



Submission to the NSW Department of Planning

Objection to State Significant Development Application SSD-89673472, Glenfield Industrial Precinct, 2 Cambridge Avenue, Glenfield

The Sydney Basin Koala Network (SBKN) is a project of Total Environment Centre and works closely with community groups across the Sydney Basin Bioregion who are deeply concerned about the impacts to koalas from development. We object to the proposed Glenfield Industrial Precinct in its current form for the significant impacts on core koala habitat, Cumberland Plain Woodland, and the undermining of the primary Georges River Koala Corridor.

While the proposal is presented as an industrial development with biodiversity mitigation measures, it will result in the continued fragmentation of one of Greater Sydney's most significant koala landscapes. The proposal removes occupied, highly suitable koala habitat, intensifies industrial land use within a mapped primary wildlife corridor, relies on unproven mitigation measures, and depends upon a biodiversity offset model that has demonstrably failed to compensate for habitat loss across the Cumberland Plain.

The proposal is inconsistent with the objectives and recommendations of the *National Recovery Plan for the Koala* (Department of Climate Change, Energy, the Environment and Water, 2022), the advice of the NSW Chief Scientist & Engineer (2021), and the *Campbelltown Koala Plan of Management* (Campbelltown City Council, 2020). Collectively, these documents recognise habitat fragmentation and the loss of landscape connectivity as among the greatest threats to the long-term persistence of koala populations. The National Recovery Plan prioritises maintaining and restoring connected habitat, protecting existing habitat before relying on offsets, and reducing road mortality through appropriately designed fauna crossings and exclusion fencing. Similarly, the NSW Chief Scientist advises that infrastructure which crosses or impacts koala movement pathways should incorporate effective underpasses or overpasses, fencing and habitat linkages, and that functional corridors should be of sufficient width to support koala movement and ecological resilience. The Campbelltown Koala Plan of Management reinforces these principles by identifying the protection and restoration of habitat linkages as fundamental to maintaining a viable and genetically connected koala population across the Greater Macarthur landscape. Any proposal that narrows, fragments or severs an important koala movement pathway, or relies on inadequate mitigation measures in place of avoiding impacts, is therefore inconsistent with national recovery objectives, the NSW Government's scientific advice and the strategic conservation framework adopted by Campbelltown City Council.

This proposal represents a significant **intensification of industrial development within a highly occupied area of core koala habitat connected to the Georges River koala corridor**, placing additional long-term pressure on one of the few remaining connected koala landscapes in Greater Sydney. We strongly recommended a reduced development impact, that increases the koala corridor to appropriate widths, and prevents the unnecessary clearing of core koala habitat and critically endangered Cumberland Plain Woodland.

