

Milton Electorate
PO Box 176, Ulladulla, NSW, 2539.
8 October 2017.

The National Parks Association (NPA) Milton Electorate is a non-government, non-political community based organisation in the Milton-Ulladulla area of the Shoalhaven. It is concerned with the preservation and protection of our natural environment and its enjoyment by future generations. As an organisation, the NPA tries to present a balanced and fact based commentary on key matters of interest to us and our community.

The Milton Electorate has 160 members and families and conducts walks twice a week in the Shoalhaven area, including in and around Narrawallee. We object to the proposal to modify the Narrawallee residential subdivision, both as to the *principle* as well as the *substance* of the revised proposal.

In ***principle*** we believe that it is bad public policy that developers should come back' after final approval stage, to seek to gain additional financial advantage by increasing the number of permitted blocks and by decreasing the approved land reserve areas and their designation. This behaviour encourages developers to constantly push the boundary in seeking to maximise their financial advantage. As a result, it is probably fair to say that today the wider community justifiably takes a jaundiced view of both developers and the bodies operating the approval process.

In terms of the ***substance*** of this particular proposal the NPA is particularly concerned about the impacts which it will have on the fauna and flora in the residential area of Narrawallee. We perceive in the proposal a cavalier approach to the treatment of the earmarked reserves and wildlife populations. Before delving in to the details of the proposal, we make the following points about areas earmarked to have endangered species:

Endangered species are so tagged because they are on the way to extinction.

1. Once extinct, they are gone forever. No more Powerful Owls, no more Black Cockatoos. While about 90% of the mammals and reptiles found in Australia are found nowhere else on earth, as a nation we have the dubious record of being the country with the worst record of native animal extinction across the entire world.
2. This is largely due to there being no effectively implemented policy and plans to maintain the currency on which these native animals exist. That currency is the habitat which they depend on for their survival. Instead we see them being regarded as expendable by sections of the community, as little more than "symbolic irritants" that can be ignored at will if so desired. They have no voice nor vote; they rely upon us to look after them, in the same way we now take care of our whales.
3. Instead, they suffer from the "death of a thousand cuts", in which a multitude of development decision are taken across Australia that cause their habitat to be removed. A new club house here, a new parking lot there etc. There is however no new clubhouse for the powerful owl. The cumulative effect of this approach is to directly cause animal extinctions.

Given the above, we oppose the proposal on the following specific grounds:

- The plan was previously approved by the NSW Government, the Shoalhaven Council and the Developer. The proposed reserves provided for the maintenance of native vegetation in the subdivision, habitat for threatened and vulnerable species and lessened the impact on endangered ecological communities. For stage one and two all vegetation has been cleared and no significant trees or habitat trees were preserved. *NPA Milton anticipates any future residential blocks will be completely cleared as well.*

- NPA Milton Electorate opposes the significant reduction of public reserves from the original combined total of 27,246sqm to 14,845sqm and the increase of residential blocks from 168 to 190. This reduction is a significant loss of open and public space within a large subdivision. Narrawallee, so far, is characterised by residential areas interspersed with reserves, allowing for intermittent tree and vegetation cover. This assists with keeping temperatures lower, acts as windbreaks and allows movement, foraging and nesting for birds. With the approved subdivision plan the vegetated ridgeline was preserved to protect the visual amenity. With the current proposal for modification the ridgeline would be totally cleared.
- We oppose the halving of the central reserve and the clearing of the native vegetation and habitat trees to make room for additional residential blocks and a croquet club. The Flora and Fauna report identified a number of habitat trees that are suitable for threatened and vulnerable birds for nesting and identified one particular tree with suitable nesting hollow for the Powerful Owl. A range of endangered fauna species were recorded in the reserves, including the Powerful Owl, Masked Owl, Grey Headed Flying Fox, Glossy Black Cockatoos and more. The report identified a cumulative loss of Blackbutt Tall Forest and associated habitat loss within the locality. This will become even more problematic with the proposed development of land behind Seascope Close and the current clearing of trees on the western side of Bishop Drive.
- A croquet club is not compatible with lessening the impact on ecological communities and preserving habitat for fauna. The proposed croquet club consists of manicured lawn, 22 car parking spaces plus a club house. All of this requires the complete clearing of land.
- NPA Milton Electorate opposes the complete scrubbing of the northern reserve. The preservation of hollow bearing trees only, without surrounding vegetation impact on the habitat and foraging of the recorded endangered fauna by removing food sources, shelter, nesting sites and by increasing human presence and activity. One of the concerns of the council appears to be the small 'islands' of bushland and the associated fire risk. *NPA Milton Electorate suggests that an alternative would be to redesign the subdivision and locate the central and northern reserves (23195sqm) adjacent to existing public reserve on the eastern side, coming up to the ridge.*
- NPA Milton Electorate notes that the southern reserve consists of an old quarry and degraded land and no habitat trees have been identified. As such NPA Milton Electorate has no issue with that land being converted to residential blocks and instead 4000sqm of bush to be preserved somewhere else in the subdivision. Consideration could be given to preserve the forest on the north-eastern corner, adjacent to Garrard Reserve and Blake Place, where a significant number of habitat trees are.
- *The priority for the NPA Milton Electorate is to maintain the approved and agreed size of reserves and to maintain intact Blackbutt Tall Forest that provide habitat for vulnerable and threatened species.*

Barry Tomkinson
 Convenor, Milton NPA Electorate.
 Mob: 0412 250595
 Email: milton@npansw.org.au