

**The Clarence Environment Centre's deputation
to Iluka Anchorage Holiday Park DA. 9th April 2013**

**Delivered to Council on site
by John Edwards**

Eighteen months ago, when this proposal was first exhibited, the Clarence Environment Centre was highly critical of the lack of ecological survey effort, and the assertions made in relation to environmental impacts. Nothing has changed.

But first I'd would like to reinforce the fact that this is a floodway, a natural drainage line, and the proponent plans to block it with 1.2m of fill, channelling the storm water through the narrow strip they have offered as a wildlife corridor. I'd also like to point out that the far side of this floodway was extensively filled to extend the Sovereign St development, but I'll leave it to others to comment on the flow-on consequences of blocking this drainage line.



The subject site during wet weather.

It's also worth noting that to mitigate the removal of extensive bushland for the Sovereign St proposal, the consultants identified this bushland here as a wildlife corridor. Now, that same consultant claims that the removal of up to 75% of the remaining corridor will, and I quote, "*make a very minor contribution towards the loss of habitat in the region*". How many times have we heard that? Every year there are thousands of DAs across the region, all making the same claim. The cumulative impacts are enormous but are never assessed.

It must be understood that virtually all remnant floodplain vegetation in NSW is now an endangered ecological community, and protected by law. So despite previous degradation of the site, tree removal, and dumping of old caravans and other waste, this site nevertheless retains high conservation values.

Here we have an old growth remnant, forming part of a critical wildlife corridor between the national park and world heritage areas. It contains trees with hollows, without which many of our threatened fauna cannot survive, including the Squirrel Gliders that are known to live here. Despite proposing to leave two clumps of Melaleucas, and a 25m wide buffer as wildlife habitat, the proponent plans to cut down all the hollow-bearing trees for safety reasons. A disaster for the resident Gliders.



A fallen limb from an old-growth Eucalypt with a perfect hollow for Gliders to nest in. The consultant claimed there were no "obvious" trees with hollows, but acknowledged that all old Eucalypts at the site will be removed for safety reasons.

On page 7, we learn that, and I quote, “*The application is not supported by Council's Environmental Officer*”, and it is clear why. This proposal comes nowhere close to meeting the aims of Council's Biodiversity Management Strategy.

There is no overall net gain for biodiversity, in fact there is a significant loss, nor does it meet the Strategy's aim to protect areas of native vegetation. The proposal will virtually sever the existing wildlife corridor, despite the Strategy emphasising the need for habitat connectivity, with aims to establish a network of corridors linking areas of native vegetation, and to ensure the viability and function of those corridors are not reduced.

Rather than providing for the protection of EECs, another aim of the Strategy, this proposal seeks to destroy more than 75% of it. It does not protect the habitat of threatened fauna, in fact it will destroy all habitat for hollow-dependent species, and bury much of the remaining habitat beneath a metre of dirt, bitumen and concrete.

Removing all the large Eucalypts, and most of the shrub and ground layer vegetation does not meet the Strategy's aim of “*no reduction in the extent of native species abundance*”. The Strategy also requires offsets to compensate for unavoidable habitat loss. Far from Council insisting on offsets, we have a situation here where part of an adjoining publicly owned reserve may well have to be cleared to provide bushfire protection for the proposed extension, while other areas of the Council reserve is to be set aside as an off-leash dog area for the convenience of visiting pet owners.

Rather than take note of their own environmental officer's assessment, Council's planners have accepted the consultant's erroneous claim that “*the vegetation on the site is not considered to be important*”. They also accept an assurance of vegetation management for the next 20 years, something that is entirely meaningless and unenforceable.

Another erroneous claim is that the, “*subject site does not comprise core Koala habitat.*” However, under the State Environmental Planning Policy 44, reliable records of breeding Koalas, and NSW Wildlife Atlas records showing Koalas at this site, automatically defines this as core habitat.

Clarence Valley Council's Koala Plan of Management lists “Forest Red Gum as a primary feed species, and Flooded Gum, Pink Bloodwood, and Broad-leaved Paperbark as secondary feed species. As you can see, the subject site is dominated by those species and all 4 have been recorded at the site by the consultant. The Coffs Harbour Koala Plan of Management also identifies these species as Koala feed trees.



Virtually all trees pictured here, predominantly Flooded Gum, Red Gum and Broad-leaved Paperbark, are all listed as Koala feed trees in Council's Koala Plan of Management.

Our submission made the point that because of the potential impacts on Koalas, the proposal should be referred to the Federal Department of Environment, for consideration as a controlled action. That was about 6 months ago.

Council's response was to seek advice from the Minister, giving him 21 days to respond or Council would proceed with the approval process. As if the sheer cheek of giving a Minister 3 weeks to respond isn't enough, that letter was posted on Christmas eve, knowing full well there was zero likelihood of receiving a response before the 14th of January deadline.

If Councillors wish to familiarise themselves with the full range of environmental impacts identified by the Clarence environment Centre, I recommend they read the Centre's November, 2011 submission which can be found on our web site. Therefore, under the circumstances, we strongly believe that this DA should not be approved.

Finally, in a move we see as directly linked to the holiday park, there is also a proposal to allow the adjoining Council reserve to be used as an off-leash area for dogs, something which will clearly benefit this pet-friendly facility.

It is a well-known fact that dogs and wildlife don't mix, particularly slow-moving species such as water birds and Koalas, with dog attack being the third largest cause of Koala mortality behind disease and road kill.



This is the prime wildlife habitat that is at stake

To solve that, there is a proposal to fence off the area, presumably at rate-payer's expense, further restricting Koala movement, and preventing their escape in the event that they inadvertently find themselves inside the fence. Again we believe this site is an inappropriate choice, given its proximity to native bushland and the national park, when a preferable fauna safe alternative has been identified.

John Edwards, for Clarence Environment Centre.