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25 February 2021

**BirdLife Shoalhaven Objects to the West Culburra Concept Proposal (SSD 3846 Culburra Beach NSW 2540)**

Dear Sir/Madam,

BirdLife Shoalhaven is a branch of BirdLife Australia, an independent, not-for-profit organization and Australia's largest bird conservation organisation with over 200,000 members and supporters.

We would like to state our objection to the proposal which would involve the clearing of over 47 ha of Currumbene Lowland Coastal Forest in West Culburra and part of a habitat corridor which extends west to the Shoalhaven escarpment and north to the Crookhaven River Wetlands.

Our concern with this development is the environmental impacts, and we address these below. However, we also make the broader point that this development proposal is one of a growing number that involve significant environmental impacts and large increases in population in areas that are perhaps not equipped to cope. We urge the development of a more strategic approach to planning that considers the needs of residents and the environment alike, rather than being developer led and somewhat ad-hoc.

**1. The importance of conserving unburned vegetation**

In the response to the catastrophic loss of habitat for birds (and other native species) due to the 2019-20 South Coast bushfires, which burnt or negatively impacted 80% of the Shoalhaven<sup>1</sup>, BirdLife Shoalhaven has established its Bushfire Research Project. This project and advocating for bird conservation, including protection and recognition of unburned habitat, has been the primary focus of our recent work, recognising that many burned areas will take decades to recover.

Significant areas of coastal forest north from St Georges Basin and including the Jervis Bay, Lake Wollumboola and the Crookhaven River catchments were spared from the fires and now represent invaluable unburned habitat that acts as refuge for native species, and source populations for recolonisation of recovering fire-affected areas. Our members have completed 500 bird surveys during

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<sup>1</sup>Shoalhaven City Council, Currowan and Comberton Fires 2019/2020:  
<https://doc.shoalhaven.nsw.gov.au/displaydoc.aspx?record=D20/283015>

2020, contributing to the National Database and demonstrating the significance of these unburned areas as refuges for recovery for Shoalhaven birds.

Far from protecting unburned vegetation, the proposed development will involve the clearing of 47 hectares of native vegetation. Furthermore, there are four Threatened Ecological Communities that will be negatively impacted. These include Bangalay Sand Forest, Coastal Saltmarsh, Swamp Oak Floodplain Forest and Swamp Sclerophyll Forest on Coastal Floodplains.

This area is known habitat for many native bushland bird species, including Threatened bird species. Local bird watchers have recorded and observed the presence of Vulnerable species, including Glossy Black Cockatoos, Powerful Owls and Barking Owls within the wider areas of the Crookhaven River Catchment identified for development, as well as in the Lake Wollumboola catchment. These observations have been reported and accepted by BirdLife Australia and the NSW National Parks and Wildlife Service (NPWS). Each of these species rely on a wide habitat range and, after the 2019-20 South Coast bushfires, loss of any further areas within their range, would threaten their overall persistence in the region.

The issue of development exacerbating stochastic environmental effects is one that is likely to occur more regularly in future as a consequence of global heating, and we urge evolution of the planning system to recognise and adapt to this issue.

## **2. Impacts on birds in high conservation value mangroves and wetlands**

As well as the loss of forest habitat, the development has the potential to degrade mangroves and the coastal wetlands in Curleys Bay and adjacent areas in the Crookhaven River. This would be likely to impact a number of waterbird species.

Surveys by NPWS and BirdLife Shoalhaven, as part of BirdLife Australia's national Shorebirds 2020 program, have recorded a wide variety of species in the western section of Curleys Bay. These species include: four species each of Cormorant, Egret and Duck, Royal Spoonbill, Striated Heron, Australian Pelican, Nankeen Night-heron, Crested Tern, Common Tern, Caspian Tern, Silver Gull, Eurasian Coot, Azure Kingfisher, Darter, Black-winged Stilt, Australian White Ibis, Straw-necked Ibis, Masked Lapwing, Black Swan, the endangered Bush Stone-curlew and the endangered Pied Oystercatcher. The mangroves are known roosting sites for Royal Spoonbill and provide nesting habitat for Chestnut Teal.

Surveys further into the bay have not been feasible due to restricted access, but it is very likely that other species also rely on the mangroves and wetlands adjacent to the site.

## **3. Tensions with existing strategies**

We question whether this development is consistent with various NSW Government's strategies and their intent.

The Shoalhaven-Crookhaven Estuary is listed in the Directory of Important Wetlands in Australia (NSW 088)<sup>2</sup> as a wetland of national importance and is of high conservation value—as identified in the South Coast Regional Conservation Strategy. The strategy states that “on the basis of the extent of seagrass, mangroves and saltmarsh present, DII (Fisheries Conservation) considers coastal water bodies on the South Coast to be particularly significant for aquatic biodiversity conservation” and goes on to list the Crookhaven River as one of these bodies. While the Directory's list of “notable fauna” primarily includes shorebirds, including Endangered species, which are not present in Curleys Bay, the potential for the development to impact adjacent waters and significant wetlands should still be considered.

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<sup>2</sup><http://www.environment.gov.au/cgi-bin/wetlands/report.pl>

Goal 5 of the Illawarra Shoalhaven Regional Plan (2015) is “a region that protects and enhances the natural environment”, while Direction 5.1 states “protect the regions’ environment by focussing development in locations with the capacity to absorb development”, with Action 5.1.1. identified as “avoid, minimise and mitigate the impact of development on significant environmental assets”. These assets are identified in Figure 1 of that strategy and include the Threatened Ecological Communities (listed above) that will be impacted as a result of this development proposal. We urge the government to avoid impacting these environmental assets.

Direction 5.4. states “secure the health of coastal landscapes by managing land uses and water quality”, with Action 5.4.1 identified as “protect sensitive estuaries and coastal lakes”. The wider area potential impacted by the development and included in the Directory of Important Wetlands in Australia are identified as significant under this goal, with the Plan stating that the “NSW Government will: protect these sensitive estuaries from inappropriate development that affects water quality or ecological function”.

Our members are also concerned at the potential for pollution of the Crookhaven River and Curleys Bay from urban runoff. The long-term expert advice provided in the NSW Government’s Comprehensive Coastal Assessments 2006 is that clearing of native vegetation in areas of low-nutrient erodible soils for urban development, will inevitably lead to degradation of coastal environments such as the Crookhaven catchment.

While Birdlife Shoalhaven is pleased that the West Culburra development proposal no longer includes significant development in the Lake Wollumboola catchment, we are concerned that such a large-scale development, resulting in trebling of the population of Culburra Beach, is likely to result in impacts on the surrounding environment. This includes the Lake Wollumboola, which is also on the Directory of Important Wetlands in Australia and also recognised by BirdLife International as a Key Biodiversity Area.

If you require any further information, regarding this submission, please contact myself or Dr. Oisín Sweeney, [REDACTED].

Yours sincerely

[REDACTED]

**Rob Dunn**  
**President**

[REDACTED]