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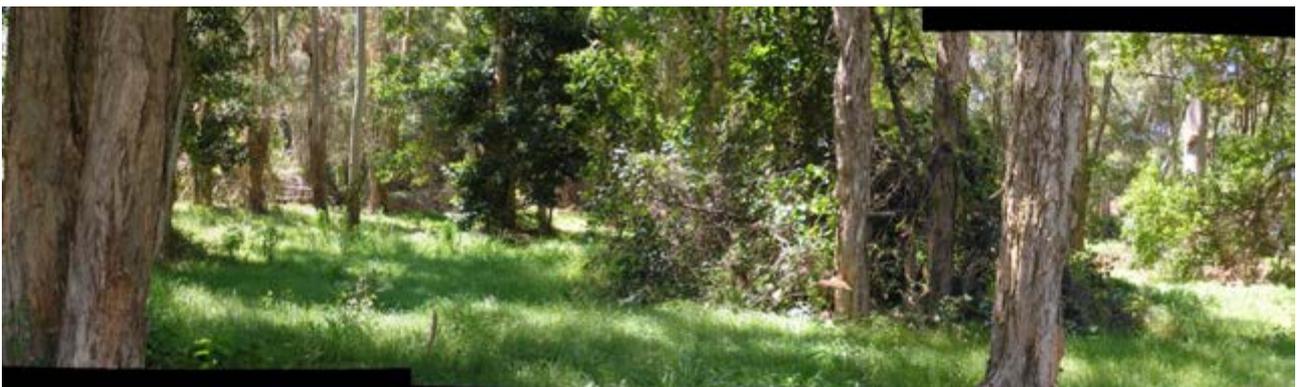
SUBMISSION

to

Development Application

No. 2011/0572

50 Site Extension of the Anchorage Holiday Park



Endangered Swamp Sclerophyll Forest Community - Site of proposed extension.

**Compiled by
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(Scientific licence - No 11209)
Honorary Secretary
20th October 2011**

Submission on Development Application No. 2011/0572 a 50 Site Extension of the Anchorage Holiday Park

Preamble

The Clarence Environment Centre has maintained a shop-front in Grafton for over 22 years, and has been closely involved with local environmental issues, particularly those relating to inappropriate development that results in unacceptable environmental impacts.

Introduction.

It needs to be noted that the exhibition document pertaining to DA 2011/0572 was not accompanied by any supporting documents, including the environmental impact assessment. The exhibited document only contained a note that stated the environmental impacts of the proposal were assessed as “minimal”. Presenting what we believe to be highly misleading information to the public, and inviting comment without providing the documents necessary to make an informed comment, is highly irregular. As it is, with only 3 days of the exhibition period remaining, that environmental assessment document is still not on exhibition, and we believe the entire exhibition period should be repeated as a result.

The Clarence Environment Centre was one of those respondents that failed, initially, to realise that all relevant documents were not provided, and armed only with a site plan that identified the presence of numerous trees, the removal of which would have to result in some ecological degradation, we undertook an independent assessment of the site.

Site description

Situated some 300m from the Clarence River, the entire site is coastal floodplain, with some areas possibly lying below sea level. The site is mostly forested with numerous old-growth Broad-leaved Paperbarks (*Melaleuca quinquinervia*) and various Eucalypts. Understory vegetation is patchy, mainly as a result of weed control measures that have seen collateral damage to native vegetation (see photograph at right, details below).



Weeds and native plants in this stack of vegetation in a cleared patch in the area proposed for the development

Extent of development

Trying to determine the full extent of the proposed park extension is not easy, as the boundary between Lots is not clearly defined. However, the the statement (page 3) that: *“The proposal will involve the clearing of several existing trees from the rear of the site that represent an unacceptable potential danger from falling limbs... ”*, is clearly misleading, and does not paint an accurate picture of the need to clear an existing old-growth forest community.

Certainly, the construction of a network of 6m wide sealed roads, leaving only 1m between sites that are only big enough to accommodate a single caravan, will leave little room for any existing trees.

