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## **Objection to the Long Bow Point Golf course application (SSD 8406)**

### **1.0 INTRODUCTION**

**1.1** Birdlife Australia (BLA) is Australia’s largest bird conservation organisation with over 110,000 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.

**1.2** BirdLife Shoalhaven (BLS) is a branch of BirdLife Australia (BLA) with over 500 members and supporters. The major part of our charter is to advocate for the conservation of birdlife in the Shoalhaven. Lake Wollumboola has been a major focus in our work over the last five years. It is a site held in the highest esteem by our members. We have previously advocated and made submissions unconditionally opposing the development proposal for a golf course on Long Bow Point.

### **2.0 BLA ATTENDANCE AT THE PUBLIC MEETING AT CULBURRA BEACH**

**2.1** BLS is aware of the BLA submission to the IPC of 18 July 2018 and obviously supports its content. In speaking at the public meeting on 24 July 2018 at Culburra Beach, on behalf of Paul Sullivan, BLA CEO, the point was stressed that this is much more than just a local issue and that the global recognition of the importance of Lake Wollumboola as a Key Biodiversity Area (KBA) is fundamental to any discussion of the Golf Course.

**2.2** Lake Wollumboola has been identified KBA under criteria set by the International Union for the Conservation of Nature - the IUCN. The IUCN is composed of both government and non-government organisations and is the world's largest environmental network. It is the global authority on the status of the natural world and the measures needed to safeguard it. It is this organisation that set the Global Standard for Identification of KBAs. The Standard employs agreed scientific criteria to identify sites that contribute significantly to the global persistence of biodiversity. BLA applied the Standard to assess sites across Australia and identified just over 300 sites, including Lake Wollumboola. It is of only 300 KBAs in Australia determined by an international standard. It was identified in 2009 for its critical habitat and reliable feeding grounds for Black Swan and Chestnut Teal. Up to almost 14,000 Black Swan have been recorded, which is near 3% of the species' world population and much of their NSW South Coast population. The Chestnut Teal population is at times 4-5,000 birds, which is over 4% of the species' global population.

**2.3** As mentioned at the public meeting, Lake Wollumboola is also recognised as part of the East Asian Australasian Flyway. The Flyway is vital for the survival of internationally significant migratory birds. It provides habitat for species protected under Federal legislation and in international migratory bird agreements with China, Japan and South Korea.

**2.4** At the public meeting, points were raised on the benefits to the community and tourism potential of the golf course. What we could have raised is that Lake Wollumboola is a major drawcard for bird tourism. Bird groups from the Shoalhaven and visitors from the Illawarra, Sydney and further field frequently visit. This level of visitation and the quality of the experience would be compromised if the golf course development was approved.

### **3.0 BLS RECOMMENDATIONS**

**3.1 BLS totally supports the NSW Department of Planning and Environment's recommendation to refuse the golf course development.**

**3.2 BLS rejects the Long Bow Point Golf Course SSD 8406 and recommends that the Independent Planning Commission refuse it.**

## **4.0 SUPPORTING STATEMENTS**

### **4.1 BLS acknowledges the values and broader recognition of these values of Lake Wollumboola**

4.1.1 The complex natural and cultural asset the Lake and its catchment represents should not be put at risk by an incomplete golf course proposal.

4.1.2 The Lake is listed under Australian legislation and international migratory bird agreements as internationally significant habitat for migratory birds.

4.1.3 The lake is recognized also by Birdlife International and the International Union for Conservation of Nature as a globally important Key Biodiversity Area particularly for Black Swan and Chestnut Teal (refer above).

4.1.4 As well as a Key Biodiversity Area, Lake Wollumboola is also recognised as part of the East Asian Australasian Flyway (refer above).

4.1.5 Lake Wollumboola supports at least 106 bird species including nesting shorebirds, Federally listed migratory shorebirds, coastal and sea birds, water birds and raptors, with at least 20,000 counted on occasions. At least 23 of those bird species are listed as threatened under either NSW or Australian Government legislation.

4.1.6 The lake, sandbar and parts of its catchment are included in Jervis Bay National Park.

### **4.2 BLS has consistently rejected the Halloran golf course development proposal, recognizing that:**

4.2.1 Locating a golf course in the Lake Wollumboola catchment ignores consistent, long term expert advice and NSW Government policy that the Lake Wollumboola catchment especially Long Bow Point, is unsuitable for urban development and should be zoned for "Environment Protection." The natural surface and ground water runoff from Long Bow Point and surrounds, is critical in maintaining the Lake's water quality, its wetlands, aquatic environment and abundant wildlife.

4.2.2 The application fails to demonstrate that no adverse impacts on the sensitive ecology of the Lake would occur due to pollution of surface and ground water from golf course fertilisers, herbicides and pesticides.

4.2.3 It is unacceptable that potential impacts on the Lake and its wildlife were not assessed. In the absence of such evidence, a precautionary approach should apply, justifying refusal.

4.2.4 The Golf course would involve clearing 32.2 ha of high conservation value coastal vegetation, but its impacts on Threatened Ecological Communities and at least 65 Threatened Species of plants and animals would be more extensive. The many surveys conducted did not meet required standards.

4.2.5 The application under-estimates the likely impacts as it does not include a Club House, which would require a further development application.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Rob Dunn', is positioned above a faint, light-colored rectangular stamp or watermark.

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