

Campbelltown Council

14th February 2023,

Dear Councillors,

RE: Item 8.2 Mt Gilead Stage 2 Biocertification. Object to Lendlease's request for Campbelltown Council to act as the applicant for Lendlease's Biodiversity Certification.

The Importance of Koala Corridors: As of this last year Koalas became endangered in NSW, the only growing, large, chlamydia free Koala colony ([McAlpine 2015](#)) left in the state is on Sydney's south western edge ([CPCP Sub Plan B - Koalas p12](#)) where this biocertification request is located. Putting aside the ecological significance of this colony to the state (and nation), it is also economically significant to Campbelltown, if it replicated the tourism potential of endangered animal sanctuaries seen across the world, it would provide a long-term tourism industry that would dwarf the one-off development of these lands and keep those gains local.

This Council recommendation relies completely on a Eco Logical's submissions response report, that is completely dismissive of 626 submissions in opposition to the Certification, this is not surprising as they are Lendlease's consultant. EA/LL also ignores Campbelltown's own Koala Plan of Management, obviously Council should not. There are three areas essential for Koala protection. Lendlease's plan plays down all three:

1. Koala Corridors numbers: There are 4 Koala corridors that pass through Gilead Stage 2, as identified by the Chief Scientist. Noorumba - Menangle Creek (A), Beulah - Woodhouse Creek (B), Nepean Creek (C), and the Nepean River. Unfortunately there is only one connection to the Nepean River via Menangle creek for both corridors A & B, but that is where Lend Lease narrows the corridor and plans to build a bridge and sewerage works. These corridors obviously need another connection to the Nepean River, the CKPoM shows others from Woodhouse Creek to the Nepean River.

2. Koala Corridor Widths: Koala corridor widths and their contiguity are the single most important criteria as to their functionality. This certification provides ***no dimensions for the width of their Koala corridors***, this makes this proposal unassessable. The [Department of Planning Conserving Koalas Report](#) that supported the Biocertification of Lendlease Stage 1, also had no figures for corridor widths. ***No minimum corridor*** width identified, without a minimum width you have no corridors. The Chief Scientist asks for an average minimum koala corridor width of 390 to 425m, that is 390m, and an absolute minimum of 250m. The minimum corridor width identified in numerous studies for this area is about 400m. This is because as [Professor Robert Close's reports](#) that looked at Koalas in Campbelltown identified that Koalas rarely (if ever) have a minimum home range that was less than 400m wide.

The Primary Koala corridor of the Nepean River is too narrow and fractured : It does not align with the [Greater Macarthur Interim Plan 2040](#) which called for *a minimum preferred width of 425 metres for primary corridors*, that is the east side of the Nepean River. The [Chief Scientist](#) called for similar figures (390m + 30m buffers) as did the [Campbelltown Koala Plan of Management](#) (425m). Yet the Nepean River here gets down to at least 250m but we don't know as we have no figures. In the image below the bites taken out of the light green restoration areas in the corridor are Drainage Basins (*Enspire (2022) Gilead Stormwater Management Strategy*) and the large area taken out of the dark green in the middle is the Riverside Reserve. They should not be in the Koala corridor, and if they are

they certainly should be excluded from the calculations for the Average Koala Corridor Width. Thus the Chief Scientists average of 390m (+ 30m buffers) along the Nepean River is not being met.



3. Protection of Corridors: Zoning, Ownership and Biobanking arrangements are all essential to get right to protect Koala corridors. Protection of Corridors - At the moment C2 will see Lendlease infrastructure inside these corridors, and we don't know who will own them afterwards. We can see that most of Corridor A and B has been pushed onto the Homestead Lot owner, not on Lendlease's property. How will they control that considering it is a State Significant Heritage item where the colonial heritage of being one of the nation's earliest farms is part of its heritage.

4. Offsets and Biobanks: Are not being retired on site or immediately adjacent - Browns Bush is a valid offset. But not Noorumba as it has no additionality - it is an existing bush reserve (and was rejected by the federal government as a biobank for stage 1. The Mt Gilead Homestead lot cannot be used as it compromises the Colonial Heritage curtilage, will be fenced off, and is not even owned by Lendlease. Lendlease are looking for 185 offsets off-site, these will obviously not help Campbelltown's Koalas.