Flora assessment

Weeds are a problem in bushland adjoining the urban fringe of Iluka, mainly due to the irresponsible dumping of garden waste. Despite clear efforts at control, the site still contains a significant number of exotic species. Among those found during a very cursory investigation were:

<i>Ambrosia artemisiifolia</i>	<i>Asclepias curassavica</i>	<i>Cinnamomum camphora</i>	
<i>Hydrocotyle bonariensis</i>	<i>Ipomoea cairica</i>	<i>Lantana camara</i>	
<i>Ochna serrulata</i>	<i>Persicaria capitata</i>	<i>Persicaria capitata</i>	
<i>Protasparagus plumosus</i>	<i>Schefflera actinophylla</i>	<i>Senna pendula</i>	<i>Tecoma stans</i>

However, that cursory flora assessment also identified the following native species:

<i>Acacia disparrima</i> **	<i>Breynia oblongifolia</i> **	<i>Carex fascicularis</i>
<i>Casuarina glauca</i> **	<i>Commelina cyanea</i>	<i>Cupaniopsis anacardiodes</i> **
<i>Cyperus eglabosus</i>	<i>Cyperus sphaeroideus</i>	<i>Dianella caerulea</i> **
<i>Dicondra repens</i> **	<i>Eucalyptus seeana</i> **	<i>Ficus coronata</i>
<i>Geitonoplesium cymosum</i> **	<i>Glochidion ferdinandi</i> **	<i>Hydrocotyle pedicellosa</i>
<i>Hydrocotyle peduncularis</i>	<i>Hypolepis muelleri</i>	<i>Juncus sp.</i>
<i>Livistona australis</i>	<i>Maclura cochinchinensis</i> **	<i>Melaleuca quinquinervia</i> **
<i>Morinda jasminoides</i> **	<i>Parsonsia straminea</i> **	<i>Polyscias elegans</i>
<i>Smilax australis</i> **	<i>Viola hederacea</i> **	

** = Indicative species of Endangered Subtropical Coastal Floodplain Forest Community

Being a floodplain forest, the proposed development site is almost certainly an Endangered Ecological Community (EEC). Our finds showed that of the 26 species identified on the day, at least 16 are included on the NSW Scientific Committee's list of indicative species for the Endangered Subtropical Coastal Floodplain Forest Community

We were confident a comprehensive survey would undoubtedly add to that list and in fact, when we finally obtained the Ecological Assessment we find these additional indicative species listed:

<i>Lomandra longifolia,</i>	<i>Eustrephus latifolius,</i>	<i>Entolasia stricta,</i>
<i>Imperata cylindrica,</i>	<i>Smilax glycyphylla,</i>	<i>Laxmannia gracilis,</i>
<i>Centella asiatica,</i>	<i>Hibbertia scandens.</i>	<i>Elaeocarpus reticulatus,</i>
<i>Desmodium rhytidophyllum,</i>	<i>Glycine clandestina,</i>	<i>Hardenbergia violaceae,</i>
<i>Kennedia rubicunda,</i>	<i>Pratia purpurascens,</i>	<i>Stephania japonica,</i>
<i>Corymbia intermedia,</i>	<i>Eucalyptus grandis,</i>	<i>Eucalyptus tereticornis,</i>
<i>Notelaea longifolia,</i>	<i>Persoonia stradbrogensis,</i>	<i>Alphitonia excelsa,</i>



The mixed Paperbark - Eucalypt Forest at the proposed development site.

We believe the impressive total of 37 indicative species in less than 2 hectares makes it safe to conclude that the community is the Subtropical Coastal Floodplain Forest EEC, and as such the proposed development should require a full species impact statement.

However, in describing the mixed Eucalypt – Stringybark forest on the site, the Flora and Fauna Assessment has overlooked the more recently described forest types that were determined to be Endangered Communities in 2004, and instead chose to attempt matching the site's community with two forest types described in the 1990s for the Regional Forest Agreements, claiming it to be a mix of Forest Ecosystem 112 (Paperbark) and Forest Ecosystem 26 (Coastal Flooded Gum).

