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July 28 Second Edition

SUBMISSION

to

SHOALHAVEN 2040 STRATEGIC PLANNING STATEMENT

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A handwritten signature in black ink, appearing to read "Rob Dunn".

Rob Dunn
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Chris Grounds

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Birdlife Shoalhaven acknowledges the Aboriginal people of the Shoalhaven, their care of country, birds and habitat and pays respects to all Elders.

1.0 INTRODUCTION

Whilst BirdLife Shoalhaven's [BLS] primary interest is in birds that cannot be served without a commensurate interest in environment, its character, health and sustainability and in particular with concepts of habitat, corridor, biodiversity and threat. To that end the Strategic Plan 2040 includes most of these concepts but certainly not to the extent that the outcomes they represent are assured in Planning. Indeed, the contemporary Shoalhaven experience has very many examples of the continuing compromise of these concepts in many contexts to the detriment of natural environment. The Planning experience toward 2040 must change to alter that situation. In large part, this is related to the perpetual Shoalhaven paradox that the Shoalhaven natural environment is 'gorgeous', 'amazing', 'magnificent' and the like because it links to a tourism mantra yet the natural environment is damaged and downgraded on a regular basis. This is despite the continuing and overwhelming feedback to Council through survey and consultancy operations that it is one of the highest priorities with the broader community. BLS would also contend that Council Planning as expressed through this document has still not come to terms with environmental challenges. BLS trusts that the comments we offer in this submission might suggest where this can be repaired in the 2040 statement.

2.0 KEY ENVIRONMENTAL DETAIL

2.11 In "About the Shoalhaven" include Nature Reserves, Conservation Parks and Key Biodiversity Areas in wording Paragraph 3. **Key Biodiversity Areas [KBAs] have particular significance for BLS** and the applied concept is being expanded, including in the Shoalhaven. KBAs have usually been omitted in Council documents related to Planning and environmental management and this needs to change for a 2040 vision.

2.12 It appears the **Statement does not recognize the complex of land tenures**, associated laws and government administrations that apply and thus the geographically specific responsibilities of Council.

2.2 Include in Paragraph 3 '**Sclerophyll Forests**' as these are the most common vegetation.

2.31 Include in Para 3 **that the "magnificent environment", for what it is, faces significant risks and threats** beyond the natural events mentioned, e.g. storms. Whilst it is a point of inclusion and emphasis it is also a point of balance of Planning ideas.

2.32 This is **supported by the community feeling and priority feedback evidence** included in the Strategy.

2.33.1 This is also **supported by the CSIRO source assessment** on Page 13. 4.1

2.33.2 With reference to "**Going Going Gone**" page 13 Long Term Trends. The inclusion of this source and statement would support its inclusion in other sections dealing with environment as 3.3 This lacks support in associated reading.

3.0 SPECIFIC BIRD DETAIL

BLS offers the following profile and data concerning birds in the Shoalhaven for the proposal that the biodiversity and threat to birds is much greater than generally specified and appreciated. A similar thought can be applied to fauna and flora. BLS would contend that the SPD 2040 whilst alluding to such situations does not adequately do so and thus the balance in the Planning profile for environment is affected.

3.1 The Atlas of Living Australia [CSIRO] and the BirdLife Australia Birddata Atlas indicate an historic profile of **360 species of birds in the Shoalhaven.**

3.2 Of these, **61 species are on Federal and/or State Threatened Species Lists such that 1 in every 6 species of birds in the Shoalhaven is threatened. This “Threat” is of course with “Extinction”.**

3.3 **Of the 61 species 17 species in the Shoalhaven are on the Federal Threatened Species list.**

3.4 The Federal Government has created a special **post-bushfire list of threatened and other species that require assessment for fire impact. There are 17 bird species listed and of these 9 of the species occur in the Shoalhaven.**

3.5 **On Page 47 Protecting Environment must include context reference to existing challenges such as Threatened Species.** This is a theme that must be pursued especially in such sections.

3.00 URBAN HABITAT

3.10 With reference to Priority 3, Page 28, **BLS would comment that neighbourhood nature, trees, canopy and natural values are being seriously eroded by current provisions**, e.g. 45 degree rule, urban growth and development without a view to ‘protecting environment’, illegal clearing on development sites.

