

Independent Planning Commission NSW Level 3, 201 Elizabeth St Sydney NSW 2000 By email to: <u>ipcn@ipcn.nsw.gov.au</u>

30th July 2018

Dear Commissioners,

NPA opposes Long Bow Point Golf Course (SSD 8406) and West Culburra mixed-use development (SSD 3846) proposals.

The National Parks Association of NSW (NPA) is a community-based organisation with over 20,000 supporters from rural, remote and urban areas across the state. NPA promotes nature conservation and evidence-based natural resource management. NPA appreciates the opportunity to comment on the proposed Long Bow Point Golf Course SSD 8406 and the West Culburra mixed use development Concept proposal SSD 3846 at Culburra Beach.

NPA opposes these developments due to their unacceptably high environmental impacts and we urge the Independent Planning Commission (IPC) to reject the proposals.

Since our inception 60 years ago NPA has consistently advocated for the protection of Lake Wollumboola and the Beecroft Peninsula. Our organisation has been influential in the creation, and gradual consolidation, of Jervis Bay National Park, and we are very proud of our involvement in what is a unique and special part of the NSW coast. Jervis Bay is recognised as a treasure, visited by many thousands of people every year, and it is the unspoilt natural environment that is the foundation of the appeal of the area.

NPA has included a proposal for extensions of Jervis Bay National Park that would add Nowra and Currambene State Forests to the national park in our recently published '<u>50 Park Proposals</u>', released to celebrate with the 50th anniversary of the creation of the NSW National Parks and Wildlife Service. This proposal also suggests that Government considers the voluntary purchase of high conservation value private land adjacent to Lake Wollumboola for addition to Jervis Bay National Park, an approach that has been used in several locations in the Jervis Bay area to consolidate the park.

Protection of the catchment of Lake Wollumboola (a wetland of national significance) ensuring connectivity for wildlife and the presence of threatened species and ecological communities are the key motivations behind our national park proposal. All of these would be greatly undermined were the golf course and mixed development proposals to proceed.

The National Parks Establishment Plan and impacts on Jervis Bay National Park

The National Parks Establishment Plan specifically identifies 'consolidating the existing east-west coast to ranges corridor near Jervis Bay' as a strategic priority for reserve building. The clearing of forests associated with these proposals clearly undermines this aim—as well as years of strategic reserve acquisition by the NSW Government to consolidate Jervis Bay National Park.

There are other priorities identified in the Plan that are also relevant to these proposals:

1. *Lands within important water catchments*: The bed of Lake Wollumboola is already incorporated in Jervis Bay National Park. However, we contend that the entire catchment

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should also be protected, as impacts with the catchment will negatively impact on the Lake itself – and therefore on the public property of the people of NSW.

- 2. Critical landscape corridors: the NSW reserve network in the coastal bioregions performs excellently in achieving north-south connectivity. However, east-west connectivity is more poorly established due to the historic bias of reservations favouring upland, less fertile habitats. East-west connectivity is likely to become more and more important as climate change impacts increase, because of the inclusion of an environmental gradient that will help species move in response to changes in rainfall, temperature and extreme weather events. The clearing of native vegetation associated with the development proposals will undermine connectivity in the area.
- 3. Poorly reserved ecosystems and critical habitats: the ecological significance of Lake Wollumboola is extremely high, and it provides critical habitat for a range of species. Lake Wollumboola is listed as a Key Biodiversity Area in recognition of this ecological significance, particularly in regards birds: over 100 species of birds have been recorded at the Lake, with substantial numbers (~20,000) being counted in a single event. It hosts species of migratory bird that are the subject of <u>international agreements</u> with Japan, China and South Korea. Australia therefore has international responsibilities to ensure the protection and conservation of important habitats for species subject to these agreements.

Water quality

We are of the view that the extent of the proposed developments in the Lake Wollumboola catchments would have negative impacts on the Lake's water quality. This is particularly true in the case of a golf course which requires high inputs of fertilisers, herbicides and pesticides. The NSW Government, through various agencies, has previously given evidence and reported that water quality changes in the catchment would degrade the Lake's ecosystem. We urge the IPC to heed this advice, and note that the application did not assess potential impacts on water quality. It is our view that this is a significant oversight, and a precautionary approach must be taken to ensure protection of the Lake—the bed of which is public land as a component of the reserve network.

Biodiversity impacts

The forests of the Jervis Bay area are included within one of just 36 global Biodiversity Hotspots, called the 'Forests of Eastern Australia'. This highlights the enormous biodiversity significance of the area. There are a host of threatened species found either in or near the proposal sites including yellowbellied and greater gliders, eastern pygmy possum, powerful, sooty and masked owls, spotted-tail quoll, ground parrot, eastern bristlebird and Jervis Bay leek orchid. It is our view that these developments propose an unacceptable risk to the conservation status of threatened species, as well as threatened ecological communities such as the SEPP 14 wetlands in the Crookhaven.

We again thank the IPC for the opportunity to comment on the proposed developments, urge the commission to reject these proposals and urge the NSW Government to continue its long-term policy of protecting Lake Wollumboola and consolidating Jervis Bay National Park.

Yours sincerely,



Ms Alix Goodwin, CEO