

Wednesday, 21st October 2020

Brad James
Planning Officer
Office of the Independent Planning Commission NSW
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Objection to Dunmore Lakes Project Modification 2 Submission

Dear Mr James,

I would like to register my opposition to Boral's Dunmore Lakes Project Modification 2 proposal. This project faces huge community opposition and poses a significant threat to the health of the hugely ecological significant areas of the Minnamurra River system. Expansion of this sand-mine does not provide enough benefit to the local community, or the region at broad, to be justified. The risks, however, could see loss of habitat for endangered species and ecological communities, of sites with Indigenous heritage and also make the area a less desirable location to live and visit.

I outline these concerns below:

Negative impacts on the vegetation adjoining Minnamurra River

This vegetation unit needs to be valued as an interdependent complex ecosystem consisting of an assemblage of groundwater dependent and saline wetland communities through to sand-forest and littoral rainforest vegetation. Many of these vegetation types are identified as endangered ecological communities (EECs).

Impacts may include groundwater changes due to dredge ponds, reduction of habitat due to removal of habitat trees with hollows and opening up of adjoining vegetation exposing rainforest to moisture loss. This unit of vegetation is virtually a discontinued island of vegetation and its sustainability is vulnerable to fragmentation, habitat loss and water balance changes.

These communities are increasingly rare and must be kept in an undisturbed state (where still in-tact to some degree) for the protection of biodiversity.

Current and future impacts on coastal wetlands distribution

A number of studies have demonstrated the mangrove vegetation in the Minnamurra River is migrating westward due to sea level rise¹. These studies have shown that this migration is impacting on salt marsh EECs near the proposed dredge pond. Provision needs to be made to plan for climate change related wetland migration.

Part of the proposed dredge pond falls within the *Coastal Wetlands and Littoral Rainforests Area* buffer identified on the coastal zone maps in the Coastal Management State Environmental Planning Policy. It would not meet the objectives of this Area:

¹ *Kerrylee Rogers and Neil Saintilan (2009) Predicting the response of coastal wetlands of southeastern Australia to sea-level rise*

(a) to protect coastal wetlands and littoral rainforests in their natural state, including their biological diversity and ecosystem integrity,

(b) to promote the rehabilitation and restoration of degraded coastal wetlands and 20 littoral rainforests,

(c) to improve the resilience of coastal wetlands and littoral rainforests to the impacts of climate change, including opportunities for migration,

(d) to support the social and cultural values of coastal wetlands and littoral rainforests,

(e) to promote the objectives of State policies and programs for wetlands or littoral rainforest management.

Impacts on Aboriginal heritage

One of the proposed sand quarry dredge ponds corresponds with the site of the Minnamurra Massacre identified by University of Newcastle Historian Professor Lyndall Ryan. This massacre was acknowledged by Kiama Council on its bicentenary in 2018. With such recent acknowledgment, it is essential that the site is protected protection to facilitate further engagement with the Indigenous and broader local community. As an early Frontier War site, it acts as a critically important site with high value which helps researchers understand and track the history of the region and Australia under early colonial rule.

Furthermore, as the archaeological report for the sand quarry identifies evidence of significant aboriginal occupation at the site, it would be highly insensitive and disrespectful to develop and degrade this site.

Negative impact to scenery and location

Minnamurra is a highly desirable location to live and visit. As regional tourism increases due to COVID restrictions, this area will likely see a boost to visitation with day-trippers and weekenders. This part of the economy supports a number of small businesses both in Minnamurra and adjacent suburbs like Kiama Downs, which are an important part of the local community.

Maintaining the areas stunning scenery and reputation as a holiday destination provides far greater local benefits over a much longer time period than this proposal does. Expansion of Boral's operations at Dunmore will negatively impact the image of this area and will detract from its charm.

Thank you for this opportunity to comment.

Yours sincerely,



Wilson Harris