

E.Hood
soultemple@iinet.net.au
CULBURRA BEACH NSW 2540

27 May 2013

Dear Director (Metropolitan & Regional Projects North),

I am writing to express **deep opposition** to the development of Culburra Beach (North & West)
Application number: MP 09_0088

As we come through the forest, the change in temperature is noticeable by a degree or so, the serenity is evident as there is no sound apart from the birds calling to one another.

I absolutely love the sight of the enormous trees which surround this passage (left & right) of Culburra Road, with a tranquil reminder of how beautiful & special nature is. To admire the gleam of the sun or moonlight filtering through the intertwining branches... This is the peace that we know & associate with life in Culburra Beach.

I cherish this experience each & every time I leave & return, I love teaching my Son the names of the Native Animals which we see in the forest whilst travelling through this stretch of road, we love keeping our eyes open for these birds & animals, while excitedly looking 'in case' we are fortunate enough to see a Koala.

This experience & daily connection to Nature, will be forever removed should the proposed development proceed.

The other reasons for my opposition are outlined below.

Environmental Impact

Listed below are species within the subject zone of this proposal: on the Vulnerable, Threatened & Endangered Lists, which have not been properly recognised or managed within the proposal or Environmental Assessment

Fauna

Glossy Black Cockatoo
Powerful Owl
Scarlet Robin
Little Eagle
Swift Parrot – Endangered
Eastern Freetail Bat
Yellow Bellied Glider
Little Tern – Endangered
Sooty Owl
Southern Myotis

Nearby nesting of: Osprey & Eastern Curlew

Flora

Swamp Oak Forest
Black She-Oak Forest
Bangalay Forest
Blackbutt Forest

Source: SLR aerial imaging, for Realty Realizations, obtained via Nowra Library Exhibition of proposal – I have been unable to locate these (3) photos in the Online Submission only Figure A has been supplied online.
Accuracy referenced with: www.environment.nsw.gov.au/threatenedspecies

Environmental Planning & Assessment Act NSW (1979)

I do not believe this Act & Integrity is being respected or followed as the concept plan has not allowed provisions to protect the environment, including the protection and conservation of native animals, plants, including threatened species, populations and ecological communities, & their habitats.

It is my understanding that this Act is not being upheld in this proposed development, the removal of the forest

species will destroy the communities which reside within them & there is a lack of acknowledgement that Threatened, Vulnerable & Endangered species of Fauna & Flora exist within the subject land.

Please take into consideration that this area (subject land) is the only waterfront forest remaining of its size & kind in Culburra Beach.

The ecology of these forests differ from Jervis Bay National Park & once removed the species within this forest will no longer reside in Culburra Beach.

It is my suggestion to assist in minimising the damage to these sensitive ecosystems, that the areas proposed for housing & 'vistas' be greatly reduced & the areas considered for 'reserves' be greatly increased.

The bike/walk way would be best moved much further back from the Mangrove & Bay - reducing the impact of both the disturbance & run-off / pollution (including noise) caused by building the 'circus' & the latter effect of human activity, vehicle pollution, fertilisers, & litter (which will be a whole new array of issues for the waterways, plants & animals to cope with).

The proposed development seeks to build 'waterfront' pathways & homes, which will adversely effect the health of the Mangroves, Curleys Bay, Crookhaven River & the remaining ecology of forest area not being demolished for housing.

Together, Shoalhaven – Crookhaven River & Lake Wollumboola form a critical habitat for migratory & indigenous birds on the NSW South Coast. These waterways are both Internationally & Nationally important for migratory birds & are of National Environmental Significance (NES).

Lake Wollumboola regularly supports more than 1% of the estimated *world* population of Black Swan (our town icon) & Chestnut Teal with flocks of over 13,000 swans recorded, it supports both plant & animal species at critical stages of their life cycles; providing a key breeding site for the migratory Little Tern (Endangered) & the Green & Golden Bell Frog (Endangered).

