

The Hon Tanya Plibersek

Minister for the Environment

By email: Minister.Plibersek@dcceew.gov.au

Dear Minister

Controlled Action - DA No 10.2021.575.1 at 15 Torakina Rd, Brunswick Heads

On 16 May 2023 the NSW Northern Regional Planning Panel approved DA No 10.2021.575.1 being a subdivision to create 131 Lots comprising of 124 Residential Lots, 3 Medium Density Lots, 1 Residual Lot and 3 Public Reserves, together with associated Removal of 233 trees, Earthworks and Construction of Infrastructure.

I am a conservation scientist with over 20 years' experience dealing with threatened species management across Australia. While I live locally (at South Golden Beach), I am professionally based at the School of Environment at the University of Queensland, where I have a professorial position. I am often asked to work for state and federal governments when it comes to threatened species assessments and planning, in particular to defining and mapping things like 'critical habitat'. As an example of my expertise, I recently co-lead the national assessment "A knowledge synthesis to inform a national approach to fighting extinction" to calculate the costs of threatened species recovery across Australia's, funded by Australia's National Environment Science Program. I have also represented Australia at international forums such as United Nation's Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services.

I have serious concerns about the further loss of Wallum and coastal stringy bark habitat associated with the development. Both habitats are among the rarest of all ecosystems in eastern Australia due to direct habitat destruction for coastal development. There are two species of threatened frogs (Wallum froglet (*Crinia tinnula*) and Wallum Sedge frog (*Litoria olongburensis*)) that occur at the site and are directly associated with 'Wallum' habitats and there are recent records of endangered Eastern Grass Owl (*Tyto longimembris*) and Glossy Black Cockatoos (*Calyptorhynchus lathami*). It is also the very habitat needed by species like the endangered Regent Honeyeaters (*Anthochaera Phrygia*) and Swift Parrot (*Lathamus discolor*) - these species are locally nomadic in eastern Australia and visit Byron shire from time to time in search of food resources, especially in times of drought (which we will shortly experience). I am convinced adequate surveys in the region will uncover more endangered species.

All species I mentioned are threatened by coastal development and for their persistence and recovery, it is well established that old growth coastal woodland and wallum habitats are irreplaceable – they cannot be recovered post degradation. Please see the relevant Conservation Advices and Recovery Plans provided the federal government as evidence.

The developer has put forward a plan to offset the loss by creating additional habitat for just one species, despite these other species being listed under the EPBC Act and are of national significance and, as such, must be adequately protected. The developer's plan is therefore completely inadequate based on current knowledge (which is also likely to be completely inadequate as proper surveys appear not to be done). The plan should not have been approved - it contravenes local plans you have created to safeguard as well as state and federal laws and the council needs to step in.

The likely significant impact on threatened species that are present within the area of the approval demands that a referral be made and section 67 of the EPBC Act provides that this should be declared as a controlled action for the likely significant impact on these species.

I would be grateful if you could take action to address these matters as a matter of priority as the MNES are under imminent threat. At the very least, an independent review of the 'wallum froglet management plan' should be undertaken to ensure the needs of other endangered species are not ignored and a thorough survey understood by competent, independent ecologists.

Please feel free to contact me if you wish to discuss further 0409185592 or james.watson@uq.edu.au.

Sincerely

A handwritten signature in black ink that reads "J Watson". The signature is written in a cursive style with a large, looping initial "J".

James Watson FQA

Professor

Centre for Biodiversity and Conservation

GreenFireScience Lab, www.greenfirescience.com

Research and Recovery of Endangered Species Group, <https://raresgroup.com.au/>

The University of Queensland