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13 February 2021

Director
Industry Assessments
Planning and Assessment
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Re Objection to the West Culburra Concept Proposal – SSD 3846

Dear Sir/Madam

I object to the proposed West Culburra Concept Proposal for mixed use development in its current form for Culburra Beach for the following reasons:

- This potential subdivision should not be allowed to proceed under an outmoded SLEP 1985 – it's over 35 years old and standards have changed.
- It is not "limited" development as recommended by the Sensitive Urban Lands Review and adopted by Department of Planning. I consider it to be large-scale and wall to wall development.
- The scale and design of this proposal does not reflect the seaside village character of Culburra Beach, the place that most people who live and visit here cherish.
- It is an unimaginative cookie cutter subdivision of treeless, small-lotted plots of land. It ticks boxes for planning outcomes but fails to meet the needs of the community as a whole.
- Current infrastructure would be overwhelmed. The proposal would mean overdevelopment, over-crowding, more rubbish, extra load on the sewer treatment system, many more cars, queueing. During holiday times it is near impossible to find parking at shops and beaches – inject hundreds more permanent residents and it will be impossible. The influx of people working from their holiday homes (due to COVID-19) last year demonstrated just how congested the retail and beach parking areas became.
- Doctors have been in short supply in Culburra. Surgeries have been trying for years to attract permanent general practitioners, but to no avail. I believe that both surgeries in Culburra have closed their books to new patients. This situation is untenable and will mean a drive to Nowra for new residents to see a GP.
- There is a lot of talk about housing affordability. As I see it, a Water Sensitive Urban Designed home with a 7-star NatHERS rating (ESD Assessment App 31) done properly would not, in my view be an affordable option for a lot of local people looking to buy in Culburra Beach.

It concerns me to also read in the ESD Assessment: “Based on review of the Concept Plan, ESD design elements will be required for future development within the West Culburra Beach Expansion Area. However, when understanding this approval is for Concept Plan only, it is possible that some of these considerations may not be relevant at the detailed approval stages (i.e. subdivision and construction certificate).... This assessment allows for flexibility as the final land use is not known at this time”. There should be no option other than ESD for new subdivisions and structures.

- Clear-felling 47ha of mature bushland (last cleared in the 1940s) to accommodate a subdivision that is not likely to be sold exclusively to permanent residents is unwarranted. It would also be attractive for investors, for holiday homes, AirBNB, which would appear to defeat the stated purpose of the proposal which is to contribute to residential housing stock in the Shoalhaven.

At the last census in 2016, the permanent population of Culburra Beach was just over 50%. I cannot see that this percentage will change dramatically with urban expansion to the west. Culburra will always be a tourist town due to its unspoiled environment and close proximity to Sydney, Canberra and the Southern Highlands.

- The boardwalk/cycleway shown will traverse through wetlands in an E2 zone. This option is not required when there is an existing car width track that could be upgraded behind the STP that would not require clearing or interfering at all with the wetland vegetation or mangroves.
- If the proposal west of the STP is approved, I am very concerned about development creep with further proposals and degradation of native bushland.
- This land is part of a habitat corridor that supports threatened species such as Powerful Owls and Glossy Black Cockatoos. Importantly it is a forest refuge for the many displaced birds and animals after the 2019-2020 fires.
- Aboriginal cultural heritage needs to be preserved and respected. Unauthorised tracks and structures to the bay/river will likely damage middens as has already occurred elsewhere in Culburra.
- Mangrove fish nurseries and oyster leases are likely to be impacted by siltation after clearing the site of native vegetation, development of the subdivision and ongoing polluted runoff from hard surfaces and gardens.
- There are no guarantees that overflows from Water Pollution Control Ponds (WPCP) during heavy rain events (which have become notably more frequent over the past few years and will likely increase due to climate change) will not occur. This is an unacceptable risk given the detrimental impact it would have on oysters and fisheries.
- The application does not demonstrate a Neutral or Beneficial Effect for surface and ground water in the Crookhaven catchment, SEPP14 wetlands or into Curley’s Bay and the River.
- The concept of recharging ground water with harvested stormwater concerns me. Will that not seep through to a receiving body carrying whatever pollution it has collected on the surface? Stormwater from the WPCPs used to water the sporting fields will also carry

pollutants such as herbicides, pesticides and fertilizers used on the grounds through to the ground water and into the Bay.

