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To Campbelltown Council,

URGENT 11th April 2023 - Objection to Biodiversity Certification Application - Mt Gilead Stage 2

Thank you for taking the time to read this ahead of the upcoming council meeting this evening.

The Sydney Basin Koala Network is deeply concerned about Mt Gilead Stage 2, which is seeking Biodiversity Certification at this evening's council meeting. We urge Council to reject the application for Biodiversity Certification based on the following information.

- 1. Risk to Koalas. It is known that threats to koalas in urban areas include: habitat loss and fragmentation; increased risk of dog attack, increased risk of vehicle strike mortality, increased risk of disease, and increased risk of drowning in backyard swimming pools. Advice from the Chief Scientist and Engineer on the Protection of the Campbelltown Koala Population 30 April 2020 (page 31) states that "Many of these threats are greatest and further exacerbated at the interface between native habitat and anthropogenic land use. There is good evidence that where urban development interfaces with koala populations and their habitat that this results in declines in koala population." Despite this known information
 - a. The proposed development site contains occupied Koala habitat. Koalas are endangered in NSW. (see Figures 1 and 2).
 - b. An **East-West Koala corridor** (containing Koala sightings) runs right through the proposed development (see **Figures 3**).
 - c. Campbelltown Koalas are already suffering increasing numbers of vehicle strikes and dog attacks (see **Tables 1 and 2**)
- Risk to other Species: The development site contains sightings of other threatened and vulnerable species and contains a Cumberland Subregion BIO Map Biodiversity Corridor of Regional Significance.

1. Risk to Koalas

The Proposed Development contains an East West Koala Corridor and occupied Koala Habitat meaning koalas would be at increased risk of associated threats if this development were to proceed. The area is also marked as an Area of Regional Koala Significance and an Area for Immediate Investment by the NSW Koala Strategy.

GILEAD STAGE 2 CONTAINS OCCUPIED KOALA HABITAT

- Including sightings from 2022

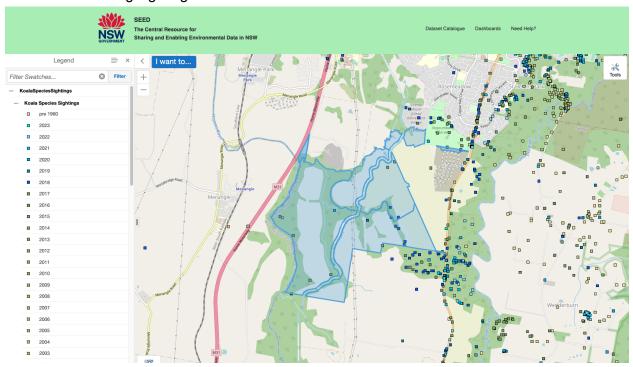


Figure 1: **Koala Sightings** from NSW Government SEED Database. Area of Mt Gilead Stage 2 Biodiversity Certification Application shown in blue

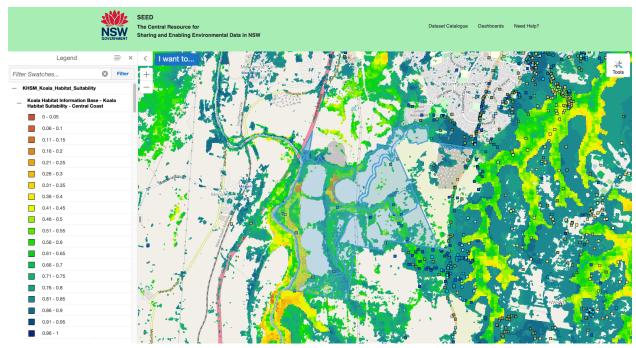


Figure 2: **Koala Habitat Suitability and Koala Sightings** from NSW Government SEED Database. Area of Mt Gilead Stage 2 Biodiversity Certification Application shown in blue

GILEAD STAGE 2 CONTAINS AN EAST-WEST KOALA CORRIDOR

The below shows Koala Corridors (blue, orange and pink) and koala sightings (white dots). The Mt Gilead Stage 2 area (blue circle), contains a koala corridor which is used by koalas (white dots). Development here would increase risk of these koalas, not only through loss of habitat but also associated risks of dog attack and vehicle strike. Campbelltown's koalas have already seen a 10 fold increase in vehicle strikes (**Table 1**) and 5 fold increase in dog attacks (**Table 2**) over the last 3 koala generations.

