

Alan Moroney - Submission for MP10_0084 Coal and allied Development at Gwandalan

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Date: 20/12/2010 9:14 AM
Subject: Submission for MP10_0084 Coal and allied Development at Gwandalan

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Date: 17.12.2010

Director, Strategic Assessments,
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GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam,

Re State Significant Site and Concept Plan Proposal MP 10_0084 Gwandalan

We object to this proposal for the following reasons:

This development breaks every rule of good planning as stated in the State Government's own planning protocols and has been allowed to be submitted ignoring their own sustainability criteria.

Development should occur along transport corridors, work should be accessible in the near vicinity, infrastructure should be planned for and outlined in the strategies and the social impacts should be viewed holistically.

This development fails every criteria listed.

The area was not identified for urban development but, instead, deemed to be of such high conservation value that little to no development should occur on the site and Wyong Shire Council had no plans for any development to occur on this site. The site was placed into the Lower Hunter Regional Strategy from the Central Coast after the exhibition period with no ability to object. There is little, to no, work in the immediate vicinity of the development. The housing development by Coal and Allied will only bring housing not industry or work except during the construction stage.

Development should be around major centres and transport corridors and be 800m from a station or transport node.

Gwandalan is remote, over 19 kms from the nearest major shopping centre and there is only one entry/exit road to the highway which is very winding.

This will not change markedly for another decade or two. The release of the North Wyong Structure Plan identifies this area for urban release in the 'long-term' which, according to the document, is after 2020. The quantum of 626 housing blocks could easily be found in other, already developed parts, of Wyong Shire and would be a wise offset to retain this vital flora and fauna corridor as part of a National Park and the 'green corridors and linkages' identified in the North Wyong Structure Plan.

Virtually all of the people who work will travel by car further adding to the green house gas emissions we are trying to bring down. No-one is going to take a bus that takes 74 minutes to get to Morisset station when a car trip takes more than 30 minutes.

Currently 53% of the population travel to work by private vehicle. Extrapolating this and applying it to the Coal and Allied development we arrive at the following figures.

The development will increase the housing in Gwandalan by 492 dwellings.

Each dwelling will house an estimated 2.6 persons giving us a population of 1 279 on the Coal and Allied site.

If the present pattern of work travel applies, 53% of these new residents will travel to work by private vehicle. If the average round trip for work is 50km, the daily distance travelled = $678 \times 50 = 33,900$ km per day.

When 1 litre of petrol is burnt 2.34 kg of Carbon Dioxide are produced. (figures supplied by John Maine)

At an average rate of fuel consumption of 10km/L, a further 7932.6kg of Carbon Dioxide will be expelled into the atmosphere each day on one round trip per day per household. This would be 2 895.4t of Carbon Dioxide annually without all of the incidental travel incurred by the residents.

At a time when we need to urgently reduce our carbon emissions this is surely pure folly.

The only entry/exit road will be placed under stress by the increased traffic brought about by these two large developments. The road is narrow and winding and has had a number of serious accidents.

1. Environmental Sensitivity

There are a plethora of compelling environmental grounds for complete rejection of this proposal. This is the only piece of native bushland left that runs from the coast to the lake along the entire coast of New South Wales, there are no more.

There appears to be no more further environmental studies done since this development was last exhibited.

There has been an inadequate flora and fauna survey (Kahlyd Brown 2008).

One example of this is the endangered *Cryptostylis hunteriana*, a leafless tongue orchid. The survey by Harper Somers O'Sullivan was not conducted when the orchid would have been visible. The Gwandalan site would lose up to 60 ha of scribbly gum woodland which is a major habitat for these orchids. The *Cryptostylis hunteriana* has been raised as an issue for the Wallarah Peninsula, and has been recently recorded near Gwandalan and Catherine Hill Bay during late 2007. Previously, population size and habitat on the Central Coast had been detailed in Bell (2001), highlighting the most commonly encountered habitat for the species as Coastal Plains Scribbly Gum Woodland.

There has been a new species of orchid discovered on site that is yet to be named.

