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BirdLife Shoalhaven is a branch of BirdLife Australia Limited ABN 75 149 124 774

Shoalhaven City Council
36 Bridge Road
NOWRA NSW 2541

10 October 2023

Dear Sir/Madam

Submission re. DA23/1707 – Demolition of existing dwelling and construction and operation of a Crematorium with associated facilities and site works

Birdlife Australia (BLA) is Australia's largest bird conservation organisation with over 200,000 members and supporters. For over a century its members have protected birds and their habitats through practical conservation and advocacy based on the best available science.

BirdLife Shoalhaven (BLS) is a branch of BLA, which itself has 1,000 members and supporters. Our charter is to help our members and the wider community enjoy and learn more about birds and to advocate for the conservation of birdlife across the Shoalhaven.

BLS welcomes the substantially reduced footprint of this proposal compared to DA22/1044 and the improved quality of the on-site environmental assessment accompanying the DA. We note that the proposal is now mostly restricted to an area of already modified habitat around an existing dwelling. Nevertheless, we wish to raise a number of issues that we consider need to be taken into account by Council in its assessment of this application.

This site and its context area was not burnt in the 2019-20 Bushfires and thus became vital refugia for a range of bird species. It is located within a high biodiversity value biodiversity corridor, recognized in SLEP2014 Biodiversity Corridor and Significant vegetation Layers.

Noting this context, any remnant native trees and shrubs on the proposed site footprint provide habitat for native birds and should be protected, enhanced and remediated. All such remnants are directly connected to the surrounding natural area bushland. Birds will visit the site despite the clearing and intrusion that has occurred, as part of roosting, foraging, movement and migration through the area.

The environmental value of the site would also be enhanced by the removal of exotic plants identified at the site. The DA has not committed to this action but BLS recommends that it do so.

The list of birds surveyed on the larger site by BLS members included four threatened species and a total of 55 species – see attached list. For example, the Glossy Black Cockatoo *Calyptorhynchus lathami* is a well-known, continuing and documented presence in the immediate area, recorded in surveys on multiple occasions by BLS members and well known to local residents.

Despite the smaller footprint proposed in DA23/1707, BLS continues to have concerns that this is an inappropriate development concept for this site, just as it was for the prior much larger footprint site on the same Lot. Whilst it is accepted that some building may be acceptable on the new site, the most appropriate would be a residence, as are all immediately local buildings. A crematorium is unsuitable and unacceptable for this site, as a commercial, semi-industrial use. It would involve higher traffic flows, vehicle movements and intrusion than a residential use and thus greater disturbance to any bird presence.

Impacts from climate change are a well-recognised threat to all biodiversity, including birds. The proposal is for a gas-fired crematorium and we question whether such an operation is consistent with local, regional, national and international efforts to reduce greenhouse gas emissions. The Council's own 2022 Sustainability and Climate Policy includes as part of its vision that:

“Creating a sustainable Shoalhaven means:

- Reducing greenhouse gas emissions and adapting to climate change...”*

and includes among its 16 Objectives and Targets:

“1. Integrate the principles of sustainability and Ecologically Sustainable Development into planning, asset management and decision-making processes across the organisation...”

9. Encourage environmentally and socially sustainable, equitable, and climate resilient land-use planning and development across the Shoalhaven region...”

13. Reduce pollution and protect the health and safety of our air, water, and natural resources...”

It is unclear how this operation is proposing to operate in a manner that would be consistent with this vision, objectives and targets.

BLS also notes that this proposal continues to have strong opposition from local residents, as an inappropriate development for a rural residential area.

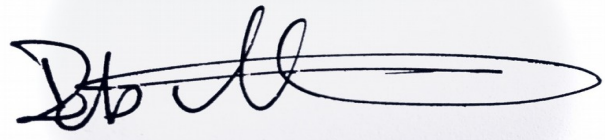
This submission was prepared with the assistance of Chris Grounds, BLS member and former BLS Conservation Officer.

If you have any queries, please direct them to Rob Dunn or Deb Callister-Carter, via the email addresses or phone numbers below.

Yours sincerely



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Attachment: List of birds surveyed by BLS members at Lot 1 DP 1041096, 339 The Wool Road, St Georges Basin (Threatened species are shown in highlights)

- White-headed Pigeon *Columba leucomela*
- Common Bronzewing *Phaps chalcoptera*
- Eastern Koel *Eudynamys orientalis*
- Horsfield's Bronze-Cuckoo *Chalcites basalis*
- Shining Bronze-Cuckoo *Chalcites lucidus*
- Fan-tailed Cuckoo *Cacomantis flabelliformis*
- Square-tailed Kite *Lophoictinia isura*
- Little Eagle *Hieraaetus morphnoides*
- Brown Goshawk *Accipiter fasciatus*
- Dollarbird *Eurystomus orientalis*
- Sacred Kingfisher *Todiramphus sanctus*
- Laughing Kookaburra *Dacelo novaeguineae*
- Australian Hobby *Falco longipennis*
- Glossy Black-Cockatoo *Calyptorhynchus lathami*
- Yellow-tailed Black-Cockatoo *Zanda funereus*
- Sulphur-crested Cockatoo *Cacatua galerita*
- Australian King-Parrot *Alisterus scapularis*
- Crimson Rosella *Platycercus elegans*
- Eastern Rosella *Platycercus eximius*
- Little Lorikeet *Glossopsitta pusilla*
- Rainbow Lorikeet *Trichoglossus moluccanus*
- Satin Bowerbird *Ptilonorhynchus violaceus*
- White-throated Treecreeper *Cormobates leucophaea*
- Superb Fairy-wren *Malurus cyaneus*
- Southern Emu-wren *Stipiturus malachurus*
- Scarlet Honeyeater *Myzomela sanguinolenta*
- Noisy Friarbird *Philemon corniculatus*
- New Holland Honeyeater *Phylidonyris novaehollandiae*
- White-cheeked Honeyeater *Phylidonyris niger*
- Brown-headed Honeyeater *Melithreptus brevirostris*
- Eastern Spinebill *Acanthorhynchus tenuirostris*
- Little Wattlebird *Anthochaera chrysoptera*
- Red Wattlebird *Anthochaera carunculata*
- Yellow-faced Honeyeater *Caligavis chrysops*
- Spotted Pardalote *Pardalotus punctatus*
- Yellow Thornbill *Acanthiza nana*
- Brown Thornbill *Acanthiza pusilla*
- Rufous Whistler *Pachycephala rufiventris*
- Golden Whistler *Pachycephala pectoralis*
- Grey Shrike-thrush *Colluricincla harmonica*
- Eastern Whipbird *Psophodes olivaceus*
- Australasian Figbird *Sphecotheres vieilloti*
- Olive-backed Oriole *Oriolus sagittatus*
- Australian Magpie *Gymnorhina tibicen*
- Grey Butcherbird *Cracticus torquatus*
- Dusky Woodswallow *Artamus cyanopterus*

- Willie Wagtail *Rhipidura leucophrys*
- Grey Fantail *Rhipidura fuliginosa*
- Australian Raven *Corvus coronoides*
- Leaden Flycatcher *Myiagra rubecula*
- Jacky Winter *Microeca fascinans*
- Eastern Yellow Robin *Eopsaltria australis*
- Red-browed Finch *Neochmia temporalis*
- Tree Martin *Petrochelidon nigricans*
- Welcome Swallow *Hirundo neoxena*