

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 international agreements 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 yellow-bellied 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,

A black rectangular redaction box covering the signature of Ms Alix Goodwin.

Ms Alix Goodwin, CEO