Extract from Bell 2008 report:

Coastal Plains Scribbly Gum Woodland is renowned for the diversity of significant orchid species present there. Threatened species such as *Cryptostylis hunteriana* (TSC Vulnerable), *Diuris praecox* (TSC Vulnerable), *Microtis angusii* (TSC Endangered), and *Genoplesium insignis* (TSC Vulnerable) are all present in this habitat. Several currently undescribed taxa also occur here, including *Diuris* sp. aff. *alba*, *Thelymitra* sp. aff. *purpurata* and *Diuris* sp. aff. *chrysantha*. It is also important in the conservation of *Acacia bynoeana* (TSC Endangered), *Angophora inopina* (TSC Vulnerable) and *Tetratheca juncea* (TSC Vulnerable) (Bell 2001; Bell & Driscoll in review).

The significance of Coastal Plains Scribbly Gum Woodland lies not in the 65ha that will be

potentially lost, but in the habitat provided for threatened plant species, including several undescribed orchid taxa.

Criticism has been given in relation to the surveys done by Coal and Allied for the fauna, with surveys being conducted in July, 2007 which is the coldest month of the year. There was only one trapping line located within the entire development site and this was considered inadequate by ecological professionals who made submissions to the Department of Planning. The vegetation in the Gwandalan site would certainly contain the appropriate flowering trees for fauna to be present in the area.

Crangan Bay is the last unspoilt pristine bay on Lake Macquarie. It is the only remaining undeveloped bay left on the entire foreshore of Lake Macquarie. The land has had extensive underground mining and is honeycombed across the site. The surface, however, has never been despoiled. There is our only sea-eagle nest in the bushland at Crangan Bay.

This development site will create fine silt run off into the bay. This fine silt cannot be filtered out. It will cover the sea grass bed which stretches almost the entire length of Crangan Bay.

Although Coal and Allied say they are using the best practice for drainage there is great potential for this development to cause problems to sea grass beds in Crangan Bay as they cannot filter out dissolved contaminants. Coal and Allied are planning to run stormwater drainage off the roads into the wetland at Strangers Gully. This and the proximity of people and domestic pets will destroy the wetland.

This is the final bay that all native flora and fauna can access and flourish without human intervention.

This development will cause environmental degradation on the South Wallarah Peninsula of the wetlands, the seagrass beds, the fragmentation and destruction of habitat and corridors for native wildlife and flora, some of which are endangered.

The Strangers Gully wetland will be seriously damaged and degraded by the directing of storm water run-off into the wetland and the wetland will be affected by edge effects as the riparian area is 50m or less across over two-thirds of the site.

At Gwandalan, most drainage lines support the EEC Swamp Sclerophyll Forest on Coastal Floodplains and some will be impacted upon directly by the proposed development. Urban runoff, stormwater detention basins, pollution, weed invasion, increased human access and rubbish dumping will inevitably occur as a result of the proximity of urban dwellings

The area contains threatened, vulnerable and endangered species of flora and fauna and habitat.

Some examples are *Angophora inopina* (Mr Stephen Bell, Cunninghamia, 2003) *Tetratheca juncea* (endangered), the Eastern Pygmy Possum and Swift Parrot, *Lathamus discolor* (endangered), Grey-headed Flying Fox, *Pteropus poliocephalus* (vulnerable), Regent honey-eater, *Xanthomyza Phrygia* (endangered), Glossy Black Cockatoo, the Powerful and Masked Owls (Dr Rod Kavanagh, Emu 1995). The Powerful Owl requires a habitat range of 2 000 ha. The flora and fauna has become unique to this area.

Best practice planning principles state the Precautionary Principle should be evoked and that there should be as much on site mitigation for sensitive environmental issues as possible. This site has none.

The proposed development must be seen in conjunction with all of the other Part 3A developments around Lake Macquarie and their cumulative detrimental environmental effect.

Tetratheca juncea, commonly known as Black-eyed Susan, which is an endangered species of flora, is located on the Rose Group development at Gwandalan and will be extinguished on site, it is also found on the Johnson Property Group/Seventh Day Adventist site at Cooranbong on the western side of Lake Macquarie and on the proposed development site for Coal and Allied. On the Coal and Allied site, it is proposed to remove 3500 plants which will conserve only 66%. This species has a C1 ranking (critically threatened) in the Response to Disturbance of Forest Species report (Environment Aust. 1999) with a conservation target of 80%. The cumulative effect of the removal of at least these three sites will affect the species existence. Similarly, *Angophora inopina* which has a C1 ranking (critically threatened) with a 100% conservation target in the Response to Disturbance

of Forest Species report (Environment Aust. 1999) is to have 54 trees removed and another 644 will be put at risk along Kanangra Drive due to edge effects. *Angophora inopina* is also found at the Cooranbong site.

