

PO Box 90
Culburra Beach NSW 2540



Department of Planning and Infrastructure
Attention Director, Metropolitan and Regional Projects North
GPO Box 39 Sydney NSW 2001.

Dear Sir/Madam,

5th June 2013

West Culburra mixed-use subdivision. Application MP 09_0088 Culburra Rd.

Please find attached an outline of the matters that will be addressed in the Lake Wollumboola Protection Association Inc final submission. I will provide the complete submission before the 30th June in accordance with the advice I received from Ms Joanna Bakopanos, of the Department of Planning and Infrastructure via email on the 30th April 2013. I have attached a summary of the environmental values of Lake Wollumboola and the lower Crookhaven River and their catchments.

Lake Wollumboola Protection Association Inc is a community environment group involved in advocacy, community education, bushcare and wildlife protection, promotion of nature tourism and historical research.

The Association's objective is to achieve protection of Lake Wollumboola and its catchment, with support from the community. The Association is a member organisation of the Nature Conservation Council of NSW.

We oppose the West Culburra subdivision application in its present form, because of potential impacts on Lake Wollumboola and the Crookhaven River Estuary and their catchments as well as on the natural environment and character of Culburra Beach. As both Lake Wollumboola and the Shoalhaven-Crookhaven Estuary are recognised in the Directory of Important Wetlands it is concerning that a development of this scale has been proposed for such sensitive coastal environments.

In our view the proponent has not demonstrated that the development would be ecologically sustainable or capable of providing the claimed social and economic benefits.

A more moderate increase in ecologically sustainable housing in the Culburra Beach area could be provided. To that end we will be recommending changes that should be made to this proposal to reduce adverse environmental impacts whilst retaining the existing character of Culburra Beach.

References to the unincorporated Lake Wollumboola Support Group in the 2000 Report of the Commissioner of Inquiries for Environment and Planning in to the Long Bow Point residential sub-division are references to members of the Lake Wollumboola Protection Association Inc.

Yours faithfully,

Frances Bray. PSM. BA Dip Ed B Ed.

President.

Reasons for opposing the proposed West Culburra mixed use subdivision.

1. Inconsistent with Director General's requirements particularly South Coast Regional Strategy Appendix 2 incorporating the recommendations of the South Coast Sensitive Urban Lands Review.

- The proposal includes development in the Lake Wollumboola catchment, contrary to explicit requirement.
- The proposal cannot be considered to be "limited" urban development in the Crookhaven River catchment.
- No alternative sites have been considered, as a means of reducing likely environmental impacts and consolidating development in the existing urban area of Culburra Beach
- No offset site has been proposed.

2. Likely unacceptable impacts of the environment.

- Inadequacies in flora and fauna surveys and assessments.
- Unacceptable likely impacts on flora and fauna, including Threatened Species and Endangered Ecological Communities.

3. Concerns regarding impacts on the water quality and ecology of the Crookhaven River, Curley's Bay and SEPP 14 Wetlands and Lake Wollumboola.

- Concerns with modelling and design for water pollution controls and validity of claims that the methods, can replicate existing nutrient loads post development.
- Unacceptable likely impacts on water quality and ecology.

4. Aboriginal Cultural Heritage.

- Concerns regarding impacts from increased population on cultural sites.

5. Poor design of subdivision layout and desired future character.

- Inconsistent with the existing character of Culburra Beach and NSW Coastal Design Guidelines.

6. Concerns regarding likely impact on industries dependent on natural resources.

- Oyster farming, tourism.

7. Limited justification for development expansion.

- Demand has not been demonstrated.
- The assessment of the population and socio-economic status and future needs of Culburra Beach is inadequate as justification for this scale of development.
- The social and economic "benefits" are over-stated.

Why Lake Wollumboola and the Crookhaven River are important Wetlands.

Lake Wollumboola and the Crookhaven River are important culturally to the Jerrinja people.

Both the Shoalhaven-Crookhaven Estuary and Lake Wollumboola are Wetlands of National Importance and Internationally significant migratory bird habitat. Together they form the most important habitat for migratory and indigenous birds on the NSW South Coast.

Lake Wollumboola.

- A unique, natural intermittently closing and opening coastal lake, highly susceptible to pollution.
- High biodiversity, including water birds, as well as Endangered wetland vegetation and the Green and Golden Bell Frog.
- Internationally significant for migratory waders, sea birds, shorebirds.
- Internationally significant for regularly supporting more than 1 % of the estimated world populations of Black Swan and Chestnut Teal with flocks of over 13,000 Swans recorded.
- Supports plant and animal species at critical stages of their life cycles providing a key breeding site for the Migratory Little Tern and the Green and Golden Bell Frog.
- Provides refuge during drought conditions for indigenous water birds and on occasions has been estimated to support more than 20,000 water birds, shorebirds and waders.

Lower Crookhaven River Estuary.

- Extensive wetland vegetation includes Endangered Ecological Communities, Coastal Salt Marsh and Swamp Oak Floodplain Forest protected under State Environment Planning Policy 14.
- Extensive areas of seagrass, and Grey and River mangroves protected under the Fisheries Act.
- Habitat for migratory waders and indigenous water and shorebirds. Ducks, Pelicans, Spoonbills.
- Refuge and nursery habitat for important fish species such as Flathead, Blackfish, Mullet, Snapper and Bream, prawns, crabs, oysters and crustaceans.

These wetland values are dependent on the natural runoff quality and flow being maintained.

Catchment values.

The coastal forests and wetlands of the Lake Wollumboola and adjacent lower Crookhaven River catchment are areas of high biodiversity, identified in the South Coast Regional Conservation Plan 2010 as being of “High Conservation Value” to be protected as “Wildlife corridors.”

Threatened species include the Glossy Black Cockatoo, Powerful Owl and micro bat species.

This area provides a significant wildlife habitat corridor linking Seven Mile Beach National Park and Comerong Island Nature Reserve in the Crookhaven/Shoalhaven River estuary south to the Jervis Bay National Park as well as providing a corridor to reserves west to the mountains and Morton National Park. Maintenance of this wildlife habitat corridor is critical for assisting endangered coastal species and ecological communities to migrate and adapt to climate change and sea level rise.

Lake Wollumboola Protection Association Inc 2013