

Public Submissions

Gilead Stage 2 - State Assessed Planning Proposal

21 November – 19 December 2022

SUB-3167

Name withheld

We have a small holding of land in Gilead in RU2 zone. We request the department to rezone all RU2 zoning of Gilead suburb to residential zoning not only for big builders. This is not fair if Government only rezone big builders land and skip the small mum dad land holders in the suburb

SUB-3172

Robynne Clarke

robynneclarke@yahoo.com

This development proposal will adversely effect koala and other wildlife in the area. The increase in activity, noise, dogs, cats and of course impact from cars will dramatically impact the populations of wildlife locally. It is so important that we carefully consider this when proposing housing developments. There are plenty of vacant areas of land that are not so closely located to significant wildlife habitat. These are more appropriate sites.

SUB-3195

Maria Bradley

mariabradley64@gmail.com

I OPPOSE this development as it will stop the dispersal of this healthy chlamydia free koala population and 287 Threatened Species found onsite

Lendlease cannot be trusted with delivering protections as they have repeatedly ignored the recommendations of NSW Chief Scientist for 390-425 m wide corridors - representatives of Lendlease have argued against protecting Condition 22 A and had 10 lots removed because they interfered with a future underpass crossing - hardly the behaviour of a company who cares

The koala corridors are to be zoned C2 which means the Minister for Planning can approve other uses for the land

The department of planning cannot be satisfied that the species including koala that are impacted will survive long term so therefore this is a localised extinction plan

NSW Chief Scientist called this the safest and shortest east west route for koalas between the Georges and Nepean Rivers - why would a government turn this into a massive housing estate?

Stage 2 rezoning request should be rejected

SUB-3196

Thor Tahli Koalas

Thortahlikoalas@gmail.com

OBJECTION to rezoning

Gilead Stage 2 (Developer:Lendlease):876-hectare site for up to 3,300 homes,school, small town centre, public open space, and environmental conservation land, including several koala corridors

Lendlease's application does not account for the dramatic deterioration in the Koala's circumstances reflected in their Endangered listing in both NSW and Federally

Stage 2 Gilead development cuts across Koala corridors, and for the ones kept it does not provide enough width for them to be effective. The optimal average corridor width for Koalas in Campbelltown has been calculated to be 425m, based on the home range size requirements for female Koalas in low carrying capacity landscapes (Biolink, 2017). In early 2018, a strategic Koala habitat and corridor study was undertaken across the Campbelltown LGA, exploring specific connectivity requirements for Koalas in order to calculate the least-cost dispersal pathways for the population.

Lendlease has not kept its promises on Gilead Stage 1 so how can they be trusted with Stage 2?

At the 2020 Lendlease AGM Michael Ullmer promised that Lendlease would "be meeting or exceeding all substantive areas of that Chief Scientist's Report" regarding the Gilead development. The Greater Macarthur Interim Plan called for minimum Koala corridors of 425m along both sides of the Nepean River. The Chief Scientist called for 390m - 425m average.

Although Lendlease claimed to follow the advice of the Chief Scientist on Gilead Stage 1 regarding Koala corridor widths, there are no corridors included on their land. Instead they used the Noorumba Reserve as a biobank for the Noorumba - Menangle Creek corridor which was only 80 metres wide in one section.

Lendlease continued to fight the widening of the Noorumba - Menangle Creek corridor in the Campbelltown Local Planning Panels (16 Dec 2020, 26 Aug 2022). The LPP could see that koala dispersal was at risk by the proposed plan and on those two occasions,

Lendlease was forced to widen the corridor under Condition 22A. At the 26th August 2022 LPP meeting, Lendlease was directed to remove 10 lots from Stage 1 to allow for the Koala underpass across Appin Road.

Threatened species of Flora and Fauna found on Stage 2 is rich in biodiversity, being home to 287 threatened species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail.

This rezoning will affect the dispersal of koala and other wildlife and therefore their ability to breed and expand

The Koala corridors will be zoned C2 which allows certain uses of the land with the approval of the Minister for Planning -these insufficient koalas corridors are not even fully protected

Gilead and Macarthur likely provide the oldest intact colonial frontier landscape in Australia. Gilead is important as it and its surroundings were most likely the marshalling area of the colonial militia and army near Menangle Creek at the invitation of the owner, Woodhouse, immediately before the massacre of Aboriginal people at Appin.

It is noteworthy that of all the colonial UNESCO sites in Australia, none are older than the buildings and landscape around Gilead and Macarthur. The frontier wars are never as immediate or as visceral as they are when walking that country

Stage 2 should be rejected outright as the DPE and the Minister for Planning cannot be satisfied that this ecological community and the species that depend on it, including the Koala will survive this development.

These are my reasons for objecting to this.

Sincerely

Thor n Tahli koalas

SUB-3211

Yvonne Fessler

yvonne1053@gmail.com

OBJECTION to rezoning Gilead Stage 2 by Lendlease

I am OBJECTING to this development for the following reasons:

Lendlease's application does NOT account for the dramatic deterioration in the Koala's circumstances reflected in their Endangered listing in both NSW and Federally.

Stage 2 Gilead development cuts across koala corridors!! For those corridors that are being kept, there is not enough width provided for them to be effective.

The optimal average corridor width for Campbelltown koalas has been calculated to be 425 metres, based on the home range size requirements for female koalas.

The Threatened species of Flora and Fauna found on Stage 2 is rich in biodiversity!! It is home to 287 threatened species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail. This rezoning will undoubtedly affect the dispersal of koalas and other native wildlife and, therefore, their ability to breed and expand.

REZONING for development should NOT be approved for this unique biodiversity rich area.

Lendlease has NOT kept its promises on Gilead Stage 1 so how can they be trusted with Stage 2?? Lendlease claimed to follow the advice of the Chief Scientist on Gilead Stage 1 regarding koala corridor widths. However, there are NO corridors included on their land!! Instead, they used the Noorumba Reserve as a biobank for the Noorumba-Menangle Creek corridor which is only 80 metres wide in one section.

Stage 2 should be rejected outright as the DPE and the Minister for Planning cannot be satisfied that this ecological community and the species that depend upon it, including our koalas, will survive this development.

The inadequate and unprotected wildlife corridors will NOT facilitate dispersal and movement across this landscape.

I hope you will seriously consider the points I have mentioned above and do your utmost to protect and preserve this wonderful and diverse environment from future development.

I am no longer a resident of NSW. However, I know this area very well and am extremely concerned about its future and that of our precious and well loved koalas and other native wildlife that call this area ""home""!!

Thank you for taking the time to read my submission.

SUB-3212

Charlotte Harrison

charlotte@laplanta.com.au

I am not a resident of the area under proposal but as a citizen of Australia I do have an interest in preventing our most iconic animals from becoming extinct. The proposal will destroy important koala habitat, some of the last remaining in NSW. The threat to extinction of koalas is real and imminent if we continue to clear habitat. I oppose new housing, infrastructure and development in this area, and suggest that higher density infill I already developed subdue a is a better option

SUB-3214

Garry Edwards

63d.wards@gmail.com

OBJECTION TO REZONING

I strongly object to the fast tracking and rezoning of Appin Village and surrounding areas for more than 12,000 homes. This development will destroy part of the critically endangered Cumberland Plain Woodland and negatively impact Koalas and other threatened species, as well as endangering the water running into the Nepean and Georges Rivers and drinking water catchments.

This planning proposal is underpinned by the Cumberland Plain Conservation Plan (CPCP) currently being assessed by the federal Department of Climate Change, Energy, the Environment and Water.

The Chief Scientist identified one Koala Corridor across Wilton Road south of Appin Village and Ousedale Creek within the Village. The Chief Scientist was also concerned about whether the CPCP's preferred east- west koala habitat corridor - Ousedale Creek - could be properly set aside as a workable koala habitat corridor, noting that its function is dependent on land purchases and restoration that will take an indefinite time to deliver.

The Nepean and Georges River are both Primary Corridors but no 425m corridors have been included in this planning proposal. The majority of advice given to DPE by the NSW Chief Scientist has not been adequately incorporated in the CPCP.

The CPCP Assessment Report acknowledges that only approximately 13 percent of the pre-1970 extent of native vegetation in the Cumberland Plain subregion remains intact, with an additional 12 percent occurring as heavily degraded communities (e.g. scattered trees) in disturbed areas. The CPCP will impact 1,753.6 hectares of threatened ecological communities including Cumberland Plain Woodland, Shale Sandstone Transition Forest and River-Flat Eucalypt Forest.

Alarmingly, the CPCP also notes that "biodiversity loss significantly increases once habitat fragmentation by clearing exceeds 70 per cent of the landscape." This threshold has already been passed and will accelerate if the CPCP is implemented in its current form.

Aboriginal Heritage

The importance of the Aboriginal heritage has been identified by the listing of the massacre site on the NSW Heritage Register.

This area should never be built on. It's a place of trauma, great sorrow and death. Development on this land will yet again trigger that trauma for our communities. (Dharawal and Gundungurra family groups petition.)

The petition stated Dharawal and Gundungurra family groups are calling on the NSW government to protect the Appin massacre site from future development. This area should never be built on. It's a place of trauma, great sorrow and death. Development on this land will yet again trigger that trauma for our communities.

Sincerely

Mr Garry Edwards

AKA Thor n Tahli Koalas

KLM – koalalivesmatter

SUB-3216

Ji Montgomery

jiprk99@gmail.com

Dear whom to concern,

I demand that you protect our endangered kolala bears from extinction as their habitats are being cleared in Campbelltown

SUB-3227

Duplicate submission

SUB-3228

Name withheld

OBJECTION to rezoning Mount Gilead Stage 2

Gilead Stage 2 (Developer:Lendlease):876-hectare site for up to 3,300 homes,school, small town centre, public open space, and environmental conservation land, including several koala corridors

Lendlease's application fails to recognise the Koala's Endangered listing in both NSW and Federally - this rezoning fails to provide koalas with the ability to disperse north south and east west

Stage 2 Gilead development severs Koala corridors, and for the few kept it does not provide enough width for them to be effective. The optimal average corridor width for Koalas in Campbelltown has been calculated to be 425m, based on the home range size requirements for female Koalas in low carrying capacity landscapes (Biolink, 2017). In early 2018, a strategic Koala habitat and corridor study was undertaken across the Campbelltown LGA, exploring specific connectivity requirements for Koalas in order to calculate the least-cost dispersal pathways for the population.

This rezoning will affect the dispersal of koala and other wildlife and therefore their ability to breed and expand

The Koala corridors will be zoned C2 which allows certain uses of the land with the approval of the Minister for Planning -these insufficient koalas corridors are not even fully protected

The Technical Assurance Panel has significant concerns including with the proposed Riverside Reserve "is located within the Nepean Koala Corridor it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area."

The koala corridors must be zoned the highest protection E2 and must be 450 metres wide minimum

Lendlease has not kept its promises on Gilead Stage 1 so how can they be trusted with Stage 2? At the 2020 Lendlease AGM Michael Ullmer promised that Lendlease would "be meeting or exceeding all substantive areas of that Chief Scientist's Report" regarding the Gilead development. The Greater Macarthur Interim Plan called for minimum Koala corridors of 425m along both sides of the Nepean River. The Chief Scientist called for 390m - 425m average.

Although Lendlease claimed to follow the advice of the Chief Scientist on Gilead Stage 1 regarding Koala corridor widths, there are no corridors included on their land. Instead

they used the Noorumba Reserve as a biobank for the Noorumba - Menangle Creek corridor which was only 80 metres wide in one section.

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Gilead and Macarthur likely provide the oldest intact colonial frontier landscape in Australia. Gilead is important as it and its surroundings were most likely the marshalling area of the colonial militia and army near Menangle Creek at the invitation of the owner, Woodhouse, immediately before the massacre of Aboriginal people at Appin.

It is noteworthy that of all the colonial UNESCO sites in Australia, none are older than the buildings and landscape around Gilead and Macarthur. The frontier wars are never as immediate or as visceral as they are when walking that country

Stage 2 should be rejected outright as the DPE and the Minister for Planning cannot be satisfied that this ecological community and the species that depend on it, including the Koala will survive this development. The inadequate and unprotected wildlife corridors will not facilitate dispersal and movement across the landscape."

SUB-3250

Peter Bradley

pbradley.phd@gmail.com

I strongly OBJECT to the Planning Proposal

and accompanying rezoning especially in light of recent announcement of this being considered as a Priority Precinct which means all the accompanying documentation has underestimated the dwelling numbers

- **Gilead Stage 2 (Developer: Lendlease): 876-hectare site for up to 3,300 homes.**

Like the Appin proposal, this planning proposal fails to show dimensions for the Koala corridors listed

All relevant scientific advice such as NSW Chief Scientist

<https://www.chiefscientist.nsw.gov.au/independent-reports/campbelltown-koala-advice> and Campbelltown Council's Koala Plan of Management

<https://www.campbelltown.nsw.gov.au/files/assets/public/document-resources/localenvironment/campbelltownkoalaplanoftmanagement.pdf> recommend corridors be at least a minimum of 390-450 metres wide to facilitate dispersal , Koalas are territorial and this width is needed so dispersing young males can move across the landscape safely

The Technical Assurance Panel has highlighted the inadequacy of C2 Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation.

The Urbis document prepared for Lendlease shows "Indicative Stormwater Basin Location Stormwater in wildlife corridors" (Urban Design Report 2022:27). This is contrary to the advice of the Chief Scientist and the TAP. In the same document Urbis have located a "proposed Figtree Hill Reservoir" in the biobank area adjacent to Brown's Bush which has also been identified as a future Koala Reserve.

Lendlease has an "Indicative Sewer Pumping Station" located at the north-west corner of the Site. The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease's insincerity to protect Koala Corridors.

Why does Ecological document list the Koala as a Threatened Species and not Endangered?

Stage 2 is home to 287 Threatened Species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and the Minister for Planning cannot be satisfied that these species will survive the land clearing, fragmentation and urban impacts

We know that the Campbelltown population of koalas, which will be impacted by land clearing for urban development in the Western and South West Sydney area, is one of a number of key populations that must be protected if the koala is to avoid extinction. In the Chief Scientist & Engineer's advice on the protection of the Campbelltown Koala population dated 30 April 2020 (First Chief Scientists Report), the Chief Scientist described the population as:³

"The Macarthur region is host to a historically continuous population of koalas, known as the Campbelltown population. The population of between 250 and 500 individuals is surviving in a landscape that is predominantly native bushland that is connected to rural farmland or periurban environment in the vicinity of the Greater Macarthur area. The Campbelltown population is one of the few remaining populations in the Sydney region. The population is considered to be healthy and uniquely Chlamydia free. The main causes of mortality are vehicle strikes and dog attacks. The impact of the widespread 2019/20 bushfires across NSW has increased the comparative importance of this koala population." (our emphasis)

2 Environment Protection and Biodiversity Conservation Act 1999 (Cth) Part 10 Strategic Assessment Section 146

The Koala Recovery Plan makes it very clear that the key threat to the east coast koala population is land clearing:⁴

"Land use practices causing the loss and fragmentation of habitat are considered the primary ecological threatening process to Koalas, to which they are particularly sensitive..."

The Koala Recovery Plan goes on to say that:⁵

"There appears to be a threshold of habitat coverage below which Koalas rapidly decline from landscapes, which ranges from 10–60% depending on the region..."

This planning proposal also fails to provide adequate koala corridors. This is a significant risk to the Campbelltown koala population as inadequate corridors will prevent dispersing koalas from moving through the landscape, which will in turn affect their ability to breed to ensure genetic diversity and access refugia in times of stress, drought or other threats. Specifically, the Chief Scientist's Second Koala Report noted:⁸

A key risk for koalas and demonstrated in 2019/20 is the threat of bushfires to wildlife and habitat. Maintaining a connected population from the Georges River Koala Reserve, west to the Nepean River Primary Corridor and associated GMGA habitat provides some resilience for the population..

This site should be kept intact, the proponent is a global multinational who would be better served by protecting the area and ensuring the survival of all 287 Threatened Species onsite

The NSW Govt can provide housing in areas without such rich biodiversity- it appears it cannot be trusted either with our native species of flora and fauna

SUB-3252

Thor Tahli Koalas

Thortahlikoalas@gmail.com

I strongly object to the following planning proposal and accompanying rezoning

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This proposal fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

Without being able to see these dimensions the credibility and transparency of this process is undermined.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation.

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve “is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area.”

Koala corridors should be zoned C1 and the ownership and management of these corridors should not remain in the hands of the developers.

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Even more worrying, Lendlease has an “Indicative Sewer Pumping Station” located at the north-west corner of the Site.

The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease’s insincerity to protect Koala Corridors.

The Koala is listed as a Threatened Species in Ecological documents not reflecting the Endangered Listing both in NSW and Federally, this oversight undermines credibility of the planning proposal.

The planning proposal fails to recognise and protect the rich biodiversity of Stage 2, according to one of the Ecological reports Stage 2 is home to 287 Threatened Species of

flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and fails to protect their ecosystems.

Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala.

SUB-3253

Fernanda Martins

Fernanda010673@gmail.com

Please copy and paste then personalise your objection to Stage 2 Gilead - 287 Threatened Species live there

**Paola Torti Wilton Action Group Matt Stellino - Animal Justice Party Councillor
Campbelltown**

<https://www.planningportal.nsw.gov.au/ppr/under-exhibition/gilead-stage-2>

I strongly object to the following planning proposal and accompanying rezoning

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This proposal fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

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SUB-3254

Urszula Gabrysiak

urszulka90@gmx.de

Objection to rezoning

Lendlease's application doesn't account for the vast deterioration in the Koala's circumstances reflected in their Endangered listing in both NSW and Federally -

Rezoning for development should not be approved for this area which is so rich in biodiversity.

Stage 2 Gilead development cuts across Koala corridors, and for the ones kept it doesn't provide enough width for them to be effective. The optimal average corridor width for Koalas in Campbelltown has been calculated to be 425m, based on the home range size requirements for female Koalas in low carrying capacity landscapes (Biolink, 2017).

In early 2018, a strategic Koala habitat and corridor study was undertaken across the Campbelltown LGA, exploring specific connectivity requirements for Koalas in order to calculate the least-cost dispersal pathways for the population.

Lendlease has not kept its promises on Gilead Stage 1 so how can they be trusted with Stage 2? At the 2020 Lendlease AGM Michael Ullmer promised that Lendlease would "be meeting or exceeding all substantive areas of that Chief Scientist's Report" regarding the Gilead development. The Greater Macarthur Interim Plan called for minimum Koala corridors of 425m along both sides of the Nepean River. The Chief Scientist called for 390m - 425m average.

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This rezoning will affect the dispersal of koala and other wildlife and therefore their ability to breed and expand.

The Koala corridors will be zoned C2 which allows certain uses of the land with the approval of the Minister for Planning -these insufficient koalas corridors are not even fully protected from human impacts and instead should be zoned E1 .