We believe James Warren and Associates would have been fully aware of the endangered coastal floodplain communities, but chose to ignore them.

Potential Fauna Habitat

As many of the existing trees on the site are hollow-bearing, they will currently provide nesting, foraging and roosting habitat for a wide range of tree-hollow dependent fauna.

The DA admits (page 5) that *“The proposed extensions will result in the loss of vegetation for construction of access roads, cabins, caravans/ camping sites and amenities”*. then adds that *“large Eucalypts that pose a risk to the safety of people and property will be removed”*.

Contrary to statement to the contrary, we believe some Eucalypts contain hollows **The removal of hollow-bearing trees is a Key Threatening Process under the Threatened Species Conservation Act.**

Seven threatened microbat species, the Brush-tailed Phascogale, Masked, Barking, and Powerful Owls, Glossy-black Cockatoo, Squirrel and Yellow-bellied Gliders, are all tree-hollow dependent, and all are known to occur within a 10km radius of the site. Despite acknowledging that suitable habitat occurs for many of those species, no targeted surveys, including spotlighting, trapping, and the use of ultrasonic call detection devices for microbats, were undertaken.

While the threats to a comprehensive list of threatened Flora and Fauna, known to occur within a 10km radius of the proposed development have been assessed, we believe that assessment has, in many instances, been cursory, and potential impacts significantly understated.



For example, the presence of significant numbers of recognised Koala feed tree species, suggests that the site is core Koala Habitat. Those species include Narrow-leaved Red Gum (*Eucalyptus seeana*) (listed as a primary feed species on the Koalas in Care website), Flooded Gum (*Eucalyptus grandis*), and Broad-leaved Paperbark (*Melaleuca quinquinervia*) (both identified in the Coffs Harbour Koala Plan of Management as preferred koala feed species).

There are recent records of a breeding population of Koalas in the Iluka vicinity (WIRES)(female with young), and the Clarence Valley WIRES wildlife carers' group has historic records of Koalas actually occurring on the site of the proposed development . Therefore, we claim Koalas are highly likely to use the site, particularly as it is part of a forested corridor that links the Bundjalung National Park with the Iluka World Heritage rainforest (see below). We also believe that the claim that: “it is **possible** that this species utilises the site...”, greatly understates the importance of the site as Koala habitat, and the site is core Koala habitat which should trigger SEPP 44 of the EP&A Act.

Other examples

Barred Cuckoo-shrike

While the Barred Cuckoo-shrike's preferred habitat, “rainforest, eucalypt forests and woodlands, clearings in secondary growth, swamp woodlands and timber along watercourses”, closely matches the site's vegetation, the fauna assessment determines that: “*Suitable habitat for this species (i.e. abundant fruiting species) is not considered to occur on the subject site*”.

Apart from the fact that the Barred Cuckoo-shrike has a mixed diet of fruit and **insects**, the flora species list includes several suitable fruiting species such as the Strangler and Sandpaper Figs.

Clearly, the site contains ideal habitat for the Barred Cuckoo-shrike, so the “likelihood of occurrence” should read “possible” at the very least.



Grey-crowned Babbler

We believe the assessment that the site does not have suitable habitat for the Grey-crowned Babbler is erroneous. Babblers inhabit forest fringes and prefer rough-barked species where they feed off insects under the bark.

Babblers have a wide home range. and have been recorded in the vicinity. There is a high possibility that they would utilise the habitat on the site.

