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Culburra Beach  
2540, NSW

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To  
Shoalhaven Council

Dear Sir/Madam,

7<sup>th</sup> Feb. 2021

**West Culburra significant Development SSD -3846**

Please consider **following evidence in opposition** to the planned significant development of West Culburra by Sealark Pty Ltd on behalf of the Halloran Trust.

I believe, the proposed and planned clearance and development of approx. 47 hectares of bushland in West Culburra is not in accordance with Government Policies as outlined below.

**Reason:**

The Bushfires in 2019/2020 approximately burned 80 % of the Shoalhaven bushland.

This presents 80 % of habitat and breeding grounds for animal species including high priority species that were listed vulnerable before the bushfires and certainly are more vulnerable after the bushfires. According to a published *paper by the Department of Agriculture, Water and the Environment on 20 March 2020*, " ...to support protection and recovery of these species conservation action will be needed for many species at many sites." "...such informed management will need to be supported by a wide range of government agencies, non-government conservation organisations, university researchers, community groups and the public."

On the other hand, the evidence of species within the West Culburra Development proposal and their vulnerability is provided by documents published *in the Ecological & Riparian Issues & Assessment Report, Appendix L, Fauna Species Recorded on the Subject Site and in the Vicinity, 22 March 2013*.

The Wildlife and Threatened Species Bushfire Recovery Expert Panel has given out a provisional list of animals requiring urgent management intervention. This report states that some species were considered threatened before the fires and the fires have now likely increased their risk of extinction.

The report further states that some species are in more urgent help than others. Following animal species within the West Culburra Development proposal have been identified by experts as highest priorities for urgent management, most of these animals have had at least 30 % of their range habitat burned and many have had substantially more.

Therefore, I believe, that in accordance with government policy, it is necessary to protect and provide habitat for the following species identified.

These species identified by the Wildlife and Threatened Species Bushfire Recovery Expert Panel and **confirmed on site** of proposed West Culburra Development by Ecological & Riparian Issues & Assessment Report, are:

*The Glossy Black Cockatoo (Calyptorhynchus lathami)* **STATUS: Vulnerable**

*The Gang Gang Cockatoo (Callocephalon fimbriatum)* **STATUS: Vulnerable**

*The Black-faced Monarch (Monarcha melanopsis)*

*The Yellow-bellied Glider (Petaurus australis)* **STATUS: Vulnerable**

*The Greater Glider (Petauroides Volans)*

*The Grey-headed Flying-Fox (Pteropus poliocephalus)*

and species identified by the Wildlife and Threatened Species Bushfire Recovery Expert Panel and **theoretically possible, but never recorded within 10 km** of proposed West Culburra Development by Ecological & Riparian Issues & Assessment Report, are:

*The Regent Honeyeater (Anthochaera Phrygia)* **Status: Endangered**

According to the Wildlife and Threatened Species Bushfire Recovery Expert Panel report released by the Department of Agriculture, Water and the Environment on 20 March 2020, it is necessary to

**“...protect unburnt areas within or adjacent to recently burnt ground that provide refuge, as well as unburnt areas that are not adjacent to burnt areas, especially from extensive, intense fire.”**

Given the fact that the bushfires last year came indeed within a few kilometers, I believe that this proposed West Culburra development proposal has to be treated under the guidelines of the above stated report.

Furthermore, may I state that a commissioned research paper by Dodo J Thampapillai for the Henry Halloran Trust (yes, the same Halloran Trust upon which Sealark Pty Ltd is proposing the West Culburra Development) states in *his GDP Growth versus Sustainability Report 2020* that **land clearing for new buildings can induce hydrologic changes over a time period exceeding 100 years and that it is not surprising that the Australian landscape has been rendered vulnerable to extreme climate events – notwithstanding the fact that climate change is a global event.**

He also states that: “Environmental capital provides the resources, which an economy needs. Note that these are not only the extractive resources, but also basic needs such as the air we breathe, the water we drink and the ground we stand on. The very same stock of Environmental capital does also act as a sink. For example, the rivers that supply water are sinks for run-off from farm properties carrying chemicals and various residues. The air-shed that provides air to breathe is also the sink for various industrial and agricultural emissions.

Upon evaluation of these official government reports and Commissioned Research by the Halloran Trust, I believe it is evident, that the West Culburra Development Proposal cannot go ahead.

Please consider this paper as part of your assessment.

Thank you



## References

Culburra West Urban Development Project, Ecological & Riparian Issues & Assessment Report, Appendix L, Fauna Species Recorded on the Subject Site and in the Vicinity, *SLR Global Environmental Solutions*, 22 March 2013

Provisional list of animals requiring urgent management intervention, Wildlife and Threatened Species Bushfire Recovery Expert Panel, *Department of Agriculture, Water and the Environment*, Commonwealth of Australia, 20 March 2020

GDP Growth versus Sustainability, J Thampapillai for the Halloran Trust, *University of Sydney*, August 2020