Gilead and Macarthur likely provide the oldest intact colonial frontier landscape in Australia. Gilead is important as it and its surroundings were most likely the marshalling area of the colonial militia and army near Menangle Creek at the invitation of the owner, Woodhouse, immediately before the massacre of Aboriginal people at Appin.

It is noteworthy that of all the colonial UNESCO sites in Australia, none are older than the buildings and landscape around Gilead and Macarthur. The frontier wars are never as immediate or as visceral as they are when walking that country.

Stage 2 should be rejected outright as the DPE and the Minister for Planning cannot be satisfied that this ecological community and the species that depend on it, including the Koala will survive this development. The inadequate and unprotected wildlife corridors will not facilitate dispersal and movement across the landscape.

SUB-3256

Margaret Raphael

beaglebabe861@yahoo.com

<https://www.planningportal.nsw.gov.au/ppr/under-exhibition/gilead-stage-2>

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This proposal fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

Without being able to see these dimensions the credibility and transparency of this process is undermined.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation.

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve “is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area.”

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SUB-3258

Aya Sneider

schneideranjuschka@gmail.com

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This project is wrong and destructive, I strongly oppose it!

SUB-3259

Lee Mowbray

leemowbraymq@gmail.com

I strongly object to the following planning proposal and accompanying rezoning

- **Gilead Stage 2 (Developer: Lendlease): 876-hectare site for up to 3,300 homes.**

Like a number of proposals up and down the coast, this fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide. Without being able to see these dimensions the credibility and transparency of this process is undermined.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation.

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve “is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area.”

Koala corridors should be zoned C1 and the ownership and management of these corridors should not remain in the hands of the developers.

The Urbis document prepared for Lendlease shows “Indicative Stormwater Basin Location Stormwater in wildlife corridors” (Urban Design Report 2022:27). This is contrary to the advice of the Chief Scientist and the TAP. In the same document Urbis have located a “proposed Figtree Hill Reservoir” in the biobank area adjacent to Brown’s Bush which has also been identified as a future Koala Reserve.

Even more worrying, Lendlease has an “Indicative Sewer Pumping Station” located at the north-west corner of the Site.

The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease’s insincerity to protect Koala Corridors.

The Koala is listed as a Threatened Species in Ecological documents not reflecting the Endangered Listing both in NSW and Federally, this oversight undermines credibility of the planning proposal.

The planning proposal fails to recognise and protect the rich biodiversity of Stage 2, according to one of the Ecological reports Stage 2 is home to 287 Threatened Species of

flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and fails to protect their ecosystems.

Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala.

SUB-3267

Cheryl Egan

eganc912@hotmail.com

As a local resident I object to Gilead Stage 2.

It is not in the public interest.

It does not consider the Precautionary Principle.

The infrastructure is woefully inadequate.

The Species Impact Study was never undertaken, which was law until 2016.

The building of houses on occupied koala land is a travesty.

Translocation of koalas has a morbidity rate of 70%.

There are no second chances, you need to get it right the first time and not keep changing the details of the DA.

SUB-3270

Angela Cranson

angc7777@gmail.com

To Whom It May Concern

I strongly object to the following planning proposal and accompanying rezoning

- Gilead Stage 2 (Developer: Lendlease): 876-hectare site for up to 3,300 homes.

This will see the extinction of the koala and many other endangered species if this development is allowed to go ahead, NSW cannot afford to lose these beautiful koalas that live in this area, so much of the environment has been destroyed because of habitat destruction, extinction is in the air for many of the native wildlife that reside in this region, NSW is losing its natural environment and green space, which serves as a very important purpose for biodiversity

This proposal fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

Without being able to see these dimensions the credibility and transparency of this process is undermined.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation.

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve “is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area.”

Koala corridors should be zoned C1 and the ownership and management of these corridors should not remain in the hands of the developers.

The Urbis document prepared for Lendlease shows “Indicative Stormwater Basin Location Stormwater in wildlife corridors” (Urban Design Report 2022:27). This is contrary to the advice of the Chief Scientist and the TAP. In the same document Urbis have located a “proposed Figtree Hill Reservoir” in the biobank area adjacent to Brown’s Bush which has also been identified as a future Koala Reserve.

Even more worrying, Lendlease has an “Indicative Sewer Pumping Station” located at the north-west corner of the Site.

The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease's insincerity to protect Koala Corridors.

The Koala is listed as a Threatened Species in Ecological documents not reflecting the Endangered Listing both in NSW and Federally, this oversight undermines credibility of the planning proposal.

The planning proposal fails to recognise and protect the rich biodiversity of Stage 2, according to one of the Ecological reports Stage 2 is home to 287 Threatened Species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and fails to protect their ecosystems.

Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala.

Kind regards

Angela Cranson

SUB-3272

Robyn Rashleigh

robynr54@yahoo.com.au

Please put in an objection to Appin rezoning by copying and pasting and personalising below - Gilead on separate post

<https://www.planningportal.nsw.gov.au/ppr/under-exhibition/appin-part-precinct>

- **Appin Precinct (Developer: Walker Corporation): 1,284-hectare site for over 12,000 homes.**

I strongly object to the fast tracking and rezoning of Appin Village and surrounding areas for more than 12,000 homes. This development will destroy part of the critically endangered Cumberland Plain Woodland and negatively impact Koalas and other threatened species, as well as endangering the water running into the Nepean and Georges Rivers and drinking water catchments.

The planning principle for the Greater Macarthur Growth Area is the conservation of biodiversity for koala population yet this planning proposal fails to adequately conserve biodiversity and the Planning Minister cannot be confident the Endangered Species like Koala will survive long term

This planning proposal is underpinned by the Cumberland Plain Conservation Plan (CPCP) currently being assessed by the federal Department of Climate Change, Energy, the Environment and Water.

The Chief Scientist identified one Koala Corridor across Wilton Road south of Appin Village and Ousedale Creek within the Village. The Chief Scientist was also concerned about whether the CPCP's preferred east-west koala habitat corridor - Ousedale Creek - could be properly set aside as a workable koala habitat corridor, noting that its function is dependent on land purchases and restoration that will take an indefinite time to deliver.

The Nepean and Georges River are both Primary Corridors but no 425m minimum wide corridors have been included in this planning proposal. The majority of advice given to DPE by the NSW Chief Scientist has not been adequately incorporated in the CPCP.

The CPCP Assessment Report acknowledges that only approximately 13 percent of the pre-1970 extent of native vegetation in the Cumberland Plain subregion remains intact, with an additional 12 percent occurring as heavily degraded communities (e.g. scattered trees) in disturbed areas.

The CPCP will impact 1,753.6 hectares of threatened ecological communities including Cumberland Plain Woodland, Shale Sandstone Transition Forest and River-Flat Eucalypt Forest.

Alarming, the CPCP also notes that ""biodiversity loss significantly increases once habitat fragmentation by clearing exceeds 70 per cent of the landscape."" This threshold has already been passed and will accelerate if the CPCP is implemented in its current form.

The importance of the Aboriginal heritage has been identified by the listing of the Massacre Site on the NSW State Heritage Register but will the NSW State Government protect the site from development?

In their petition, No development at Appin Massacre Area, the Dharawal and Gundungurra family groups are calling on the NSW Government to protect the Appin massacre site from future development. "This area should never be built on. It's a place of trauma, great sorrow and death. Development on this land will yet again trigger that trauma for our communities."

Appin and North Appin are now being considered as Priority Precincts, according to Minister Roberts (Daily Telegraph Dec 5th) which means the CPCP has grossly underestimated the amount of dwellings and the accompanying impacts on Endangered and Threatened Species including the Koala

This proposal fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

SUB-3274

Taylor Cameron

taylorlouise_cameron@hotmail.com

I Taylor Cameron strongly object to the following planning proposal and accompanying rezoning

- **Gilead Stage 2 (Developer: Lendlease): 876-hectare site for up to 3,300 homes.**

This proposal fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

Without being able to see these dimensions the credibility and transparency of this process is undermined.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation.

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve “is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area.”

Koala corridors should be zoned C1 and the ownership and management of these corridors should not remain in the hands of the developers.

The Urbis document prepared for Lendlease shows “Indicative Stormwater Basin Location Stormwater in wildlife corridors” (Urban Design Report 2022:27). This is contrary to the advice of the Chief Scientist and the TAP. In the same document Urbis have located a “proposed Figtree Hill reservoir” in the biobank area adjacent to Brown’s Bush which has also been identified as a future Koala Reserve.

Even more worrying, Lendlease has an “Indicative Sewer Pumping station” located at the north-west corner of the Site.

The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease’s insincerity to protect Koala Corridors.

The Koala is listed as a Threatened Species in Ecological documents not reflecting the Endangered Listing both in NSW and Federally, this oversight undermines credibility of the planning proposal.

The planning proposal fails to recognise and protect the rich biodiversity of Stage 2, according to one of the Ecological reports Stage 2 is home to 287 Threatened Species of

flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and fails to protect their ecosystems.

Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala.

SUB-3275

Sharon Frohreich

shafroh@gmail.com

This development must stop

Our beautiful wildlife needs this land to survive

SUB-3285

Susan Clarkson

susan.clarkson@y7mail.com

I strongly object to the following planning proposal and accompanying rezoning.

Gilead Stage 2 (Developer: Lendlease): 876-hectare Site for up to 3,300 homes.

This proposal fails to apply the planning principle for the Greater Macarthur Growth Area, namely, biodiversity conservation for the koala population.

The planning proposal fails to show the dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

Without being able to see these dimensions, the credibility and transparency of this process are undermined.

Zoning Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are incompatible with Koala conservation.

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve “is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area.”

Koala corridors should be zoned C1, and the ownership and management of these corridors should not remain in the hands of the developers. To leave it in the hands of the developers shows a blatant disregard for the koalas and their habitat. Yet again, this government is showing that developer profit comes above endangered species and the people of this area.

The Urbis document prepared for Lendlease shows “Indicative Stormwater Basin Location Stormwater in wildlife corridors” (Urban Design Report 2022:27). This is contrary to the advice of the Chief Scientist and the TAP. In the same document, Urbis has located a “proposed Figtree Hill Reservoir” in the biobank area adjacent to Brown’s Bush which has also been identified as a future Koala Reserve.

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The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease’s insincerity to protect Koala Corridors.

The Koala is listed as a Threatened Species in Ecological documents not reflecting the Endangered Listing both in NSW and Federally, this oversight undermines the credibility of the planning proposal. Why have a scientific report if it is just going to be ignored?

The planning proposal fails to recognise and protect the rich biodiversity of Stage 2; according to one of the Ecological reports, Stage 2 is home to 287 Threatened Species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and fails to protect their ecosystems.

I am shocked that Mt Gilead is now a priority by the NSW government, and nothing has been done to save the Koala, an endangered species, and the other threatened species. The NSW Liberal government need to be held to account over this, I am dismayed that the government is short-sighted on this.

Climate change is a real threat in southwest and western Sydney, with temperatures expected to increase even more with urban sprawl.

Action needs to be taken now to stop this.

SUB-3288

Stephan Anatala

acid.is.truth@gmail.com

My name is Steve and I'm appalled you are considering destroying koala habitat.

I OBJECT to the following planning proposal and to rezoning rural land to residential

- **Gilead Stage 2 (Developer: Lendlease): 876-hectare site for up to 3,300 homes.**

This proposal should be rejected because it fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

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Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala.

SUB-3295

Jennifer Cuthbertson

nathalie.em@bigpond.com

I OBJECT to the following planning proposal and to rezoning rural land to residential

- **Gilead Stage 2 (Developer: Lendlease): 876-hectare site for up to 3,300 homes.**

Our family lives in AVALON BEACH, where koalas were, within my lifetime, so plentiful that everyone had a koala in their back yard. Now, all that remains are the sad road signs warning of koalas but ALL the koalas in the area have been wiped out.

Our precious koalas are endangered in the wild and every effort must be made to preserve existing koala habitat.

The subject proposal should be rejected because it fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

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Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation.

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Koala corridors should be zoned C1 and the ownership and management of these corridors should not remain in the hands of the developers.

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Even more worrying, Lendlease has an “Indicative Sewer Pumping Station” located at the north-west corner of the Site.

The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease’s insincerity to protect Koala Corridors.

The Koala is listed as a Threatened Species in Ecological documents not reflecting the Endangered Listing both in NSW and Federally, this oversight undermines credibility of the planning proposal.

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Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala.

SUB-3296

Maree Holton

maree.holton@hotmail.com

<https://www.planningportal.nsw.gov.au/ppr/under-exhibition/gilead-stage-2>

I OBJECT to the following planning proposal and to rezoning rural land to residential

- Gilead Stage 2 (Developer: Lendlease): 876-hectare site for up to 3,300 homes.

This proposal should be rejected because it fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

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Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala.

SUB-3300

Peter Kervarec

ballaratphotographer@gmail.com

Simply this.

The damage to our koala populations cannot continue.

I've just returned from Europe where would be tourists think we have healthy, well looked after populations of koalas when in actual fact, they are endangered in some place. Being killed mainly via road kills by cars.

Another few years and there won't be any koalas left.

Koala carers are already under extreme duress.

SUB-3312

Alanna Somers

somers1959@me.com

I strongly object to this planning proposal for the following reasons:

There is a stunning array of threatened flora and fauna at the site which includes the critically endangered Cumberland Plain Woodland (CPW) and Shale Sandstone Transition Forest (SSTF), the endangered River-Flat Eucalypt Forest (RFEF), the threatened Pomaderris brunnea and the endangered Koala, Squirrel Glider, Cumberland Plain Land Snail and the Southern Myotis.

The proposal fails to show that the Chief Scientist & Engineer's advice to DPIE on minimum koala corridor widths of 390-425m has been observed.

Koala corridors and buffer zones should be zoned C1 rather than C2 to prevent disturbance to koalas from edge effects. Koalas are highly susceptible to urban edge effects on the habitat perimeter which produce physiological stress, environmental trauma and disease.

There appears to be infrastructure planned for areas identified as wildlife corridors by the Chief Scientist & Engineer, such as a stormwater basin, a reservoir, and even a sewer pumping station, which will compromise the Menangle Creek to Noorumba, and the Woodhouse Creek to Beulah corridors, as well as the proposed koala reserve in the biobank area near Browns Bush. This is unacceptable.

The Chief Scientist's Koala Report 2020 warns that

It is the functional role that habitat in Mount Gilead site plays in connecting the north end of the Nepean Corridor in an easterly direction that means protecting corridor structures at MGS2 is critical, preventing an isolated population at Nepean.

It further notes that

As addressed above, the importance of the Mount Gilead site to the east-west movement of koalas is amplified by its location at the north end of the Nepean corridor. Koalas currently can move through the landscape in an easterly direction towards the Georges River. However, once housing development occurs along the western flank of the MGS2 site, the route for koalas to move east or west will be through a narrow strip of habitat at the confluence of the Nepean River and Menangle Creek. However, the Panel notes that planning for future transport corridors (Figure 1) includes an indicative transport corridor to potentially run through this strip of habitat, while the MGS2 biodiversity certification application and conceptual plans illustrate (Figure 2 and Figure 8) this habitat being potentially surrounded by three roads.

NSW government programs, plans and strategies are failing to protect koalas and their habitat and the Koala is on a trajectory to be extinct in the wild in NSW by 2050. Now we have mega-developers encroaching on land occupied by the uniquely healthy and thriving koalas of southwest Sydney. I urge you to reject this planning proposal, while acknowledging that the NSW Government is a rubber stamp for developers and has a track record of development at any cost.

SUB-3315

Sharon Rigby

Shaza1262@gmail.com

I strongly object to the following planning proposal and accompanying rezoning

Gilead Stage 2 (Developer: Lendlease): 876-hectare site for up to 3,300 homes.

The land referred to in this planning proposal is not 'Terra nullius'

It is certainly not unoccupied

Many wildlife species have called this land 'home' for a very long time - but they will be severely compromised or wiped out by this development.

Residents currently in situ:

1 endangered species (koala) and

287 Threatened Species

Live here

Koalas need connectivity. They have home ranges, attachments to particular trees, but they also need to move " to escape fire and to live, breed, expand their gene pool and maintain disease resistance. Stuck in a dead end " known as a "koala sink" " they mope and dwindle. Inappropriate fencing, roads and housing developments cause "koala sinks'.

This site sits at the nearest point between the Nepean River and Georges River bush corridors.

This proposal fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

Without being able to see these dimensions the credibility and transparency of this process is undermined.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation.

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve "is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area."

Koala corridors should be zoned C1 and the ownership and management of these corridors should not remain in the hands of the developers.

The Urbis document prepared for Lendlease shows “Indicative Stormwater Basin Location Stormwater in wildlife corridors” (Urban Design Report 2022:27). This is contrary to the advice of the Chief Scientist and the TAP. In the same document Urbis have located a “proposed Figtree Hill Reservoir” in the biobank area adjacent to Brown’s Bush which has also been identified as a future Koala Reserve.

Even more worrying, Lendlease has an “Indicative Sewer Pumping Station” located at the north-west corner of the Site.

The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease’s insincerity to protect Koala Corridors.

The Koala is listed as a Threatened Species in Ecological documents not reflecting the Endangered Listing both in NSW and Federally, this oversight undermines credibility of the planning proposal.

The planning proposal fails to recognise and protect the rich biodiversity of Stage 2, according to one of the Ecological reports Stage 2 is home to 287 Threatened Species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and fails to protect their ecosystems.

Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala.

Please refuse this proposal in it's entirety

Sharon Rigby

0417659788

SUB-3323

Bernice Ravina

berniceravina@gmail.com

I strongly object to the following planning proposal and accompanying rezoning

- **Gilead Stage 2 (Developer: Lendlease): 876-hectare site for up to 3,300 homes.**

Lendlease' s application doesn't account for the dramatic deterioration in the Koala's circumstances reflected in their Endangered listing in both NSW and Federally.

This proposal fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

Re zoning for development should not be approved for this unique biodiversity rich area.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide. (Biolink 2017).

Without being able to see these dimensions the credibility and transparency of this process is undermined.

Lendlease has not kept its promises on Gilead Stage 1 so how can they be trusted with stage 2?Although Lendlease claimed to follow the advice of the Chief Scientist on Gilead Stage 1 regarding koala corridor widths, there are no corridors included on their land.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation.

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve “is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area.”

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The planning proposal fails to recognise and protect the rich biodiversity of Stage 2, according to one of the Ecological reports Stage 2 is home to 287 Threatened Species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and fails to protect their ecosystems.

Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala.

Therefore I strongly object this planning proposal and accompanying rezoning.

SUB-3324

Francisco Lara

eliasanmiguel@gmail.com

As a temporary resident researcher in the Australian Botanical Gardens in Mount Annan I have become aware of the critical situation of the Koala populations across NSW and Australia, and how the development plan for MacArthur region further threatens their survival.