Hoary Wattled Bat

The “Threatened Species of the Upper North Coast of NSW”

states that “*In north-east NSW, it (the Hoary Wattled Bat) reaches the Lower Clarence and Richmond River areas, extending from near Murwillumbah in the north to between Grafton and Coffs Harbour*”. However, the assessment selectively quotes from that booklet, deleting all reference to the lower Clarence, claiming: “... *its range extends from Murwillumbah to between Grafton and Coffs Harbour*”. They then manipulate the habitat description by stating: “*It occurs in open forest, favouring forests dominated by Spotted gums, boxes and ironbarks*”, eliminating the additional habitat description that includes “*healthy coastal forests where Red Bloodwood and Scribbly Gum are common*”.

While not dominated by the nominated species, the site clearly contains healthy coastal forest which, does contain other Bloodwood species, and clearly the assessment that the species is unlikely to occur at the site, is questionable. The fact that no attempt to determine if any microbat species occur at the site, adds to the general failure of the consultant to adequately assess the full impacts of the project.

Rose-crowned Fruit-dove

Despite acknowledging that the Rose-crowned Fruit-dove occurs in moist Eucalypt forest and swamp forest, the consultant assesses the occurrence of the species at the site as unlikely, because there is no suitable "*abundance of fruiting species*". "Threatened Species of the Upper North Coast of NSW" explains that the Fruit-dove feeds entirely on "*fruit from vines, shrubs, large trees and palms*", and they are "*thought to move locally as they follow the ripening fruits*".

As there are palms, figs and fruiting vines present at the site, there is no reason why the doves would not occur. Again we believe that, given their having been recorded in the nearby World Heritage area, the species should be acknowledged as likely occurring at the development site when fruit is available.

Spotted-tailed Quoll

The Spotted-tailed Quoll has a large home range, and has been recorded in the vicinity. Therefore the assessment's acknowledgment that the Quoll also "*inhabits a range of habitats a range of habitats including dry and moist sclerophyll forests, woodlands, coastal heathlands and rainforests*", makes it difficult to understand how the consultant can conclude that the Quoll is unlikely to occur at the site because "*suitable habitat is not considered to occur*". This assessment is further seen to be questionable when we know that Quolls have often been known to live close to human habitation, even to taking up residence in sheds.

Therefore, once again we believe the consultant has understated the potential impact the proposal could have on the Quoll.

Threatened frogs

Despite undertaking no targeted frog survey, the James Warren ecologist/scientist asserts, that: "*Due to a history of disturbance from clearing activities, the majority of the subject site is likely to provide habitat for commonly occurring frog species only.*" We can think of no scientific reason to assume that threatened frog species, at least two of which would find the habitat suitable and are known to occur in the vicinity, would not utilise the habitat on the site, particularly in wetter periods.

Habitat connectivity

According to the NSW Scientific Committee, in determining hundreds of native flora and fauna species are headed for extinction if threats are not addressed, has identified the most damaging of those threats as land clearing and the fragmentation of bushland and forest habitat.

The site of the proposed park extension at Iluka forms a part of an important extant forested corridor joining the Bundjalung National Park in the north, to the southern section of Iluka's world heritage listed littoral rainforest (see below). We believe the proposed development will remove a 200 metre section of that corridor, and the impact of that disconnection has not been addressed.



The above GIS ArcView image above, shows the Iluka strip lying between the Clarence River on the left and the Pacific Ocean on the right. The light green areas are the Bundjalung National Park at top and the world heritage Iluka reserve on the right. The caravan park is outlined in red and the forested area to be removed for the extension is clearly visible, as is the vegetated corridor squeezed between urban development and the pale cleared area which is the golf course. The darker patches in the native forested area denotes old growth patches which are also clearly visible on the development site.

In conclusion

We believe the site contains an endangered ecological community, and the consultant accedes that one threatened species is **likely** to utilise the site, and 16 others would **possibly** occur. Add to that the five species we have identified as likely to utilise the site, for foraging, roosting or nesting, this means the vegetation that the developer proposes to destroy, is suitable habitat, which could be utilised by as many as 23 threatened species. The number of unlisted species that might rely on the habitat is unknown, but would be significant.

Therefore, some serious thought should be given by Council before approving this proposal

Yours sincerely
John Edwards
Honorary Secretary.