24th August 2013

Environmental Planning Unit Sutherland Shire Council 4 Eton Street, Sutherland, NSW

To whom it may concern:

Submission relating to the new draft Local Environment Plan. Lot 3 DP213924, 60-70 Bournemouth Street, Bundeena (56,000 m² Boy Scout Camp) and Zoning SE corner of Bundeena E3

As a Bundeena Resident and frequent user of the Coast Track starting at Beachcomber Ave, Bundeena, I am writing regarding the new draft LEP. While I endorse the following goals of the plan:

- (a) To achieve an appropriate balance between development and management of the environment that will be 1) ecologically sustainable, 2) socially equitable and 3) economically viable.
- (d) to minimize the risk to life, property and the environment from hazards, particularly bushfire, flooding and climate change,
- (e) to concentrate development in localities with adequate infrastructure accessible to transport and centres.
- (g) to protect and enhance the natural environment and scenic quality of the Sutherland Shire through the retention and rehabilitation of wildlife habitats, wildlife corridors, bushland, foreshores and waterways,

I have concerns regarding the former Scouts land known as Spring Gully which is proposed to be rezoned E2 with added permissible uses 'recreation camp' and 'eco-tourism facilities'. Although previously privately owned, this land has always been enjoyed by the public and is effectively part of the Royal National Park and original owner's bequest suggests it was intended for preservation. Constant with the above goals 'to protect and enhance the natural environment and scenic quality of the Sutherland Shire through the retention and rehabilitation of wildlife habitats, wildlife corridors, bushland, foreshores and waterways', rezoning the land E2 is appropriate considering the high ecological, cultural and aesthetic values and the need to prevent any development that could damage or otherwise have an adverse effect on those values.

This land is in a pristine state and the addition of 'recreation camp' or 'eco-tourist facilities' as permissible uses would make possible the following uses;

Building accommodation (whether or not for the purpose of financial gain) for the purpose of sport or recreation, holiday making or spiritual retreat. Permanent caretaker accommodation and facilities for the holding of events, functions, training, conferences and the like.

As a local resident living near this land I understand its significance and see the fauna and flora that is sustained by the fragile Sydney Basin angophora and banksia forest ecosystem (we have recently seen migratory Channel Billed Cuckoos and Koels, echidnas and wallabies!). It is obvious that these additional uses are inappropriate for this land without causing significant land clearance and environmental degradation. I believe the land cannot be developed under the proposed additional

permissible uses in a manner that minimises the environmental, economic and social impacts. There is a high risk of bushfire in an extreme weather event on this site which is isolated from the road system. The single road in and out makes the land a liability to RFS volunteers who might be called apon assist in a evacuation and the proposal of 'fire proof' bunkers is of dubious merit financially making mokery of the economic viability of an eco-camp with 6 tents (as described)- and the effectiveness is by no means guaranteed before any DA plans have been sighted.

Additionally the Scout land takes in the headwaters of Spring Creek and several tributaries. The large APZ clearings that would be required by development under the additional permissible uses proposed for the Scout land, which slopes greater than 18 degrees and which forms a large portion of the Bundeena catchment area, would increase the risks of flooding in the flood prone residential areas of Bundeena through soil erosion and increased run-off during storms.

I agree that the land be zoned E2 however we ask the permissible uses 'Eco-tourism' and 'recreation camp' be removed from the definition.

Furthermore the SE corner of Bundeena (including 51 Bournemouth Street) is proposed to be zoned E3 when the rest of Bundeena and Maianbar is E4. I see no reason for a different level of zoning as there is no greater fire risk to other areas that abut the bush (Thomson St, Eric Street and most of Maianbar). Further it is in direct contradiction to the claims that a Spring Gully development is not on fire-prone land to say the SE corner of the residential are is high risk, suggesting inconsistency in the Council's arguments. E3/E4 – while I note that E3 has more restrictions on development than E4 but E4 has previously permitted dual occupancies.

Dual occupancy is consistent with the following stated aim:

e) to concentrate development in localities with adequate infrastructure accessible to transport and centres.

As many homeowners will be responsible for adult children or parents living at home, and given the large size of house blocks in the Shire, I endorse dual occupancy to increase density and services to existing residential areas.

This may seem to be contradictory to the desire to preserve the bushland from development, but development within the village and in an already residential area is clearly a different issue.

Yours sincerely,	
Georgia Wallace-Crabbe	
Signature	