evacuation capacity in bushfire or flood events, and pose unacceptable risks to residents’ safety.

### **Health and Services**

Local GPs and health services are already operating at full capacity. Residents currently travel to Nowra for many services—this burden will grow substantially with a development of this scale. Emergency services will face delays in response times, made worse by congestion at peak holiday periods.

### **Strain on Local Amenities**

Shops, schools, and beaches in Culburra are already crowded during tourist season. This development would push them beyond capacity, diminishing liveability for existing residents and visitors alike.

## **3. Cultural Heritage and Community Identity**

### **Aboriginal Heritage**

The site is known to contain Aboriginal cultural heritage, yet no archaeological excavations or meaningful consultation with Aboriginal stakeholders has been undertaken. This is disrespectful and risks the destruction of irreplaceable cultural sites.

### **Loss of Village Character**

The proposal is a cookie-cutter, high-density sprawl. Small treeless lots and suburban-style layouts jar with Culburra’s identity as a low-density coastal village. Residents and visitors come here for its natural beauty, open spaces, and community atmosphere—not for urban sprawl.

## **4. Planning and Governance Failures**

### **Outdated Zoning**

The development relies on the outdated Shoalhaven LEP 1985, rather than modern planning frameworks or the Sensitive Urban Lands Review, which explicitly recommended only limited development in this sensitive location.

### **Ignored Council and Expert Advice**

Shoalhaven City Council identified multiple flaws in 2017, including inadequate stormwater management, poor foreshore protection, insufficient open space, lack of pedestrian and cycle connectivity, and questionable staging of development. These concerns remain unresolved. The Department’s own reviews confirm persistent gaps in water quality protection and environmental safeguards.

## **5. Irreversible Consequences**

This development is not simply “growth.” It is a gamble with Culburra’s future:

- Once bushland is cleared, it cannot be restored.
- Once waterways are polluted, they cannot be returned to their natural state.
- Once oyster industries collapse, they will not recover.
- Once cultural sites are lost, they are gone forever.

No short-term housing or commercial gain outweighs these permanent losses.

## **Conclusion**

The West Culburra Mixed-Use Subdivision is fundamentally flawed. It endangers critical environmental assets, fails to protect Aboriginal cultural heritage, overwhelms infrastructure, and ignores modern planning principles. I urge the Department to refuse this application outright. Any future planning for Culburra must:

1. Respect the Sensitive Urban Lands Review recommendations.
2. Protect the oyster industry, Lake Wollumboola, and Crookhaven River.
3. Involve genuine consultation with Aboriginal communities.
4. Align with sustainable, small-scale development consistent with Culburra’s unique coastal character.

Respectfully submitted,

Bryce Dickes

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