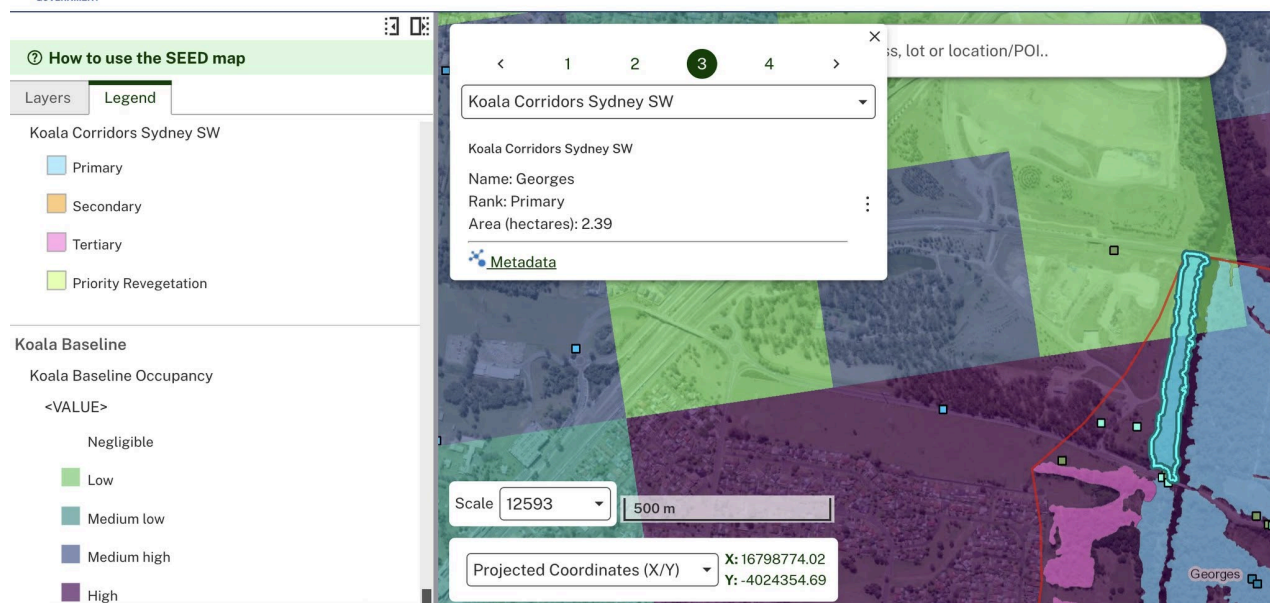


Image 1: The proposal is located within an area identified by the NSW Government as containing high koala occupancy with a mapped Primary Koala Corridor with many Koalas sighting in and around the site.

Our key concerns are outlined as follows:

1. The proposal underestimates the importance of highly suitable, occupied koala habitat

The Biodiversity Development Assessment Report (BDAR) acknowledges koala activity across the site but significantly underestimates the ecological importance of the habitat proposed for removal. The habitat is both occupied and highly suitable for koalas, meeting the definition of core koala habitat.

The proposal will remove approximately **132 koala feed trees** together with **1.14 hectares of Critically Endangered Cumberland Plain Woodland**. Although this cannot be assessed in isolation as it forms part of a much larger connected landscape supporting the Campbelltown koala population. Koala records occur throughout the impact area, confirming that the habitat is actively used rather than functioning as isolated remnants.



Image 2: The Glenfield BDAR found evidence of Koalas at ten locations on the site (pg. 108)

The proposal focuses primarily on the amount of vegetation removed rather than the strategic function of that vegetation within the broader landscape of connected koala habitat.

This approach is inconsistent with **Campbelltown's Koala Plan of Management**, which recognises that habitat connectivity and movement corridors are fundamental components of Core Koala Habitat (Campbelltown City Council, 2020). In addition the Georges River corridor is identified as a strategic linkage area in the Campbelltown Koala Plan of Management, however the proponent is not applying appropriate koala corridor methodology to the site. The ecological significance of habitat cannot be measured solely by its area. Habitat that enables movement between larger habitat blocks is often more valuable than larger but isolated vegetation patches. It is completely inconsistent for the proponent to assert this habitat is not suitable for koalas when their own BDAR and NSW Habitat mapping clearly demonstrates its value to koalas.

2. The proposal intensifies industrial development within a mapped Primary Koala Corridor

The Georges River corridor is mapped by the NSW Government as a **Primary Koala Corridor** and by Campbelltown City Council as a strategic linkage area with recent koala records occurring within and immediately adjacent to the development site, confirming that the corridor and connected habitat on the site is functioning as core koala habitat within a primary movement corridor.

One of the most significant shortcomings of the proposal is that it fails to recognise the strategic importance of its location and the opportunity to restore a wider, safer koala corridor for movement.



Image 3: The site is identified as a strategic linkage area in the Campbelltown Koala Plan of Management (2018, page 29)

Rather, this proposal is an intensification of industrial land use within one of the most important remaining landscape connections for koalas in Greater Sydney.

