

28 May 2016

To:

The General Manager  
Mr Russ Pigg  
Shoalhaven City Council

From:

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## **REFERENCE : THE DA11/1728 LONG BOW POINT GOLF COURSE**

### **1.0 INTRODUCTION**

**1.1** BirdLife Shoalhaven [BLS] is a branch of BirdLife Australia, an independent, not-for-profit organization dedicated achieving conservation of bird habitats and preventing further degradation and loss of natural habitat and extinction due to impacts of land clearing, draining and pollution of rivers and wetlands and development expansion in sensitive coastal environments.

**1.2** BLS objects in the strongest terms to the proposed golf course development application at Long Bow Point in the Lake Wollumboola catchment. Our comments are informed in part by our members who play an active role as volunteers in the NSW NPWS Shorebird Recovery Program at Lake Wollumboola and more broadly on many sites on the Shoalhaven coast.

### **2.0 RECOMMENDATION**

**2.1 That the DA11/1728 Long Bow Point Golf Course should be rejected.**

## **3.0 CONSIDERATIONS**

### **3.1 SIGNIFICANT BIRDLIFE ISSUES**

**3.11** Testimony to the significant values of Lake Wollumboola and its catchment, which are recognized at both a national and international level, are:

- Inclusion of the Lake and part of the catchment in NSW Jervis Bay National Park
- Listing as a Wetland of National Importance largely due to the lake's value as bird habitat
- Listing as a Globally Important Bird Area for Black Swan and Chestnut Teal-supporting at least 1% of the world population, with surveys of Grey Teal and Eurasian Coot also likely to meet this criterion
- Recognised as internationally significant migratory bird habitat as part of the East Asian-Australasian Flyway under international treaties
- Lake under consideration for listing as a Wetland of International Importance under the Ramsar Convention. (Assessed by NPWS as meeting 4-5 criteria when only 1 is needed for listing)
- Recognition of the Lake as Threatened bird species habitat for 23 species including 5 species listed as Critically Endangered
- Recognition of Long Bow Point as likely habitat for an additional 18 Threatened bird species
- Catchment recognised as Threatened Species habitat and Wildlife Corridor in South Coast Regional Conservation Plan 2010 (DECCW)

**3.12** Both Lake Wollumboola and the catchment are significant habitat for birds and celebrated for the diversity of birdlife they support. Over 100 species of birds both the Lake and its catchment are native and migratory species depend on the lake's sandbar, mudflats, wetlands and shallows, open waters, sea grass and algae beds, salt marsh and rocky reefs and shoreline including around the Long Bow Point peninsula. These environments provide nesting, fishing, foraging and roosting habitat where birds feast on abundant sea grass, algae, fish and crustaceans, worms and insects. The greatest numbers of birds (up to 20,000 recorded) and bird species diversity, both migratory waders, seabirds and native water birds, flock to the lake during warmer months when Lake levels are low and inland wetlands are drought-affected.

**3.13** The main criticism of BLS is that whilst the Lake and catchment support high numbers of bird species listed as Threatened in both Australian and NSW legislation, 23 for the Lake and an additional 18 for the catchment, the Species Impact Statement (SIS) has not assessed the potential impacts of the golf course proposal on Threatened Species dependent on the Lake. The SIS claims that the proposed water management measures would result in no adverse impact on the Lake water quality or ecosystem despite failing to address criticisms of these claims in expert advice from Office of Environment and Heritage. Furthermore despite the requirements for the SIS, surveys and assessments for all Threatened bird species likely to inhabit the catchment are either incomplete or not conducted all, so claims that there would be no significant impact on these Threatened Species are not based on evidence.

- **See Submission Attachment A Threatened bird species of Lake Wollumboola and its catchment 2016**

## **3.2 ENVIRONMENTAL CONSIDERATIONS**

**3.21** BLS consider that construction and ongoing maintenance of a golf course on this sensitive site, together with foreshadowed tourist and recreational uses, represent significant and unjustified risks to this precious and internationally significant environment.

**3.22** Long Bow Point is critical to maintaining the Lake's water quality, natural variability and ecology due to its natural vegetation cover and low nutrient quality runoff from its creeks, wetlands and ground water.

