

Design Framework Draft Settlement Background Paper Venus Bay
URBAN DESIGN FRAMEWORK
Connell Wagner Pty. Ltd.

SUBMISSION Version 5

Presented by

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VENUS BAY

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Venus Bay 2005

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SYNOPSIS

We present a brief summary of the essence of our reply to the paper titled Urban Design Framework Draft Settlement Background Paper Venus Bay¹. Our reply is on behalf of the members of Protecting Anderson Inlet and Significant Environs [PAISE] and is endorsed by the Tarwin Lower Venus Bay Association Inc. [TLVBAl]. The impetus for our response was an invitation by Connell Wagner to 'express our thoughts'. I refer to the abovenamed document as Settlement Papers in the interests of brevity.

On examination of the Settlement Papers some major flaws emerged. In order to enable an Urban Design Framework of substance to be produced we have supplied relevant photos and published evidence. The areas for consideration and incorporation in the final document are presented in abridged number point from the contents page, Articles 1-12 below:

1. Extension of Borders. We have highlighted our reasons for opposing the arbitrary extension of borders. These reasons include contravention of the Victorian Coastal Strategy and the expressed wishes of the majority of Venus Bay Residents.
2. Indigenous Heritage We have made recommendations for future plans which incorporate the protection of archaeological sites e.g. middens or mounds. Reference is made to the pertinent legislation or process for building permits..
3. Design and Development Inappropriate inclusion of an *Expression of Interest* forced us to pay attention to a rural property outside of the designated Township Borders of Venus Bay drawn by Connell Wagner.
4. Venus Bay Wetland Project We expand on the brief mention in the Settlement Papers which lists a Master Plan for a {Venus Bay} Wetlands. The Settlement Papers made no reference to the community's vision. www.venusbaywetlands.com
5. Wetland Conservation Incentives We have given emphasis to the importance of the Commonwealth Government's wetland conservation incentives omitted from the Settlement Papers.
6. Floods Maps We have identified the obvious inundation and flooding apparent to local residents which led to the discovery that previous documentation for Evergreen and parts of Tarwin Lower had been removed from the SGSC Planning Scheme Maps. Questions are raised about the separate and collective obligations and susceptibility to lawsuit of Shire Councils when decisions are made to build on inappropriate sites.

¹ Connell Wagner 2006 Urban Design Framework Draft Settlement Background Paper Venus Bay
Revision 7 Reference 6183/01: 16.1.2006.

7. Storm Surges and Climate Change. We describe storm surges and future predictions of the effects of climate change. Reference to climate change has been submerged in this paper.
8. Acid Sulfate Soils. The omission from the Settlement Paper about presence of disturbed acid sulfate soils [AASS] on Evergreen and probable acid sulfate soil [PASS] over a large part of the Tarwin Lower Venus Bay area raises more questions. High levels of disturbed acid sulfate soil [AASS] is a major limit to any development. AASS requires costly repair not just mitigation. We recommend that responsible placement of an overlay on affected areas should be given priority.
9. Waste Water recycling and Sewage Disposal. We have considered the apparent link postulated between future development and the implementation of reticulated sewerage in the Settlement Papers. The conjecture that the two are inextricably linked raises questions about Competition Policy. The apparent imposition of a compulsory sewerage scheme in order to facilitate development received many related but separate references in the settlement papers
10. Competition Policy. We have located and identified the Municipal Association of Victoria's [MAV] competition policy. This policy draws attention to authorities who may commercially benefit from representing a real or perceived conflict of interest. The lack of importance given to alternative solutions in the Settlement Papers is addressed.
11. Population We have highlighted the weight given to the population projections in the Settlement Paper. Projections are notoriously specious and lend themselves to opportunistic interpretation. The social/real needs for the projected ageing population and the young and adolescents appear to be secondary to the desire for expansion in the Settlement Paper.
12. Flora and Fauna. *Flora* We have raised the issue here of the mistaken vulnerability classification of indigenous species in the Settlement Paper. The discussion about Ecological Vegetation Classes was given very little prominence but is the pre-eminent reason why Venus Bay is so special. We were easily able to find the correct classification. *Fauna* We have made limited mention of our unique fauna. It is self-evident that road kill occurs during holiday periods. Increasing house building with its appended reduction in habitat to the detriment of our indigenous mammals is occurring already at an alarming rate.

