

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

Sunday 2 June 2013.

From

Will Mrongovius & Diane Davies

[REDACTED]

Dear Sir/Madam,

Re; **West Culburra Mixed Use development concept plan.**

We are the owners of [REDACTED] Culburra Beach.

We have reviewed the concept plan.

We oppose the proposal in its present form. We do support a more moderate increase in housing and facilities which are demonstrated to be ecologically sustainable.

We do not support any development within the Lake Wollumboola catchment area and we only support "limited" development in the Crookhaven River catchment area.

Any such development is inconsistent with Department of Planning and Infrastructure requirements .

The Director Generals requirements are;

- **"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.**

These requirements are based on expert advice from three independent inquiries in particular the South Coast Sensitive Urban Lands Review 2006.

Lake Wollumboola and the Shoalhaven-Crookhaven Estuary have been listed in the Directory of Important Wetlands since the 1990's. As a result , both Lake Wollumboola and the Shoalhaven-Crookhaven Estuary are "Wetlands of National Importance," with the Lake particularly sensitive to pollution from urban development because of its mainly closed character. Both water bodies are significant for their wetland vegetation and habitat for migratory and native bird species.

Further 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.”

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. Such a wildlife habitat corridor is, we believe, critical for assisting endangered coastal species and ecological communities to migrate and adapt to climate change and sea level rise.

Development in the Lake Wollumboola and Crookhaven River catchments would result in;

- Loss of over 70 ha of native woodland and wetland vegetation and loss of wildlife habitat corridor and Threatened Species habitat eg Glossy Black Cockatoo and Powerful Owl.
- Additional population pressure with associated increases in recreational activities and pets, (eg dogs and cats) causing disturbance to wetland wildlife particularly to native and migratory water birds.
- 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.

The proposal argues that increased development would reverse the decline in permanent residents and thus increase economic and social opportunities.

We refute this claim.

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.

The proposal ignores the significant contribution to the local economy and community of part time residents, such as ourselves, as well as holiday residents and tourists we encourage. 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. It would have a negative impact on tourism.

Suggested changes

We recommend a series of changes be made in keeping with the character of Culburra Beach and to reduce the adverse environmental impacts.

- 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.

The current proposal constitutes over-development.

- 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.
- 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.

We fully support the Director General's requirements and therefore ask that the proposal be amended accordingly.

We would like to attend and speak at any hearing

Yours faithfully

Will Mrongovius & Diane Davies

[Redacted signature]