

Jervis Bay Regional Alliance



Independent Planning Commission NSW
Level 3, 201 Elizabeth St
Sydney NSW 2000
30th July 2018

Submitted by email to: ipcn@ipcn.nsw.gov.au

Objection to Long Bow Point Golf Course SSD 8406 and West Culburra mixed-use development SSD 3846.

Dear Commission members,

The Jervis Bay Regional Alliance Inc (JBRA) is an environmental advocacy group covering the NSW south coast from Culburra Beach to Sussex Inlet and the catchments and ecosystems of Lake Wollumboola, Jervis Bay and St. Georges Basin. The JBRA's charter includes advocacy for environmental, social and cultural heritage, as well as the visual quality of the coast. Sound planning decisions at all levels of government are key areas of concern for our group.

Thank you for the opportunity to comment regarding Long Bow Point Golf Course SSD 8406 and the West Culburra mixed use development Concept proposal SSD 3846 at Culburra Beach. The Jervis Bay Regional Plan 1996 identified Lake Wollumboola and catchment for protection, and our organisation has proposed extensions to Jervis Bay National Park that incorporates area of Lake Wollumboola's catchment. Our members are frequent visitors to Lake Wollumboola and value its beauty, unique ecology and extraordinary birdlife. Protection of this unique ecosystem and its high biodiversity value is the most appropriate and responsible course of action in our view.

JBRA members consider that approval of either or both applications would represent both individual and cumulative threats to the high environmental values of Lake Wollumboola, the lower Crookhaven River and their catchments.

Accordingly, we support the recommendations of the Department of Planning and Environment that both applications be refused.

Lake Wollumboola

We find it extraordinary that a golf course was proposed at Long Bow Point, arguably the most sensitive part of the Lake's north-west catchment, when there is a long history of government initiatives to protect the lake and catchment.

The West Culburra application also involves residential, industrial and infrastructure development in the lake catchment.

Lake Wollumboola is of international environmental significance for birdlife, including international migratory wading species, nesting shorebirds, water birds and coastal birds. It is recognised as internationally significant migratory bird habitat, part of the East Asian Australasian Flyway, for at least 34 species in international agreements with China, Japan and South Korea. It is also recognised as a Key Biodiversity Area (KBA) by the International Union for the Conservation of Nature (IUCN) under its Global Standard for identification of KBAs, particularly for supporting large Black Swan and

Chestnut Teal populations. 106 bird species have been identified at the lake, with at least 20,000 counted on one occasion.

Lake Wollumboola is unique. A complex and diverse ecosystem has developed based on the lake's variable closing and opening cycle and the natural runoff quality from its catchment. The NSW Joint Agency Study, Scanes P, Ferguson A, Potts J, "Environmental sensitivity of Lake Wollumboola: input to Considerations of Development Applications for Long Bow Point, Culburra," (2013) and other experts who gave evidence at previous Independent Inquiries, warn that water quality changes in the catchment are likely to degrade the lake's sensitive ecosystem. The existing urban area already contributes increased nutrients and sediments, but insufficient information is available to determine the lake's capacity to tolerate inevitable increase in pollutants from a golf course and further residential and other urban uses.

Construction of a golf course and associated clearing of coastal forest is highly likely to have significant adverse impacts on both lake and catchment, due to polluted surface and ground water from golf course fertilisers, herbicides and pesticides. Water quality management measures under these circumstances are not capable of reducing pollution to natural levels. We note that the Department of Planning and Environment has not accepted the consultant's claims of "Neutral or Beneficial Effects" on either surface or ground water quality.

Also, it significant that the application did not assess potential impacts on lake water quality and ecology, despite a requirement to do so.

The lake catchment is high conservation value coastal forest and wetlands. A golf course would cause significant impacts on threatened ecological communities and at least 65 threatened species including flora and fauna, such as microbats, green and golden bell frog and threatened bird species. It is clear that this is an area of particularly significant biodiversity value and the impacts of the proposed developments would be extremely high.

The Jervis Bay Regional Environment Plan 1996 and three Independent Inquiries since have also recommended the highest levels of protection. The south west lake catchment (1998) and the lake bed and sandbar area (2002) were included in Jervis Bay National Park, with the South Coast Sensitive Urban Lands Review (2006) recommending that the remaining undeveloped high conservation value lands also be zoned E1 National Park and included in Jervis Bay National Park. We support this recommendation and oppose development that will have a negative impact on this important part of the national reserve system.

More recently the NSW Government's Illawarra-Shoalhaven Regional Plan 2015 states that the lake and catchment must be protected and describes the lake as a "South Coast jewel". The NSW Government policy as expressed in the Halloran Planning Proposal 2015 is for Long Bow Point to be zoned for "Environment Protection", depending on a proposed biodiversity offset.

The minimal biodiversity offset proposal for the golf course—which includes land that is already protected as coastal wetlands and sensitive coastal areas—does not represent compensation for the extent of potential loss.

Without evidence in support of claims of "Neutral or Beneficial Effects" a precautionary approach should apply, justifying refusal of the golf course application.

Crookhaven River catchment

Whilst the West Culburra application proposes urban development in both the Lake Wollumboola and Crookhaven River catchments, it is located mainly in the Crookhaven catchment.

With regard to water quality impacts, the Department of Planning and Environment Report 2018 expresses significant doubts about the validity of claims of a Neutral or Beneficial Effect on the water quality of wetlands and the river.

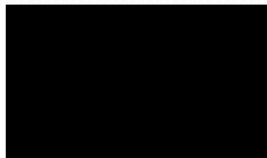
Both the river and catchment are environmentally sensitive comprising 91.65 hectares of native forest which is habitat for threatened fauna and endangered ecological communities. SEPP 14 wetlands fringe the river. Proposed housing and tourist facilities along the 3-kilometre river frontage would degrade both the wetlands and regionally significant Aboriginal cultural heritage sites.

The loss of connectivity for native species, including threatened species, is also concerning. This proposal undermines efforts to increase connectivity in this area through the Jervis Bay Regional Alliance proposal for extensions to Jervis Bay National Park and the Great Eastern Ranges corridor initiatives. Connectivity of natural ecosystems is vitally important to ensure that wildlife has the maximum possible chance of adapting to climate change by providing movement corridors to respond to environmental pressures.

No impact assessment or Commonwealth referral has been provided for potential impacts on migratory birds. This is a significant omission given the importance of both Lake Wollumboola and Crookhaven estuary as part internationally significant habitat for migratory birds, protected under the Australian Government Environment Protection and Biodiversity Conservation Act 1999.

Accordingly, we recommend that the Commission refuse both applications.

Yours sincerely,

A solid black rectangular box redacting the signature of Dr Oisín Sweeney.

Dr Oisín Sweeney, Chair, Jervis Bay Regional Alliance Inc