Lower Crookhaven River Estuary is habitat for migratory waders & indigenous water & shorebirds, it is refuge & nursery habitat for important fish species: Flathead, Blackfish, Mullet, Snapper, Bream, Prawns, Crabs, Oysters & Crustaceans.

These wetlands (as with all wetlands) are dependent on the water quality & flow of nature being maintained. This cannot be ensured with this size & type of development.

I believe an extension of the Environmental Assessment is required (at least two (2) independent parties, aside from SLR) to be completed, water pollution control measures to be created according to Culburra Beach's conditions & the water quality monitoring be extended to the entire duration of the development & at least 12mths beyond completion. In order to adequately track the changes induced by the development & clearing of the proposed areas.

Reference: www.MangroveWatchAustralia.org.au

"Coastal natural resources including mangroves have come under increased risk, particularly near large urban centres. Degradation of mangrove habitat by the direct loss or alteration of trees reduces its capacity to function effectively as a viable ecosystem. This in turn endangers the species that depend upon the healthy mangrove ecosystems."

I suggest the way to reduce the negative environmental impacts of this proposal, is to significantly reduce the housing density, (from overcrowding to low density) – as laid out in the Shoalhaven Sensitive Urban Lands Assessment & Recommendation for the proposal: "Land within Crookhaven River catchment is considered suitable for limited urban development, Site planning should allow for suitable protection of ecological communities & riparian setbacks to exceed current Department of Natural Resources (DNR) requirements"

The proposed development in Curleys Bay, Crookhaven River & Lake Wollumboola will remove a very significant Wildlife Habitat Corridor.

On the greater scale; this corridor links Seven Mile Beach National Park, Comerong Island Nature Reserve (in Crookhaven / Shoalhaven River estuary south) to Jervis Bay National Park, as well as reserves to the mountains & Morton National Park. These corridors are incredibly important for the retention & preservation of many species.

There has been little to no consideration given to retaining a Wildlife Corridor within the 'circus' – this will not only deplete the opportunity for existing native residence to co-exist with the urban sprawl, yet it will also be terribly unsightly. (This is Culburra Beach, not the city – Culburra Beach is its own town, this development seeks to create another version of ShellCove, totally ignoring the characteristics of our suburb)

It is therefore questionable whether the concept plan complies with Director General's Requirement (DGR 9.1) to accurately assess the potential, definite, direct & indirect impact of the development on flora & fauna, while considering these impacts on local & migratory threatened species, populations, ecological communities & critical habitats.

The proposal is not consistent with the objectives & goals of the State Environmental Planning Policy 14 (Coastal Wetlands SEPP), especially with regards to the Conservation Strategy relating to wetlands & living resources, in providing feasible alternatives to the proposed development & supplying credible reasons as to why these alternatives have not been considered.

Apart from stating that similar habitats exist in surrounding areas, there appears to be little to no compliance, with Environmental Planning Policy 71 (Coastal Protection SEPP) to protect & preserve the native coastal vegetation (including but not exclusive to the Mangroves) & taking necessary steps to conserve animals & plants within their habitats while minimising the impact of development on existing wildlife corridors.

This concept plan (from my understanding) is not complying with the principle of biodiversity nor does it provide adequate safeguards or measures to protect or rehabilitate the above mentioned wetlands & ecological systems.

Refer 2.9 Ecological & Riparian Issues & Assessment

- The statement that the area has 'not had sightings' of the threatened species within the proposed site, is largely due to public access being denied, as the land is 'privately owned' & no permission is granted to view such animals.
- To state that this site holds a 'minor fraction' of the environmental resources in Jervis Bay Region – is amazing, as this proposed area holds the entire habitat for these 'threatened species' to continue to survive in Culburra Beach – regardless of the surrounding areas, Culburra Beach's wildlife & plant life needs to be protected.
- The proposal advises: the 'very mobile' animal communities will be able to relocate to surrounding habitats.
What will most likely occur is many will die, the ones who do find similar habitats will be forced into areas already occupied – resulting in overcrowding, mixed bloodlines & unnecessary territorial disputes
- It is wise to consider the Precautionary Principle of the Ecologically Sustainable Development Process & the objectives of this Authority. There is ample evidence of serious & irreversible environmental damage to Culburra Beach's ecological communities & wildlife corridors. A lack of scientific information or proper investigation relating to the loss & degradation of this habitat & the flow on effect of it; ought not be used as an excuse to proceed regardless.