If you have any questions please do not hesitate to contact me on 9211 5022.

Yours sincerely

Saul Deane

Total Environment Centre.

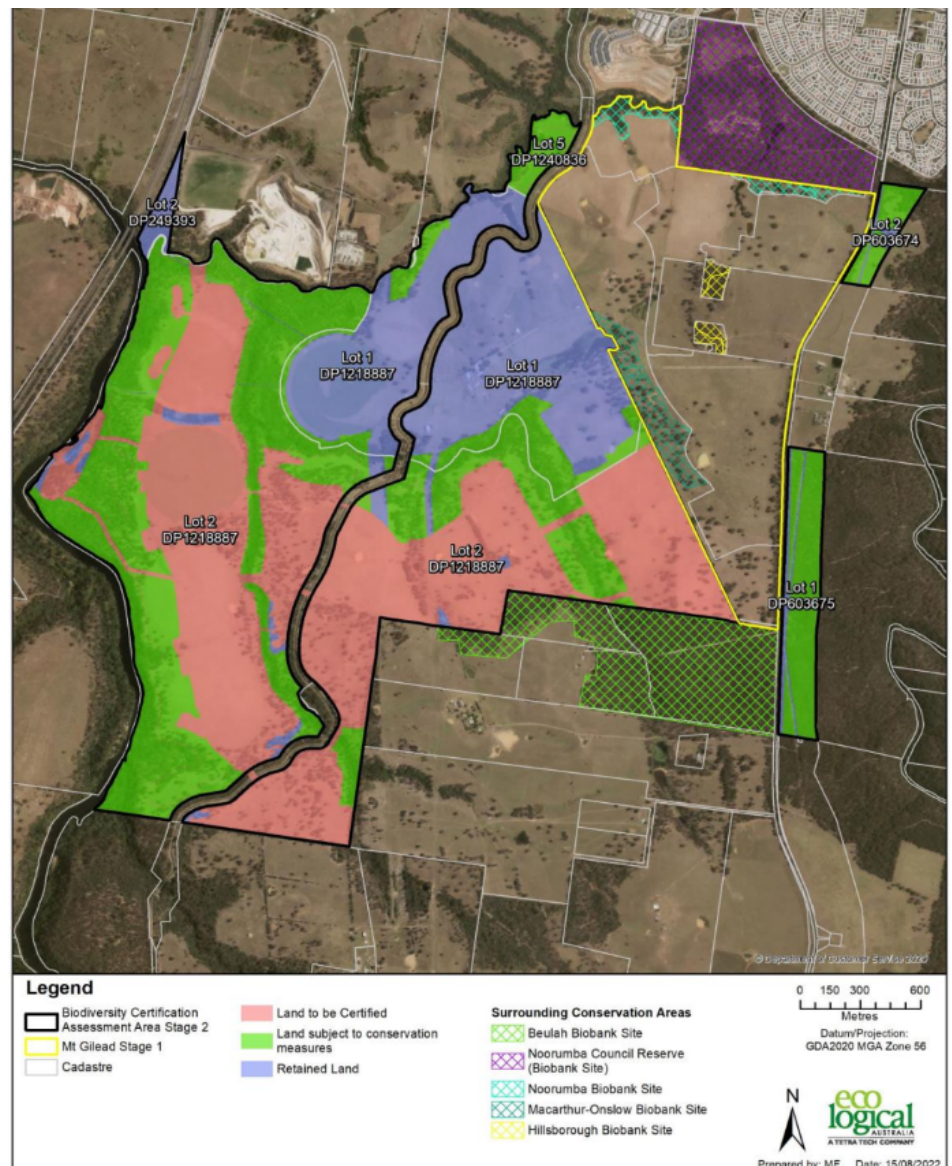


Figure 2: Land proposed for Biocertification and fenced koala Conservation area after ELA (2022 Revised BCAR)