

## **CLARENCE ENVIRONMENT CENTRE**

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Date: 2<sup>nd</sup> December 2011

The General Manager Clarence Valley Council Prince Street South Grafton

Dear Sir

## DA-SUB2011/0057

Lot44 DP751395, 138 Carrs Drv Yamba 2464

The Clarence Environment Centre has assessed the above DA and wish to make the following points.

- The land in question contains a considerable amount of native vegetation, deemed to constitute an endangered ecological community (EEC). We remind Council that the removal of any parts of an EEC is an offence under the Threatened Species act should not be allowed. Lots 13 and 14 comprise mostly of Swamp Sclerophyll Forest which provides critical connectivity particularly for fauna.
- We were under the impression that no development of West Yamba was to occur until the Yamba sewerage system was upgraded. Therefore we are concerned that wastewater disposal areas are to be raised with imported soil material. Also most of the area in lots 13, 14, , 20, 21 and 22 also contain Swamp Sclerophyll Forest EEC, with lot 20 also containing some Coastal Saltmarsh. These lots have available wastewater disposal areas placed well within the EEC which will drain directly into the community, through the Paperbark Swamp into the riparian zone and into Oyster Channel. Lot 17 also has a large area of Coastal Saltmarsh within the potential wastewater disposal area which would be draining fresh treated water—into a saline ecosystem potentially causing long term change within the ecosystem.
- The entire site is flood-prone, and lying in an area only metres above sea level. The on-site sewage treatment systems will overflow in times of flood releasing excess nutrients and into the lower Clarence river, lake and estuary ecosystems. The entire site drains into Oyster Channel with the stormwater drainage passing through Coastal Saltmarsh, Swamp Oak, and Swamp Sclerophyll forest. Stormwater from heavier rain events will carry excess nutrients, chemicals, fertilizers and pet faeces from the residences and their gardens into the lower Clarence river, lake and estuary ecosystems. During times of even minor flooding, these increases in contaminants will be considerable.

- We believe the proximity of the water table beneath the site should be a concern as it will rise during flood events more common in the wetter summer months. Anecdotal evidence suggests that the water table is less than 500mm below the ground during summer, with the adjacent Swampy areas having 5cm of surface water when surveyed during the drier winter months. Also, urban run-off will have a cumulative effect on the Lower Clarence River, lake and estuary ecosystems, with no assessment of the impacts of the recently approved subdivisions at James Creek and Gulmarrad, and their potential affect on these systems, yet undertaken.
- With the advent of climate change, and the knowledge that sea-level rise will ultimately inundate the area, and the Environment Centre believes that to start building a new suburb that has a "use by date" is ridiculous.

Yours sincerely
John Edwards
Honorary Secretary