Australia should be ashamed, and will be, unless you act urgently to save your magnificent environmental legacy.

SUB-3340

Stephen Bruce

steve.bruce366@gmail.com

I strongly oppose the proposal:

Gilead Stage 2 (Lendlease) 876-hectare site for up to 3,300 homes.

My reasons are:

- 1. The project avoids and ignores the planning principle for the Greater Macarthur Growth Area which includes the conservation of biodiversity for the Koala population and the countless other flora and fauna which will be destroyed by this sprawl at any cost.**
- 2. Koala (wildlife) corridors must be just that; for wildlife and not for swings, bbq's and roads. The attempt to convert these corridors into C2 zones is a disgrace. The developers and the government knows that once lots of people, dogs and bikes are encouraged into the corridors, the animals move out and biodiversity suffers. Parks should be placed in the housing zones.**
- 3. It appears that Lendlease is attempting to shrink the scientifically determined width of the corridors and even to sever them altogether. Dimensions are vague and this creates massive distrust amongst those of us who wish to see guidelines being strictly observed.**
- 4. The Priority Precinct statement by the planning Minister, Anthony Roberts, will almost surely mean that the original estimate of house numbers and the resulting impact on Endangered and Threatened Species will have been vastly underestimated.**
- 5. Must we again witness the loss of such a valuable animal, its many, many diverse colleagues and undisturbed woodland simply to smash through with more bricks and mortar, sterile parks, and picnic tables? It is not necessary to build this amount of houses (up to 15,000) and squeeze out the wildlife forever while doing it.**

The Minister should halt the project until it can be shown that scientific advice is being adhered to and that the developer can display greater detail and clarity around these rules and guidelines.

Thank you

Stephen Bruce

SUB-3343

Sharn Ogden

sharn.ogden@bigpond.com

I oppose this development. It's shameful enough that we only have one remaining healthy koala population left in NSW, without encroaching on their territory. Placing houses in this area brings cats, dogs, motorbikes, noise and vehicles.

The proponents have not clearly followed scientific advice regarding safe corridors, and are unlikely to consider the koalas best interests when on the ground.

Have we run out of land to build houses that is not too close to koala habitat?

Perhaps the NSW state government should consider going up, not out. These large urban sprawls are bad for the environment, create long energy inefficient commutes, are inefficient use of land. In fact, the only advantage is a few individuals make a lot more money.

SUB-3348

Brenda Gerrie

brendagerrie@bigpond.com

I object to this development. At this point in time I do not trust this government or the proponent to adequately protect the koalas.

Thank you

SUB-3350

Georgia Wallace-Crabbe

georgia@filmprojects.com.au

Dear Sir/Madam

We have been closely following the Figtree Hill/ Mt Gilead development for a documentary about Koala protection across NSW.

Regarding Figtree Hill Stage 2, we demand that the Chief Scientists Report be followed in regard to commitments and recommendations made prior to approval of Stage 1 (and contingent on which stage 1 was approved), namely:

- 1. All creeks should have at least 425 metre wildlife corridors**
- 2. Road Underpasses on Appin Road adjoining Noorumba Reserve, Beulah, Mallaty Creek and Ouzedale Creek should be installed now, ahead of Stage 2, as an indication of Lendlease intention / commitment to building these.**
- 3. No buildings or retention dams should be allowed within wildlife corridors**
- 4. All wildlife corridors should be C1 and not C2.**

This is the minimum required to maintain the corridor, after paddock trees were cleared in Stage 1 that were important to the koalas movement between the Appin and Nepean Rivers.

This corridor is vital to the survival of an important, disease free population of koalas that may hold the key to the survival of the species in NSW.

Thanks for the opportunity to make this submission.

Georgia Wallace-Crabbe

SUB-3352

Cita Murphy

jazzies@bigpond.net.au

We are opposing this proposed development because of the massive fauna and flora destruction this will cause.

We note the timing of feedback so close to Christmas on this huge development as deliberate and disgraceful.

We don't believe the proposed development will only be for up to 3,300 dwellings and will increase dramatically as soon as Biocertification is received a repeat of Stage 1.

There is no width stated on Koala corridors. Koala Corridors must be a minimum of 390 to 450 metres wide.

Zoning of Koala corridors must be C1 not C2 . C2 zoning allows for access roads, buildings, bbqs, lighting, dog walking, playgrounds etc.

All Koala corridors, all environmental conservation areas must be handed over to National Parks for management and ownership. Developers must not control and own these areas.

All Koala / Wildlife Corridors , Reserves and Environment Conservation areas cannot be used for :

- a) stormwater and or stormwater basins**
- b) sewers, sewer pumping stations and ponds**
- c) for any other use or purpose .**

The proposal fails to recognise and protect the rich natural diversity . This area is home to 287 threatened species, 124 native vertebrates, 8 species birds, (very conservative number), 11 native mammals, the Cumberland Plain Land Snail and their ecosystems. Comment from experienced Environmentalists is there are trees you ca'n't see anywhere else.

This land should all be National Park not another overdevelopment.

Where are the Wildlife Overbridges so Koalas, Wallaroos, Gliders can travel safely across Appin Road ? There are supposed to be five Wildlife Crossings and not one has been built.

Where is Campbelltown's precious green space going to disappear to if this development is allowed ?

Please do not allow this development if you want to save the healthiest Koala population from extinction. Thankyou.

SUB-3405

Bronwyn Vost

bronwynvost@bigpond.com

Gilead Stage 2

I submit that Stage 2 should be rejected outright.

Lendlease's poor record in Stage 1.

Lendlease has not kept its promise to abide by the Chief Scientist's conditions regarding 425 m koala corridor widths in the development of Gilead Stage 1. I conclude that they would similarly disregard the conditions in Stage 2. In Stage 1 they strongly resisted widening Corridor A to the west and south of Noorumba Reserve until compelled to do so by Local Planning Panels of Campbelltown Council. At the time of writing, the corridor widening associated with Clause 22A has not been incorporated into Lendlease's Stage 1 plans.

Offsetting

The offset process which underlies Stage 1 has meant that about 100 healthy mature koala habitat trees have already been bulldozed. Many more will probably meet a similar fate in Stage 1. Stage 2 is well-wooded koala habitat and must not be subjected to offsetting. No other land can compensate for this unique site where the Nepean and Georges Rivers are at their closest, forming a natural koala corridor.

Threatened species.

The land on Stage 2 is rich in biodiversity, being home to 287 Threatened or Endangered species of flora and fauna. These include 124 native vertebrates, 8 species of birds, 11 native mammals (the Endangered Koala being one of these) and the Endangered Cumberland Plain Land Snail.

During an extinction crisis, it is untenable to put at risk the survival of all these threatened species. Surely, we can supply homes without taking essential habitat.

The DPE and the Minister for Planning cannot be satisfied that this ecological community will survive this development.

Heritage.

Gilead is part of probably the oldest intact colonial frontier landscape in Australia, and part of the Appin Massacre story. Dharawal and Gundungurra people have objected to the site being disturbed.

SUB-3440

Terry Ingram

twi62@hotmail.com

This proposal fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

Without being able to see these dimensions the credibility and transparency of this process is undermined.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation.

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve “is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area.”

Koala corridors should be zoned C1 and the ownership and management of these corridors should not remain in the hands of the developers.

The Urbis document prepared for Lendlease shows “Indicative Stormwater Basin Location Stormwater in wildlife corridors” (Urban Design Report 2022:27). This is contrary to the advice of the Chief Scientist and the TAP. In the same document Urbis have located a “proposed Figtree Hill Reservoir” in the biobank area adjacent to Brown’s Bush which has also been identified as a future Koala Reserve.

Even more worrying, Lendlease has an “Indicative Sewer Pumping Station” located at the north-west corner of the Site.

The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease’s insincerity to protect Koala Corridors.

The Koala is listed as a Threatened Species in Ecological documents not reflecting the Endangered Listing both in NSW and Federally, this oversight undermines credibility of the planning proposal.

The planning proposal fails to recognise and protect the rich biodiversity of Stage 2, according to one of the Ecological reports Stage 2 is home to 287 Threatened Species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and fails to protect their ecosystems.

Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala."

SUB-3446

Name withheld

I request that Stage 2 be rejected outright, for several reasons:

1. Lendlease had a terrible record in Stage 1

Lendlease has not kept its promise to abide by the Chief Scientist's conditions regarding 425m koala corridor widths in the development of Gilead Stage 1. There is no reason to believe that they will abide by these conditions in State 2. In Stage 1 they strongly resisted widening Corridor A to the west and south of Noorumba Reserve until compelled to do so by Local Planning Panels of Campbelltown Council. At the time of writing, the corridor widening associated with Clause 22A has not been incorporated into Lendlease's Stage 1 plans.

2. Offsetting

The offset process which underlies Stage 1 has meant that about 100 healthy mature koala habitat trees have already been bulldozed. Many more will probably meet a similar fate in Stage 1. Stage 2 is well-wooded koala habitat and must not be subjected to offsetting. No other land can compensate for this unique site where the Nepean and Georges Rivers are at their closest, forming a natural koala corridor.

3. Threatened species

The land on Stage 2 is rich in biodiversity, and is home to 287 Threatened or Endangered species of flora and fauna. These include 124 native vertebrates, 8 species of birds, 11 native mammals (the Endangered Koala being one of these) and the Endangered Cumberland Plain Land Snail.

During an extinction crisis, it is untenable to put at risk the survival of all these threatened species. Surely, we can supply homes without taking essential habitat.

The DPE and the Minister for Planning cannot be satisfied that this ecological community will survive this development.

4. Heritage

Gilead is part of probably the oldest intact colonial frontier landscape in Australia, and part of the Appin Massacre story. Dharawal and Gundungurra people have objected to the site being disturbed.

For these multiple reasons, please reject this proposal.

SUB-3469

Pam Handyside

pamhandyside@bigpond.com

See attached file.

Gilead Stage 2 (Developer: Lendlease): 876-hectare site for up to 3,300 homes.

I object to this planning proposal as it fails to apply the planning principle for the Greater Macarthur Growth Area namely, the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed and scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

Without being able to see these dimensions the credibility and transparency of this process is undermined.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation.

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve “is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area.”

Koala corridors should be zoned C1 and the ownership and management of these corridors should not remain in the hands of the developers.

The Urbis document prepared for Lendlease shows “Indicative Stormwater Basin Location Stormwater in wildlife corridors” (Urban Design Report 2022:27). This is contrary to the advice of the Chief Scientist and the TAP. In the same

document Urbis have located a “proposed Figtree Hill Reservoir” in the biobank area adjacent to Brown’s Bush which has also been identified as a future Koala Reserve.

Even more worrying, Lendlease has an “Indicative Sewer Pumping Station” located at the north-west corner of the Site.

The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease’s insincerity to protect Koala Corridors.

The Koala is listed as a Threatened Species in Ecological documents not reflecting the Endangered Listing both in NSW and Federally, this oversight undermines credibility of the planning proposal.

The planning proposal fails to recognise and protect the rich biodiversity of Stage 2, according to one of the Ecological reports Stage 2 is home to 287 Threatened Species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and fails to protect their ecosystems.

Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala.

The NSW Government has a social, moral, ethical and legal obligation and duty of care to protect endangered and threatened species by enforcing its own legislation and

regulations designed to protect those very endangered and threatened species that are under threat in this project.

This project must be refused.

SUB-3472

Peter Hughes

mrhughes@hotmail.com

NO! Enough development in the Sydney Basin. Take your development to the other side of the Blue Mountains where it is desperately needed to provide critical mass for services to our regional areas.

It is amazing that there are still populations of Koala and Powerful Owls and other threatened species in the areas that you are sizing up to be bulldozed and turned into suburbia.

You know full well the numbers of threatened species and other surviving animal populations in the area. You know they are there because of the preservation of bushland in the area over time, and the fact that if you start building in the buffer areas along side, over time, the populations we are still lucky to have will decline.

You can't argue against this... it is a fact. It is also a fact that while animals will use corridors, populations will still suffer, and numbers will decline. It's inescapable because the edge effect of suburbia moving alongside bushland will damage the habitat these animals need to survive.

How can such a thing be considered at a time when our koala and other threatened species populations continue to decline? Greed and Short Sightedness, that's how.

Population policy in NSW is governed by ""how can we best enrich the pockets of our developer mates"", not ""how can we produce the best result for our population"".

If you folks had any sense you would be looking at the state of NSW and noting that the major regional towns remain just that ... towns. There are no real cities out in western NSW... where there is ample space for expansion. Tamworth has just 64-thousand people, Wagga 56 thousand. Those two towns are each the size of the Gilead and Appin proposals you want to plonk on the edge of this threatened species habitat. Short sighted and stupid.

You need to be making it easier for people to go west. Encourage populations to move across the mountains and help build up the resources and infrastructure out there. It's commonsense. Sadly, you people are lacking in that.

In twenty year's time those who succeed you in your roles will look at the Appin and Gilead areas and determine that your decision to build homes for more than 50-thousand people on the edge of a thriving threatened species habitat was a complete disaster.

SUB-3475

Amanda Richman

arichman@australianethical.com.au

Please see attached submission setting out our concerns about lack of transparency by Lendlease and the NSW Government with respect to this proposed development.

15 December 2022

Department of Planning and Environment
NSW Government

Gilead Stage 2 planning proposal PP-2022-3978

Thank you for the opportunity to comment on the Gilead Stage 2 planning proposal. Australian Ethical Investment is currently an investor in Lendlease Group and we have had close dialogue with the company about this development and its impact on the local koala colony. We have concerns about the development and what we perceive to be a lack of transparency in this consultation with respect to biodiversity impacts.

Who we are

Australian Ethical Investment Limited was established in 1986 to manage the savings of Australians in an environmentally and socially responsible way. Today we manage over \$8 billion in superannuation and managed funds for over 110,000 Australians. Our ethical investment approach aims to deliver strong financial performance and help shape a future that better serves people, animals and the planet.

Importance of protecting nature

Our planet's 11,000-year era of climate stability is coming to an end, not by the geological rhythms of nature but by the frenzied activities of humans. Humanity's impact on nature's finely tuned ecosystems is intensifying and we are approaching tipping points at our own peril.

As the UN Secretary-General observed at the opening of the COP15 Biodiversity Conference this month, we are waging a war on nature. Humanity has become a weapon of mass extinction, with a million species at risk of disappearing forever. Australia is unfortunately contributing to this with one of the worst track records on species loss and habitat destruction.

As a financial organisation seeking to invest for the long-term financial interests of our customers, we recognise that nature loss poses a systemic risk to the stability of financial, economic and social systems. As an ethical organisation, we recognise that the systemic destruction of nature is a tragedy so much greater than what could ever appear on a balance sheet.

We need governments to be ambitious in their efforts to protect and preserve nature. And businesses to put protection ahead of profit. This required level of ambition does not appear to us to have been demonstrated by either Lendlease or the NSW government in this process.

Lack of transparency

Maps showing calculations of the koala corridor widths

Our primary concern is that there are no maps available that show how the average width of the three koala corridors proposed for Mount Gilead were calculated (i.e. with transect lines drawn and widths of each transect line stated) as has been done for other koala corridors in the Oct 2021 Biosis Report 'Cumberland Plain Conservation Plan, Functional Koala Corridors' (available [here](#)). That report says, 'It is anticipated that the mapping for the final Koala corridor for Gilead will be finalised through a future rezoning process, such as a planning proposal through Campbelltown City Council or a State led rezoning, however will remain consistent with the OCSE advice'. That mapping has not been provided.

In our view it is unacceptable for the rezoning consultation to not include this information. The Expert Panel of the Office of the NSW Chief Scientist made clear that providing sufficiently wide corridors through the Mt Gilead site was critical to protect koalas, and heavily criticised Lendlease for the way in which it proposed to calculate the average widths of the corridors stating: 'the transects as drawn do not provide a realistic reflection of the actual corridor width' and 'the Proponent should provide a clearly articulated, transparent and defensible method for calculating the corridor widths and the orientation of the transects'.¹

This demonstrates the need for transparency in how corridor widths are calculated, so that independent parties may assess whether the recommendations of Expert Panel the Office of the NSW Chief Scientist have been genuinely applied by Lendlease and by the NSW government. It is not enough for the NSW Government to articulate the methodology that will be applied. Genuine transparency requires public disclosure of how that methodology has been applied, including the transect lines and measurements through all three corridors at Mount Gilead.

Use of offsets

We are also concerned that Lendlease proposes to use Noorumba Reserve Biobank credits for this development.

Koalas are endangered in NSW. We appreciate Lendlease has made several commitments to protect koalas, but the fact Lendlease needs to rely on credits suggests the development will still on balance have a negative impact. The NSW government should not be permitting rezoning that is proposed to have a negative impact on this species.

Further, we do not understand how credits from Noorumba Reserve Biobank can be used to justify impacts from the development. Noorumba Reserve already exists and provides koala habitat today. It is unclear to us what additionality the credits provide.

We think it is unacceptable that as part of the rezoning consultation, the public is not given information about why Lendlease needs to rely on credits despite the protections it has said it is offering koalas, and how credits from an existing reserve will benefit koalas.

Riverside Reserve

It is unclear from the documents exhibited what impact the Riverside Reserve will have on koalas, given its location within a critical koala corridor. We understand Riverside Reserve will be subject to a proposed concurrence clause.

¹ https://www.chiefscientist.nsw.gov.au/_data/assets/pdf_file/0005/485924/OCSE-Response-to-questions_Campbelltown-Koalas-Feb-2021.pdf at pages 9 to 10.

But we do not know what the Planning Secretary's decision with respect to this proposed concurrence clause will be. We think it is unacceptable that this information is not provided as part of the rezoning consultation.

Conclusion

There is significant public interest in this development over concerns about its potential impacts on koalas. For the reasons stated above, it is our view that this consultation is not fair and transparent. It seems to, whether by accident or design, protect the proponent ahead of the public interest.

We appreciate that there is some overlap between the rezoning application and the Biocertification application which is a separate statutory process. But a consultation on rezoning Gilead Stage 2 for urban development, without providing critical information that would enable the public to assess the biodiversity impacts of this rezoning, is not genuinely consultative.

Our submission is that there should be a public consultation on this development that includes all relevant information necessary for members of the public to understand the biodiversity impacts. This should include:

- Maps showing calculations of the koala corridor widths including transect lines and measurements
- An explanation as to why Lendlease needs to purchase credits to offset impacts on koalas and why this approach is considered acceptable given koalas are endangered
- An explanation for how Noorumba Reserve Biobank credits will offset the negative impact of the development on koalas
- Information about what is proposed for Riverside Reserve and the associated impacts on the koala corridor

If you have any questions about our submission please contact our Ethical Stewardship Lead, Amanda Richman (arichman@australianethical.com.au). We are very happy to discuss our views further.