This land-use intensification and its impacts on koalas have not been adequately addressed in the proposal or BDAR. Such intensification causes continuing ecological degradation through:

- increased lighting
- heavy vehicle movements
- continuous noise
- increased human activity
- stormwater runoff

Creating long-term edge effects. These impacts extend well beyond the vegetation proposed for removal.

3. The proposal is inconsistent with the recommendations of the NSW Chief Scientist

The NSW Chief Scientist and Engineer has advised that maintaining broad, connected habitat corridors is essential for the long-term persistence of the Campbelltown koala population. Their recommendations were for both CPCP land **and surrounding areas**. (DPE Factsheet, 2023)

The Chief Scientist recommended that strategic koala corridors generally comprise habitat widths of approximately **390–425 metres**, together with **30 metre buffers**, in order to maintain ecological function and minimise edge effects associated with urban development (Chief Scientist & Engineer, 2020).

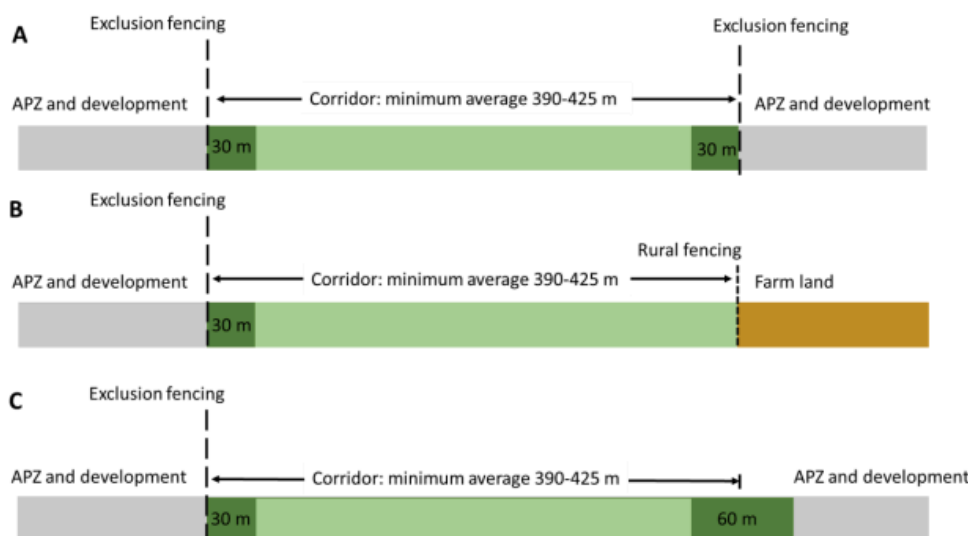


Image 4: Corridor Widths, Buffers and Exclusion Fencing Guidelines (NSW OCSE 2021, pg 20)

Rather than protecting or restoring a corridor of this scale, the Georges River corridor in this proposal is confined to a small strip, prioritising public recreation that immediately adjoins warehouses without buffers or asset protection zones.

The submitted masterplan identifies this area as an "Offset Zone for Recreation and Regeneration", but in practice it functions as a narrow interface between intensive industrial development and the Georges River. This approach is inconsistent with both the NSW Chief Scientist and Campbelltown Koala Plan of Management.

The proposal also appears to conflate public open space with ecological conservation. While recreation corridors provide community benefits, they cannot be regarded as equivalent to protected wildlife corridors where habitat integrity and disturbance minimisation are the primary management objectives. Increased public access inevitably increases disturbance, lighting, noise, domestic animals, weed spread and edge effects.

Rather than strengthening the Georges River corridor, the proposal progressively erodes its ecological function. We recommend significantly widening the corridor including buffers, installing koala exclusion fencing and ensuring asset protection zones that fall within the development footprint.

4. The proposal relies upon an experimental arboreal crossing rather than maintaining connected habitat



The proposal relies heavily on an arboreal crossing to compensate for habitat fragmentation however koalas primarily disperse across the ground.