INTRODUCTION

We will begin this submission by quoting a passage from the UDF Design Framework Draft Settlement Background Paper Venus Bay 54 page document (referred to from hereon as '*Settlement Paper*') The extract is located under the heading: "The impact of further development on the environment".

The three estates are built on the fragile sand pit between the open ocean and a significant wetland system (Anderson Inlet).



© Ken Walker Critically Endangered Great Egret (L) FFG Act on Anderson Inlet South Gippsland Victoria

Against present day coastal policies and legislation it is unlikely that the original Venus Bay Development would have been approved and in retrospect the estates should not have been built on in this location. Therefore, none of the surrounding wetland or coastal environment should be further compromised by unsuitable development and any future development should not encroach or impact on the surrounding environmental features including the foreshore reserve, flood plains and Anderson Inlet.²

We are concerned that the Settlement Paper appears to have endorsed potential rezonings that are not strategically justified in terms of the appropriateness of these areas to sustainably support any additional development. These ideas are apparently not based on any strategic investigation or community endorsement.

² Connell Wagner 2006 UDF South Gippsland Design Framework Draft Settlement Background Paper Venus Bay P 45

1) LOCAL LORE, LITERATURE SEARCH AND DESKTOP STUDY

A literature search, desktop study, asking the experienced locals or even exploration of our freely available website www.venusbaywetlands.com would have revealed evidence that in 1960 the incumbent Premier Henry Bolte then Chairman of the Alfred Hospital Board overruled strenuous objections to the subdivision.³

- a) Further the South Gippsland Shire has copies of Minister McCutcheon's Letters⁴ and these were made available under the FOI Act to the Tarwin Lower Venus Bay Association Inc. [TLVBA Inc.]. These letters were in response to an application in 1991 to subdivide the dunes of the Evergreen Property in to 34 house blocks. (These are the same Dunes marked 1 and 2 which are currently included in a map as the proposed border extension to the Hamlet of Venus Bay). While the application was approved by the then Woorayl Shire Council the Minister refused the amendment (L16) and overruled on appeal.

Reasons given for not allowing the amendment (L16):

Non compliance with A Coastal Policy for Victoria (1988).

Chapter 2 of the policy clearly states that:

'No new subdivisions will be permitted in sensitive or dynamic areas such as dunes. Construction in fragile or unstable areas will be generally prohibited. Settlements with little or no existing infrastructure will be kept at their present development and generally confined to existing boundaries.'

Further the minister stated:

'From a strategic planning viewpoint, it is preferable to maintain the distinct edge that Lees Road provides between urban and rural uses in Venus Bay. A large scale subdivision such as the one proposed under Amendment L16 will set an undesirable precedent for urban encroachment into an environmentally sensitive area'.

'In view of these considerations, I am not prepared to reverse my decision to refuse approval of the Amendment'.

It appears that the authors of this 'Settlement Paper' have been directed to or have assumed the responsibility of reversing Minister McCutcheon's 1991 decision.

³ The Victorian Public Interest Research Group Ltd. [P.I.R.G.] 1977 *A Coastal Retreat*. C/- The Union, Monash University: Clayton. . National Library of Australia card number and ISBN 9598982 5 5

⁴ South Gippsland Shire Council [SGSC] ref:115384C dated 3rd January 1991 and 2.4.1991 available from the Tarwin Lower Venus Bay Association [TLVBA]

2) SUBSTANTIVE CITED EVIDENCE TO HELP WITH ANALYSIS

- a) We will present evidence based material to amplify the current document enabling it to be presented to DSE in a more professional and critically analysed form. The final document must pass the tests of rigour, accountability and adherence to the hierarchy of ‘state and regional coastal policies at a local level’⁵
- b) The main thrust of this document is about the failure of the abovenamed Draft Settlement Paper to critically assess, analyse and measure against Government Policies and Strategies what was agreed to by the community. Ten pages of the *Summary Data* from the workshops were attached to the “Settlement Paper” without any attempt to apply substantial weight to the views expressed by the people attending the workshops.

