

18th July, 2018

Professor Mary O’Kane AC
Chair Independent Planning
Commission
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Sydney NSW 2001
e-mail ipcn@ipcn.nsw.gov.au

Objection to the Long Bow Point Golf course application (SSD 8406)

Dear Professor O’Kane,

BirdLife Australia strongly objects to the proposed Long Bow Point golf course and supports the NSW Department of Planning and Environment’s recommendation for its refusal. The impacts on water management, water quality and disturbance for Lake Wollumboola and its internationally significant birdlife are unacceptable.

Lake Wollumboola is recognised internationally as a Key Biodiversity Area (KBA) under the International Union for the Conservation of Nature’s (IUCN) Global Standard for Identification. It is one of only just over 300 KBAs currently recognised in Australia. The Lake was identified as a KBA due to its critical habitat for Black Swan, an iconic and much-loved Australian native bird, with almost 14,000 recorded at this site (>2.7% of the species’ world population). Similarly, the Chestnut teal population of up to 5,000 birds is over 4% of the species’ global population.

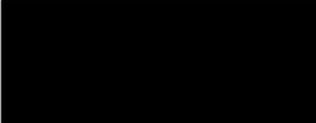
The Lake is also part of the East Asian Australasian Flyway as significant migratory bird habitat and the species that rely on it are protected by the Commonwealth under bilateral agreements with China, Japan and South Korea.

Furthermore, the Lake – which is part of Jervis Bay National Park – supports at least 106 bird species including nesting shorebirds, EPBC listed migratory shorebirds, coastal and sea birds, water birds and raptors. At least 23 of those bird species are listed as threatened under either NSW or Australian Government legislation.

The proposed golf course will adversely impact on Lake Wollumboola and is likely to have impacts on the regional ecosystem far beyond its shores.

A full submission opposing the development is attached. If you have any questions relating to this objection, please contact BirdLife’s Key Biodiversity Area Program Manager Golo Maurer on 0467 444 114.

Yours sincerely



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ATTACHMENT

BirdLife Australia objects to the proposed Long Bow Point golf course and supports the NSW Department of Planning and Environment's recommendation for its refusal. This objection derives from well-founded concerns regarding potential damaging impacts for Lake Wollumboola and its internationally significant birdlife as well as adverse impacts for threatened bird species dependent on maintaining the lake catchment in natural condition.

BirdLife Australia is proud to be the nation's largest bird conservation organisation with over 110,000 members and supporters. As an independent not-for-profit organisation, we work with many partners: government and non-government organisations, private landholders and Indigenous groups to prevent extinctions. For over a century our dedicated members have protected birds and their habitats, through practical conservation and advocacy based on the best available science.

BirdLife Shoalhaven represents BirdLife Australia at the local level as part of a national grass roots network committed to protecting Australia's native birds.

BirdLife Australia is working in partnership with the world's leading nature conservation organisations to identify and conserve the most important sites for nature worldwide. These sites are determined using the International Union for the Conservation of Nature's (IUCN) Global Standard for Identification of Key Biodiversity Areas (KBAs) <https://portals.iucn.org/library/node/46259>. The Standard employs agreed scientific criteria to identify sites that contribute significantly to the global persistence of biodiversity.

The IUCN is a membership Union uniquely composed of both government and civil society organisations. It provides public, private and non-governmental organisations with the knowledge and tools that enable human progress, economic development and nature conservation to take place together. Created in 1948, IUCN has evolved into the world's largest and most diverse environmental network with 1,300 Member organisations and draws on input of some 10,000 experts. IUCN is the global authority on the status of the natural world and the measures needed to safeguard it.

Lake Wollumboola, is one of only just over 300 KBAs currently recognised in Australia. It was identified in 2009 for its critical value for Black Swan with up to almost 14,000 recorded. This number is near 3% of the species' world population and means that Lake Wollumboola, at times, is an essential safe haven for one of Australia's most iconic and most loved bird species.



