



PO Box 295 Vincentia NSW 2540 | [www.birdlifeshoalhaven.org](http://www.birdlifeshoalhaven.org) | [shoalhaven@birdlife.org.au](mailto:shoalhaven@birdlife.org.au)  
BirdLife Shoalhaven is a branch of BirdLife Australia Limited ABN 75 149 124 774

To:  
General Manager  
Mr Russ Pigg  
Shoalhaven City Council

From:  
Birdlife Shoalhaven  
C/o Chris Grounds  
Conservation Officer

**SUBMISSION CONCERNING THE EXHIBITED  
WORROWING HEIGHTS PRECINCT PLAN 2017  
from  
BirdLife Shoalhaven  
AUGUST 2017**

BirdLife Shoalhaven (BLS) advocates for the conservation of birds and their habitats and promotes the appreciation and understanding of birds across the Shoalhaven and beyond. BLS is a branch of BirdLife Australia Limited, an independent, not-for-profit organization, which was established in 1901 and currently has over 12,000 members and 70,000 supporters.

A handwritten signature in black ink, appearing to read "Rob Dunn", is written over a light blue grid background.

**Rob Dunn**  
President  
0438 250600 - [president@birdlifeshoalhaven.org](mailto:president@birdlifeshoalhaven.org)

*Chris Grounds*  
**Chris Grounds**  
Conservation Officer  
0401137158 [solum306@gmail.com](mailto:solum306@gmail.com)

## **CONTENTS**

- 1.00 General Recommendation**
- 2.00 Specific Recommendations and Comment**
  - 2.1.0 Key Biodiversity Area status**
  - 2.2.0 Bird habitat and Habitat Corridor**
  - 2.3.0 National Parks Links**
  - 2.4.0 Woolworths-Bayswood Site Considerations**
  - 2.5.0 Options Preference**

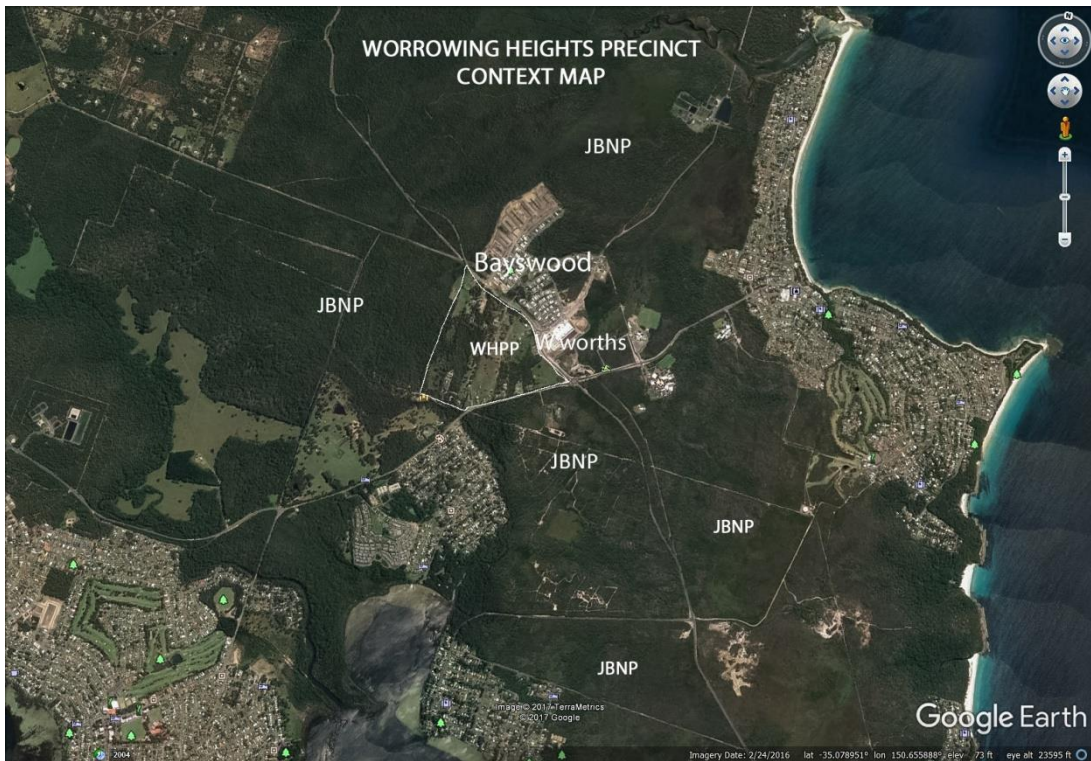
### **1.00 General Recommendation**

**1.1.0 BLS believes the Precinct Plan must be developed with a full consideration and planning acknowledgement of the existing precinct environment, the character of surrounding environment and the changes that have occurred in these over recent years as adjacent lands have progressed or are progressing to National Parks and Wildlife [NPWS] tenure and the considerable degree of environmental destruction associated with the Woolworths-Bayswood development site. BLS notes that the WHPP does not seem to be sufficiently aware of the developments in progression of adjacent lands to the Jervis Bay National Park [JBNP].**

