



CLARENCE ENVIRONMENT CENTRE

29-31 Skinner Street

South Grafton 2460

Phone/ Fax: 02 6643 1863

Web site: www.cec.org.au

E-mail: admin@cec.org.au

Date: 10th July 2012

Deputation to Clarence Valley Council on proposed extension to the Anchorage Caravan Park

The Clarence Environment Centre acknowledges the efforts made by Council staff to ensure the retention of as much vegetation on the project site as possible. However, as identified in Council's Business Papers, and the DA itself, the most critical component of that forest, hollow-bearing trees, will likely be cut down for safety reasons.

In terms of Ecologically Sustainable Development, State planning laws, and the Clarence Valley Council Biodiversity Management Strategy, call for a no net loss of biodiversity outcome. We see no evidence of any offsets or plans to achieve this aim, and stress the point that any loss of vegetation will have a detrimental impact on all native fauna currently using the site.

The admission that the proponent did not undertake a full flora and fauna impact assessment because of cost considerations is unacceptable, given the significant number of threatened species identified as likely to occur. That list included Squirrel Gliders, which have recently been recorded living immediately adjacent to the park (NSW Wildlife Atlas). A comprehensive fauna survey could well lead to the need to undertake a Species Impact Statement.

The area to be cleared is core Koala habitat, as evidenced by the record of a breeding population. Because it appears the Clarence Valley Council's "Comprehensive Koala Plan of Management" has yet to be finalised (gazetted?), this triggers the State Environmental Planning Policy (SEPP) 44, requiring a Koala Plan of Management be prepared, something that has not been done by the developer. This would appear to be even more critical now that we learn the park is designated "pet friendly".

While it is no secret locally, the Clarence Environment Centre was, when making its original submission, unaware that the park welcomes pet dogs. The reason for that was because, other than a general acknowledgment that: "*Domestic dogs and cats prey on native fauna*", when assessing threats of the proposal to native fauna (Section 4), the Development Application made no mention of the fact that park visitors may actually have dogs on the site. We believe this was a serious and probably deliberate omission.

It now appears clear that another application before council to allow an adjoining portion of bushland to be used as an off-leash area for dogs, is directly linked, and has been supported by the Park management as an additional facility for its guests.

As stated in our submission to the off-leash proposal, the current status of the Koala population at Iluka is tenuous at best, and because the Koala is a relatively slow-moving animal it is highly vulnerable to dog attack, one of the main threats identified by the NSW Scientific Committee in its determination of the Koala as a threatened species.

In terms of cumulative impacts, we urge Council to consider the fact that there is also a proposal by the local Land Council to develop a large area of bushland in the immediate vicinity, where Koalas have also been recorded within the past year. We believe the loss of this bushland corridor will have a profound impact on all native fauna, not just Koalas.

I thank you for this opportunity to comment.

Yours sincerely

John Edwards

For Clarence Environment Centre.