Yours sincerely



John McMurdo
Chief Executive Officer
Australian Ethical Investment

SUB-3476

Donna Singer

donna.singer@live.com.au

OBJECTION to rezoning

Gilead Stage 2 (Developer:Lendlease):876-hectare site for up to 3,300 homes,school, small town centre, public open space, and environmental conservation land, including several koala corridors

Lendlease's application does not account for the dramatic deterioration in the Koala's circumstances reflected in their Endangered listing in both NSW and Federally - no development should be approved for this unique biodiversity rich area

Stage 2 Gilead development cuts across Koala corridors, and for the ones kept it does not provide enough width for them to be effective. The optimal average corridor width for Koalas in Campbelltown has been calculated to be 425m, based on the home range size requirements for female Koalas in low carrying capacity landscapes (Biolink, 2017). In early 2018, a strategic Koala habitat and corridor study was undertaken across the Campbelltown LGA, exploring specific connectivity requirements for Koalas in order to calculate the least-cost dispersal pathways for the population.

Lendlease has not kept its promises on Gilead Stage 1 so how can they be trusted with Stage 2? At the 2020 Lendlease AGM Michael Ullmer promised that Lendlease would "be meeting or exceeding all substantive areas of that Chief Scientist's Report" regarding the Gilead development. The Greater Macarthur Interim Plan called for minimum Koala corridors of 425m along both sides of the Nepean River. The Chief Scientist called for 390m - 425m average.

Although Lendlease claimed to follow the advice of the Chief Scientist on Gilead Stage 1 regarding Koala corridor widths, there are no corridors included on their land. Instead they used the Noorumba Reserve as a biobank for the Noorumba - Menangle Creek corridor which was only 80 metres wide in one section.

Lendlease continued to fight the widening of the Noorumba - Menangle Creek corridor in the Campbelltown Local Planning Panels (16 Dec 2020, 26 Aug 2022). The LPP could see that koala dispersal was at risk by the proposed plan and on those two occasions,

Lendlease was forced to widen the corridor under Condition 22A. At the 26th August 2022 LPP meeting, Lendlease was directed to remove 10 lots from Stage 1 to allow for the Koala underpass across Appin Road.

Threatened species of Flora and Fauna found on Stage 2 is rich in biodiversity, being home to 287 threatened species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail.

This rezoning will affect the dispersal of koala and other wildlife and therefore their ability to breed and expand

The Koala corridors will be zoned C2 which allows certain uses of the land with the approval of the Minister for Planning -these insufficient koalas corridors are not even fully protected

The Technical Assurance Panel has significant concerns including with the proposed Riverside Reserve "is located within the Nepean Koala Corridor it cannot support uses such as access roads, built structures, barbecues, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area."

Gilead and Macarthur likely provide the oldest intact colonial frontier landscape in Australia. Gilead is important as it and its surroundings were most likely the marshalling area of the colonial militia and army near Menangle Creek at the invitation of the owner, Woodhouse, immediately before the massacre of Aboriginal people at Appin.

It is noteworthy that of all the colonial UNESCO sites in Australia, none are older than the buildings and landscape around Gilead and Macarthur. The frontier wars are never as immediate or as visceral as they are when walking that country

Stage 2 should be rejected outright as the DPE and the Minister for Planning cannot be satisfied that this ecological community and the species that depend on it, including the Koala will survive this development. The inadequate wildlife corridors will not facilitate dispersal and movement across the landscape.

20,977 people recently signed an E Petition to NSW Government because they are opposed to this development.

To ignore this objection will surely see the demise of a healthy koala colony in Sydney, which is a travesty.

This is now an endangered species.

SUB-3479

Susan Sorensen

quinkan@gmail.com

I am so concerned and disappointed about the negative impact that this development will have on this last healthy, chlamydia free, breeding koala colony left in NSW. Koalas have suffered enormous habitat loss and that are now endangered and in the path to extinction in NSW by 2030 if they and their habitats are not protected. I understand Lendlease proposes to take a number of steps to protect koalas, but they have not to date done what they said they would do for Stage 1 of the development. There is a huge lack of transparency about the impact the development will have and what the true repercussions will be if developers such as Lend Lease are given the green light. All they see is profit making for the immediate future for themselves.

The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements.

Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas.

Please protect koalas and reject the stage 2 development application until Lendlease puts forward a public and transparent plan that will genuinely protect the local koala colony. All developers such as Lendlease must be held to account for promises and plans for overpasses, culverts and underpasses being built. They have not followed through with stage 1 planning and so any further development must be abandoned.

SUB-3482

Penryn Maddrell

penryn@gmx.com

My sister, Reyna Menadue and I own 563 Appin Rd Gilead, comprising 47 hectares with extensive frontage onto Appin Rd, that is almost adjacent to the Lend Lease Gilead 2 proposal.

Gilead stage 2 planning proposal appears to have been able to bypass the Campbelltown Council Department of Planning completely and apply directly through the NSW Department of Planning and Environment. With the Walker Corporation and Ingham's Property Group rezoning applications appearing to follow the same process.

Our concern is, these three large development groups seem to be setting a precedent whereby they bypass the local council planning department, to apply for rezoning of random pockets of unconnected land.

We feel this approach could potentially jeopardise the rezoning prospects of all other landowners in between these holdings, that also form part of the Greater Macarthur 2040 growth area.

In the Greater Macarthur 2040 growth plan, 563 Appin Road falls within the Urban Capable Land zone. Over the years, we have been in regular contact with the Campbelltown Council Department of Planning and the NSW Department of Planning and Environment, with an interest to having our parcel of 47 hectares, with an extensive road frontage onto Appin Rd, rezoned.

Until now, we had believed the years of work put into The Greater Macarthur 2040 would ensure an equitable and logical opening up of the area for urban growth. However, we are now concerned major developers are being fast tracked in an ad hoc fashion that potentially impacts the interests of other established landowners.

Surely the NSW Department of Planning and Environment rezoning process should be seen to support the interests of all rate payers and not just huge holdings.

What is the process for individual landowners south of Gilead stage 2, along Appin Rd, to be included in the rezoning of the Greater Macarthur 2040 growth area? And what oversight does the NSW Department of Planning and Environment have in place to ensure the equitable and logical rezoning of land so that the interests of all landowners are included.

Yours sincerely

Penryn Maddrell

Reyna Menadue

SUB-3489

Peter Butler

peter.butler11@gmail.com

See Greens submission

SUB-3491

Sue Whare

Sue.m.whare@gmail.com

This proposal fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

Without being able to see these dimensions the credibility and transparency of this process is undermined.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation.

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve “is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area.”

Koala corridors should be zoned C1 and the ownership and management of these corridors should not remain in the hands of the developers.

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Even more worrying, Lendlease has an “Indicative Sewer Pumping Station” located at the north-west corner of the Site.

The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease’s insincerity to protect Koala Corridors.

The Koala is listed as a Threatened Species in Ecological documents not reflecting the Endangered Listing both in NSW and Federally, this oversight undermines credibility of the planning proposal.

The planning proposal fails to recognise and protect the rich biodiversity of Stage 2, according to one of the Ecological reports Stage 2 is home to 287 Threatened Species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and fails to protect their ecosystems.

Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala.

SUB-3494

Name withheld

I oppose this planning proposal as it fails to apply the planning principle for the Greater Macarthur Growth Area: the conservation of biodiversity for the koala population. The koala is listed as a Threatened Species. The planning proposal fails to show dimensions for the koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide. Without being able to see these dimensions the credibility and transparency of this process is undermined.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with koala conservation. The Technical Assurance Panel (TAP) raised the concern that the proposed Riverside Reserve "is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area." Koala corridors must be zoned C1.

Lendlease's Urban Design Report 2022:27 shows "Indicative Stormwater Basin Location Stormwater in wildlife corridors"(contrary to the advice of the NSW Chief Scientist and the TAP), a "proposed Figtree Hill Reservoir" in the biobank area adjacent to Brown's Bush which has also been identified as a future Koala Reserve and an "Indicative Sewer Pumping Station" located at the north-west corner of the Site. The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease's insincerity to protect Koala Corridors.

The planning proposal fails to recognise and protect the rich biodiversity of Stage 2 - home to 287 Threatened Species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail - and fails to protect their ecosystems. Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the koala.

Given that the credibility and transparency of this process is already undermined, the ownership and management of these corridors should not remain in the hands of the developers.

This planning proposal must be rejected in its entirety.

SUB-3495

Yvonne Hartman

harty617@gmail.com

I strongly object to the fast tracking and rezoning of Appin Village and surrounding areas for more than 12,000 homes. This development will destroy part of the critically endangered Cumberland Plain Woodland and negatively impact Koalas and other threatened species, as well as endangering the water running into the Nepean and Georges Rivers and drinking water catchments.

The planning principle for the Greater Macarthur Growth Area is the conservation of biodiversity for koala population yet this planning proposal fails to adequately conserve biodiversity and the Planning Minister cannot be confident the Endangered Species like Koala will survive long term.

This planning proposal is underpinned by the Cumberland Plain Conservation Plan (CPCP) currently being assessed by the federal Department of Climate Change, Energy, the Environment and Water.

The Chief Scientist identified one Koala Corridor across Wilton Road south of Appin Village and Ousedale Creek within the Village. The Chief Scientist was also concerned about whether the CPCP's preferred east-west koala habitat corridor - Ousedale Creek - could be properly set aside as a workable koala habitat corridor, noting that its function is dependent on land purchases and restoration that will take an indefinite time to deliver.

The Nepean and Georges River are both Primary Corridors but no 425m minimum wide corridors have been included in this planning proposal. The majority of advice given to DPE by the NSW Chief Scientist has not been adequately incorporated in the CPCP.

The CPCP Assessment Report acknowledges that only approximately 13 percent of the pre-1970 extent of native vegetation in the Cumberland Plain subregion remains intact, with an additional 12 percent occurring as heavily degraded communities (e.g. scattered trees) in disturbed areas.

The CPCP will impact 1,753.6 hectares of threatened ecological communities including Cumberland Plain Woodland, Shale Sandstone Transition Forest and River-Flat Eucalypt Forest.

Alarmingly, the CPCP also notes that ""biodiversity loss significantly increases once habitat fragmentation by clearing exceeds 70 per cent of the landscape."" This threshold has already been passed and will accelerate if the CPCP is implemented in its current form.

The importance of the Aboriginal heritage has been identified by the listing of the Massacre Site on the NSW State Heritage Register but will the NSW State Government protect the site from development?

In their petition, No development at Appin Massacre Area, the Dharawal and Gundungurra family groups are calling on the NSW Government to protect the Appin massacre site from future development. "This area should never be built on. It's a place of trauma, great sorrow and death.

Development on this land will yet again trigger that trauma for our communities."

Appin and North Appin are now being considered as Priority Precincts, according to Minister Roberts (Daily Telegraph Dec 5th) which means the CPCP has grossly underestimated the amount of dwellings and the accompanying impacts on Endangered and Threatened Species including the Koala.

SUB-3497

Name withheld

I strongly object to the Gilead Stage 2 proposal.

This proposal fails to apply the planning principle for the Greater Macarthur Growth Area, namely the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

Without being able to see these dimensions the credibility and transparency of this process is undermined.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation.

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve “is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area.”

Koala corridors should be zoned C1 and the ownership and management of these corridors should not remain in the hands of the developers.

The Urbis document prepared for Lendlease shows “Indicative Stormwater Basin Location Stormwater in wildlife corridors” (Urban Design Report 2022:27). This is contrary to the advice of the Chief Scientist and the TAP. In the same document Urbis have located a “proposed Figtree Hill Reservoir” in the biobank area adjacent to Brown’s Bush which has also been identified as a future Koala Reserve.

Even more worrying, Lendlease has an “Indicative Sewer Pumping Station” located at the north-west corner of the Site.

The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease’s insincerity to protect Koala Corridors.

The Koala is listed as a Threatened Species in Ecological documents not reflecting the Endangered Listing both in NSW and Federally, this oversight undermines credibility of the planning proposal.

The planning proposal fails to recognise and protect the rich biodiversity of Stage 2, according to one of the Ecological reports Stage 2 is home to 287 Threatened Species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and fails to protect their ecosystems.

Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including koalas.

SUB-3499

Jennifer Forster

jforster@bigpond.net.au

I object to the Stage 2 of the Gilead estate near Campbelltown.

I am a retired pharmacist and a mother of three adult children and a potential grandmother.

The recent news that koalas in NSW are not only on the endangered list but will be extinct by 2050 has horrified myself and everyone I know .

Having viewed the photos and commentary of the destruction wrought by Stage 1 of Gilead where over a 100 mature koala habitat trees, some 300 years old, were slaughtered in the name of ~progress' with no accommodation made for the evicted koalas.

Where do Lend Lease and the NSW State Liberal government expect these koalas to go?

I do not have any confidence that Lend Lease will provide koala corridors of the width required by the chief scientist or will provide adequate underpasses under busy, about to become busier, Appin Road before Stage 2 is attempted.

In spite of our former PM grasping photo opportunities cuddling a koala at the Australian Zoo that will not keep koalas from extinction. Like humans, koalas need to move, looking for food and prospective mates.

Everything is wrong with Gilead stage 2. It is too far from Sydney, being a dormitory for Wollongong almost. Schools, parks, community centres, swimming pools, recreation areas, medical care and above all, public transport and public housing are nonexistent.

Given London has a population of 8.9 million and an area of 1,572KM squared and Sydney has a population of 5.3 million in an area of 12,368KM squared, where the move is to move into formerly despised inner city suburbs close to transport, schools, hospitals and cultural amenities, the discrepancy is clear. Building more inaccessible ~dormitory' suburbs away from Sydney centre and causing the destruction of pristine bushland and koala and other wildlife habitat is criminal for humans and our flora and fauna.

Some of those sprawling, black roofed, treeless, vegetationless, koalaless suburbs will reach 56 degrees in coming global warming years.

Lendlease and the state Liberal Party government need to provide we citizens with an ironclad reason why Stage 2 should proceed and with it the inevitable extinction of Australia's unique koala population.

SUB-3508

Josephine Morehead

josephinetobin64@gmail.com

Activity No PP - 2022 - 3978 should be rejected.

The land is rare and valuable habitat for a number of endangered species and the Lendlease plan does not allow the retention of sufficient habitat.

Australia is making a mess of providing new homes for our growing population and the proposed development is a wasteful sprawl which harks of a bygone age when land seemed unlimited. We know now people live happier lives when we plan better and use smaller spaces and we cannot waste anymore of our irreplaceable land.

Gilead is the oldest intact colonial frontier landscape in Australia with Aboriginal and early settler importance.

Sydney's sprawl must stop now for endangered wildlife to survive, the suburbs consolidated and our heritage saved.

SUB-3511

Anna McCormack

xannabm@gmail.com

Gilead Stage 2 (Developer: Lendlease): 876-hectare site for up to 3,300 homes.

This proposal fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

Without being able to see these dimensions the credibility and transparency of this process is undermined.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation.

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve “is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area.”

Koala corridors should be zoned C1 and the ownership and management of these corridors should not remain in the hands of the developers.

The Urbis document prepared for Lendlease shows “Indicative Stormwater Basin Location Stormwater in wildlife corridors” (Urban Design Report 2022:27). This is contrary to the advice of the Chief Scientist and the TAP. In the same document Urbis have located a “proposed Figtree Hill Reservoir” in the biobank area adjacent to Brown’s Bush which has also been identified as a future Koala Reserve.

Even more worrying, Lendlease has an “Indicative Sewer Pumping Station” located at the north-west corner of the Site.

The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease’s insincerity to protect Koala Corridors.

The Koala is listed as a Threatened Species in Ecological documents not reflecting the Endangered Listing both in NSW and Federally, this oversight undermines credibility of the planning proposal.

The planning proposal fails to recognise and protect the rich biodiversity of Stage 2, according to one of the Ecological reports Stage 2 is home to 287 Threatened Species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and fails to protect their ecosystems.

Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala.

SUB-3513

John Philpott

Veganpride11@gmail.com

**Koalas are an endangered species and if we keep destroying their habitats for the sake of
lend lease profits we should hang our heads in shame.**

signed

John Philpott.

SUB-3517

Name withheld

This proposal fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity including the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed. Scientific advice recommends corridors be at least a minimum of 390-450 metres wide. Without being able to see these dimensions in the plan, the credibility and transparency of this process is undermined.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation. This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve “is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbecues, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area.”Koala corridors should be zoned C1 and the ownership and management of these corridors should not remain in the hands of the developers.

The Urbis document prepared for Lendlease shows “Indicative Stormwater Basin Location Stormwater in wildlife corridors” (Urban Design Report 2022:27). This is contrary to the advice of the Chief Scientist and the TAP. In the same document, Urbis have located a “proposed Figtree Hill Reservoir” in the biobank area adjacent to Brown’s Bush which has also been identified as a future Koala Reserve. Even more worrying, Lendlease has an “Indicative Sewer Pumping Station” located at the north-west corner of the Site.

The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease’s insincerity to protect Koala Corridors.

The planning proposal fails to recognise and protect the rich biodiversity of Stage 2. According to one of the ecological reports, Stage 2 is home to 287 species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail, yet fails to protect them.

Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala.

SUB-3518

Lawrence English

lawrence@room40.org

dear folks

I am very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW.

While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements.

Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

Thank you

+Lawrence

SUB-3519

Louise Holmes

louholmes41@hotmail.com

To Whom it May Concern

I am very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements. Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony. We can't keep doing this type of development, it is unsustainable for everything and everyone.

Regards

Louise Holmes

SUB-3520

Brandon Hurst

bjh1992@gmail.com

I am very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements. Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony

SUB-3521

Sue Guymer

aitchguy@gmail.com

It is vital to maintain habitat for the survival of endangered Koalas.

While Lendlease has proposed 3 corridors in the Mount Gilead Development, they aren't wide enough, and have only one small area of intersection. It is vital to provide a better east-west corridor for koala movement.

SUB-3522

Name Withheld

I am concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements. Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3523

Gilbert Grace

gilbert@gilbertgrace.com

I am a long time investor with Australian Ethical Investments for the specific reason they take these issues, of biodiversity, habitat, and the environment seriously. They have reached out to ensure that we as investors are well informed of current activity with our investment portfolio. As someone concerned about the deplorable speed at which Australian governments are pushing its native flora and fauna to extinction, I am very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW.

The species that has already suffered so much habitat loss it is now endangered in NSW through no small contribution by the Liberal and National Party policies on land clearing and the lobbying and vote buying of various developers on either side of the political fence.

While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have.

The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements.

Further, no government should not approve any development that relies on credits to offset negative impacts to koalas or any other species. Ecological collapse begins slowly until the tipping point then races away uncontrolled, not unlike the recent floods and wildfires that have been the result of human exploitation of our fragile environment. We are part of the ecology of this landmass and bioregion. We collectively and the government in particular are responsible for the stewardship of the bioregion. The profits of investors should be far down the list of concerns given the state of the world at present.

Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3524

Christine Kuhl

chrisjkuhl@hotmail.com

I am deeply concerned about koala habitat.

SUB-3525

Michelle Zuvela

zuvela565@gmail.com

I am concerned about the safety of the koala colonies and preservation of their habitat at the Mt Gilead development. The public demand transparency on the koala corridors.

SUB-3526

Jan Stewart

jan@janstewart.com.au

I am very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements. Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3527

Simon Goldstein

simonjamesgoldstein@gmail.com

Don't make koalas extinct to the area.

SUB-3528

Brendan Smith

hello@bjsmith.xyz

I have concerns around this project and it's lack of transparency. From what I have read there seems to not be enough thought applied to conservation of the local habitat, which appears to also endanger koala populations; which are already concerningly low after the bushfires we had a few years ago.

SUB-3529

Name Withheld

I am very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW.

While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. The application should not be approved until there is public consultation on the biodiversity impacts of the development.

That consultation must include koala corridor maps with measurements. Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3530

Name Withheld

I am very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. Koalas are unique to Australia and precious in that.

While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements.

Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. This would be entirely irresponsible and mock the intention of protecting koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3531

Peter Lange

piotr.m.lange@gmail.com

I am not a resident of NSW, but I've heard of a lot of bad reputation of NSW government when it comes to environmental protection, and in particular land clearing madness and no regard for non-human animals' right to a place to live. This development is just another cut in this death-by-a-thousand cuts process of destruction for a fistful of dollars. Another koala colony is doomed, nowhere to go. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. What is the point of this classification "endangered" if the government is under no obligation to protect the endangered species? I don't believe for a second Lendlease's assurances "to take a number of steps to protect koalas". A lack of transparency is a sure sign of what's really going to happen. The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements. Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3532

Claudia Taranto

tarantoclaudia@gmail.com

I am very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW.

While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have.

The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements.

Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Credit systems are increasingly being exposed as not worth the paper they are written on.

Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3533

Name withheld

Firstly, I am very concerned about the impact of development in the southern, western and northern outer regions of Sydney. The urban sprawl is shocking, removing valuable land from both the agricultural sector and from wildlife. Parents ought to be able to drive less than an hour out of Sydney to see a cow in a paddock or a market garden! None of these new suburbs have the space for a tree or a garden so surely that is taken away from carbon credits! Let's not talk about traffic or the appalling lack of infrastructure to these regions - I've lived my life in a dormitory suburb DRIVING more than an hour each way to my place of work! And, it is getting worse!

It is disgusting that in this day and age, we are still arguing about the few healthy local koala colonies left in NSW. Forget your land grabbing profits, REDEVELOP existing suburbs along train lines, at stations to be higher density. Koalas and many other native species, including plants and fungi, have already suffered so much habitat loss that they are already extinct or now endangered in NSW.

ALL stakeholders need to be transparent in all stages of the process particularly the width - would you like to be restricted to live in a narrow corridor! What are the actual measurements? It doesn't look to me like any of it is natural bushland. It needs to be widened and rehabilitated. What about appropriate fencing to keep out our darling pet dogs who have a killer instinct and will kill koalas when they descend a tree? What is the fire safety plan?

Protect the koala colony properly - minimal attempts are not enough. Real, rather than token, public consultation on the biodiversity impacts of the development, is required.

Furthermore, an honest construct to calculate the real environmental cost of land-grabbing development needs to be applied - not one that relies on credits to offset negative impacts to koalas. Are you planting fire resistant species next to developments or between developments and koala corridors? Or, do the highly flammable eucalypts and melaleucas that line our roads and medium strips negate the fire break that a road could provide? It'd be great to see some common sense applied to housing development!

Stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

Sincerely,

SUB-3534

Name withheld

I am very concerned about the likely impact of this development on the local koala colony, and the current lack of transparency around assessment and mitigation of that impact.

This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have.

The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements. Further, the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3535

Phillip Haley

Phillip@xe131.net

I am very concerned about the likely impact of this development on the local koala colony, and the current lack of transparency around assessment and mitigation of that impact.

This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have.

The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements. Further, the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3536

David Forrest

organicforrest@hotmail.com

Koalas are a threatened species and their population has been decimated by past development of their habitat. The remnant populations must be protected from development which breaks the contiguous habitat they require for genetic diversity and range of landscape food sources. Developments also create human associated and feral domestic animal predation on koalas and traffic deaths. Responsible planning will consider the predicament of potential extinction of this important native species. The design and planning considerations of this proposed development are unscientific by isolating populations and inadequate land area to protect koalas . Further reductions in land area affected by this development must be made and reviewed by independent ecologists. The State government must use planning restrictions to remove the threat to our iconic native animals and reverse the reality of extinction for koalas.

yours truly

David Forrest Dip App Sci

SUB-3537

Name withheld

I am very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements. Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3538

Cheyne Morris

cheynemorris@internode.on.net

I am very concerned about the impact of this development on the local koala colony.

This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss is now endangered in NSW. While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. This can inevitably happen when big dollars are part of the equation and big international firms have stakes in these developments.

The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements.

Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony. This is a fundamental democratic requirement that government can support. Thank you for considering my submission.

SUB-3539

Name withheld

With koalas endangered after the 2019 bushfires, it is absolute lunacy to further deplete their habitat. We need to concentrate on decreasing urban sprawl, reducing our reliance on cars, and protecting the unique species this country is a home for. It is unconscionable to do anything else.

SUB-3540

Jeffrey Hamilton

jhamilton@stainedglass.com.au

I am very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. While I understand the developer proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have.

The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements.

Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Such ""offsets"" appear to tick boxes and look good on paper, but in any practical sense they do nothing at all to help a specific population of threatened species. You know this to be true.

I respectfully ask that the NSW Government says no to this application until the developer Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3542

Matthew Doherty

dohmatt@hotmail.com

I am very concerned about the impact of this development on the local koala colony.

This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. The application should not be approved until there is public consultation on the biodiversity impacts of the development.

That consultation must include koala corridor maps with measurements.

Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas.

Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3543

Jennifer Kent

jenniferknt@gmail.com

I am concerned about the potential impact of this development on one of the few remaining populations of koalas in NSW. The koala is now listed as endangered in NSW and the proponent has not supplied sufficient information that would assure the proposed koala corridors would protect the koala colony. The provision of offsets is not supported. The development should not proceed until Lend-lease provides full public disclosure of its plans that can be evaluated to insure the continuation of this healthy koala colony.

SUB-3544

Chris Wilson

wanaka3@gmail.com

I am very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements. Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3545

Pamela Schultz

pamela.schultz9@gmail.com

In 2011, I completed a PhD on the subject of sea and tree-change landscapes and the environmental thresholds of these landscapes (Schultz 2011). Upon completing my interviews with people that came and went from the tropical landscape of Far North Queensland, I concluded that people come for all sorts of reasons but what attracted them to the area in the first place consequently changed the landscape they were initially attracted to by insensitive development. The developers' housing subdivisions were too cramped and pushed out wildlife and depleted biodiversity. They turned untidy creeks and marshlands into streamlined canal-type creeks. There were also no buffer zones incorporated in their designs to quell the impacts on World Heritage Areas, or creeks and river riparians.

I therefore recommended that all waterways, whether ephemeral or permanent have a 200m riparian to make up for all the unlawful encroachment on the creeks and rivers that have occurred since colonial settlement.

I sincerely hope that the Gilead Stage 2 design will incorporate a distance pertaining to my recommendation and reconsider that also a buffer distance be a part of the plan so that incrementally, people do not negatively impact on the corridors designed to protect wildlife and aquatic health. It is time that the various governments 'woke up' to the fact that repairing environmental degradation is very expensive and that corridors such as the one I propose are essential for water quality, carbon sequestration and the mitigation of global warming or climate change.

Yours sincerely, Dr Pam Schultz

SUB-3546

Penelope Pace

penejtown@gmail.com

I am very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements. Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3547

Name Withheld

When will all the land clearing, development and mining stop? When Australia is concreted from coast to coast, old mines are toxic ponds, and the koalas exist as painted figures on the walls of child care centres? Will we ever value nature as our greatest asset? Please, ensure more than adequate “excessive even” habitat for koalas and all our wildlife.

SUB-3549

Zoe Butler

zoelizabethbutler@gmail.com

This proposal fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

Without being able to see these dimensions the credibility and transparency of this process is undermined.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation.

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve “is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area.”

Koala corridors should be zoned C1 and the ownership and management of these corridors should not remain in the hands of the developers.

The Urbis document prepared for Lendlease shows “Indicative Stormwater Basin Location Stormwater in wildlife corridors” (Urban Design Report 2022:27). This is contrary to the advice of the Chief Scientist and the TAP. In the same document Urbis have located a “proposed Figtree Hill Reservoir” in the biobank area adjacent to Brown’s Bush which has also been identified as a future Koala Reserve.

Even more worrying, Lendlease has an “Indicative Sewer Pumping Station” located at the north-west corner of the Site.

The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease’s insincerity to protect Koala Corridors.

The Koala is listed as a Threatened Species in Ecological documents not reflecting the Endangered Listing both in NSW and Federally, this oversight undermines credibility of the planning proposal.

The planning proposal fails to recognise and protect the rich biodiversity of Stage 2, according to one of the Ecological reports Stage 2 is home to 287 Threatened Species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and fails to protect their ecosystems.

Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala.

SUB-3550

Name withheld

I am writing to express my concern about the impact of this development on the local koala colony, which is one of the last healthy koala colonies left in NSW. Koalas have already suffered so much habitat loss that they are now an endangered species in NSW. I understand that Lendlease has said it will take action to protect the koalas, but there is not enough transparency about the impact that the development will have on the colony. The development application should not be approved until there is a public consultation on the biodiversity impacts of the development. In particular, the consultation must include koala corridor maps with measurements. In addition, the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for the koalas of NSW and reject this application until Lendlease provides a transparent and public plan that will genuinely protect the local koala colony.

SUB-3551

Jiva vassilevska

jivavas7@yahoo.com

Please try to safe the koala's habitat

SUB-3552

Andrew Smith

andysmith2558@gmail.com

We are very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements. Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

Thank you,

Andrew Smith & Michelle De Mol

Warrimoo, NSW

SUB-3553

Claire Stewart

toclairstewart@gmail.com

As an Australian Ethical customer I'm responding to the LendLease development and impact on the local endangered koala population - we are watching! If they do not ensure the factual details of their plans are made public and transparent we will divest. I'm frankly sick and tired of this type of short sighted greed destroying the very habitats that make Australia beautiful and unique.

SUB-3554

David Pyett

dpyett@bigpond.net.au

The over development of old natural forest and later agricultural land is the greatest mistake that our generation has made. Money and power have triumphed over nature and the environment, with the obscene assistance of politicians of all flavours.

This has to stop, or we will all suffer. Not to mention the wildlife, which in the overall scheme of things, is a vital part of the balance of the ecology.

Lendlease must be forced to have total regard and respect to the natural environment, at that includes the Koala population.

Please ensure that Lendlease are required to make proper provision for wildlife and the total environment as a major part of their obligations is return for being allowed to develop prime land. They CAN afford it!!

SUB-3555

Carolyn austin

carolynja@westnet.com.au

Koalas are iconic to Australians and an important part of the bush habitat. I am very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements. Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3556

Name withheld

This application should be blocked until there is thorough consultation on the biodiversity impacts including koala corridor maps with measurements & until there are mechanisms to ensure Lendlease is taking steps to protect koalas beyond mere lip service. Koalas have suffered immensely from bushfires & loss of habitat in NSW. Companies left to police themselves rarely results in good outcomes for our wildlife.

The NSW government approving a development that uses credits to offset the negative impacts on koalas is absurd & makes the NSW government appear like an environmental bandit happy to sacrifice our precious & unique wildlife for the benefit of commercial interests. This is unacceptable.

Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local koala colony.

SUB-3557

Jim Morris

jmrrs@bigpond.com

I looked at the Eco Logical's biodiversity maps and saw that what native vegetation remained was fully used. That is, no buffer between development and native habitat and a need to extend connectivity between disconnected habitats. I am a superannuation fund investor in Australian Ethical Super and share Australian Ethical's deep objection to the inadequate information made available and therefore, no proper public consultation.

Tragically natural habitat is only valued in property values terms when the true value of native habitat and biodiversity cannot be expressed in money terms. Truisms stated in "money can't buy" terms bear this out regarding ethical spiritual emotional health values, all essential to human wellbeing, and all deeply connected with our natural environment.

The Mount Gilead developer might insist that having the development within that existing natural environment will be a major benefit to residents at Mount Gilead and therein is a meaningful monetary worth. My response would be another cliché, we "love (our remnant bushlands) to death". This is starkly proven for anyone, Eco Logical experts and total novices alike by a stroll/struggle along the back fences of properties that back onto bushland. I have already mentioned buffers, no property should have ever been allowed to back onto bushland, there should always be a wide buffer area between human habitation and nature for the protection of native species and protection from fire and damage from tree falls. Cutting down trees for better distance views often occurs.

Occupants of properties take it upon themselves to create buffers by clearing bushland well away from their properties and filling the gap with non native lawn, which naturally moves into bushland, proving they should never have been allowed to build where they have. Very likely a massive tangle of non native weeds have overgrown the area immediately behind the properties, hence my earlier use of "stroll/struggle".

I echo Australian Ethical's plea, to please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3559

Elisabeth Aroney

eurydice.aroney@gmail.com

Submission:

My submission against the proposal will argue that Stage 2 of this planning proposal should be rejected outright.

My argument is based on Lendlease's poor record in Stage 1 plus questions raised by the investment fund Australian Ethical about the transparency of the negotiations between Lendlease and the NSW government. These negotiations are taking place with no council oversight and no independent planning panel assessment. Important investors in the project are already threatening to divest from Lendlease for this very reason. See <https://www.abc.net.au/news/2022-12-10/investor-threatens-to-divest-from-lendlease-over-koala-habitat/101756726>

Lendlease has not kept its promise to abide by the Chief Scientist's conditions regarding 425m koala corridor widths in the development of Gilead Stage 1. This suggests that they would similarly disregard the conditions in Stage 2.

In Stage 1 they strongly resisted widening Corridor A to the west and south of Noorumba Reserve until compelled to do so by Local Planning Panels of Campbelltown Council. At the time of writing, the corridor widening associated with Clause 22A has not been incorporated into Lendlease's Stage 1 plans.

Offsetting

There is ample evidence from scientists that the carbon offsetting process is inadequate as a process to protect the habitat of endangered animals. See <https://www.theguardian.com/australia-news/2022/nov/24/nsw-environmental-offsets-scheme-risks-trading-away-threatened-species-for-cash-inquiry-finds>

The offset process that underpins Stage 1 has meant that about 100 healthy mature koala habitat trees have already been bulldozed. Many more will probably meet a similar fate in Stage 1. Stage 2 is well-wooded koala habitat and must not be subjected to offsetting. No other land can compensate for this unique site where the Nepean and Georges Rivers are at their closest, forming a natural koala corridor.

Threatened species

The land on Stage 2 is rich in biodiversity, home to 287 Threatened or Endangered species of flora and fauna. These include 124 native vertebrates, 8 species of birds, 11 native mammals (the Endangered Koala being one of these) and the Endangered Cumberland Plain Land Snail.

During an extinction crisis, it is untenable to put at risk the survival of all these threatened species. Surely, we can supply homes without taking essential habitat.

The DPE and the Minister for Planning cannot be satisfied that this ecological community will survive this development.

Thank you for the opportunity to comment.

Elisabeth Aroney

SUB-3561

Anne Joly

missannejoly@gmail.com

To whom it may concern - I'm deeply concerned about koala survival across Australia and particularly the colony living at Mount Gilead. No more koalas, no more healthy land & communities - we all know it.

Please reconsider your development plans with Lendlease. You have a responsibility of care & action.

SUB-3562

Sarojini Krishnapillai

sarojinikrishnapillai@gmail.com

Now is the time to protect all koala habitat.

We need more information about what Lendlease has planned for Gilead 2 so that the public can understand if the company's public statements about sustainability match up to the developments it has planned.

Endangered species such as the koala need all the help they can get, not risky promises that could result in catastrophic habitat loss.

Lendlease won't be here in 100 years time when our children judge us on the decisions we made today. They won't be able to repair the environmental problems landclearing creates.

Setting aside habitat is an insurance policy - for when climate induced disasters such as fires and floods threaten other habitats.

Relying on carbon credits to 'offset' negative impacts on biodiversity is false accounting at best.

Australia has one of the highest rates of extinctions in the world, mainly because of landclearing.

Please do not approve this development until meaningful public consultation takes place on the biodiversity impacts of the development.

That consultation must include koala corridor maps with measurements.

No developments that clear ANY koala habitat should be approved.

Thank you,

Sarojini Krishnapillai

SUB-3564

Josephine Velte

josephine.velte@gmail.com

Habitat loss is decimating our koala population.

Along with habitat loss due to bush fire, destruction of native forests for development is killing koalas and leaving the survivors with fewer and fewer options.

They need homes too.

Please stop the destruction of our native forests, especially koala habitat.

SUB-3566

Gabriel White

white.gabriel.anne@gmail.com

Gilead Stage 2 (Developer: Lendlease): 876-hectare site for up to 3,300 homes.

This proposal fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

Without being able to see these dimensions the credibility and transparency of this process is undermined.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve “is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area.”

Koala corridors should be zoned C1 and the ownership and management of these corridors should not remain in the hands of the developers.

The Urbis document prepared for Lendlease shows “Indicative Stormwater Basin Location Stormwater in wildlife corridors” (Urban Design Report 2022:27). This is contrary to the advice of the Chief Scientist and the TAP. In the same document Urbis have located a “proposed Figtree Hill Reservoir” in the biobank area adjacent to Brown’s Bush which has also been identified as a future Koala Reserve.

Even more worrying, Lendlease has an “Indicative Sewer Pumping Station” located at the north-west corner of the Site.

The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease’s insincerity to protect Koala Corridors.

The Koala is listed as a Threatened Species in Ecological documents not reflecting the Endangered Listing both in NSW and Federally, this oversight undermines credibility of the planning proposal.

The planning proposal fails to recognise and protect the rich biodiversity of Stage 2, according to one of the Ecological reports Stage 2 is home to 287 Threatened Species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and fails to protect their ecosystems.

Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala.

SUB-3568

Name withheld

I am very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements. Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3570

Judith Boag

rainboag@activ8.net.au

I have heard about this koala Gileads project and passionately believe the mapped koala corridors should be made public to enable the project to be managed publicly and with integrity .