Proposed Stage 2-4 Development

The considered addition of 'New Retail Arena' is sold as a positive increasing support for existing local business, yet installing a new retail centre will completely undermine current business trading in Culburra Beach. It is a self serving addition & not in the interest of the town or existing businesses – which already work incredibly hard for their customer base.

An additional 'tourist leisure hub & motel' will also undermine the present Motel & Caravan Parks in the area. The town simply does not need two of everything.

Installing a jetty / boat ramp to Crookhaven River, will lead to an increase in water pollution & elevate the risk of damaging the ecological communities.

To be functional to the greater community not just the 'development community', the bike /walkway would be beneficially located along Culburra Roadside. Providing cyclists & walkers alike a safe passage through Culburra Beach. Utilising the existing cleared & mowed area in front of the 'subject land'.

The creation of a Golf Course in Culburra Beach, is both damaging to the sensitive nearby wetland ecology with the habitual use of fertilisers & herbicides being certain to result in changes to the water table, nutrient pollution & adversely impact the surrounding natural environment. Plus, the addition of this Golf Course, will remove business from Callala Bay (where locals happily travel to do their golfing).

The creation of a Golf Course in Culburra Beach, is not a positive for the local economy or the environment.

Roundabout creation; if the development of this proposal is expected to increase traffic so heavily as to require a Roundabout to manage the volume – the towns peaceful lifestyle will without doubt, be lost.

The speed limit will also decrease to accommodate this structure; slowing the rest of the towns arrival/departure.

If the area is going to grow so substantially as to justify adding double of all amenities, why is it that there is minimal allocation for industrial growth in the area zoned as Industrial? It appears the proponent does not believe his own statement that the development of subject land, will increase business opportunities for locals.

It is unnecessary & unsuitable to line a boulevard with Norfolk Pines, this is merely an attempt to glamorise the area, where there is no need; as Culburra Beach is beautiful by nature. I suggest retaining the original trees rather than planting foreign species in an area lush with beautiful & native plant species. The people who choose to purchase these homes (should the proposal be accepted) ought to live in harmony with the natural surroundings of the area they have chosen to move to.

Creating 'Vistas' – again unnecessary, people are able to gain access to such vistas currently, without having to clear forests to enjoy the views.

Addition of a Sports Oval – there is already an existing oval, which is sufficient for the area. This is again creating duplicates of existing functional areas within Culburra Beach.

Adding extra housing for the aging community is required, I suggest the use of already cleared land – next to the Ambulance Station, to be utilised for this development.

Social & Economic Value – refer 2.4 Social Context of Proposal

- **Culburra Beach is not slowing itself into extinction as this proposal suggests.** We appreciate our aged community, every community holds a reasonably significant proportion of elderly – yet other suburbs are not considered as townships in decline – these statements made by the proponent are done so to imply that this development will 'save Culburra Beach' from a non existent danger.

