

## Proforma G - Callala Matters – 13 responses

Dear Committee,

The proposed Halloran subdivision in Callala Bay exemplifies the flaws in the current NSW planning system. Over a century ago, Henry Halloran acquired vast tracts of land in NSW and the ACT that he developed into residential communities. The Halloran Trust has long sought to develop 2,760 hectares in the Shoalhaven, most of which is categorised as "Category 2 – Sensitive Regulated Land" under the Local Land Services Act so clearing native vegetation is prohibited. Utilising outdated planning law, Halloran exploited the flawed NSW Biodiversity Offset Scheme to secure a biobank agreement over its undevelopable land in exchange for the rezoning of 41ha of healthy coastal forest near Callala Bay for a residential subdivision.

The NSW DPE approved the rezoning in October 2022, even though the necessary Biodiversity Certification had not been granted and community opposition was nearly unanimous. The planning for the Halloran subdivision has failed on multiple fronts. It does not align with the Jervis Bay Settlement Strategy 2003, which nominated 35ha (rather than 41) in Callala Bay as a "potential urban release" subject to site constraints including the protection of threatened species and vegetation.

The subdivision plan neglects to safeguard three endangered species including the Greater Glider and the Gang Gang Cockatoo as well as five threatened species. All but 2ha will be razed, including old-growth forest containing vital hollow-bearing trees, in what the Biodiversity Certification application acknowledges as "a complete loss of all biodiversity values". Approving rezoning without Biodiversity Certification disregards a critical process meant to safeguard biodiversity. Biodiversity Certification is legislated to integrate planning for biodiversity conservation at the strategic level and should run in parallel with the rezoning process. Biodiversity Certification under current legislation is unlikely because the entire 41ha subdivision site is Federally designated as "Critically Endangered" and is home to three endangered and five threatened species.

The recommendation from Shoalhaven City Council's biodiversity-offset-certified ecologists is unequivocal: "The current design/footprint of this development should not be supported." The proposed destruction of a healthy, mature coastal forest that survived the catastrophic bushfires of 2019-20 underscores the conflict in current planning rules between profit-driven development and environmental preservation for sustainable growth and does not adequately address the long-term effects of climate change on communities and the environment. In an increasingly arid climate, obliterating critical endangered species habitat for suburban expansion is unacceptable.

The Halloran subdivision would worsen the housing crisis by releasing expensive houses over a 12-year period to maximize profits. The location is distant from jobs, high schools, hospitals, shops, public transportation and infrastructure and already 66% of houses in Callala Beach and 29% in Callala Bay stand empty. Proper planning could enable community growth without compromising the forest that lends the region its unique charm.

The proposed Halloran subdivision in Callala Bay underscores the need for a modernized, environmentally conscious planning system in NSW that prioritises the success of future generations through biodiversity preservation and sustainable development while taking into account community needs and the impacts of climate change.

Yours sincerely