Although arboreal pole crossings have been used opportunistically in Queensland, they are not advised in NSW and they cannot be used to replace continuous habitat or appropriately designed fauna underpasses or overpasses integrated with connected vegetation.

The NSW Chief Scientist & Engineer advises that infrastructure which crosses, or may impact, koala movement pathways must be designed to enable safe movement across or beneath linear infrastructure. Connectivity structures including underpasses, overpasses or culverts, together with exclusion fencing and appropriate habitat connections, should be incorporated at the earliest stage of planning (NSW Chief Scientist & Engineer, 2021, pp.27–28).

The proposal attempts to justify fragmentation by relying on mitigation measures that remains uncertain. Avoiding fragmentation should remain the primary objective of biodiversity conservation inline with the National Recovery Plan for the Koala (2022).

5. The cumulative impacts have not been adequately assessed

The Environmental Impact Statement considers the proposal largely in isolation, however the Campbelltown koala population has experienced decades of incremental habitat loss associated with residential expansion, industrial development, road upgrades and infrastructure projects.

Collectively, these developments progressively narrow wildlife corridors, reduce habitat quality, isolate populations, increase road mortality and reduce long-term genetic connectivity.

This proposal forms part of that continuing pattern and the cumulative impacts should be assessed alongside other developments affecting the Georges River corridor rather than only considering direct impacts within the development footprint.

6. Biodiversity offsets cannot compensate for the loss of functioning habitat

The proposal proposes to offset the removal of Critically Endangered Cumberland Plain Woodland through the Biodiversity Offset Scheme however, the NSW Government has admitted that offsetting of Cumberland Plain woodland has failed across western Sydney.

The NSW **Growth Centres Biodiversity Offset Program Annual Report 2024–25** states that the program is "**no longer keeping pace with the rate of impacts from development**" and that biodiversity offsets secured remain below target while vegetation clearing continues to increase (Department of Climate Change, Energy, the Environment and Water, 2025).

Only approximately **17.7%** of the long-term target for protecting Critically Endangered Cumberland Plain Woodland has been secured over the life of the program demonstrating that clearing now and offsetting later has failed to replace ecological values lost on the Cumberland Plain.



The National Recovery Plan for the Koala does not regard biodiversity offsetting as an alternative to avoiding impacts on koala habitat. Instead, it requires planning frameworks to prioritise avoiding and minimising impacts to koalas and specifies that any offset decisions should be strategic, undertaken at a landscape scale and informed by the Recovery Plan. Accordingly, fragmentation of koala habitat cannot be justified solely through the provision of biodiversity offsets elsewhere, particularly where those offsets do not maintain the ecological function and connectivity of the impacted landscape.

In conclusion

The Glenfield Industrial Precinct is inconsistent with the strategic objectives of koala conservation in south-west Sydney.

The proposal:

- removes 132 koala feed trees and over 1ha of Critically Endangered Cumberland Plain Woodland
- is located within a mapped **Primary Koala Corridor** and an area of **high koala occupancy**
- intensifies industrial development within one of the most significant remaining koala movement corridors in Greater Sydney
- fails to implement the appropriate koala corridor widths, buffers and exclusion fencing
- relies on an experimental arboreal crossing rather than maintaining continuous habitat;
- fails to adequately assess cumulative impacts; and
- depends upon a biodiversity offset model that has demonstrably failed across the Cumberland Plain.

The Georges River corridor is one of the last remaining landscape-scale habitat connections supporting the Campbelltown koala population. Once fragmented and degraded through industrial intensification, its ecological function cannot realistically be restored.

For these reasons, we request that the NSW Department of Planning refuse SSD-89673472 in its current form. At a minimum, the proposal should be fundamentally redesigned with a smaller footprint to avoid impacts on core koala habitat, maintain a functional corridor consistent with the Chief Scientist's recommendations, and prioritise avoidance of impacts over reliance on biodiversity offsets and unproven mitigation measures.

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References:

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