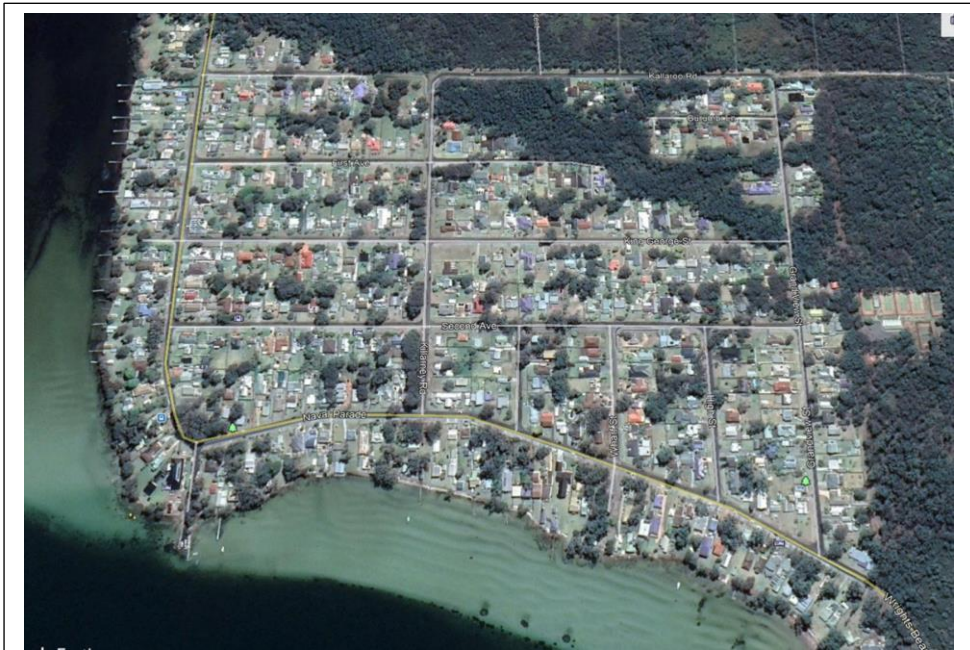
3.20 The urban environment is an important element of natural environment in all the elements BLS is suggesting must be recognized in combination. viz. habitat, corridor, biodiversity. It is quite apparent in some cases of growth and development in the Shoalhaven there is little thought for environmental protection.

3.30 The quality of the natural environment in this urban environment is well established as critical to the physical and especially mental well-being of residents and visitors alike.

3.40 One example of the serious deterioration in urban natural environment is provided in the following photos of Erowal Bay village in 2004 and 2018. BLS offers the urban tree profile of the Erowal Bay Village as an exemplar, which makes quite apparent the degree of tree removal, which identifies a major intrusion into one type of habitat which supports birdlife. If similar urban habitat intrusion was to occur in the life of the Strategy Plan 2040 document there would be few trees left. Will the document protect such habitat? Clearly, habitat, especially corridor and thus biodiversity has not been and is not being protected.



EROWAL BAY VILLAGE 2004



EROWAL BAY VILLAGE 2018

4.0 COMMUNITY ENGAGEMENT

4.1 The Strategy [Page 85] does not include any reference to and consultation with Shoalhaven Conservation Organizations, .g. BirdLife Shoalhaven, Native Plant Society, National Parks Association, many with links to state and national bodies. This will provide valuable perspectives and often local information and data not otherwise accessible or available. This should be considered as an essential part of community engagement.

5.0 OTHER RECOMMENDATION AND COMMENTS

5.1 Remove and Replace PHOTO FROM Page 11 of 'Off-Leash' dog with either on leash dog or no dog at all and just a couple. This would at least recognize that 'dogs on beaches' is a controversial social and environmental conundrum on Shoalhaven Beaches, certainly to shorebirds and threatened species. Any such illustration also needs to be chosen sensitively given recent events on Collingwood Beach.

5.2 Check and clarify reference to traditional name for Aboriginal Groups in "About The Shoalhaven". Recognition of the Jerrinja is missing and this is a tradition and history based community associated with the Jerrinja Local Aboriginal Lands Council, whose interests covers a large area of the Shoalhaven and who have a significant property portfolio that would be embraced by Planning provisions. A similar comment would apply to other Shoalhaven Lands Councils. Are the local Aboriginal representative groups satisfied with this grouping?

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Inbox

Council Email

Tue, Jul 21, 9:49 AM (22 hours ago)

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