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**Subject:** Dunmore Lakes Mod 2 submission  
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Independent Planning Commission - Dunmore Lakes Sand Extraction Project.

Application DA [195-8-2004](#) Mod 2 - Dunmore Sand and Soil

Dear Commissioners,

4/11/2020

I have read the DPIE Report and recommendations and I wish to state that I'm objecting to this Modification for several reasons listed below.

What seems evident to me is that every step along the way since I first sighted what was planned in Modification 2 has been rushed or miss managed to the detriment of the final outcome.

I took notes at the Neighbour Briefing 10/4/19 and it was clear to me then that several things didn't match up. The ensuring listing on the DPIE website 25/4/19 amazed me even more. Firstly the two dredge ponds had increased in 5A from 8m to 12m and 5B from 12m to 27m. However the sand resource gained in each location didn't change at all even though the depths of the ponds had. You can see some of the other changes below which add weight to my belief. After listening to the comprehensive timeline of events given by Terry Sinclair at the zoom meeting this has only served to strengthened my beliefs.

In regard to the DPIE role and contact persons assigned to this process. Listed in order Jack Murphy was the first then Jen Seed to Anthony Barnes. At this stage they all seemed to be understanding what we were saying. Then entered Colin Phillips, and then maybe finally Mathew Sprot both of whom I personally had little contact with. You'd have to wonder what was lost in the shift from one assigned person to the next. Accuracy and detail in the final report is not a word I'd use.

At best I have a feeling that the species report could easily be described as inadequate. The original report from 25/4/19 describes the trees to be removed as 11 Bangalay trees and 1 stag with a total of 31 hollows. One would think all are crucial figures. I have constantly disputed these numbers. Boral's Planning and Development Manager in last Wednesday's zoom meeting described what was to be removed as 38 hollow bearing trees in a 50 tree total. I'm convinced that the 38 trees described as hollow bearing trees are Bangalay trees (*Eucalyptus botryoides*). The balance left is only 12 unnamed trees. I dispute this number. I'm aware that there is a difference between a sapling and a tree. To some this may explain the why there is significantly more "other" vegetation present than just 12 "unnamed" trees. I have observed several large mature Coastal banksia (*Banksia integrifolia*) and several large mature Cheese trees (*Glochidion ferdinandi*) scattered though the clumps of Bangalay SF EEC. I've also viewed other trees I couldn't clearly make out using binoculars including what looks like Corkwood (*Duboisia myoporoides*).

Clearly I'm not at all convinced the "other", "trees", only number 12. Leaving that aside, I cannot prove the fact due to my constantly being refused the chance to do an onsite inspection until recently, Unfortunately this was after the DPIE had finished its report. To my knowledge the few inspection opportunities provided earlier to other's, didn't allow for any counting of trees or hollows.

Due to the at best, scant detail of this report, it's easy to understand why species which I

believe to be present, like Zieria are not listed. Let's hope it's not the rare and endangered Zieria granulata - Illawarra zieria. It's extremely unlikely to be the highly rare and critically endangered Zieria ziebaeuerlenii - Bomaderry Zieria. However I'm assured there is Zieria there. Who knows which one?

Surely a peer reviewed report could come up with the real loss of species and habitat the clearing of this vegetation would have. I'm also very angered by the suggestion that offsets can not be used onsite. This is stated as the best option. Why not here I ask?

The number of hollows in the "38 hollow bearing trees" plus 4 stags must surely exceed 100 not the originally presented 31 hollows. However I can't find any updated number of hollows stated in any report. Surely this is the most outstanding feature a Bangalay tree presents to this site, commonly called habitat. Manufactured nesting hollows or boxes can only be seen as a very poor substitute due to the short period of time they last. As opposed to Bangalay trees which often live more than 500 years. In that time, producing larger nesting hollows for larger animal requirements as time goes on.

I'm beginning to feel that such detail is not always seen as very important to some agencies and levels of government as a nearby development proposal, the Minnamurra boardwalk, which was presented to KMC, had proven to have approximately a third of the trees in the report misnamed.

To me detail is very important and in this final report there still is much missing, misleading or inaccurate in the Boral Modification's 1,000+ pages. To site another example, the single figure statement that 5B is 370m from the river. Clearly vegetation which relies on regular saltwater inundation can be sighted 162m from the edge of 5B. How can one figure be given when we have tides?

As if the said rushed vegetative report wasn't inadequate enough. I don't believe the fauna report is any more comprehensive. The report lists 6 endangered animals on this site from an extensive list, several of them endangered. In the GEPS submission to DPIE it was stated that its highly likely the Powerful Owl should be added to that list of fauna present. Clearly a couple or at best few quick night visits may not be enough time to sight them there. The net result is that only 3 species were given offset credits. I contend this is not a just outcome.

I'm strongly of the belief these and other important issues raised need to have a totally independent peer reviewed report.

Given the points I have made here I consider due process has not been carried out. I strongly recommend the best option here would be to refuse this Modification, leaving the applicant the option to reapply under current guidelines. Let's see what information a full EIS brings.

Warren Holder

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