**1.2.0 BLS is concerned that there seems to be an underpinning rationale to this Plan that there must be urban development on this site. That seems presumptuous given the nature of the site, the environmental value and its context. Any development opportunities, such as the two mentioned in the WHPP, need to be strictly planned and supervised on site to avoid vegetation and habitat destruction.**

**1.3.0 BLS supports in principle the concept of a Worroving Heights Precinct Plan [WWPP] and the intention to rationalise planning and landuse in the area but considers that in its present form birdlife and habitat will be placed at risk.**

**1.4.0 BLS recognizes the private ownership tenure across most of this precinct and current land use.**



**The degree of interference in the north <> south habitat corridor associated with JBNP and Booderee N P created by the Woolworths-Bayswood development and the Worroing Heights Precinct.**

## **2.00 Specific Recommendations and Comment**

**2.1.0 There is an urgent need to recognize that the precinct is part of the Jervis Bay Key Biodiversity Area [KBA].**

**2.1.1** The precinct is included in the Jervis Bay KBA and is considered a “biodiversity hotspot” under the international agreements that BirdLife Australia is party to with the IUCN and other conservation organizations.

**2.1.2** The precinct shares this status with the adjoining JBNP and estates and properties progressing to the JBNP national parks areas in this KBA.

**2.2.0 All remnant vegetation of the site is of value as bird habitat and habitat corridor and should be conserved in all forward planning.**

**2.2.1.a** The Precinct contains important remnant vegetation, which constitutes important habitat for birds and bird movements and migration, especially from the western to the eastern portions of Jervis Bay National Park [JBNP]. The WHPP states *“Biodiversity “Habitat corridors” and “Significant Vegetation” as identified in SLEP 2014 are located throughout the precinct, along with the application of Clause 7.20 of SLEP 2014 which relates to the specific local provisions to protect the unique natural and cultural values of the Jervis Bay area.”*

**2.2.1.b** The south-western portion of the precinct is affected by a SLEP Corridor overlay.

**2.2.3.c** WHPP itself recognizes that: *“While the site is zoned as rural land, large portions of the site remain heavily vegetated with connections to surrounding natural areas and reserves.”*

**2.2.2** A number of threatened species can be associated with that area and the WHPP recognizes this fact. The WHPP nominates *“. . .Eastern Bristlebird, foraging for Glossy Black Cockatoo, Gang Gang Cockatoo, Square Tailed Kite, Powerful Owl . . .”*

**2.2.3** BirdLife Shoalhaven observations in the adjoining Heritage Estate and Wirriliko Road estate areas, which are now progressing to JBNP, indicates more threatened species than nominated are likely to be part of the suite of bird species involved in this site. BirdLife observations in the neighbouring Heritage Estates have extended the catalogue for that site to include other threatened species as Little Eagle, Little Lorikeet and Dusky Wood Swallow. Additionally the Eastern Ground Parrot has been sighted on the Wirriliko Block immediately opposite the precinct.

**2.2.4** It is most likely that the precinct vegetation offers nesting habitat and this is supported by the WHPP which recognizes that *“Many hollow bearing and habitat trees are located within the precinct.”* This feature stresses a priority need to preserve such habitat features in any proposed developments. This will be all the more important given the destruction, either legal or illegal, of native vegetation, habitat and habitat trees associated with other developments in the St Georges Basin area.

**2.3.0 The remnant vegetation must be recognized and considered as an important link between the portions of the JBNP and on that basis any planning and development must allow for value of this remnant vegetation.**

**2.3.1** There are now four individual properties, including Heritage Estate, progressing to the extension of JBNP on the eastern side of The Wool Road, immediately opposite this precinct. The congregated area of these properties is a researched habitat of the Endangered Eastern Bristlebird and a number of other threatened bird species. There are 104 catalogued bird species, eleven of which are threatened species.

**2.3.2** BLS notes the presence of an EEC Swamp Mahogany [*Eucalyptus robusta*] which as a Cool Season flowering eucalypt is critical to seasonal feeding of many bird species, e.g. Little Lorikeet, a Threatened species.

**2.3.4** The WHPP recognizes “... *the biodiversity importance of the area in which the precinct is located, in the context of surrounding national parks will need to be considered in future development proposals.*”

**2.4.0 Further planning and development at the site must recognize the extensive native vegetation and habitat corridor destruction that has taken place at the Woolworths - Bayswood site and that this has exacerbated the choke-point effect in the habitat corridor east to JBNP and Booderee National Park.**

**2.4.1** It is not possible to plan development of the site without this consideration.

**2.4.2** Any development which allows further destruction of remnant vegetation will force further enhancement of the choke-point in the east-west corridor.

**2.4.4** The biodiversity of Booderee National Park is dependent on this corridor.

**2.5.0 None of the Options provided are satisfactory in terms of BLS recommendations and commentary. Option 2 involves the least apparent disturbance of vegetation but creates a disjunction between two vegetation zones which therefore interferes with the habitat corridor effect. The “Preferred Precinct Plan” is unacceptable to BLS on the same basis.**

**2.5.1** BLS questions the rationale that development toward urban use has to underpin planning for this precinct.

**2.5.2** BLS does not believe the WHPP is yet internally consistent with the environmental values noted and that these are not yet sufficiently detailed, which the WHPP actually recognizes.