- The town is filled with young families, who choose Culburra Beach because of it's small community & closeness with nature.
- The study concludes the impact on the community will bring in a younger population (mostly retirees) this statement defies itself. One hand is saying it brings in young people & the other hand states it will bring retirees (not young people).
- The proposal notes they find there to be 'too many empty houses' – they are not always empty, they are homes; owned by people & families who invest & respite in Culburra Beach.
The proposal does not guarantee all homes sold will be occupied full time by residents rather than visiting families.
- The proposal hypothesises that the proposed development 'may' 'is likely' 'will potentially' benefit the town – at the expense of the towns core enjoyment: the nature, the wildlife & the bush
- Please investigate the downfall of Sanctuary Point, where the crimes have escalated enormously & the suburb is now considered 'unsafe'. This is largely due to the influx of mass housing – the area has been destroyed by these developments. Statistics to be provided at later date.
Culburra Beach does not need to suffer the same fate, lessons need to be learned by the effect of growth in areas where it is not warranted.
- Increasing the population of an area does not guarantee or always create a better economy, employment opportunities & services, as seen in other coastal towns, it generally increases crime, youth issues, segregates economic stature (rich / poor).
- Culburra Beach has a very healthy tourist industry, which does not need increasing – it is evident by the steady flow of visitors every public holiday, school holiday, summer season & basically any time people can escape their regular 'city' lifestyle – altering the feel & appearance of our town, will diminish tourist activity, not increase it.

As the very essence of what the tourists are escaping will be what Culburra Beach becomes.

There are many more points to argue within this proposal for the concept plan / development; to continue, my submission would be as long as the proposal itself.

Indigenous Heritage

As noted in page 39 of the proposal, it is acknowledged that the 'subject land' is of heritage & historical value to the Aboriginal community of Jerrinja. Traditional Indigenous significance is held within the proposed development sites; Yet this is being overlooked.

The 'proposed land - Culburra West' was the main journey route for the Jerrinja Tribe to meet with Tribes of the Shoalhaven area, this land was a place of regular Corroboree's. (Learned through consultation with a Jerrinja member).

Simply because there is no physical evidence present of this activity, does not mean it is of no significance to the Aboriginals; this area needs to be retained & preserved. There is very little left for the Aboriginal community to connect with in Culburra Beach – apart from their Elders speaking of the past.

The inter generational equity of Aboriginal Heritage, must be preserved for Future Generations.

Such disregard to this heritage is a disgrace. The whole area, is sacred to Aboriginals & what has not already been destroyed by European sprawl, ought to be listed as Heritage Land & zoned accordingly.

This land does not belong to any one person; it belongs to the Tribe of Jerrinja. This must be recognised & honoured. The Jerrinja community have been tucked away in the furthest corner of the area, the very least we can do is stop destroying their native homeland. Allowing it to remain untouched, untarnished & available for all, to acknowledge as Sacred Land.

I advise I have sought consultation on these matters with the Environmental Defenders Office.

As a resident, these are my views on the proposal & it's immediate & longterm effect on Culburra Beach:

The forest areas within the subject zone, keeps the balance between nature & the community, it is the warm welcome we (visitors & locals alike) receive each time we arrive in Culburra Beach.

The removal of this forest will severely **detract** from the area's attractiveness to both visitors & locals.

The very reason people choose Culburra Beach, is the natural beauty & the belief that it is protected & will always be here to admire & enjoy.

We, the ones who live & love it in Culburra Beach – we do so simply because of the natural surroundings. This lifestyle will be devastated should the proposed development proceed.

We have friends & family who choose Culburra Beach for it's beauty. Removing such a significant portion of this area will increase the risk of people overlooking Culburra Beach as their destination of choice & travelling further south to enjoy what we already have; untouched natural wonders.

If you view Culburra Beach from an aerial perspective, it will be clearly seen, that there is in fact, very little wilderness remaining in Culburra Beach. To lose this forest – we will lose greatly, not only for the sacrifice of the trees & creatures within this forest, but for the joy & spirit that is “Culburra Beach”.

There are cleared areas within Culburra Beach & the proposed development sites that offer opportunity for development & population growth. Simply because a person 'holds the title' to this land, ought not give right of way to the desecration of it's heritage & beauty.

To say there are many & more forests around Culburra Beach, & there is no need to preserve this one; is truly arrogant.

