

Balmain 2041 NSW

25 February 2021

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

**Re**      *Objection to the West Culburra Concept Proposal – SSD 3846*

Dear sir/Madam,

I object to the *West Culburra Concept Proposal – SSD 386* as it stands for the following reasons:

- ***Excessive Scale***

It is excessive in scale both for the amount of housing and for the size of industrial development it proposes. The Sensitive Urban Lands Review which supports the South Coast Regional Strategy states that this area is suitable for 'limited' development; this concept proposes 244 housing lots with 293 dwellings adjacent to an already functioning township, Culburra Beach, and cannot be deemed 'limited' development. It is basically a new satellite town which could more likely drain the current Cullburra Beach community rather than contribute to it.

The raising of HOB is not acceptable particularly without details.

There is no indication as to the possible aesthetics of approach or any cohesive management.

It is an outdated concept of overdevelopment aimed at benefiting the developers, real estate agents and wealthy investors.

- ***Environmental and Ecological insensitivity***

It is insensitive to environmental concerns regarding the wetlands and wildlife corridor that will be destroyed. Clearfelling 47ha of mature Currumbene-Batemans Lowland Coastal Forest is not appropriate as it is in good condition and provides contiguous and protective habitat for many native species, including the Powerful Owl and Glossy Black cockatoo, some of which are currently under protection through the Save Our Species program. It importantly provides refuge for those animals and birds that have been displaced as result of the tragic 2020 bushfires.

The mangroves fish nurseries and fishing and oyster industries will surely be at risk due to nutrient pollution and changes in water quality (e.g. turbidity, pH) due to increased run-off and erosion during and after construction.

The proposed cycle track is through wetlands in an E2 zone and is unnecessary. There is currently a car track behind the STP which could be upgraded so as not to disturb the mangroves and wetland vegetation.

- **Aboriginal Heritage**

Further consultation with the Jerrinja community is necessary to ensure aboriginal heritage is respected and safeguarded. Aboriginal middens along the Crookhaven River are recognised as Regionally Significant Aboriginal cultural heritage and would very likely be threatened by any development in this area.

- **Water Quality**

Water quality is probably the most important issue in places such as Culburra and other low lying coastal towns. The NorBE (Neutral or Beneficial Effect) requirements for surface and ground water in Crookhaven catchment, the Sepp14 wetlands , Curley's Bay and Crookhaven River don't seem to be addressed by the this application as i required.

Such a large scale development will impact the water quality of Curley's Bay from runoff and ongoing use of fertiliser and pesticides. This will undoubtedly put current local fishing and oyster industries under threat. Oysters in particular are filter feeders and are known to sequester heavy metals and other toxicants that bind to sediments in the water column.

Recharging groundwater with harvested stormwater also risks pollutants seeping through to groundwater, wetlands and Curley's Bay.

Inclusion of a sportsfield seems unnecessary as there is already an upgraded one in Culburra/Curley's Bay area. The positioning of the field in this Concept Proposal seems to be in low lying area again runs risk of runoff getting into wetlands and Curley's Bay. Preferably his area could be left as natural scribbly gum forest and wetland.

- **Industrial**

The intended expansion of the industrial area is inappropriate as this area not well suited to extensive industry. Nowra is the region's industrial hub and it would be more suitable for any expansion proposed to be smaller and situated to the east of current industrial site on land that has already been cleared at some point.

- **Infrastructure**

The long term disruption to locals and the environment should this proposal go ahead is very problematic. The current infrastructure would be overwhelmed and the unintended fallout from such excess is not dealt with, e.g. waste services, sewer, more cars etc.

The resources available for the large infrastructure works in this development would be better spent upgrading those needed in the town already.

- **Bushfire Issues**

There is insufficient allowance for evacuation in the event of fire as it is still a one way in and one way out access. Increased numbers during the summer and holiday periods already pose risks in this regard.

- **Community cohesion/structure**

It is insensitive to the character and concerns of Culburra Beach and Curley's Bay . This concept plan gives no visual indication of what the finished 'product' might look like and how attractive or not it will be for those approaching the Town. Will it have another name? It certainly will not be sympathetic to Culburra Beach township as indicated by the proposed Concept Plan.

The distance from this satellite suburb will increase dependence on cars for visiting beach and shops, greatly adding to pressure on parking and casual ambience.

- ***Aesthetics of a South Coast township***

This proposal presents as incompatible with the culture and aesthetic of Culburra Beach and Curley's Bay.

- ***Who benefits?***

This heavy handed top-down outdated concept gives no guarantees as to what the finished product would look like. I think a totally new approach is required if we are to show respect to land, environment and community. Perhaps a competition open to modern and creative town planners and urban designers who can tread lightly while providing for community.

This community has been crying out for some development and increased opportunity for access to a more varied living option yet this developer has not held any genuine community consultation to determine what the community as a whole would benefit from.

Passive community recreational spaces have not been included

Locals want more affordable housing so that they and their families can stay in Culburra Beach and Orient Point and while this development purports to provide much accommodation it is doubtful that it will be financially available or suitable to those who want and need it most, i.e., the people who have already built this community.

This proposal is an outdated concept of overdevelopment aimed at benefiting the developers, real estate agents and wealthy investors.

- ***Employment opportunity***

It is questionable as to whether there will be many benefits to the local community as these large developments usually bring their own tradespeople instead of supporting local businesses. Culburra Beach has a robust building industry which caters for ongoing and gradual development.

A smaller more integrative development would better cater for improved services, e.g., medical and allied health services, small businesses, tourism etc. would be more plausible. GPs in Culburra Beach are already over utilised and resources could better be directed to such meaningful and necessary services.

It is likely that tourism will remain the main source of income for Culburra Beach and there is much opportunity for nature and Aboriginal cultural tourism and education. I can't see this development enhancing this.

Inclusive and **non-confrontational** community consultation could achieve a lot to this end.

I would very much like to see

- Well constructed inclusive community consultation with residents of Culburra Beach, Orient Point and Jerrinja community.

- Given that tourism is likely to be the main basis of Culburra's economy what kind of tourism does the town want? Currently family holidays and retirees are the main forms and there is potential for more environmental and Aboriginal cultural tourism.
- A novel modern approach to seaside, small community development that respects both environment and community
- Opportunity for locals to stay in their community.
- Additional areas for community involvement and integration such as passive recreation , musical events, talks, Probis, U3A.
- **This proposal by this developer thrown out once and for all!** Culburra Beach and other small South Coast towns need and deserve smaller, clever and more modest inclusive expansion of housing and business. Development is necessary but **bad development is bad development** and this is a good case in point. It is the same old same old boring, environmentally insensitive proposal that has been going on for decades based on outdated decision making. Times have changed so let us move on to modern, efficient and productive styles of development for our South Coast before it is too late. Whatever happened to the triple- bottom line?

I may live in Sydney but I and my family have been coming down the Culburra nearly 20 years on a very regular basis. We were attracted to the natural beautiful environment and its ecological values. We enjoy the slow pace and peaceful ambience and we support local businesses while participating in local community. I am a member of the Lake Wollumboola Protection Association which is dedicated to protecting the health and integrity of the Lake for its core ecological and cultural values. I am very grateful that the new Concept Proposal no longer includes the Lake Wollumboola Catchment.

I am objecting to this Concept Plan but I am in no way an extremist as some have referred to those who do not support this development. I care about this community and in full sincerity object to this Concept Proposal as it promises large gains for very few at a huge cost to many.

I have not given any political donations over the past 2 years.

Yours sincerely

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