We speak about maintaining habitat for our previous fauna but little is done about it on a practical level. Stand up for our Koalas

SUB-3576

Name withheld

There appears to be a lack of transparency around the impact the development will have on the colony. I am very concerned about this as this colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. Before the application is approved there needs to be public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements. Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3583

Mary Forbes

maryforbes969@gmail.com

Our beloved national icon, the Koala, is enduring critical decline and facing extinction before 2050. I am appalled that any consideration be given to a development that further threatens and fragments the habitat of any Koala population.

This proposal fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

Without being able to see these dimensions the credibility and transparency of this process is undermined.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation.

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve “is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area.”

Koala corridors should be zoned C1 and the ownership and management of these corridors should not remain in the hands of the developers.

Proposed stormwater basin. reservoir and sewer pumping station are incompatible with habitat and will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease’s insincerity to protect Koala Corridors.

The Koala is listed as a Threatened Species in Ecological documents not reflecting the Endangered Listing both in NSW and Federally, this oversight undermines credibility of the planning proposal.

The planning proposal fails to recognise and protect the rich biodiversity of Stage 2, according to one of the Ecological reports Stage 2 is home to 287 Threatened Species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and fails to protect their ecosystems.

Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala.

Australians want to see their favourite animal, the Koala, and its home ranges protected. They value our unique biodiversity, flora and fauna and distinctive ecosystems and landscapes. These are treasures that must take precedent over the rapaciousness of developers.

SUB-3591

Paul Ross

vjryan58@bigpond.com

I am very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements. Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3592

Wendy Davies

wdbk2016@exemail.com.au

I wish to object to the development of Gilead Stage 2 on the following grounds :-

- (a) the failure to seek to protect the exceptionally rich biodiversity of both fauna and flora on site ;**
- (b) the inadequate attention to the planning principle of the Greater Macarthur Growth Area in regards to the conservation of biodiversity for the koala population ;**
- (c) the lack of awareness by the developer that koalas are now listed as endangered at both state and federal levels ;**
- (d) the zoning of corridors is not compatible with koala conservation, as observed by the NSW Chief Scientist and the Technical Assurance Panel ;**
- (e) construction of detention basins involves further destruction of habitat and landscape features and the interference with ecosystems (as demonstrated by the 3 detention basins in Smiths Creek, Campbelltown).**
- (f) the impact on air quality - the Campbelltown to Douglas Park area experiences the worst air quality in the whole of the Sydney Basin. The removal of so much bushland will greatly exacerbate this, with increases in respiratory health issues.**

Wendy Davies

SUB-3595

Mark Herrmann

mark.herrmann@eco-sanctuaries.com

I am extremely concerned about impacts of this development on one of the last healthy populations of koalas in NSW. Koalas are increasingly under pressure nationally and particularly so in NSW. Given the recent national commitment to no species loss by the Commonwealth, NSW should be supporting this. The species has already suffered considerable habitat loss it is now endangered in NSW. Endangered species habitat should not be available for development. All critical habitat should be protected from clearing or peripheral impact ensuring that the colony continues to function and remains healthy. Recognising that there is substantial existing clearing does not mean that cleared areas do not contribute to the overall health of this colony. In the first instance, any approved development should be limited to areas that are not colonised by koalas. While I understand that offsets are being considered, offsets require time to develop and be useful as functional habitat. Plantings must be proven to be successfully established with sufficient time to develop into viable koala habitat that is able to support sustained browsing by koalas and suitable for other local species. It is not acceptable to permit clearing of viable habitat prior to the successful establishment of viable habitat. While it may be feasible to develop in cleared areas that do not contribute to critical habitat, the ecosystem must be able to function as a unit. Corridors must protect substantive habitat. The current proposal includes dead end corridors which do not provide for wildlife to traverse. There are significant creek line corridors excluded from any protection and some corridors with bottlenecks that are totally unsuitable for habitat or wildlife generally. The corridors maximise fringe impacts from adjoining development. This includes noise, weeds and invasive plant species, domestic animal interactions (hunting, chasing, disease introduction etc), and light pollution.

While I understand Lendlease is considering some protection measures for koalas, it remains unclear what development impacts will be on koalas, koala habitat and the wider ecosystem will be. The development proposal and its impact on the environment should be fully transparent. The NSW Government should not approve developments in Koala habitat and developers should be required to minimise all environmental impact on critical habitat and ecosystems. Ecosystems will not function effectively if they are treated as a patchwork where development has significant edge impacts and prime habitat is limited to fragments and corridors that disrupt normal species feeding and home ranges. This will affect the general health and breeding of all species including koalas and will result in the progressive demise of this important koala population.

A proper public consultation process that can evaluate biodiversity impacts of the development should be undertaken before further approval is considered. The current

proposals for habitat protection are completely inadequate and do not address key ecological considerations for habitat or species that are proposed to be protected. Offsets should be utilised to provide a significant net gain in habitat and this should be located in areas that address the ecological requirements for the species in this environment. Habitat restoration takes decades to reach maturity and a new limited species planting will not provide an adequate offset for clearing existing habitat. the development must not proceed without the investment and bonds required to ensure these key issues are addressed and can be implemented should the developers default.

SUB-3597

Frances DART

frances.dart@gmail.com

I am very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements. Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3600

Name withheld

I object to Gilead State 2 because.....

The unique koala habitat in this area cannot be offset by another area

This land is home to 287 threatened or endangered species of flora and fauna

Lendlease strongly resisted measures to protect koalas and their habitat in Stage 1

Dharawal and Gundungurra people object to the site being disturbed due to its cultural heritage significance

SUB-3602

Diana Pryde

savesydneyskoalas@gmail.com

Save Sydney's Koalas (SW) Inc is opposed to this planning proposal and accompanying rezonings. See attached Submission pdf.

SAVE SYDNEY'S KOALAS



Submissions for Gilead Stage 2 planning proposal - **Greater Macarthur Growth Area**

- Gilead Stage 2 (Developer: Lendlease): 876-hectare site for up to 3,300 homes.

We object to this planning proposal and accompanying rezonings.

According to the NSW Koala Strategy (2022: p21) the koalas in the Campbelltown LGA are the largest chlamydia-free koala population in New South Wales.

Save Sydney's Koalas goal is to secure the continued growth of the Koala population in Sydney's southwest - the largest recovering Koala population in NSW, in a state where Koalas are on a trajectory to extinction by 2050 - accelerated by the 2019/20 bushfires.

As for the GMGA, the planning principle for Gilead Stage 2, should be *the conservation of biodiversity for koala populations* ([Advice on the protection of the Campbelltown Koala population](#)) Therefore, Koala habitat including effective wide Koala habitat corridors, defined in line with the Chief Scientist's recommendations, must be retained and properly protected.

Koala Habitat Corridors

Wide Koala habitat corridors are perhaps the single most important factor for Koala protection in Macarthur. The fact that **these two planning proposals provide no dimensions for these Koala habitat corridors**, undermines their credibility and the transparency of this process. *The optimal average corridor width for koalas in Campbelltown has been calculated to be 425m, based on the home range size requirements for female koalas in low carrying capacity landscapes* (Biolink, 2017). (See the Campbelltown City Council, [Comprehensive Koala Plan of Management](#) which was approved by the NSW Government in August 2020.)

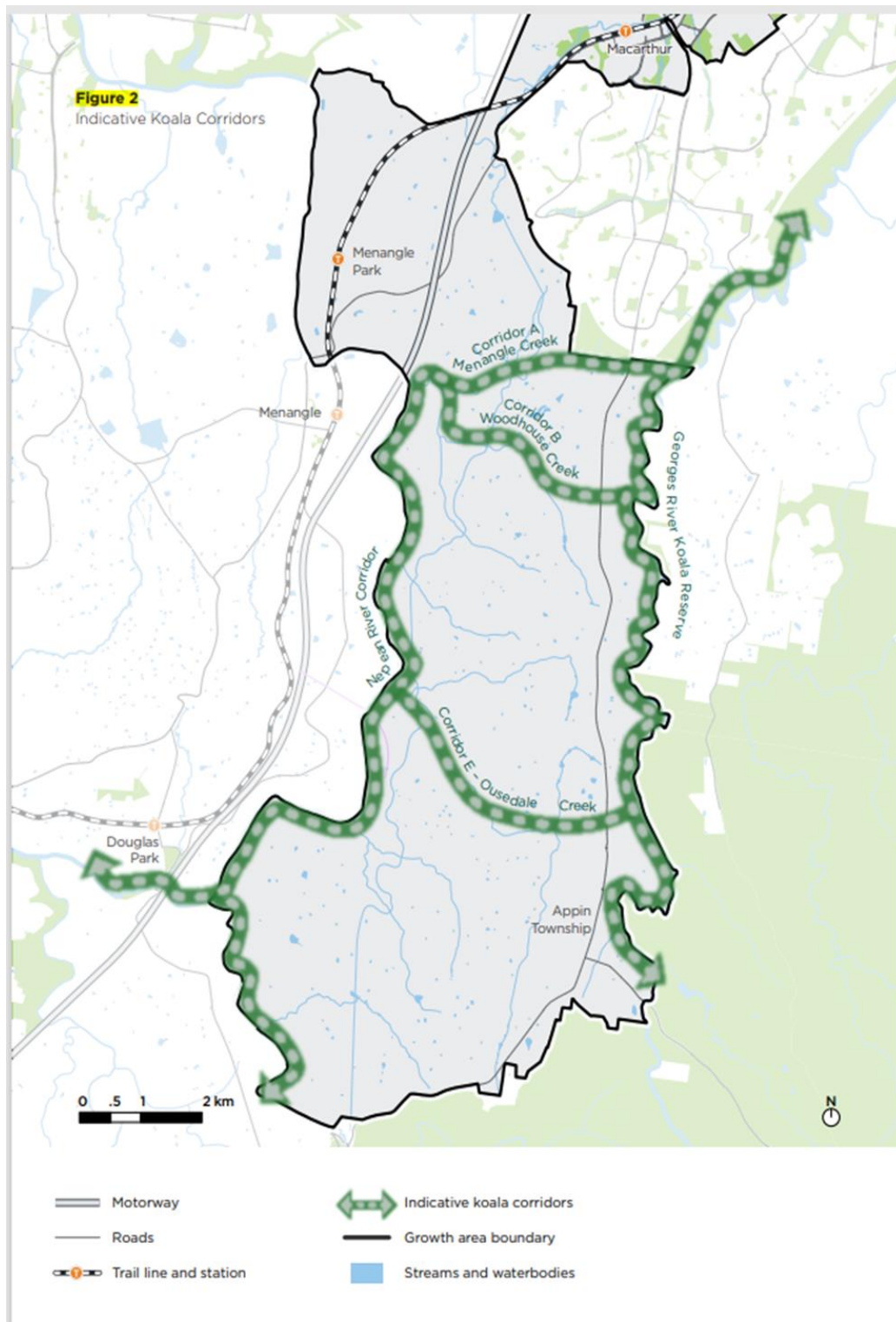
In the Chief Scientist's second report, [Advice regarding the protection of koala populations associated with the Cumberland Plain Conservation Plan](#), the panel highlighted the importance of treating koala corridors as habitat instead of just movement tracks from one destination to another.

The **Greater Macarthur Interim Plan 2040** called for *a minimum preferred width of 425 metres for primary corridors*, that is, the east side of the Nepean River on the Mt Gilead S2 property. The **Chief Scientist** called for similar figures (390m + 30m buffers).

Koala corridors without a minimum width are not functional habitat corridors. The corridor calculations underpinning the Lendlease S2 and the CPCP are therefore flawed without a minimum width.

The Chief Scientist ((April 2020) identified two east-west corridors within Gilead along: Noorumba-Menangle Creek and Beulah-Woodhouse Creek. Lendlease in Stage 2 has recognised these two corridors which it had overlooked in Stage 1 despite them being well identified in the Campbelltown Comprehensive Koala Plan of Management (CKPoM).

It is not enough to pass a planning proposal using “Indicative Koala Corridors”? Save Sydney’s Koalas believes there needs to be more specificity.



The [Cumberland Plain Conservation Plan](#) is working on the assumption that at least one east-west koala habitat corridor will be set aside at the Lendlease Mount Gilead development. Three east-west corridors have been identified at Mount Gilead - the Nepean Creek, Noorumba-Menangle Creek and Woodhouse Creek corridors. The Woodhouse Creek koala habitat corridor is Lendlease's preferred corridor for protection, but in Response to Questions about advice in the first Koala report, the Chief Scientist criticized both the width and the design of the Woodhouse Creek Corridor (Corridor B), and said that it was not in line with the optimal widths recommended by Dr Steve Phillips, the author of the [Campbelltown City Council's Comprehensive Koala Plan of Management](#):

The methodology from Dr Steve Phillips in his advice to council states that:

- *An optimum width of 409m–425m be maintained as desirable.*
- *The means of which these measures are to be validated must also be transparent and statistically robust, to which end we propose a series of width measurements at 200 m intervals along the entire length of the SLA, each of which must evidence the minimum width requirement of 250 m.*
- *Based on the Figure provided by Lendlease, the Panel does not understand how this methodology of Dr Phillips was applied by the proponent which is purported to be in accordance. For example, there is no consistency in the application of the 200 m intervals between the transects along the length. For example, the distance between A8 to A9 is much greater than the distance between A17 to A18.*
- *Further, there are irregularities in the orientation of the transects: for example, A4 is at an unusual angle to the other measures, and to the corridor (i.e. oblique, rather than perpendicular), and this is noted for a number of the other transects."*

Why has the Department of Planning not followed the advice of the Chief Scientist regarding corridor widths?

Why has the Department of Planning accepted the biodiversity assessment reports that do not properly recognise the Koala as Endangered?

The three Reports accessed via the Planning Portal as listed below, only identify the Koala as being listed as Vulnerable both in NSW and Federal Government legislation:

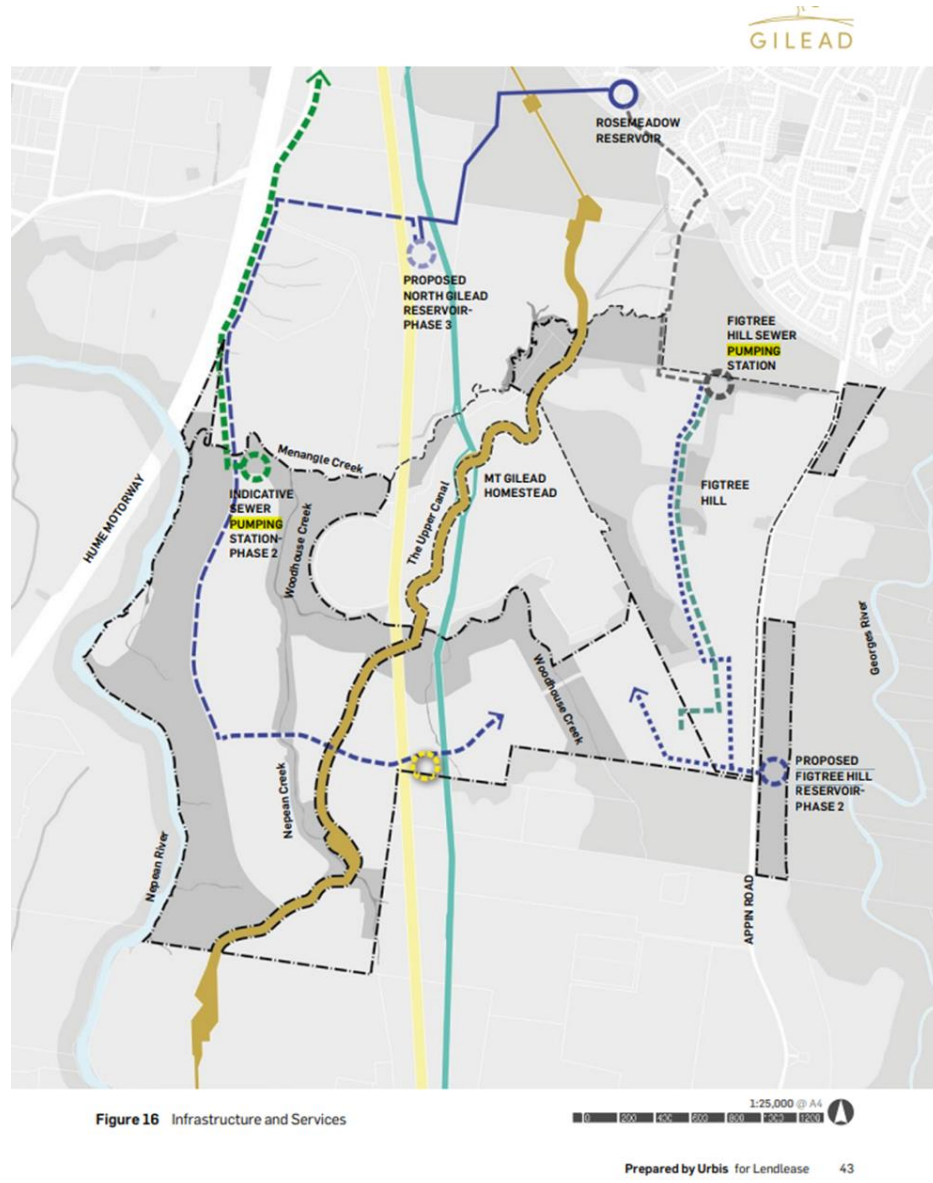
- Riparian Plan pdf p24
- Mt Gilead - Stage 2 Biodiversity Certification Assessment Report & Biocertification Strategy Nov 2022 p175
- Mt Gilead - Stage 2 Biodiversity Certification Assessment Report & Biocertification Strategy Sept 2022 p176

Zoning of Koala corridors (and buffers) as C2 rather than C1 will enable these Koala corridors to be annexed for other uses that are not compatible with Koala Habitat, as was also identified by the Technical Assurance Panel (TAP). TAP reminded Lendlease in its letter 27th Sept 2022 of what is permissible in the Koala Corridors. It also had concerns about the proposed Riverside Reserve being located within the Nepean Koala Corridor. We note that there are two roads marked on the map in the Gilead Infrastructure and Servicing Strategy (page 22). Yet more roads to cut into the Koala corridors and stress the koalas. **This proposal completely disregards the Chief Scientist's warnings and his advice on what is permissible in a Koala Corridor.**

Lendlease's inadequate corridors are not even fully protected. These koala corridors must therefore be

zoned C1 and the ownership/ management of these corridors cannot remain with the developers.

The Urbis document prepared for Lendlease shows “Indicative Stormwater Basin Location Stormwater in **wildlife corridors**” (Urban Design Report 2022:27). This is contrary to the advice of the Chief Scientist and raised as a concern by the TAP. Disturbingly, there is also a proposed road (see map below - green dotted line) cutting across Corridor A. In the same document (page 43 Figure 16 see below) Urbis has located a “proposed Figtree Hill Reservoir” in the biobank area adjacent to Browns Bush which has also been identified as a future Koala Reserve. Furthermore, Lendlease has an “Indicative Sewer Pumping Station” located at the north-west corner of the Site. This proposed infrastructure would cut both Koala Corridors A and B, proving Lendlease has no intention of protecting Koala Habitat Corridors.



