



CLARENCE ENVIRONMENT CENTRE Inc

87-89 Skinner Street

South Grafton, 2460

Phone/ Fax: 02 6643 1863

Web site: www.cec.org.au

E-mail: admin@cec.org.au

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Submission to the Proposed Variation of DA

Preamble

The Clarence Environment Centre was strongly opposed to the above development from the start, and believes the impacts on wildlife, particularly the numerous threatened species that were identified as utilizing the existing forest on the site.

The impacts on wildlife through that habitat being replaced by bitumen roads, homes and fences is further exacerbated by peripheral damage to retained habitat through pollution run-off, rubbish dumping. The estimated addition of more than 300 motor vehicles onto local roads will spread those impacts throughout the wider Iluka peninsular, including national parks and world heritage areas.

As such we do not support the addition of any further lots that are guaranteed to add, albeit to a minor extent, to those impacts.

Stormwater disposal

The recent flood, which we stress was not a major event, nevertheless identified a number of problems that will significantly impact surrounding bushland. Weeks after the event, major ponding in some areas is still occurring, and while that bushland is used to periodic inundation, the addition of polluted run-off from the more than 140 homes, and thousands of daily vehicle movements, will have a seriously detrimental impact on that bushland.

It should be acknowledged that, with some 14ha of land eventually covered by roof-tops and bitumen roads, more than half of the total rainfall will be instantly delivered by stormwater drains directly into that adjacent bushland, massively increasing the ponding problems.

Compliance monitoring

A cursory visit to the site, has led to some concerns about a possible lack of official oversight and compliance monitoring, not only with consent conditions, but also occupational health and safety. Unfinished, and unstable security fencing (see below), with fence materials still lying around on the ground (see right) are just some of the indications of sloppy operation, even indifference, to the mandatory requirements governing a construction site.





Dangerously unstable and unfinished security fencing



As usual, erosion control has been carried out in a fashion that suggests a contractor going through the motions rather than giving any serious consideration to preventing sediment from ending up off-site.

Mesh has been haphazardly placed, and already the worse for wear, and will prove to be completely ineffective when the current excavation is completed, the site refilled, and road infrastructure is in place.

Ethics

While not directly related to the proponent's request for a variation of their development approval, the Clarence Environment Centre would like to express concern about the ethical approach to marketing this development. Beginning with the naming of the development, "Birrigan Iluka Beach". While we acknowledge the site currently resembles a beach, we point out that there isn't a beach within a kilometre of the development.

However, to visit the website and see the following image (below left), along with a series of holiday snaps of rock fishing, putting greens and luxury yachts at anchor in a marina, does raise the issue of ethics which, in this instance, appear to mirror the general 'cowboy' approach described above.



We acknowledge that there is a greater chance of selling one of these cramped little home sites by showing those images rather than the current reality, pictured above right, but we have to ask, **where is the truth in advertising?**

We thank council for providing this opportunity to comment, and ask that:

- a) The request for the additional building lots be denied, and
- b) Some oversight of the development be carried out to ensure full compliance with **all** regulations, not limited to those raised above.

Yours sincerely



John Edwards
Honorary Secretary