Article I. EXTENSION OF THE BORDERS

1) COASTAL SETTLEMENT BOUNDARIES

- a) The option to extend the Borders of Venus Bay did not appear in any paper work we received. While borders were arbitrarily extended see Figure 5 Number 1-4⁶ there appears to have been limited, if any, direction or evidence to support choosing these areas.
- b) Vague references such as “providing a structure for growth” and “what land use or style of future development should be encouraged where?” were written on the UDF Community Consultation Workshop Task Sheets (mistakenly not distributed at the meeting) on 17th January 2005. The examples did not at any time indicate extending borders although this question was put to our group by a representative from Connell Wagner, Andrew Mason.
- c) The following statement was recorded in the document “Coastal Settlement Boundaries⁷ :

‘the Minister for Planning has recently clarified the State Government’s position by stating:

*‘The strategic extent of settlements is defined by the **existing** [our emphasis] extent of urban zoned land unless the future strategic extent of a settlement is shown on a plan included in the planning scheme’.*

⁵ Connell Wagner. South Gippsland Coastal UDF’s Settlement Background Paper 2006-03-02 *Figure 1. Integration of Australia’s coastal policies and how they relate to the Urban Design Frameworks*

⁶ Figure 5 2006 January Attached to the “Settlement Papers”

⁷ Alistair Kellock and Associates 2005 Coastal Settlement boundaries A discussion paper on boundaries for coastal settlements - A clarification or further to the State Planning Policy Framework and Victorian Coastal Strategy 2002 VCS

- d) In our opinion the drawing-in of 4 areas to extend boundaries on sensitive sand dunes is an intent on the part of (it is unclear whether DSE or SGSC or Connell Wagner have driven this) agents to circumvent the word existing in the letter from the Minister for Planning.

“These boundaries ought to be established through a strategic process, have a strategic process and their determination based on sound planning investigations”.⁸

- e) There is no evidence of “sound planning investigations”. The extension of these boundaries is in direct contravention of the Victorian Coastal Strategy and Site and Development Guideline 3 key areas and in particular described as:

“Point 3 Ecological Guidelines (structures result in minimal change to natural systems, native vegetation disturbed as little as possible, avoid locating structures in dunes, [our emphasis] protection of marine biological values).”⁹

2) ISSUES RELATED TO BORDERS

The community’s view was that there should be:

- a) No expansion at all.
- b) Infill 900 blocks [currently only 50% of Building Occupancy permits have been issued [195 applications]
- c) Consolidation; for privacy, retention of trees, space for on site waste treatment
- d) Limit size of houses to suit small blocks¹⁰
- e) Avoidance of building in sensitive sand dunes

3) STRATPLAN 2005

The majority of the community as evidenced in the StratPlan 2005 has challenged and has not accepted the logic and reasons for these recently postulated boundaries.¹¹

To question 7 in the Stratplan 2005:

“Would you support any proposal to expand the existing boundaries of the Venus Bay Township through the rezoning and subdivision of existing agricultural land currently Zoned Region A?”

75% of the respondents (45% return from all ratepayers addressed) said **NO**

⁸ loc.cit. p 2

⁹ South Gippsland Coastal UDF’s Settlement Background Paper p 11

¹⁰ Stratplans 1993 and 2006

¹¹ www.venusbaywetlands.com Link to Stratplan 2005 home page

Kellock states “there must be a set rationale for this boundary which is accepted and endorsed by the local community”¹²

❖ See StratPlan 1993 and Stratplan 2005

2.2 Building Controls (Q. 10 to 15, and 16).

Extract from the Report

Over three quarters (77%) of those responding would not support high density developments in Tarwin Lower (Q. 10), **and 83% would not support these developments in Venus Bay (Q.11)**; even if waste water issues were resolved. The Tarwin Lower sample was very small; however 59% of those responding indicated their preference against high density development. **A majority of respondents (59%) believed the community should again (as in 1993) recommend to the Council to reconsider strategies and financial incentives to encourage block consolidation (Q. 12).** It should be noted that 16% of people were undecided and 23% were against this proposal. **A large majority (89%) supported a height restriction of two stories for buildings ((Q. 13); a similar trend to the 1993 results.** Respondents were evenly divided in their response to controls on residential buildings and fencing with 42% for controls and 44% against, with 13% undecided. The results for control of commercial buildings (Q. 15) were less equivocal, with 59% for controls, 29% against and 11% undecided.

