

## Objection to the West Culburra Development proposal - SSD 3846

I object to the revised West Culburra Development application on environmental, economic and community grounds. I'm not against progress or even development, I have children who are growing up and will need housing and jobs too, I just want to see a 21st-century version of progress - environmentally sustainable and sensitive, respectful of Indigenous culture and economically sensible. This proposed development is none of these.

### Economic misrepresentation

There has been no independent assessment of the developer's economic outlooks for the proposed development. This has led to misrepresentation in the community that could potentially lead to dire consequences for the future of Culburra. When a party stands to make multiple millions in profits from a business deal is it common sense that their assessment stands to be favourable to themselves and crucial that an objective review of the facts and future projections is undertaken.

- The developer identifies one of the core problems with the Culburra retail precinct's failure to thrive is that we have 78% excess retail space for the size of the town's population, based on Australian recommended retail-to-population ratios. As part of the proposed development, in addition to adding further population to the town, the proponent also plans to add additional retail space. The result, according to the developer's plan, would be an even more exacerbated imbalance in retail space to population - Culburra would be left with 93% excess retail space based on Australian averages.

This point is critical to the idea that the proposed development is going to enhance and support Culburra's retailers. Of Culburra's shop owners who support the proposed development, this support is based on the misguided assumption that the development will boost and strengthen Culburra businesses by bringing more people to the town. This is incorrect and needs to be acknowledged. The true effect of the development is likely to be that there is an increase of vacancies in the retail precinct and that increased competition driven by a larger retail shopping precinct will actually make retail competition tougher, potentially leading to the failure of businesses.

Additionally, the developer plans to increase the current industrial estate by 140%. Coupled with a population increase of 24% and proximity to the regional industrial centre of South Nowra, a 140% increase in industrial businesses will put serious strain on the business owners in the existing Culburra industrial area.

- The developer also makes unverified claims regarding the amount of post-construction employment this development will deliver to the town. This point also requires due diligence and objective assessment. Many in the town are basing their support on these employment claims and yet there are a number of serious issues

with the projections.

The developer claims the development will create over 200 full-time equivalent (FTE) jobs on an ongoing basis in Culburra. This number is based on a crucial unsubstantiated assumption: that all the additional space in both the retail and new industrial areas post-development are fully leased to thriving businesses. And even on this basis the developer makes projections on employment density in local businesses post-development that are in excess of what currently exists.

Given the fact that post-development the Culburra retail businesses will be in a worse position regarding the recommended Australian retail-to-population standard ratios, and that there will be a disproportionate increase in the town's industrial space compared to the increase in population, the developer's base assumption that all retail and industrial space post development is fully leased to thriving businesses is highly likely to be untrue. This makes the developer's projections misleading and unlikely to come to fruition.

- Another failing in the revised West Culburra Development proposal is the projection that only 1-2% of the new residences will be purchased as holiday rentals. This is both unsubstantiated and out of line with current occupancy in the town. The result of this misleading projection is that current residents are hoping an increase in houses will lead to cheaper housing for family members and supporters of the development are feeding this myth with 'supply and demand' arguments. Anybody with any financial understanding realises that with Culburra only two and a half hours from Sydney, interest rates at all-time lows and no legal restrictions on the number of holiday houses, the idea that more houses will equate to cheaper housing is a fallacy. The current residents' expectations need to be properly addressed before genuine support for the development can possibly be assessed.

## Environmental concerns

- I am not confident that the building of a housing development comprising hundreds of dwellings plus a new industrial estate is not going to pollute the waterways and cause damage to the adjoining government-recognised wetland. I understand the original proposal in 2018 was rejected on environmental concerns of stormwater runoff into the wetlands and waterways. I see no independent verification that the developer's current solution to this issue will solve the problem.
- Since the developer's original proposal in 2018 the Shoalhaven region's bushland has been seriously damaged by fire, with as much as 80% of native bushland having been damaged. The result is a landscape under strain and much of our flora and fauna struggling, some of which even having become endangered to the extent where the Department of Agriculture, Water and the Environment, in a report released on 20 March 2020, instructs us that it is necessary to:

*"... protect unburnt areas within or adjacent to recently burnt ground that provide refuge, as well as unburnt areas that are not adjacent to burnt areas, especially from extensive, intense fire."*

Any decision made on the West Culburra Development proposal should defer to this advice given by the Department of Agriculture, Water and the Environment.

## Cultural heritage

By cultural heritage I include both Indigenous and lifestyle heritage – both of which are being overlooked by the development proposal.

- Indigenous culture is an important part of Australia's heritage and unlike previous centuries we are living in an age that respects this fact. The Halloran Trust is approaching this development proposal using out-dated, last-century ideals of progress. The local Jerringa community has not been adequately consulted on the impact a large development like this will have on their history and culture.
- In terms of lifestyle heritage, the West Culburra development proposal, and in the longer term the horrendous idea of demolishing the entire forest for more urban sprawl (which I note the Halloran Trust has already begun working on with rezoning applications!), completely and utterly dismisses the needs and values of current residents and even visitors.

This is a small, regional coastal village epitomised by beauty, peace, tranquillity and a relaxed lifestyle. That is why residents choose to live here and that is why visitors choose to visit. Adding hundreds upon hundreds of extra residents in housing developments that are completely out of character with the rest of the town will destroy the lifestyle choice of the town today. The town's infrastructure is not set up to cope with this potential increase and nor does it want to.

Regional coastal villages have a distinct atmosphere about them and are part of Australia's cultural heritage. In the same way that we protect architectural designs from our history for the posterity of future generations, so too must we protect the culture and lifestyle of towns such as Culburra and not allow profit-driven developers to sweep through with developments that show lack of respect and understanding of the people who live there.

## Bushfire risk

- Culburra is a village at the end of a single entrance/exit road. If this housing development is completed and close to a thousand extra residents are added to the village's population, there will be increased risk to all residents in the event of an emergency that requires evacuation. Given what we now know about the vulnerability of our coastal villages during severe bushfire events it seems a high-risk strategy to be allowing new developments that will increase community risk factors without undertaking proper emergency planning. This of course would be

exacerbated many times over if the developer is allowed to continue with its plans for the entire 800 hectares of bushland.

### Infrastructure overload

- I note that while the proposed development will significantly increase the population of Culburra there is no mention by the developer or Council on how the increased infrastructure needs will be met. Has Council funding been made available to compensate for the extra wear and tear the future additional 300 families will have on the local roads? What will be the effect of the proposed development on the local medical capacity, ambulance services and police presence? Will the local school be able to accommodate the expected increase in students?

### Conclusion

If the Halloran Trust's vision is allowed to unfold it will be akin to allowing the future of our Shoalhaven home environment to be dictated to us by a deceased family whose ideals and visions of progress are nearly a century out of date. We do not want urban sprawl to be our living environment. We do not want the nature around us decimated. Progress in the 21<sup>st</sup> century must be environmentally sustainable and sensitive and respectful of current residents. This is not to say there is no room for development in Culburra and if the Trust is interested there are many locals who have ideas of what could be done instead of a housing development to improve the town and make money for a developer. Let's make sure 'progress' is what works for the community that is living here now and guide the Halloran Trust to create a legacy for the Halloran family that they could be proud of.