Threatened species

There is no doubt that the land on Stage 2 is rich in biodiversity.

The survey undertaken by Eco Logical Australia Pty Ltd (ELA: 2022) recorded:

A total of 124 native vertebrate fauna species, comprising 68 birds (two threatened and one migratory species), 17 microbats (including eight threatened species), one megabat (Grey-headed Flying Fox), 11 terrestrial and arboreal mammals (including two threatened species), 11 frogs, 13 reptiles, three fish and one threatened invertebrate, were recorded in the Stage 2 BCAA by ecologists). A full list of species recorded by ELA is provided in Appendix G, together with a list of species recorded by remote cameras (Appendix H), hair tubes (Appendix I) and anabats (Appendix J)

However, this survey would not have captured all the fauna species in this area. ELA also recorded 287 native flora species (page 52). Save Sydney's Koalas believes this land should not be developed as the loss of biodiversity is too great. Save Sydney's Koalas supports the submission made by NPA Macarthur and shares all its concerns about the impact of this proposed development.

It is likely that in such a biodiverse rich ecosystem there are many more native species yet to be identified. It is extremely important that this whole ecosystem is protected, especially with the amount of land clearing that is to take place. The DPE and the Minister for Planning cannot be satisfied that this ecological community will survive this development.

This Planning Proposal for 3,300 homes cannot possibly simultaneously protect the diverse native fauna and flora species living there or visiting there. Development on the subject land will produce noise, pollution, run off into creeks and waterways. Furthermore, Lendlease will not be precluded from applying for higher density housing at a later date as they did for Stage 1, thus creating more threats to fauna and flora.

This development proposal will impact all the threatened species and is effectively a localised extinction plan for any species on this site.

Pomaderris brunnea is an endangered species which "cannot withstand further loss in the Hawkesbury Nepean CMA" (Eco Logical Aus) should be protected at all costs.

Koalas listed as Endangered not taken into account.

Two Eco Logical reports supplied by the NSW Government for this Planning Proposal have not been updated on the current Threatened Species Listings. For example, these reports do not take into account the up listing of the Koala to Endangered at both State and Federal level which means that the proposal needs to be reviewed with better protection measures.

The Chief Scientist bemoaned the lack of a clear definition of the terms 'adequacy' and 'persist', noting **"that it must aim towards a thriving and resilient koala population rather than simply a population 'hanging-on.'"**

The Nepean Creek Riparian Corridor needs to be widened.



The Species Credit maps in the Ecological report illustrate the importance of the Nepean Creek as habitat to such animals as the Endangered Cumberland Plain Land Snail, the Squirrel Glider, the Southern Myotis (already impacted by dam dewatering), the Large-eared Pied Bat, the Greater Broad-nosed Bat etc. These animals will be put at risk by this development and the accompanying human impacts such as light pollution, weeds and habitat removal reducing the amount of insect prey available.

The Nepean Creek riparian corridor needs to be widened. It must be recognised for the high environmental habitat it provides. The proposal must include all 'impacted habitat' and 'impacted red flag vegetation' (ELA p.93). The adjacent vegetation provides an important source of food such as insects. All hollow-bearing trees need to be protected as they provide important habitat (refer to the NPA Macarthur submission).

Figure 1: Impacted habitat p. 56 Appendix C

The Stage 2 land should not be developed for a housing estate. It should be preserved for its environmental value. The risk to the Cumberland Plain Woodland (a critically endangered ecological community) alone should ensure its protection. If the habitat of all the threatened species can be preserved intact, then a whole ecological community would also be saved.

Section 126K (2) states that a biocertification strategy is a policy or strategy for the implementation of conservation measures to ensure that the overall effect of biodiversity certification is to improve or maintain biodiversity values. (ELA p.116 Nov 2022) Save Sydney's Koalas believes this development does not pass this standard.

Flooding Impact



Picture 1: Noorumba Reserve dam prior to flooding (CCC website)



Picture 2: Noorumba Reserve dam on 3rd December 2022 (P Durman)

The impact of land clearing on Lendlease's Stage 1 at Figtree Hill has already had a negative impact on the environment with the clearing of mature hollow bearing trees (see Picture 3) and run off from cleared land. Picture 2, was taken at the Noorumba Reserve dam on 3rd December 2022 (the dam was built by Thomas Rose nearly 200 years ago). The water in this dam is usually clear (see picture 1) but 9 months after the flooding started in 2022, it is still muddy due runoff from cleared land on Stage 1. (Lendlease cleared over a hundred trees on Stage 1.)



Picture 3 Lendlease Stage 1 – 7th December 2021
(Lendlease claimed that these were at the end of their lives!)

This runoff is going to be exacerbated by the building of the roads, rooftops, paving and other hard surfaces on both Stage 1 & 2. This is an indication that we can expect household chemicals, dog faeces and litter to enter the reserve in the future. It is unlikely that the retention basins and stormwater pipes will address these issues.

Flawed Process /Lack of Transparency

The only major Koala protections secured on site in Gilead Stage 1 have been secured through the Local Planning Panel. **Under this fast tracking proposal** announced by the Minister for Planning and Homes, Anthony Roberts, the Dept of Planning and the Environment (DPE), **oversight of these planning proposals by local councils and their local planning panels have been eliminated from the review process.**([2nd Nov 2022](#)). We believe this is not in the public interest, undemocratic and lacks transparency.

All the advice of the Office of the Chief Scientist and Engineer ([Campbelltown Koala Advice](#)) should be applied in its entirety, not just cherry picking the bits the proponent chooses. It should be taken in conjunction with the Campbelltown *Comprehensive Koala Plan of Management* using the optimal widths recommended by Dr Steve Phillips.

As the proponent, Lendlease, has paid for their own ecologist report we feel it is necessary to have an independent review /Environmental Impact Statement.

In making this submission it was necessary to read 34 documents with numerous maps. It was difficult to have a clear holistic understanding of the impact of the development as many of the maps did not show important infrastructure such as the proposed link road and map keys were often impossible to find. Koala corridors need greater specificity with actual measurements not indicative labels. The end result is that the impact on the koala corridors is being seriously understated.

The following Appendices are missing from the Gateway documents: Appendix N: Gilead Koala Management Plan and Appendix O: Construction Environment Management Plan.

The proposal needs to be resubmitted and put on exhibition with all the missing documents and taking into account the up listing of Koalas to Endangered.

Public Interest

Stage 2 should be rejected outright. During an extinction crisis and human induced climate change, why would we put at risk the survival of all these threatened species? A recent study by European Commission scientist Giovanni Strona and Flinders University professor, Corey Bradshaw, found that *found that one extinction caused a cascade of extinctions that have been coined "co-extinctions"*. ([ABC News 17th Dec 2022](#)) Professor Bradshaw said that "if we save more species, we're going to have more capability in reducing climate change over the next century or so." Surely, we can supply homes without taking essential habitat and exacerbating the effects of climate change.

The people of NSW do not want to see Koalas become extinct in the wild and, therefore, their protection is in the public interest. Save Sydney's Koalas collected 20,977 signatures for an e-petition (see Appendix A) which called upon the NSW Parliament to, amongst other things, stop the rezoning of Stage 2 of the Gilead development and review the approval of Stage 1. This was one of the few e-petitions to achieve the 20,000 signature threshold to have it tabled in the NSW Parliament and trigger a debate, clearly demonstrating the public concern over the threats to this important Koala population.

Heritage

Gilead and Macarthur likely provide the oldest intact colonial frontier landscape in Australia. Gilead is important as it and its surroundings were most likely the marshalling area of the colonial militia and army near Menangle Creek at the invitation of the owner, Woodhouse, immediately before the massacre of Aboriginal people at Appin.

It is noteworthy that of all the colonial UNESCO sites in Australia, none are older than the buildings and landscape around Gilead and Macarthur. The frontier wars are never as immediate or as visceral as they are when walking that country.

APPENDIX A - Save the Koalas of Sydney – NSW Parliament e petition

To the Honourable the Speaker and Members of the Legislative Assembly of New South Wales, this Petition of certain citizens of New South Wales notes that:

Macarthur's Campbelltown Koalas are uniquely Chlamydia free and the largest recovering Koala population in the Sydney basin, indeed NSW. The NSW government must stop approving the loss of Koala habitat and corridors in Macarthur (Airds, Campbelltown, Appin and Wilton).

Gilead is the shortest wildlife corridor between the Georges and Nepean Rivers, providing an escape from fire and a pathway to recolonise habitat. Losing Gilead will fragment this local population and push this colony, and with it NSW Koalas, towards extinction.

NSW Planning must apply their own Koala protections (SEPP 44 - Campbelltown Koala Plan of Management - minimum 425m wide Koala corridors along creeks & rivers with Appin Road Koala crossings), rather than rely on 'developer Koala reports' to approve (rezone/biocertify) as they have for Lendlease's Gilead development and are doing for Walker at Appin and SE Wilton.

The Cumberland Plain Conservation Plan must apply the Chief Scientist's Campbelltown Koala Advice (2020) - min. 450m wide koala corridors, keep EPBC oversight of biobanks and set up an independent Koala Recovery Team to approve Koala management plans.

We ask the Legislative Assembly to:

1. Declare an Upper Georges River Koala National Park
2. Stop the rezoning of Stage 2 of the Gilead development and review the approval of Stage 1
3. Build 5 effective Koala crossings on Appin Road
4. Implement min. 450m wide Koala corridors across the rivers and creeks of Macarthur

SUB-3603

Levi Cardenas

lpatcar@hotmail.com

I am very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements. Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

Let's not put profits before nature!

SUB-3609

SherrieCross

sherriecross53@gmail.com

Please see the attached pdf file which holds my complete submission.

RE: Submission and Objection to Lendlease's Planning Proposal to rezone Gilead Stage 2 from rural to residential to develop a 876-hectare site on the Koala habitat corridors of south-west Sydney.

Introduction

The koala colony that is resident in the area of the Lendlease Gilead Stage 2 development proposal (to be referred to hereon as "the Campbelltown koalas") has exceptionally high conservation value because it is both free of Chlamydia and expanding its range. It is imperative that these koalas are able to use the habitat corridors that have to date, contributed to their high conservation value.

This submission centres on the question of whether the two fauna underpasses, proposed to be built by Lendlease under the upgraded Appin Road, will perform their stated purpose of enabling these koalas to maintain their habitual east-west movements through their existing habitat range. Scientific evidence is provided to demonstrate the fundamental uncertainty that surrounds the efficacy of road underpasses to mitigate the effects of road upgrades and fauna exclusion fencing. This level of uncertainty is unacceptable when planning for an endangered species. It is proposed that this development proposal should not be given approval unless Lendlease agrees to build one or more land bridges to ensure safety and landscape connectivity for the Campbelltown koalas.

Background

To accommodate the Gilead housing estate developments (and others throughout the Macarthur landscape), Transport For NSW plans to upgrade the Appin Road to four or six lanes, with plans for fauna exclusion fencing to prevent fauna road deaths. According to some reports the fencing will extend for 100 kilometres south to Wilton¹. This prompted a concern on the part of the CSE (Chief Scientist and Engineer) that the habitual east-west movements of the Campbelltown koalas between the Georges River riparian zone and the Nepean River riparian zone would be blocked². In response to the CSE concerns, Lendlease proposes to build one permanent and one temporary underpass under the Appin Road, the assumption being that this will enable koalas to maintain their east-west movements across the road.

Question: Can road underpasses mitigate the impacts of road upgrades and fauna exclusion fencing on koalas and other native wildlife?

The CSE has recommended that the design of underpasses should take account of the "latest evidence"³. If underpasses are relied on to facilitate koala movements we must have full confidence that the Campbelltown koalas will be able to use them. If they cannot, the result will be east-west corridor blocking and the erosion of the territorial and genetic resources that presently support robust koala populations in the region. In addition, koalas and other wildlife will be trapped in fire grounds when fire comes to

¹ I do not have details on the length of the fencing or the precise number of lanes in the upgrade. Several phone calls with Transport for NSW yielded no response.

² Chief Scientist and Engineer, "Campbelltown Koala Advice: regarding the protection of koala populations associated with the Cumberland Plain Conservation Plan", 14 May 2021.

³ Chief Scientist and Engineer, op. cit. p. 27.

the bushland east of the Appin Road. These threats will severely challenge the sustainability of the Campbelltown koalas.

The short answer to the above question is: “We don’t know; further, given our present state of scientific knowledge, we have no means of knowing”. There is no concrete basis for Lendlease’s claim that underpasses will mitigate the impacts of the fauna fencing along the Appin Road. The evidence on koala use of underpasses is at best mixed.

Some studies have shown that koalas can successfully use underpasses if they are modified with appropriate fauna furniture⁴. But one study—which was recently elevated in the media as providing positive evidence that wildlife will use underpasses—could not test for koala usage at all⁵.

In contrast to the Jones study, a study by Ben Allen of the University of Southern Queensland has seriously questioned the efficacy of underpasses in providing safe passage for koalas and other native fauna across major roads⁶. The Allen study was commissioned by the Queensland Department of Transport and Main Roads to study the fauna fenced Toowoomba Bypass in south-eastern Queensland for a twelve-month period. Three types of fauna crossing structures—underpasses, culverts and a viaduct—were studied with camera traps to assess their support of wildlife movements across roads.

Allen’s team recorded 185 confirmed animal crossings. Of all confirmed crossings, over 76% were made by introduced invasive species—foxes, feral cats, dogs and hares⁷. Just one koala was confirmed to have crossed the bypass in twelve months, and this was at the viaduct⁸. No koalas used the underpasses⁹, despite the fact that these installations were large, open structures with ‘fauna furniture’ designed specifically for arboreal species such as koalas¹⁰. The only native fauna (of over 30 native species recorded in the area) to make any use of the underpasses were red-necked wallabies and goannas¹¹. This was a minority usage and 82% of confirmed crossings at underpasses were made by feral cats, foxes and dogs¹². Both domestic

⁴ For example, Jones, Darryl, “Safe passage: we can keep koalas safe through urban design”, Australian Geographic, August 4, 2016.

⁵ Goldingay, Ross L, David Rohweder, Brendan D. Taylor and Jonathan L. Parkyn (2022) “Use of road underpasses by mammals and a monitor lizard in eastern Australia and consideration of the predator-trap hypothesis”, first published 05 July 2022. <https://doi.org/10.1002/ece3.9075>. Goldingay et al noted that during the 2-year study period, koalas used the road underpasses in the test sites (at the Oxley Highway at Port Macquarie and at the Pacific Highway south of Grafton) “occasionally”, and that this reflected the low koala numbers in the area. The low numbers meant that this study could not test for koala usage of underpasses.

⁶ Allen BL, Young G, King R (2021) ‘Wildlife use of crossing structures along the Toowoomba Bypass’. Final report to the Department of Transport and Main Roads (University of Southern Queensland: Toowoomba).

⁷ Allen et al (2021), op cit. p. 4.

⁸ Allen et al (2021), op cit. p.10

⁹ Ibid.

¹⁰ Allen et al (2021), op cit. p. 7.

¹¹ Allen et al (2021), op cit. pp. 11 & 20.

¹² Allen et al (2021), op cit. p. 10.

and wild dogs had high use of the underpasses¹³ and domestic dogs had significantly higher records in the underpass than in surrounding bushland¹⁴.

The nil use of underpasses by koalas was not a reflection of low koala numbers in the study area. The study records 29 photos of koalas in surrounding bushland areas¹⁵ (though the number of individual animals could not be specified).

Allen's report to the Queensland Department of Transport and Main Roads advised that "despite the investment in several fauna underpasses and a viaduct the road remains a substantial barrier to most native wildlife and is instead frequented by feral, invasive species"¹⁶. Allen notes that the "general lack of robust experimental studies" is a serious failing in our ability to ascertain the impacts of road construction and mitigation strategies on wildlife¹⁷. A further complicating factor in assessing native wildlife usage of crossing structures is that "determining the most appropriate type can be fraught with difficulty depending on local contexts"¹⁸.

What does the Allen et al study mean for the Campbelltown koalas?

The question of whether underpasses can support koala movements across roads is at best unresolved. Our present state of scientific knowledge is such that we have no certainty to determine whether the Campbelltown koalas will successfully use the planned underpasses.

Further, the complicating factor of local context is critically important in respect of the Campbelltown koalas. Allen's finding that domestic dogs had particularly high usage of the underpasses has grave implications for these koalas. Even more concerning is Allen's finding that those dogs concentrated at underpass locations more than at bush land locations. The Gilead area is known for its roving domestic dogs and this mortal threat to koalas will only increase with housing development. This brings an additional and grave uncertainty to the question of koala use of underpasses in the Gilead area. The strong likelihood is that if we rely only on underpasses, the increasing dog numbers will deter koalas from achieving or maintaining familiarisation with underpasses. This will mean that east-west landscape connectivity for the Campbelltown koalas will be blocked, which will remove a vitally important factor in the success of this colony to date.

The pipe underpass design proposed by Lendlease

The design proposed by Lendlease for the underpasses is that of a pipe. In the study by Darryl Jones of Griffith University (referenced in footnote 4), koala usage of a box culvert underpass was initially recorded as nil. Jones' team surmised that the water collecting at the bottom of the culvert was a deterrent so they installed a ledge along one side of the culvert. After that several koalas were recorded using the culvert. This means that the pipe design proposed by Lendlease will be wholly unsuitable if it lacks appropriate fauna furniture.

¹³ There were 93 photos of domestic dogs using the underpasses and 49 photos of wild dogs/dingos using the underpasses. Allen et al (2021), op cit. pp. 29-30.

¹⁴ Allen et al (2021), p. 29.

¹⁵ Allen et al (2021), op cit. p. 30.

¹⁶ Allen et al (2021), op cit. p. 11.

¹⁷ Allen et al (2021), op cit. p. 6.

¹⁸ Allen et al (2021), op cit. p. 6.

While the Jones study sets proper underpass design as a minimum condition for koala usage, and demonstrates success in a given context, it is nevertheless unable to provide a general level of certainty for underpass efficacy. The Allen study shows that underpasses cannot be relied upon across all local contexts. In that study, the nil use of well-designed underpasses by koalas strikingly underscores the significant and unacceptable uncertainty surrounding underpasses.

While the scientific evidence is unresolved, we cannot claim that underpasses are sufficient to support koala movements in all circumstances. In particular, a grave threat will be posed to the koalas by the interaction of the increasing dog population with the proposed underpasses. Even if Lendlease improved their currently inadequate underpass design, there exists significant uncertainty that it would provide the koalas with safety and landscape connectivity.