On the basis of the previous Government coastal policies and community opinion¹³ then the following recommendation should be made:

• **RECOMMENDATIONS**

- ✓ Remove these 4 sensitive sand dunes from the diagram.
- ✓ Put in place a process for consolidation of those possible of the 900 remaining blocks
- ✓ Limit size of houses to suit blocks
- ✓ Limit height of dwellings
- ✓ Restore a Design and Development Overlay [DDO] to the planning Scheme.

Article II. INDIGENOUS HERITAGE

1.) SIGNIFICANT SITES

- a) Local knowledge about and the existence of ancient bones in this area are not identified by those with respect for and with a sense of protection about middens and mounds. This is because there are some individuals who would seek to destroy them as happened in March 2005 when a skull was used as a football.

¹² Alistair Kellock *loc cit* p 17

¹³ Stratplan 2005 Result of a Survey of All Tarwin Lower Venus Bay ratepayers forwarded to Connell Wagner by the Tarwin Lower Venus Bay Association Inc. in November 2005

These areas are known to be a significant and are an important factor in the sensitive nature of these Sand Dunes, within the Estates, the Beach and the Inlet.

- b) The way that recently (March 2005) discovered bones were desecrated and disrespectfully treated ought to have been a trigger for a change in the way this very special place is viewed. When greed accompanied by moral turpitude seeks to ignore and disrespect the archaeological culture of others it is time for an overlay. The way blocks of land are denuded for building without regard for the ecology and habitat of native flora and fauna is criminal. An authoritative management plan for oversight of all clearing of land ought to be put in place.
- c) There is referral within the Settlement Paper on page 29 and 30 to Aboriginal Affairs Victoria [AAV] with some interesting spelling of what is normally spelled Bunurong and sometimes referred to as Bunwurung. There is also referral to a Study being carried out by AAV. At the time of writing the submission this study is not ready for general release. (Personal contact, John Tunn AAV)

- **RECOMMENDATIONS**

- ✓ Insert an indigenous cultural and heritage overlay in the SGSC Planning Scheme
- ✓ Provide a management plan for the oversight of clearing works prior to commencement of the digging of all foundations.
- ✓ Encourage education of visitors and the community about the custodial care of middens and mounds by giving financial and in kind support,
- ✓ Give written clear and precise guidelines about the Planning Permit Process
- ✓ Encourage more liaison between the Gippsland Cultural Heritage Unit and Aboriginal Affairs Victoria¹⁴ and South Gippsland Shire Council
- ✓ Explain to potential buyers without prejudice about Consents to Disturb and ensure that these permits for Venus Bay are referred to the Central Gippsland Aboriginal Health and Housing Corporation¹⁵ Under Section 21U (3) of the CATSI Act 1984.¹⁶

Article III. DESIGN AND DEVELOPMENT

Urban is a word that many people in ‘Coastal Villages and Hamlets’ object to because of its connotations of suburbia and/or high density settlement. It is interesting that the word Settlement which more accurately reflects the style of living in Venus Bay is used in the title of the Background Paper (Connell Wagner 2006).