The Lake's reliable feeding grounds for Black Swans underwrite much of their NSW South Coast population. Similarly, with a Chestnut teal population of 4-5,000 birds the Lake is at times the home for over 4% of the species' global population. As a result, any actions compromising Lake Wollumboola is likely to have impacts on ecosystem far beyond its shores and need to be considered in a regional and national context.

Furthermore, the Lake which is part of Jervis Bay National Park, is of regional importance for a large number of bird species. It supports at least 106 bird species including nesting shorebirds, EPBC listed migratory shorebirds, coastal and sea birds, water birds and raptors, with at least 20,000 counted on occasions. At least 23 of those bird species are listed as threatened under either NSW or Australian Government legislation.

These data are based on bird observations and monthly counts and assessments since 1993. The Lake is monitored as part of BirdLife Australia's KBA Guardian program and is subject to an annual assessment and reporting on the condition of and threats to its ecosystem and diverse birdlife. Surveys at the Lake have been conducted by ornithologist and previous KBA -Guardian Joy Pegler with assistance from Frances Bray (the current KBA-Guardian) and other dedicated local volunteers.

Lake Wollumboola is also recognised as part of the East Asian Australasian Flyway as internationally significant migratory bird habitat for at least 34 species in the Australian Government Environment Protection and Biodiversity Conservation Act (1999) and in international migratory bird agreements with China, Japan and South Korea. Migratory birds are present at Lake Wollumboola mainly in warmer months, but also younger birds, including Bar-Tailed Godwits and Eastern Curlews over-winter at the lake. The Lake is also recognised as providing breeding habitat for the Endangered migratory Little Tern and Endangered local Pied Oystercatcher as well as attracting rare avian visitors from Canada and New Zealand.

According to the NSW Office of Environment and Heritage, 19 threatened bird species are likely to depend on the Lake catchment habitat.

BirdLife Australia is therefore deeply concerned about the Long Bow Point Golf course project. The impacts of this environment would likely trigger its addition to the global "KBAs in Danger" list as a result of degradation of the Lake and catchment ecosystems and loss of internationally significant birdlife.

The lack of major built-up infrastructure as compared to classic urban developments often leads to the popular perception that Golf Courses have only little or no environmental impact. This perception is wrong. Impacts on water management and quality, native vegetation and direct disturbance of birds are often severe. With regards to the proposed golf course at Long Bow Point our specific concerns are:

- The proposal to locate a golf course in the Lake Wollumboola catchment is contrary to expert advice that the catchment is unsuitable for urban development and should be rezoned for conservation purposes. The "South Coast Sensitive Urban Lands Review" 2006 incorporated into the NSW South Coast Regional Strategy 2007, recommended that the most appropriate conservation zone under the standard instrument for LEPs is Zone E 1 National Parks Nature Reserves.
- The NSW Government policy as expressed in the Halloran Planning Proposal is for Long Bow Point to be zoned for "Environment Protection", depending on a proposed biodiversity offset. (that is either E 1 National Park or E 2 Private Conservation.)



- The application fails to demonstrate that water management measures would prevent adverse impacts on the Lake's sensitive ecology due to polluted surface and ground water from golf course fertilisers, herbicides and pesticides.
- Natural runoff quality from Long Bow Point and surrounds, is critical in maintaining the Lake's sensitive water quality and ecosystems, wetlands and wildlife, yet the application fails to assess potential impacts on the Lake and its wildlife. Accordingly, without evidence in support of claims of Neutral or Beneficial Impacts, a precautionary approach should apply.
- The establishment of the golf course involves the clearing of 32.2 ha of high conservation value coastal vegetation and would result in significant impacts for Threatened Ecological Communities and at least 65 Threatened Species flora and fauna including 19 Threatened Bird species.
- The minimal biodiversity offset proposal including land that is already protected as coastal wetlands and sensitive coastal areas, does not represent compensation for the extent of potential loss.

Accordingly, BirdLife Australia endorses and strongly supports the recommendation by the NSW Department of Planning and environment for the application to be refused.