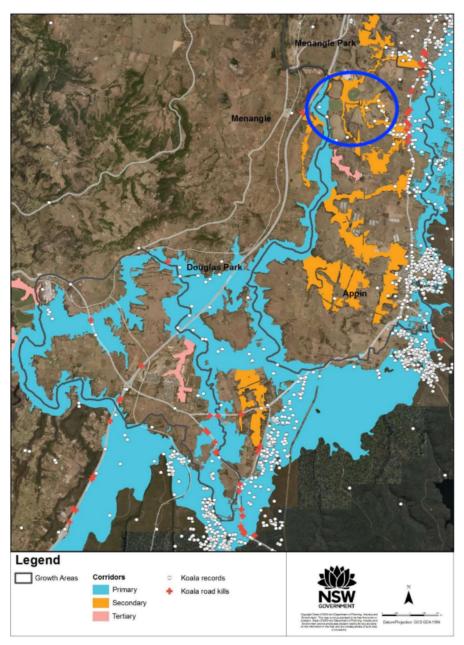


Figure 3: **Koala Habitat Suitability and Koala Sightings** from NSW Government SEED Database. Area of Mt Gilead Stage 2 Biodiversity Certification Application circled in blue. Image from Chief Scientist and Engineer. Advice on the protection of the Campbelltown Koala Population. Koala Independent Expert Panel. 30 April 2020.

CAMPBELLTOWN'S KOALAS ARE ALREADY UNDER INCREASING THREATS FROM DEVELOPMENT ASSOCIATED THREATS.

Local Government Area	2022	Generation 1 (2016-2021)	Generation 2 (2010-2015)	Generation 3 (2004-2009)	<i>pre</i> 2004	Grand Total
Blacktown City Council		1				1
Blue Mountains City Council					2	2
Campbelltown City Council	2	39	22	3		66
Central Coast Council				1		1
Cessnock City Council		3	1	1		5
Council of the City of Sydney			1			1
Dungog Shire Council			1			1
Hawkesbury City Council		3	8	1	3	15
Lake Macquarie City Council		4	1		2	7
Lithgow City Council		1				1
Liverpool City Council		4	2		2	8
Maitland City Council		1				1
Northern Beaches Council					1	1
Port Stephens Council		2	3	1	32	38
Shellharbour City Council			1			1
Shoalhaven City Council		1			2	3
Singleton Council		1			1	2
Sutherland Shire Council		20	4	1		25
Wingecarribee Shire Council		26	5	5	2	38
Wollondilly Shire Council	1	41	23	8	10	83

Table 1: The number of vehicle strikes within each Local Government Are (LGA) partitioned into koala generations (a period of 6 years). (Biolink 2023).

Local Government Area	2022	Generation 1 (2016-2021)	Generation 2 (2010-2015)	Generation 3 (2004-2009)	pre 2004	Grand Total
Campbelltown City Council		10	11	2		23
Cessnock City Council					3	3
Hawkesbury City Council		1	1	1		3
Northern Beaches Council					1	1
Port Stephens Council			4		13	17
The Council of the Shire of Hornsby					1	1
Upper Hunter Shire Council		1				1
Wingecarribee Shire Council			2			2
Wollondilly Shire Council			1		1	2
TOTAL	0	12	19	3	19	53

Table 2: The number of dog attacks within each Local Government Are (LGA) partitioned into koala generations (a period of 6 years). (Biolink 2023).