**3.23** We urge Council not take these risks in the light of the 2013 Report by NSW Office of Environment and Heritage and other NSW Government agencies that the lake is highly sensitive to pollution of surface and ground water particularly from a golf course at Long Bow Point and that the Lake would suffer "catastrophic" consequences and "never recover" if the golf course went ahead.

## **3.3 PLANNING CONSIDERATIONS**

3.9 Whilst BLS support the NSW Government's decision as part of the Halloran Planning Proposal requirements that Long Bow Point should be zoned for environment protection and not a golf course, BLS consider that the Long Bow Point area and remaining undeveloped private lands in the lake catchment should be included in Jervis Bay National Park, so the high environmental and cultural values of the Lake and catchment and their extraordinary bird life are conserved for future generations. National Park listing would be more beneficial for Culburra Beach and Shoalhaven community with potential for increased bird tourism and Aboriginal cultural heritage tourism from across Australia and overseas, compared to a private golf course.

## **ATTACHMENT A**

### **THREATENED BIRD SPECIES of LAKE WOLLUMBOOLA AND CATCHMENT 2016**

This attachment provides two lists both naming Threatened bird species for Lake Wollumboola and its catchment as classified in either or both the NSW Threatened Species Conservation Act and the Commonwealth Environment Protection and Biodiversity Conservation Act.

The first list is of Threatened bird species recorded at Lake Wollumboola under both Acts.

The second list is of Threatened bird species either recorded at or likely to occur in the Lake catchment, according to the NSW Office of Environment and Heritage.

Several bird species listed may utilise both Lake and catchment.

**CE= Critically Endangered. E= Endangered V=Vulnerable. Migratory species are also identified.**

#### **List 1. Threatened bird species recorded at Lake Wollumboola.**

The Australian Government's upgraded listings for Curlew Sand Piper, Eastern Curlew, Great Knot, Lesser Sand Plover, Red Knot and Bar-tailed Godwit in 2015-16, are based primarily on loss of their habitat in East Asia but also reflects pressures on migratory bird habitat in Australia. These listings increase Lake Wollumboola's significance as habitat for these internationally protected species and therefore heighten the case for refusal of the golf course application at Long Bow Point and for any development expansion in the Lake catchment.

#### **Critically Endangered. (CE)**

Beach Stone Curlew. NSW

Curlew Sandpiper. Commonwealth CE. NSW E Migratory

Eastern Curlew Commonwealth CE Migratory

Great Knot Commonwealth NSW V

Hooded Plover NSW CE. Commonwealth V.

#### **Endangered. (E)**

Little Tern NSW E. Migratory. Breeding

Pied Oyster Catcher NSW E Breeding.

Lesser Sand Plover Commonwealth Endangered NSW V Migratory

Red Knot. Commonwealth E Migratory

## **Vulnerable (V)**

Broad-billed Sandpiper NSW and Commonwealth V. Migratory

Bar-tailed Godwit Commonwealth V

Black-tailed Godwit NSW V Migratory

Black Bittern NSW V

Eastern Osprey NSW V

Fairy Tern Commonwealth only V Breeding.

Greater Sand Plover Commonwealth and NSW V Migratory

Little Eagle NSW V.

Little Shearwater NSW V

Sanderling NSW V Migratory

Sooty Oyster Catcher NSW V.

Square-tailed Kite NSW V

Terek Sandpiper NSW V Migratory

White-fronted Chat NSW V Potentially breeding.

## **List 2. Threatened bird species either recorded or likely to occur in the Lake Wollumboola catchment.**

### **Critically Endangered**

Orange-bellied Parrot CE Commonwealth and NSW

Regent Honeyeater CE both Commonwealth and NSW

### **Endangered**

Swift Parrot E Commonwealth and NSW

### **Vulnerable**

Spotted Harrier V NSW

Powerful Owl V NSW

Barking Owl V NSW

Sooty Owl V NSW

Masked Owl V NSW

Glossy Black Cockatoo V NSW

Gang Gang Cockatoo V NSW

Swift Parrot E NSW

Little Lorikeet V NSW

Turquoise Parrot V NSW

Pink Robin V NSW

Scarlet Robin V NSW

Flame Robin V NSW

Hooded Robin V NSW

Varied Sitella V NSW

Olive Whistler V NSW