



# OUR FUTURE SHOALHAVEN

INC2000820  
PO Box 129  
Huskinson  
NSW 2540

The Director,  
Industry Assessments Department of Planning, Industry and Environment.  
Locked Bag 5022  
Parramatta NSW 2124

## West Culburra Concept Proposal SSD 3846

Dear Director,

Our Future Shoalhaven objects to the proposal SSD 3846 at Culburra Beach because:

1. The environment should not be compromised for the achievements of other goals which can be met in other ways
2. We need to stop damaging Aboriginal cultural heritage for our own and future generations
3. We need holistic quality planning, which will not:
4. Incur future costs such as dealing with sea level rise, conflict arising from illegal clearing, increased species loss because of the introduction of pets.
5. We need to arrest the creeping environmental destruction occurring in this area.

The proposal is at odds with the ***Illawarra-Shoalhaven Regional Plan***, which advocates a precautionary approach, and outlines the intention to:

- Protect the region's environmental values by focusing development in locations with the capacity to absorb development.
- Deliver housing in new release areas best suited to build new communities, provide housing choice and avoid environmental impact

The proposal does NOT follow existing planning documents specifically with goals related to:

- Development in locations with the capacity to absorb development
- Protection of the environment (clearing for vistas and use of the foreshore – once built danger of illegal clearing, and inappropriate use and destruction of the wetlands)
- Protection of Aboriginal cultural heritage
- Development sensitive to existing character – coastal village
- Support for existing industries and jobs.

### Environment

The proposed site is part of the catchment to Lake Wollumboola, and in immediate proximity to the wetlands of the Crookhaven River. Given that many wetland ecosystems have been damaged in the recent drought and bushfires, fulfilling previous obligations to



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care for our fragmented wetland system is even more important. Wetlands store carbon, regulate our climate and control flooding. Studies indicate that the cost of coastal storm damage would have been 10 times higher over the past 5 decades if the storm surges hadn't been absorbed by coastal wetlands. They also absorb waste including pollutants and carbon, and provide animal habitat. The developers own study acknowledges that the development may lead to pollutant run-off, damage to riparian vegetation which would permanently impact water quality, lead to increased people pressure with illegal clearing to create views and access to water, and damage and disturbance. The proposed management solutions rely on signage (so far not working to protect the health of dunes and other marine reserves as evidenced by past home owner behaviour in similar locations and increasing environmental vandalism that SCC acknowledges it is unable to control), water quality monitoring (have they committed to ongoing monitoring?) and the 100m buffer which will be intentionally breached to create 'vistas'.

Australia has already lost more than 50% of its wetlands through intentional infilling, drainage for mosquito control, creation of land for infrastructure and agriculture, and pollution and upstream changes to water flows.

Immediately adjacent to the proposed development is Billy's Island which is the last remaining undisturbed wetland area in the southern part of the estuary.

The proposed development would result in considerable environmental harm:

- clearing of over 47 ha of Currumbene-Batemans Lowland Coastal Forest, part of a habitat corridor which supports threatened species, extending west to the Shoalhaven escarpment and north to the Crookhaven River Wetlands. This area has not been logged or significantly cleared for at least 80 years and is in good condition.
- clear-felling of remnant coastal forest and which provides significant refuge habitat for native species displaced by the 2019-2020 South Coast fires.
- damaging impacts from polluted urban runoff for the Crookhaven River, its wetlands and the oyster and fishing industries it supports.

Of great concern to us is the proposal to remove vegetation in the E2[7(a)] zone for the purpose of creating vistas. We note that SCC does not support this intention:

Council does not support substantial clearing of vegetation in the 7(a) for the purpose of creating vistas. This is contrary to the objectives of the 7(a) zone.

## Planning driven by desire of land owner rather than intention of strategic plans

The proposal is at odds with the Illawarra-Shoalhaven Regional Plan, the intention of which is to:



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Protect the region's environmental values by focusing development in locations with the capacity to absorb development.

Deliver housing in new release areas best suited to build new communities, provide housing choice and avoid environmental impact

Whilst there is a shift in urban planning to reduce the footprint of urban areas at the same time as providing more housing (especially affordable housing) proposed subdivisions such as SSD 3846 will create an urban sprawl in what was otherwise a coastal village. Indeed the proposal appears to be at odds to the Department of Planning's requirement for 'limited development' in the Crookhaven River catchment.

Additionally the proposal is at odds to the existing character of Culburra, and does not represent a 'desired future character' from the perspective of the local community.

We note the majority of the housing is located between 10m to 20m above sea level. Given the predicted sea level rise, and predicted increase in extreme weather it seems prudent to maintain substantial vegetation on the foreshore to protect from erosion.

We are concerned about the liveability of what is proposed. The housing area appears to be medium density but it is a pocket of intense development with no internal green spaces, and the liveability appears to depend upon views (for some) to the bush and water (which will result from inappropriate clearing). This urban area is likely to be another hot, concrete sub-division where each dwelling will require permanent internal lighting, airconditioning or heating to be comfortable and liveable.

## Aboriginal cultural heritage

The Illawarra-Shoalhaven Regional Plan aims to 'protect the region's cultural heritage'. This proposed subdivision will result in the degradation of Aboriginal middens along the Crookhaven River shore, which are recognised as Regionally Significant Aboriginal cultural heritage.

## Existing industries and employment

We note that Fisheries have reported that the proposal remains a significant risk to the fisheries nearby, and they believe the modelling to be flawed. This alone should halt the development as the Shoalhaven has a chronic shortage of sustainable 'primary industry and associated jobs, therefore what exists should not be threatened.



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## Conclusion

This proposal seems to be about putting a 'square peg in a round hole'. The developer has a vision (square peg – note, there is nothing wrong with square pegs) and wants to create it in an inappropriate place (round hole).

Arguing that Culburra has a projected population growth of whatever amount is a spurious argument – the village will only grow as much as housing opportunity allows. The question is whether or not this village, which is squeezed between the environmentally sensitive Lake Wollumboola and the environmentally sensitive Crookhaven Creek, is an appropriate site for urban expansion.

Other than for the developer's income we cannot identify benefits to the community from this proposed development.

Yours respectfully

Secretary, Penny Davidson  
Our Future Shoalhaven Inc

## Sources

Illawarra-Shoalhaven Regional Plan, 2015, NSW Government.

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