1. AN EXPRESSION OF INTEREST on page 31 of the Settlement Papers is almost out of context with the rest of the document. The question is: What has the bold statement about an urban development proposal, to do with an Urban Design Framework? This idea about a rural area outside of the Township borders defined on the Figure 5 has never

¹⁴ King J. 2005 Update on registered sites at Venus Bay. *The Star* Letters to the Editor page 14

¹⁵ Ibid

¹⁶ Ibid

been put in concrete terms.¹⁷ There is no critical assessment of this idea. Where are the mentions of flood plains and disturbed acid sulfate soil which are the limiting constraints prohibiting any suggestion of ‘man-made wetlands’? The disturbed acid soil needs to be dealt with¹⁸ under the *National Strategy for the Management of Coastal Acid Sulfate Soils*¹⁹ which

Recognises the importance of the environment and ecologically sustainable management of our land and water resources by all stakeholders. The National Strategy has been framed within a number of major natural resource management policies. These include: the *National Strategy for Ecologically Sustainable Development*, the *National Water Quality Management Strategy*, the *National Strategy for the Conservation of Australia's Biological Diversity*, the *Intergovernmental Agreement on the Environment*, the *Decade of Landcare Plan*, and the *Wetlands Policy of the Federal Government of Australia* and more recently *Australia's Oceans Policy*.²⁰

2.) WETLANDS It is interesting and disturbing that this inserted section contains the only mention of wetlands when the town’s vision of repairing this rural property and returning it to its wetland habitat status has been on public display for over 3 years.*

*See website: www.venusbaywetlands.com

3.) OPPOSITION TO THE EXPRESSION OF INTEREST BY THE COMMUNITY

(a) This proposal is hardly an expression of interest as the proponent has taken up a number of hours with consecutive town planners, lobbying councillors, conducting sales pitches and attending meetings arranged by protestors. This idea targeted Venus Bay with a plan to dredge the land with canals and lakes with islands made from the ‘spoils’ – already disturbed Acid Sulfate Soil [AASS] (see NatAss above and Section VIII page 24 of this submission).²¹ An inappropriate plan to build 2000 houses on this 348 hectare (880 acres) mire abutting Anderson Inlet was presented as an artist’s impression. Like the authors of this document we have never seen any detail.

(b) This idea was strenuously and vocally objected to by over 3500 people in a petition presented to parliament, 4500 postcards and over 1000 people at 3 meetings in the Venus Bay Community Centre.

¹⁷ Connell Wagner 2006 South Gippsland Coastal UDF’s Settlement Background Paper p 31

¹⁸ Report Prepared by: *National Working Party on Acid Sulfate Soils*

2000 Report Published by: *NSW Agriculture Wollongbar Agricultural Institute Bruxner Highway Wollongbar NSW 2477, Australia* January 2000 ISBN 0 7310 9842 0

Internet site: <http://www.dpie.gov.au/dpie/armcanz/pubsinfo/ASS/ASS.html>

¹⁹ Loc cit. pages 22 and 23 Objective 4 To rehabilitate disturbed ASS and acid drainage.

²⁰ Ibid page 1

²¹ Ibid

(c) The reasons for opposing this “expression of interest” are well documented and have stayed relevant for 3 and half years. Following a resolution at the second meeting held at the Venus Bay Community Centre on August 2nd 2003 most of the following reasons were included in the resolution and some were adapted for the Postcard campaign:

- ✓ The loss of fish breeding areas and bird habitats through dredging and exposure of the already mapped high levels of acid sulfate soil.
- ✓ Close proximity of urban activity which is a hindrance to the recuperative needs of visiting migratory birds.
- ✓ Damage to the water table.
- ✓ Over scaled developments causing detriment to the visual and recreational amenity of the area
- ✓ Threat to the areas economic future that of green tourism.
- ✓ Contravention of Victorian Coastal Strategy
- ✓ Disturbance to migratory birds.
- ✓ Lack of emergency egress.
- ✓ Interference with archaeological sites.
- ✓ Threat to flora and fauna habitat.

4) THE STATE PLANNING POLICY FRAMEWORK [SPFF]

Excerpts of the key components of the State Planning Policy Framework (SPFF) which sets out general, policies and principles for land use and development in Victoria are outlined below:

Environment Clause 15.01 outlined in the Settlement Paper²²

This clause refers to protection of catchments, waterways and groundwater. The objective of this clause is to assist the protection, and where possible, *restoration of catchments, waterways water bodies, groundwater* and the marine environment.