Each forest within the region is home to differing species – as the land, the soil, the vegetation, flora / fauna are unique to each area & therefore irreplaceable & not interchangeable.

The damage to the ecological balance will be irreparable. Money does not make air – the world is awakening to the importance of forest conservation – even rich forest areas, once diminished, do not recover.

To turn this beautiful natural wonder into streetlights & rooftops is sacrilege & a severe loss for future generations, who will be devoid of the privilege to enjoy it's original glory.

Once developed, the region will differ very little from Sydney. A place many of the locals **left** in order to live in a quiet area harmoniously coinciding with nature.

We sought the 'sleepy town' atmosphere, we left behind the endless rush & hustle of Sydney – please do not destroy the essence of Culburra Beach by bringing the faceless habits of not knowing & partaking in the community, if people wish to be part of Culburra Beach – there is housing available.

I have never, in my whole 33 years of Sydney life, **ever** – seen anyone pull up to admire housing estates & say “wow look at all these houses, wish we had that where we live”.

However, I have seen & heard people (on many occasions) admiring the natural surroundings of Culburra Beach, saying how they love being able to drive around & see the wild places. This effect on people, will no longer exist if this project proceeds.

Culburra Beach is exceptionally attractive to visitors & residents because of it's natural untouched wilderness, the bush, the creatures, the birds (which are no longer seen in many areas of NSW due to *clearing* of their habitats).

Please do not overlook the importance of this nature to human balance. If the creation of a mass housing development is permitted, then the balance will be irrevocably be tipped.

I have seen people pull over to watch a flock of Black Cockatoos fly by – IN AWE. I have heard people chatting about the magnificence of the area, due to the nature which abounds here.

By changing the very core of Culburra Beach's spirit, by creating yet another 'suburb', what will be attractive then? The visitors (or tourists as proponent calls them) will be far less interested in coming back.

It is gravely concerning that SLEP has been tweaked in order to be more flexible toward development. This indeed is disturbing; that the value & heritage of any area (especially one as special & unique as Culburra Beach) is to be 'reworked' to facilitate & allow housing to dominate, as it does so widely throughout NSW.

What is currently proposed will not help the people of Culburra Beach – long or short term using FIFO – fly in fly out tradespeople, as was done in the studies of the area for the proposal.

I put it to the proponent – to use the land for **Eco Tourism**. This is a booming & financially rewarding industry.

This replaces the desire to destroy a single tree or creature in this process, as there are very usable already cleared areas within the proposed property, which can be utilised in very positive ways.

To share the wonder, & be paid for the privilege – charge people to stay on the land & enjoy the natural environment, exactly as it is.

There is speak of helping the community financially through employment; this could be done by employing the Indigenous community to guide those who stay in the retreats on the property, enabling them to explore this truly wonderful forest & have a well rounded experience of Culburra Beach with people who know & respect it's real heritage.

If money must be made; it is possible – there needn't be destruction, to create this outcome.

The beauty of Culburra Beach, is the nature within it.

To destroy this, will be to destroy Culburra Beach.

Money does not make an area 'rich'.

The wilderness, the ocean, the lakes, the bays, the pristine wonder that is only found in natural places - this is the richness of Culburra Beach.

Proper old growth forest, natural animal residents, Indigenous cultural heritage, raw beauty, untouched wilderness, must be respected & preserved.

As a species we are far too slow to recognise the importance of such places. Usually once an area is ruined, hindsight arises & the notion that it ought to have been left alone seeps in – **here is the chance – take it** – be part of pro activity rather than reactivity.

This is an opportunity – not to destroy, but to preserve.

The spirit of the area; IS the reason people choose Culburra Beach.

Please refer to petition submitted; containing **398** signatures against the proposed development.

The proponent speaks of Culburra Beach having a “poorly expressed public domain” - this statement is false. I am proud to live in Culburra Beach & be part of the community - exactly the way it is.

Sincerely,
Emma Hood
soultemple@iinet.net.au