

**Comments re: 09_0088 Mixed Use Subdivision West Culburra (Concept Plan)
June 2013**

Loss of intact bushland

- It is disappointing to see the proposed loss of 72 hectares of intact bushland mature enough to contain 92 hollows for nesting birds and breeding bats (that can take over a hundred years to develop to usable size), when there is already cleared land close by.

Maintaining the natural scenic quality of the entrance to Culburra Beach

- Norfolk Island Pines belong in Norfolk Island, not in Culburra Beach, and London Plane trees belong in London. The current entrance to Culburra Beach is highly visually attractive, being through a long avenue of native bushland and endangered ecological communities. The Council has taken an environmentally-sensitive approach to avenue planting in the shopping centre by installing Coastal Banksias. Integrating development with the natural environment says a lot more about the character of the town than an out-of place exotic in such quantities as to dominate and detrimentally transform the front door into the community.
- The only purpose of these trees seems to be to screen the over-sized four-storey buildings proposed for along the roadside, to '*lessen the visual impact of new buildings on adjoining natural landscapes*' (pp44). . In relation to these buildings, the application states that '*the type, bulk and scale of development proposed is considered appropriate for the location.*' This is self-serving rubbish !!! Elsewhere the application states that '*the built form of Culburra Beach is described as low density set in an open landscape of remnant vegetation, lawns and herbaceous bushes*' (pp105) and comments on the '*natural scenic quality of the surrounding areas*'. It is this natural scenic quality that needs to be retained at the entrance to the town.
- Being located at the front door to the town, the proposed four-storey buildings are in a highly visually-sensitive location, and visual amenity needs to be carefully and sensitively managed, rather than dramatically changing the nature of the entrance to the whole town just to suit the developer's interests.
- Consent conditions should require either reduction of the height of the four-storey buildings to something comparable with the nature of Culburra Beach or relocating them to give a better set-back from the main road, so that shorter trees can be used to screen them.
- Consent conditions should mandate use of native species local to the area as street plantings along Culburra Road and throughout the development.

Crookhaven River Foreshore Park

- This riparian land is identified as having high ecological values with 100m of native vegetation to be retained, however the proposal identifies various contradictory functions including an 'active waterfront' and 'leisure hub'; with elements to include cycleways, barbeques, playgrounds, fitness stations, recreational facilities, boat ramps, cafes, restaurants, motels and the like, as well as stormwater runoff treatment systems. How much ecological value and buffering will actually be retained on this riparian land ?????
- The proposal contains no public open space other than this foreshore park and an oval that is to be constructed at a later stage of the proposal. The ecological value of the foreshore land will be destroyed by persistent resident demand for recreational open space for active uses such as playgrounds, ball games, skateboarding, etc.
- Masterplanning and safeguarding of the ecological integrity of this waterfront land should be closely conditioned to ensure protection of its ecological functions. Narrow linear bushland remnants such as what is proposed are highly susceptible to edge effects that push into the bushland and erode its ecological values. Maybe the park needs to be 150m wide with the additional width allocated to recreational pursuits.

Lighting

- The impact of streetlighting & lighting of facilities in the foreshore park upon adjacent bushland and waterbodies, particularly any migratory bird or waterbird roost sites along the foreshore, is not considered. Placement, design and orientation of such lighting should be closely conditioned.