Similarly, the Rose Group development at Gwandalan will cut a wildlife corridor and lead to species extinction in the view of Wyong Shire Council officers (Assessment Panel review meeting, Catherine Hill Bay, 2007). This development also restricts fauna movement and threatens their habitat. Wildlife corridors are also being cut or built up to on the developments by the Rose Group and Coal and Allied at Catherine Hill Bay.

The proposed 194ha being handed over to conservation will not protect the flora and fauna under threat across the sites.

The fact is that these sites currently have no development so there is no net gain for any species only a net loss of their habitat. The removal over the Coal and Allied 75 ha development site of up to 60 000 trees is a serious concern for climate change and protection of habitat for the squirrel glider particularly with the removal of hollow-bearing trees that take hundreds of years to develop. Trees on this site have been dated at 1 000 years old.

The land being placed in conservation is the more disturbed and degraded site.

A report entitled Wallarah Conservation Assessment of Lands (Department of Environment and Conservation NSW) states that the underlying principle of conservation is to maintain connectivity between habitats. Habitat fragmentation strongly influences ecosystem components and processes. Landscapes of the south Wallarah Peninsula are heterogeneous and currently have high levels of interconnectivity.

The habitats between Munmorah and Lake Macquarie SCAs and generally between Chain Valley Bay and Crangan Bay are considered to be of highest significance to the Squirrel Glider and Masked Owl (Smith et al 2002). Coastal habitats are now considered the stronghold of the Squirrel Glider in NSW and the population of Squirrel Gliders in the Northern Wyong and Southern Lake Macquarie area is the largest known in NSW (Smith 2002). These animals are territorial and will die if their bushland homes are destroyed. The area contains summer flowering eucalypts and winter flowering banksias which provide an important habitat for nectar feeding animals such as the Squirrel Glider. The area proposed for development is Dry Open Forest/Woodland and within the site is Strangers Gully which is a significant wetland that supports aquatic fauna such as the Wallum Froglet (threatened in Wyong Shire).

The site contains four threatened plant species and nine threatened fauna species. It also contains four state listed endangered ecological communities and five of the vegetation communities are considered to be naturally rare, <1 000ha extant within the Lower Hunter and Central Coast REMS region.

High diversity of small to medium mammals is considered highly significant given the location of the study area between two large urban centres.

“It is the position of the DEC that the South Wallarah study area is of extremely high conservation value and that development opportunities across the site are limited due to the potential for incremental habitat loss and fragmentation.”

The cumulative effect of the Part 3A developments, some approved, others in the process, by the Rose Group and Coal and Allied at Gwandalan and Catherine Hill Bay, Coal and Allied at Nord's Wharf and another development by Johnson Property Group at Trinity Point, Morisset Park and north Cooranbong, all in the southern half of Lake Macquarie, cannot be under-estimated and these developments should be looked at in their totality and not in isolation.

This development should not proceed in any form. If the land is zoned E1 National Parks and Nature Reserves it could be dedicated to the state for protection of its unique environment. Remember this is the only remaining buffer of virtually undisturbed bushland that connects the ocean with the lakeshore between the urban settlements of the Central Coast and Newcastle and, in fact, along the entire NSW coast.

Moral Grounds

Coal and Allied purchased these lands for the cost of the mining leases and, it is our understanding, the company paid no money for the actual land.

The company has conducted extensive underground mining across the site which has lead to an extremely unstable surface for construction.

The company has already made its profits from the coal mining conducted and it is immoral to conceive that land always understood by the State to be going to be dedicated to conservation upon cessation of mining until the company became majority owned by Rio Tinto will now be lost to our native flora and fauna. This would appear to be double-dipping.

The development at Gwandalan by Coal and Allied is conceptually unsound and detrimental to all stakeholders bar the profit-takers.

This land should be immediately dedicated as a National Park so there is no further threat to its unique flora and fauna and it is protected for all time. Remember, this is the only corridor and buffer of bushland left along the entire sea board of New South Wales.

Yours truly

Susan and Kelvin Wynn