



WILDLIFE RESCUE SOUTH COAST Inc

(formerly Native Animal Network Association Inc)

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NPWS Licence No: MWL000100253

18th December 2012

The Director General Planning
Att: Heather Wharton
Dir Metropolitan Projects North
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam

RE : Application No. 06_0135
Integrated Tourist & Residential Development, Comberton Grange, **Nowra NSW.**

Members of the Wildlife Rescue South Coast Inc. (WRSC) object to the development proposal outlined above.

Wildlife Rescue South Coast (WRSC) is licensed under the NPWS Act to rescue, rehabilitate and release injured and orphaned native wildlife. The WRSC area covers from Gerringong, the South Coast, and the Far South Coast to the Victorian border and has been operating in these areas for over 20 years.

WRSC members believe in the necessity to work for protection of habitat for Australia's wildlife, with the knowledge that it is vital to ensure maintenance of their habitats for their ongoing sustainability. The numbers of wildlife injured and orphaned in the local area is growing and at times difficulty is found releasing rehabilitated wildlife back to natural areas, as those areas are decreasing rapidly with ever increasing development.

Members of WRSC have been shocked at the number of Threatened Species found on the site and question the ability of the Shaolin developers to ensure no impacts occur. One or two species could be handled appropriately but when there are at least 14 **Threatened Species (fauna)** noted, the difficulty becomes insurmountable.

Wildlife cannot survive these onslaughts of development, the losses of habitat and tree removal or the impacts of human populations with all the trappings of urbanisation.

WRSC members question why the proposal has been allowed to get this far without realising or noting so many native fauna species on this site. Surely it is their responsibility to ensure ongoing habitat and survival for these species.

Fauna Species - WRSC Point - Inadequate Assessment, too varied for this proposal.

The Gang Gang cockatoo is listed as ***Vulnerable on the NSW species lists*** and is known to inhabit local surrounding areas close by the Shaolin site and has been included in fauna studies.

The Gang Gang cockatoo lives in eucalypt forests and heavily wooded areas of south eastern Australia. It has become well known for its remarkable tameness when feeding among branches. They return each day to the same tree until the food there is exhausted. They feed mainly on the seeds of native shrubs and trees, including eucalypts, acacias, cassuarinas and cypress pine and have also been seen on *Persoonia* species.

While the area may not be used for breeding, destruction of the bushland will impact greatly on this wonderful bird.

WRSC members also believe this section of land holds the most diverse and plentiful Australian native creatures on the South Coast of NSW, WRSC members do not differentiate between threatened or non listed species, all wildlife is precious and must be protected.

Hot Spots - WRSC Point – Must be Protected!

We would like to refer your attention to statements by Professor Norman Myers concerning “biological hot spots” and the important role they play in our environment.

Professor Myers is Honorary Visiting Fellow of Green College, Oxford University as well as visiting Professor of many other universities. He is well respected and his knowledge, we believe has been used by Australian Governments on previous occasions. Professor Myers has stated that there are only five countries in the world with more than one of these vitally important “biological hot spot”. It appears Australia has two, one in Western Australia and the forests of the East coast of NSW. *Forests on the Shaolin site!*

It would be sad to see the demise of yet another of these “hot spots”. WRSC members believe every effort should be made to protect the natural areas remaining on our coastline containing habitat for Australia’s wonderful wildlife.

Threatened Species - WRSC Point - Not enough Protection!

The proposed Shaolin environmental study has detected 14 fauna species listed as Threatened. Some are nationally Threatened.

As stated previously the ability to minimise impacts must lessen with the extra numbers of species found.

We would request that a ban on cats be placed on this site as was included in the Stockland Vincentia development plan although this ban could not be policed by Shoalhaven City Council or other government agencies. The idea is a good one but requires definitive follow up and legislation to ensure it can be implemented. Finances are required to carry out this ban.

The list of Threatened species goes on and with each one, it is clear they cannot be adequately protected. The numbers are too great to expect there to be NO IMPACTS on these threatened species, such as:

Glossy Black cockatoo, black bittern, masked owl, powerful owl, Eastern pygmy possum, Southern Brown bandicoot, Grey headed flying fox, Fishing bat, Eastern falsistrelle, Eastern freetail bat, Yellow bellied glider, sheath tail bat, Large bent wing bat, Large-eared Pied bat, etc etc.

Again – the number of wildlife and biodiversity of this wonderful bushland does not allow for such an inappropriate development. It is apparent given the quality of this bushland that there are other undetected species on the site.

WRSC MEMBERS OBJECT TO THIS PROPOSAL AND WISH TO REITERATE TO THE MINISTER THAT TOTAL PROTECTION FOR OUR WILDLIFE IS REQUIRED.

Total protection can only be achieved if the land is donated to the National Estate for community use.

It is understood that Jervis Bay **and its catchment** are listed on the Register of the National Estate, registered because of its environmental value.

The only complete protection of our wildlife and sensitive coastal bushland is for the whole site to be donated to the community through the National Estate (Federal body).

The area proposed by the Shaolin development to be donated to NPWS would not successfully protect any species due to the close proximity of suburbia surrounding the area and the introduction of domestic pets and all the trappings that come with human habitation.

Habitat Corridors - WRSC Point – Corridors Must be Retained.

The subject site at Currumbene Creek forms part of an important habitat corridor system and as such should be protected. Losing this part of the corridor will see the flora and fauna species divided.

Wildlife needs habitat corridors for their survival!

This is an important issue and must be assessed!

Australian Wildlife (not just Threatened Species) are suffering and just clinging on in coastal areas due to ever-encroaching developments and loss of bushland and habitat.

It is for these reasons that WRSC must lodge objections to the Shaolin proposal.

Holistic Assessments - WRSC Point - Cumulative Impacts Need Assessment.

While the Shaolin site will critically impact on the wildlife in our area, there are other problems occurring which must be taken into consideration with this application.

The Stockland/Woolworths development at Vincentia in the near vicinity has added a greater impact to our former abundant Australian wildlife and has been a disaster.

It is apparent that approval for this additional proposals will see another major change to the area and have further disastrous impacts on our wildlife.

WRSC members request the Minister look at cumulative impacts while assessing the Shaolin development.

SUMMARY

Members of Wildlife Rescue South Coast have raised many concerns over this proposal and believe the development is inappropriate for such a diverse and biological hot spot area.

There are too many fauna species on this site to ensure adequate protection is given if this development application is approved. **Too many Threatened Species** not to have negative impacts on their sustainability.

Retaining habitat corridors is vital for the continuing sustainability of Australian wildlife (those listed as Threatened or those not Threatened). They must not be fragmented!

Cumulative impacts **MUST** be taken into consideration with the Shaolin proposal.

Suggestions should be made to Shaolin developers that it would be financially viable to donate the whole property to the National Estate for community use.

WRSC requests the Minister receive and note our objections.

Thank You

Yours faithfully

Jenny Packwood
Secretary