2. Risk to Other Species.

The NSW SEED Database shows other vulnerable and endangered species of flora and fauna have been sighted in the Gilead Stage 2 development area including:

- Gang Gang Cockatoos (endangered)
- Spotted-tailed Quoll (endangered)
- Brown Pomaderris (endangered)

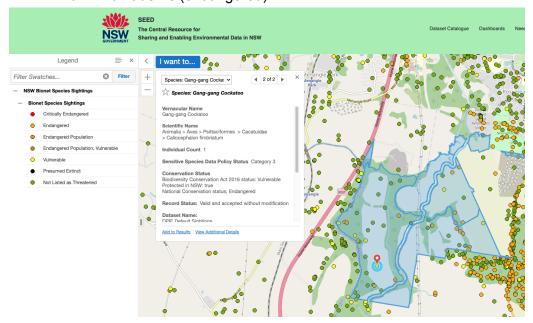


Figure 4: NSW SEED Database, Gang Gang Cockatoo. Gilead Stage 2 Area is shown in blue

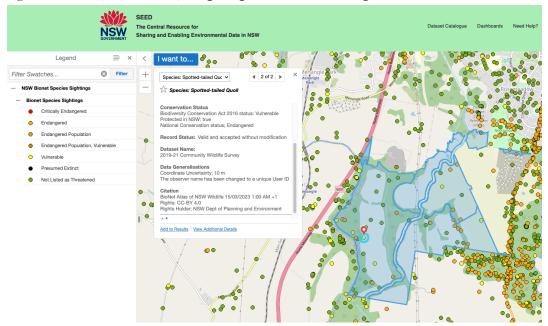


Figure 5: NSW SEED Database, Spotted-tailed Quoll. Gilead Stage 2 Area is shown in blue

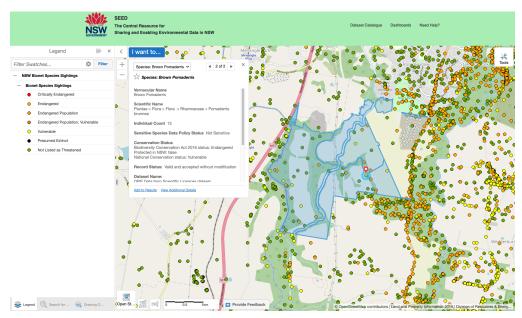


Figure 6: NSW SEED Database, Brown Pomaderris. Gilead Stage 2 Area is shown in blue

This area contains Cumberland Subregion BIO Map Biodiversity Corridor of Regional Significance (Figure 7). The Cumberland pain is Critically Endangered and is home to endagered species such as the Cumberland Land snail.

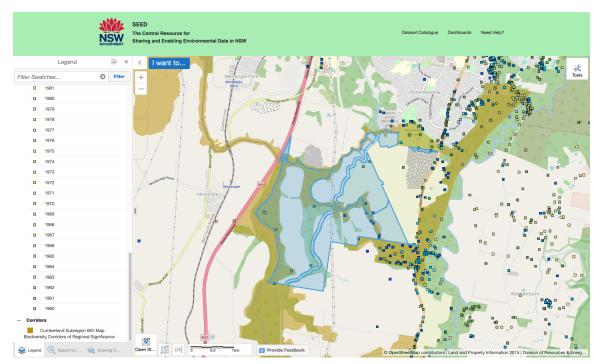


Figure 7: NSW SEED Database showing the Cumberland Subregion BIO Map. Brown areas are Biodiversity Corridors of Regional Significance. Gilead Stage 2 Area is shown in blue

All of the facts presented above are freely available on the NSW SEED database, The Chief Scientists report and Biolink 2023 report.

Campbelltown's Koalas are the last healthy, growing population in NSW. Their survival and expansion is key to koala recovery in NSW. Allowing Gilead Stage 2 to proceed undermines the conservation of koalas by encroaching on their habitat exacerbating the risks this koala population is already facing.

Thank you for considering these issues.

Kind regards,

Jade Peace

Sydney Basin Koala Network



References

NSW SEED government database: https://www.seed.nsw.gov.au/

Chief Scientist Advice on the Protection of the Campbelltown Koala Population: https://www.chiefscientist.nsw.gov.au/ data/assets/pdf file/0005/318830/Koalas-Advice-Final.pdf

Biolink 2023:

https://assets.nationbuilder.com/sydneykoalanetwork/pages/32/attachments/original/1676612494/Sydney Basin_Koala_Assessment.pdf?1676612494