reduce the area proposed for development in both the Lake Wollumboola and Crookhaven catchments to achieve a moderate increase in housing and facilities that is ecologically sustainable. This proposal constitutes over-development. The following changes are recommended;

- Remove proposed development in Lake catchment and relocate to disturbed parts of the Crookhaven catchment identified for future development eg adjacent to sewerage treatment plant exclusion zone and north of Culburra Rd west of ambulance station. Excellent choice for possible site for sports oval, providing easy access to Culburra residents and visitors without impacting on village streets.
- Long Bow Point and adjacent land in the Lake catchment north of Culburra Rd should be identified as the planning offset site.
- Decrease density and height of housing and apartments proposed south of Culburra Rd, with some medium density housing and the apartments relocated to north of Culburra Rd.
- Reduce housing proposed in Stage 3, ie the central part of the Crookhaven catchment between Shelley and Cactus Points, which drains to the SEPP 14 Wetland. This would reduce water quality impacts and loss of native vegetation, improve development design by providing a habitat corridor/green belt and housing clusters, rather than strip development. Maintain the SEPP 14 wetlands and wetland vegetation for conservation and relocate, adjacent to the northern Collector Road, the proposed walking track, bike paths and board walks so between Shelley Point and the point adjacent to Billy's Island, they are out of the wetland.
- The water pollution control measures should be designed according to local conditions and not a generalized computer model. They should be designed and located away from sensitive wetlands and streams to prevent overflow of polluted waters from the development during high rainfall events that characterize the local environment.
- The proposal is inconsistent with Department of Planning and Infrastructure requirements as it involves involves development in the Lake Wollumboola catchment and extensive, not "limited" development in the Crookhaven River catchment.
- The proposal does not include an offset site for the likely environment losses caused.

Loss of coastal village character and lifestyle.

- Doubling of population, increased density and building height at entrance, 11 m height of buildings, with an ugly urban sprawl, like Shellharbour and some of the outer city areas of Nowra, without a green belt separating housing areas. This is completely out of character with the Culburra Beach village that most current residents and visitors actually prefer and appreciate.
- Unspoiled beaches, surfing breaks and car parks will become over-crowded. Access areas will be badly affected, with more funding and better servicing of the village roads and services needed.
- water pollution and weed infestation in Curley's Bay-Crookhaven River wetlands and creeks and wetlands of Lake Wollumboola, as water pollution controls are not capable of reducing sediments and nutrients to natural levels or removing chemicals.
- Jetty and boating activities resulting in sedimentation, dredging of river, with damage to banks and seagrass.

- unintended damage and vandalism of important Aboriginal cultural heritage sites due to significant increase in public access to Crookhaven shore and wetlands.
- potential pollution of oyster leases.

Social and economic impacts not as significant as promised.

The proposal argues that increased development would reverse the decline in permanent residents and thus increase economic and social opportunities. However increased population does not necessarily create a more diverse economy, more employment opportunities and social services for the increased population. Nowra as the regional centre, is the main source of employment opportunities. Residential development expansion in other coastal areas has not led to greater prosperity, improved employment opportunities or social services. Already, there are problems with the road traffic at peak times going into Nowra. The access roads from Culburra Beach, via Pyree Lane and Greenwell Point Road are constantly being repaired due to the heavy traffic, especially after rains and high tourist times.

The proposal ignores the significant contribution to the local economy and community of part time residents as well as holiday residents and tourists through redevelopment of existing homes, construction of new homes, support for local businesses, and creation of new businesses. It also ignores their interests in conserving Culburra Beach's main assets, the unique coastal village character and our unspoiled environment.

The proposal claims to encourage new tourism and recreation opportunities but details are limited and environmental constraints not addressed. Tourists come to spend time on our beaches, wanting to stay within walking distance of the waterways, not wanting to get into their cars, find very limited parking areas and lack of changing, shower and toilet facilities at the beach access points, which is what will be needed, should this development go ahead. This will impact on Shoalhaven City Councils resources and create higher rates for residents.

Recommended changes.

Reduce the area proposed for development in both the Lake Wollumboola and Crookhaven catchments to achieve a moderate increase in housing and facilities that is ecologically sustainable. This proposal constitutes over-development. The following changes are recommended;

- Remove proposed development in Lake catchment and relocate to disturbed parts of the Crookhaven catchment identified for future development eg adjacent to sewerage treatment plant exclusion zone and north of Culburra Rd west of ambulance station-possible site for sports oval.
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- The water pollution control measures should be designed according to local conditions and not a generalized computer model. They should be designed and located away from sensitive wetlands

and streams to prevent overflow of polluted waters from the development during high rainfall events that characterize the local environment.

• The timing of water quality monitoring as the basis of progressing to the next stages of development should be extended past 12 months to enable assessment of cumulative impacts.

Background.

Department of Planning and Infrastructure requirements.

The main Director-General's requirements are that;

- "No development will occur in the Lake Wollumboola catchment."
- "The proposal must demonstrate consistency with the South Coast Regional Strategy" which states at Appendix 2 that,
 - -"land in the Lake Wollumboola catchment is unsuitable for urban development" and
 - -"land in the Crookhaven catchment is considered suitable for limited urban development," with higher densities than usual "to reduce the land take and economise on land resources."
 - -housing renewal and increased density within the existing urban area should occur prior to further green-field development.
- An offset site for loss of environmental values should be proposed.