- The scale and dimensions of the Industrial units is over-kill in my opinion and not justified. I don't believe it would be competitive with Nowra/Bomaderry which is the main Industrial hub with good access to transport links, Princes Highway and the railway. The smaller Industrial lot to the east of the existing industrial area is in my view a better option for extending the existing industrial area.
- I strongly object to the proposed HOB change from the existing 7.5m to 11m described as Medium Density. As Matt Philpott of Allan Price & Scarrats said in his recent presentation, "the 12 large blocks will be sold to a builder and is zoned for High-rise flats" - not Medium density. There are no drawings provided to show how a wall of 11m tall buildings would look along the main road into Culburra Beach. Totally out of character.
- The Integrated Housing lots are earmarked as appropriate for downsizing over 50s with a proposed HOB change from 7.5m to 8.5m, ie two storey. Speaking from experience, two storey dwellings do not suit older persons nor in my view would they be suitable for growing families needing more space than singles and couples. A mixture of single and double storey dwellings in this area would be more useful to more people as well as being in keeping with the existing town.
- There is no provision for playgrounds and community spaces outside of the odour zone in this medium density section of the concept plan.
- The medium density area integrates well with the existing township. The area to the west of STP is not connected to the existing town but separated by bushland, the STP and industrial estate. Residents will need to drive to do their weekly shop. It would be a satellite to the existing township.
- I am also very concerned about the fire risk of bringing so many more people into an area surrounded by fire prone bushland with one way in and one way out.
- Wind driven fires and ember attack do not respect 29m Asset Protection Zones in the proposed subdivision.
- Public reserves seem to double as utility areas and not dedicated to passive recreation or useful community spaces. Dedicated community spaces where people can meet, listen to live music, picnic, festival and market spaces, children's playground – a real community hub are in short supply. A swimming pool would be well received and used by both young and old. Swimming lessons, school carnivals, aquafit classes etc.
- Culburra Beach does not need another playing field. The existing playfields have been upgraded over the years and I believe application was made to Council to extend or upgrade them further. I understand that the playing fields have been included mainly to dispose of stormwater. If that is the case then I think the playing fields are a waste of space, particularly given that it is inside the odour zone which will likely impact on team sports participants and spectators. It would be most unpleasant. It would be better left untouched as scribbly gum forest and wetland providing more of a buffer to the STP.

- The sporting fields and associated infrastructure, I understand is on low lying land and I expect, to be useful as both an all-weather playfield field and a stormwater disposal site, would need to be raised with fill. Not ideal when in close proximity to wetlands with the possibility of siltation/pollution occurring during construction.
- In the Review of Concept Plan, Sept 2017 Shoalhaven Council asks the developer about what works are to be approved under the concept proposal. The answer: “There are no works proposed – all works are subject to Development Applications submitted. Only zone boundaries, location and type of facilities and infrastructure are established through the concept plan”. That tells me that there are no guarantees that what the concept plan shows is what Culburra will get. Should this plan be approved, amendments will be made at various stages of development. Will the public be invited to make comment on amendments? This will be an ongoing problem for all concerned. Writing yet another submission on the same issue will become very tedious.

I have lived in Culburra Beach since the early 1980s and have seen it grow steadily within the current footprint to meet the changing demographic.

There is a limit as to how much expansion a coastal village can accept before it spoils the reason people want to live and holiday here. Tourism is a very important source of revenue for this town and that must not be compromised by installing inappropriate urban expansion just because the area was zoned decades ago without much forethought.

Nowra and Bomaderry are the main centres in the Shoalhaven for larger scale urban expansion. Culburra Beach need not take any of the projected population growth for the Shoalhaven in a new subdivision. It need only expand its population with infill developments such as dual occupancy, granny flats, townhouses and villas within the footprint of the existing town and including the already cleared and degraded land between the ambulance station and the eastern edge of the odour zone.

The area earmarked medium density could be developed in stages in a shorter timeframe. It would be a more immediate injection of housing with all that it is purported to bring. It will also benefit from the amenities of the existing town centre within easy reach and no need for an intrusive raised boardwalk/cycle path through E2 wetlands.

I am grateful that the proposal no longer includes development in the Lake Wollumboola catchment.

I have not made any political donations in the last two years.

Regards

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