Coastal Areas Clause 15.08²³

The objective of this clause is to protect and *enhance the natural ecosystems and landscapes of the coastal and marine environment*, ensure sustainable use of natural and coastal resources and achieve development that provides an environmental, social and economic benefit enhancing the community’s value of the coast.

- a) These two sub clauses embody the reasons why the “expression of interest” given credence in the Settlement Paper was rejected by this community. This idea totally ignored the presence of flood plains (see following flood photos on pages 9 18,20,21,22 and back cover) the functioning wetlands and the presence of acid sulfate soil.²⁴

RECOMMENDATIONS

²² UDF Settlement Paper p 11

²³ *ibid*

²⁴ See reference later in this document Article VIII

- ✓ Provide a mechanism which will prevent inappropriate ideas from wasting the time of the Shire Town Planners the Councillors and the community.

Article IV. THE VENUS BAY WETLANDS PROJECT

1) This project was advanced as a positive outcome for the Evergreen property creating a tourism asset together with economic benefits to local and regional business. This project has been and is being widely advertised in the TLVBA Inc Quarterly Newsletter as well as in local and regional media. The full story is obtainable on the Venus Bay Wetlands Project website www.venusbaywetlands.com.²⁵ This concept was repeated at both Connell Wagner workshops and listed in the Summary Data, but ignored in this Settlement Paper. The idea of a ‘man-made wetland’ is rather superfluous considering the Evergreen property is a functioning wetlands now.

Wetlands

*Wetlands are “areas of marsh, fen, peatland or water, whether natural or artificial, permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water the depth of which at low tide does not exceed six meters”. And “may incorporate riparian and coastal zones adjacent to the wetlands, and islands or bodies of marine water deeper than six meters at low tide lying with the wetlands”.*²⁶ Ramsar Convention on wetlands.



©K Walker

Photos of flooding on Evergreen in August 2004 from Louis Road towards the Inlet and the Jetty

²⁵ www.venusbaywetlands.com

²⁶ Whitten, S. Bennett, J. Moss W. Handley, M. Phillips, B. 2002 Incentive measures for conserving freshwater ecosystems. Review and recommendations for Australian policy makers. P 1

2) This Evergreen property is a habitat for birds containing wetland grasses and is laced with peat.²⁷ A peat fire was extinguished by “[ploughing and dousing] after a month in the period between 10.4.2004 and 18.4.2004.”²⁸ A peat fire would expose the acid sulfate soil to oxidisation and result in disturbed acid sulfate soil or Actual Acid Sulfate Soil [AASS]. Evergreen abuts Anderson Inlet which is listed in the Commonwealth Listing of Important Wetlands as a significant national wetlands²⁹ The majority of the property is a wetland containing peaty black soil which is a prominent factor in the manufacture of acid sulfate soil. Huge flocks of migratory and other birds descend on this area including black swans, ibis, golden plovers, royal spoonbills and in particular the *Great Egret*, a critically endangered and FFG listed bird under the FFG Act [see photos and sketch 1 &11] and the orange bellied parrot Listed under the EPBC Act. Kangaroos, wombat, echidnas, tiger and brown snakes and a wide variety of frogs including the Growling Grass frog also use Evergreen as habitat.



© S. Zaitsev

²⁷ Land Conservation Council 1980 and Conservation Council. [LCC] 1980. *Report on the South Gippsland Study Area, District 2* Victoria Melbourne: Oct 1980 pp 85, 86, 93 Table 9. Present in the Melbourne State Library Special Reserve.

²⁸ **Appendix 1** Letter to Beverley Walker from Melzer D. 2004 *Peat Fire at Venus Bay* EPA

²⁹ A directory of Important Wetlands in Australia

Kangaroos mingling with sheep on 348 hectare Evergreen Property in 2001 from the Jetty end

*SKETCH OF Great Egret –
Yellow bill non-breeding note the distinctive eye marking*³⁰



**Critically Endangered
Great Egrets
Also Australian Ibis on Evergreen
August 2003**



³⁰ Simpson, K. Day, N. 1984. *The Birds of Australia. A Book of Identification 75 Birds In Colour* South Yarra Vic. Lloyd O'Neil Pty.Ltd.