The best-practice solution for wildlife passage across major roadways

The best-practice infrastructure for ensuring safe wildlife passage across major roads is the land bridge. The CSE recognises this as the appropriate solution. It recommended that “A land bridge should be considered to allow Koalas and other fauna to cross the Appin Road” and referred to the substantial land bridge then under development for wallabies at Mona Vale¹⁹. A web search for wildlife land bridges yields a plethora of information on these installations across the USA, Canada, the UK, Europe and Asia.

The above mentioned Darryl Jones of Griffith University was part of a collaboration to design and build a land bridge across a major roadway adjacent to Karawatha Forest, 18km from the Brisbane CBD. His follow-up studies in 2018 showed that it had been “extraordinarily well used” by native fauna, many of which began to use it immediately²⁰. This land bridge is used by multiple species of native mammals, birds, reptiles and amphibians.

This land bridge presents to the animals as a landform, contiguous with the adjoining Karawatha Forest and planted with the same species. It supports routine fauna dispersal as well as escape from fire. And it has several features that provide multiple species with escape from predators, including spiky thickets, grass tussocks, hollow logs and wood/stone debris piles. Jones’ preferred outcome to mitigate the habitat fragmentation and vehicle collision impacts of road construction is the installation of multiple land bridges.

Recommendations

1. Though not proven to support koala landscape connectivity, underpasses will facilitate some wildlife movements, so they should be retained. It should be a condition of approval that Lendlease develop and install a design with appropriate fauna furniture to provide opportunities for various native species.

¹⁹ The Chief Scientist and Engineer, “Campbelltown Koala Advice: Report 1. ‘Advice on the protection of the Campbelltown Koala population, Koala Independent Expert Panel’”, 30 April 2020, p. xiv.

²⁰ ABC Gardening Australia, “Highway Haven”, Series 29/ Episode 4, published 8pm, 27 April 2018.

2. The recommendation of the CSE to build a land bridge across the Appin Road should be included as a condition of approval for the proposal. Ideally there should be more than one land bridge. These land bridges should have direct connection with the east-west koala movement corridors through the housing estates. If these conditions are met, we will have a reasonable starting point for the maintenance of the east-west movements of the Campbelltown koalas.

Conclusion

To proceed with planning on the assumption that underpasses will be sufficient to mitigate the impacts of fauna exclusion fencing would be **radically irresponsible**. Given the scientific uncertainty surrounding the efficacy of road underpasses to support koala landscape connectivity, a plan to rely entirely on underpasses for this purpose would amount to an experiment. Such an experiment would have unacceptably high risks for the Campbelltown koalas, including entrapment in fire grounds, increased predation and loss of the landscape connectivity that has fostered the robust success of this koala colony to date. No university ethics committee would give approval for it.

The **fundamental uncertainty** that underpins the use of underpasses in the Gilead area cannot be ignored and should not be tolerated when planning for a threatened species. Unproven technologies should not be permitted. For threatened species such as the koala, we cannot be satisfied with less than the **best-practice solution**. The construction of land bridges will produce the belt-and-braces approach that is essential for the long-term protection of the Campbelltown koalas.

SUB-3614

Michael Baker

mbaker@sjb.com.au

On behalf of SJB Planning please find a submission to the exhibition of Gilead Stage 2 Planning Proposal PP-2022-3978 attached for your review.



Department of Planning and Environment
Locked Bag 5022,
Parramatta NSW 2124

Attn: Gary Hinder

19 December 2022

Re: Submission to Exhibition of Gilead Stage 2 Planning Proposal PP-2022-3978

Dear Gary,

We write in relation to the public exhibition of the Gilead Stage 2 Planning Proposal (PP-2022-3978).

We act on behalf of LEDA Holdings Pty Ltd, the owners of the adjoining Rosalind Park site, immediately to the north being 33 Medhurst Road, and 101 and 111 Menangle Road, Menangle Park, also the subject of a separate Planning Proposal (PP-2022-3252).

We write to raise the following issues/concerns with the Gilead Stage 2 Planning Proposal:

- Proposed Alignment of the Transit Corridor across Menangle Creek;
- Proposed zoning of the land for the Transit Corridor crossing of Menangle Creek;
- Proposed apportionment of upgrade works to Medhurst Road and the Medhurst Road/Menangle Road intersection under the VPA; and
- Confirmation that the Koala Corridor along Menangle Creek complies with the Department of Planning and Environment's (DPE) transect requirements.

In addition to the above concerns, we are interested in exploring with DPE and Lend Lease, further opportunities for increased connectivity between the Gilead Precinct and the Rosalind Park site.

The above issues/concerns are explained in more detail in the attached submission.

Should you require any further information, please do not hesitate to contact me on (02) 9380 9911 or by email at mbaker@sjb.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M. Baker', written over the typed name and title.

Michael Baker
Director

Encl.

Submission to Gilead Stage 2 Planning Proposal PP-2022-3978

1. Introduction

We act on behalf of LEDA Holdings Pty Ltd, the landowners of the Rosalind Park site at 33 Medhurst Road and including 101 and 111 Menangle Road, Menangle Park. The Rosalind Park site is shown in Figure 1.

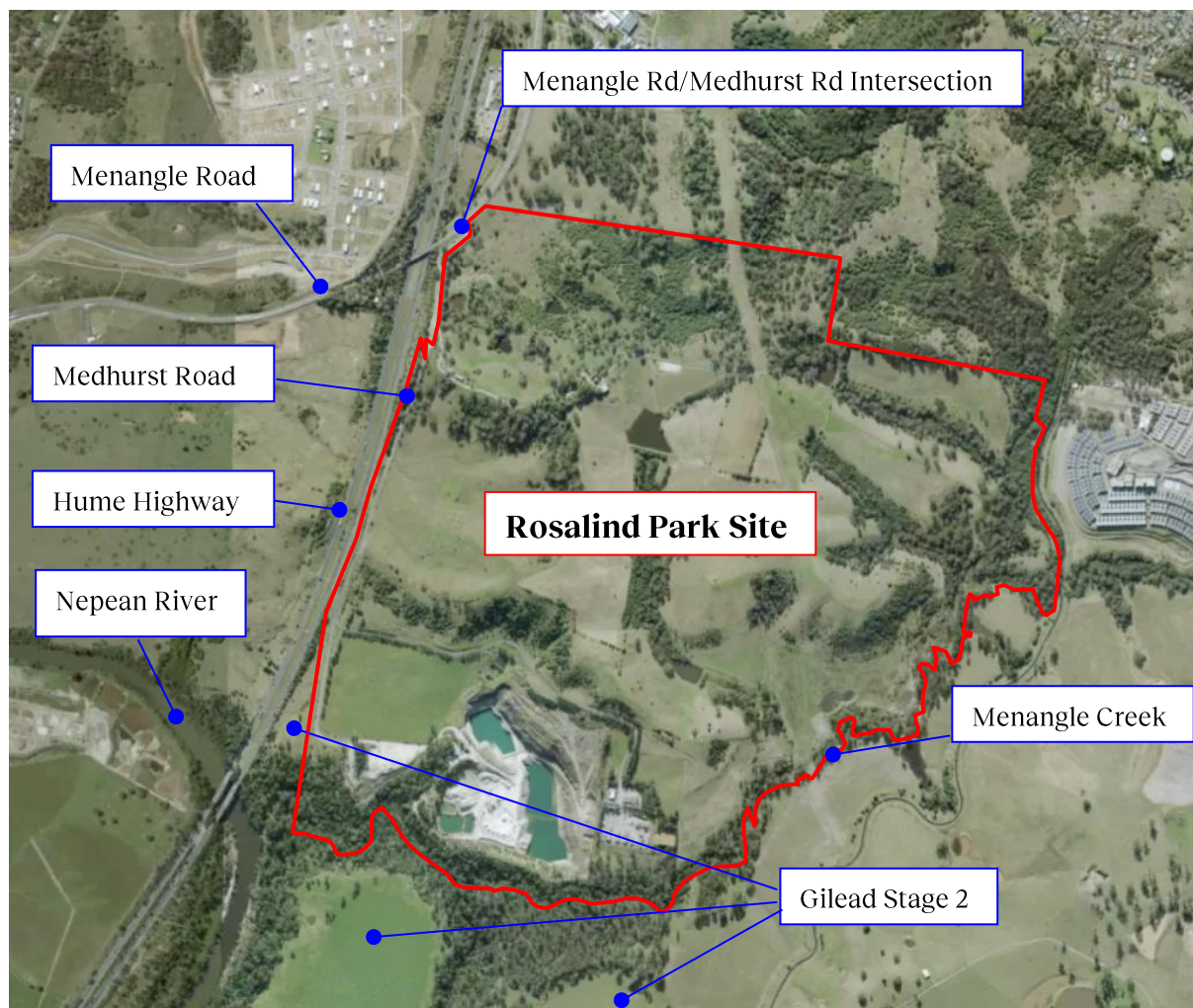


Figure 1: Aerial view of site (Source: NearMap)

On 9 September 2022, LEDA Holdings Pty Ltd lodged a Planning Proposal (PP) with Campbelltown City Council for the rezoning of the Rosalind Park site for predominantly urban purposes. The PP is reference No.PP-2022-3252 and is currently under assessment by Council.

The Rosalind Park PP aims to enable the redevelopment of the site for urban purposes providing residential land to accommodate approximately 1,460 lots, commercial land comprising a village and neighbourhood centre, community and recreation facilities, as well as passive and active open space, and including the conservation of 70 hectares of land for the protection of koala habitat, riparian corridors and indigenous heritage.

The Rosalind Park PP also includes the delivery of significant infrastructure i.e. the delivery of the Transit corridor north of Menangle Creek, along the existing Medhurst Road corridor along the western boundary adjacent to the Hume Motorway through to Menangle Road in the north, and the delivery of a new Medhurst Road/Menangle Road intersection.

A copy of the Illustrative Structure Plan for the Proposal is provided at Figure 2.



Figure 2: Illustrative Structure Plan for Rosalind Park PP (Source: Design and Planning)

2. Rosalind Park PP and relationship to Gilead Stage 2

For the most part, the Rosalind Park PP site is located immediately to the north of the Gilead Stage 2 PP site, with the exception of a small wedge of land located to the south-west. This wedge of land is located on the northern side of Menangle Creek, between the Hume Highway and Medhurst Road and forms part of the Gilead Stage 2 site.

Other than for the wedge of land mentioned above, the two sites share a common boundary to Menangle Creek. This common boundary along Menangle Creek is known as “Koala Corridor A” under the Chief Scientist and Engineer Report “Advice on the protection of the Campbelltown Koala population” (April 2020). The proposed delivery of the Koala Corridor under both planning proposals will result in a vegetated Koala habitat buffer largely separating the two sites.

A copy of the combined Structure Plan for Rosalind Park PP and Gilead Stage 2 is provided in Figure 3. Figure 3 shows the relationship between the proposed Indicative Layout Plans (ILP) for the two properties.

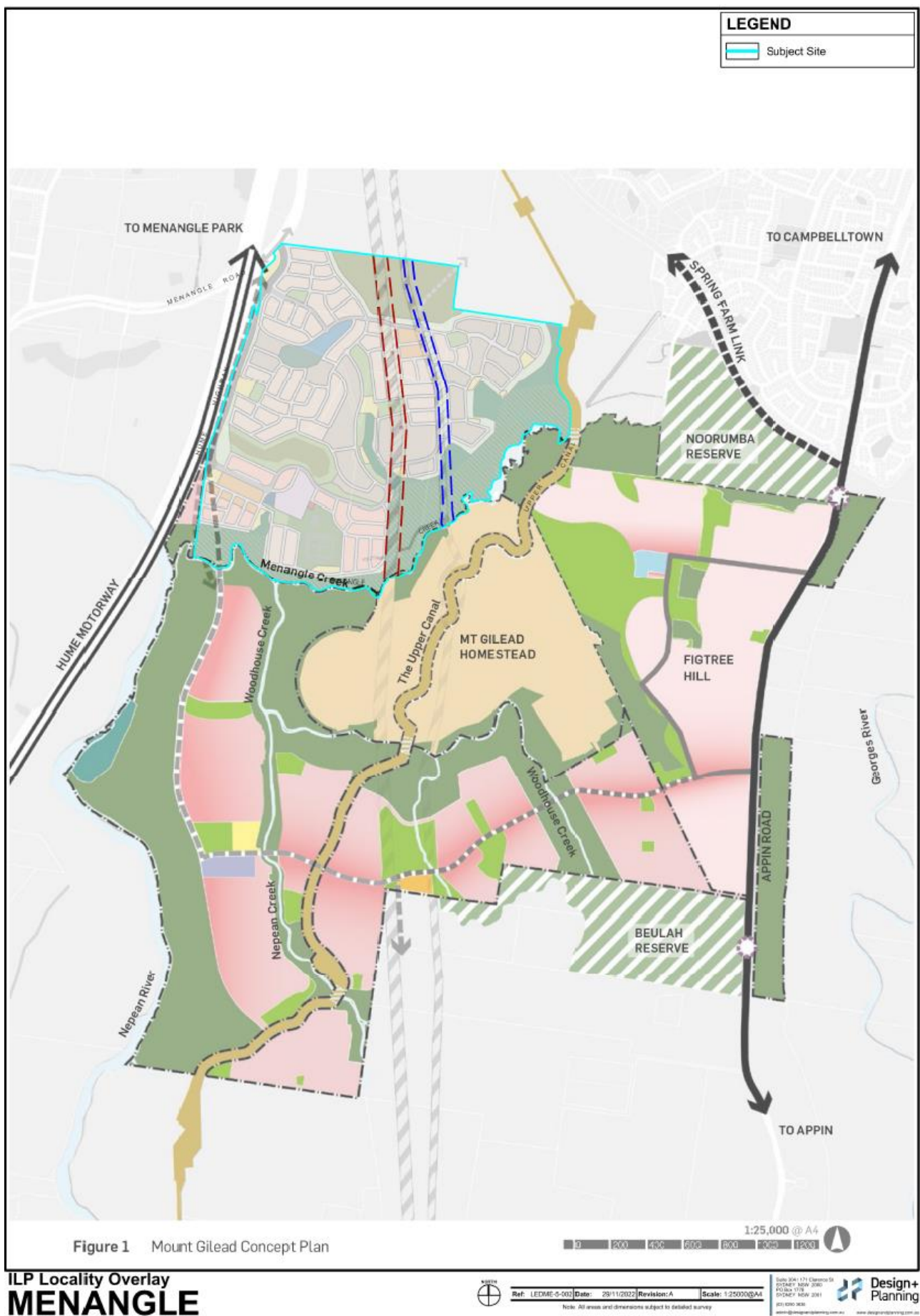


Figure 3: ILP Locality Overlay (Source: Design and Planning)

3. Issues/concerns with Gilead Stage 2 Planning Proposal

3.1 Alignment of the Transit Corridor across Menangle Creek

As is evident from the proposed Rosalind Park ILP shown in Figure 2 and the combined Rosalind Park ILP and Gilead Stage 2 ILP shown in Figure 3, the alignment of the proposed Transit Corridor between the Gilead Stage 2 ILP is inconsistent with the Rosalind Park ILP where it crosses Menangle Creek and within the Rosalind Park site. This is illustrated further in the extract at Figure 4.

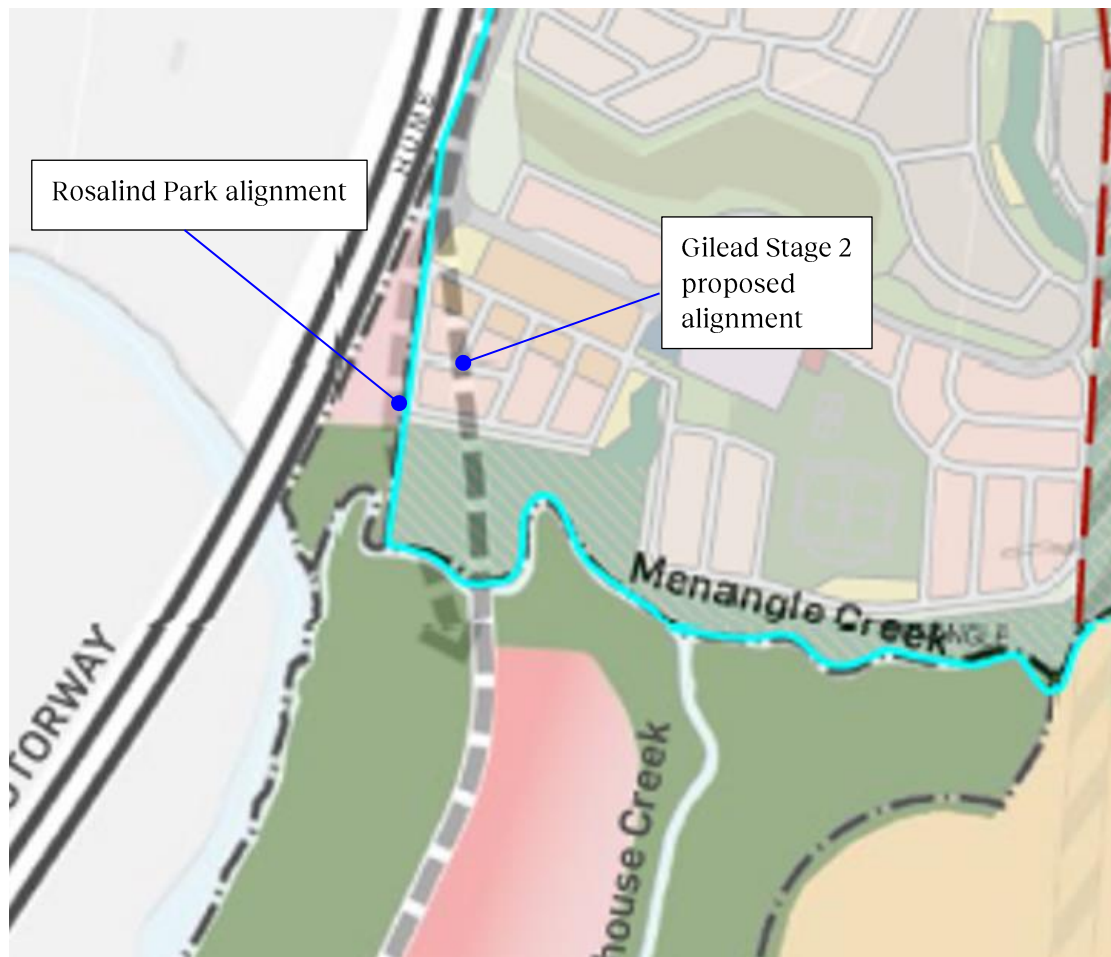


Figure 4: Extract of the two ILP's showing location of proposed Transit Corridor (Source: Design and Planning)

The Rosalind Park ILP has sited the Transit corridor along the western boundary of the site along the alignment of the existing Medhurst Road. This is the most suitable alignment in terms of the topography of the Rosalind Park site, to minimise cut and fill through the hilly topography to the north and also aligning the transit corridor parallel and adjacent to the existing Motorway corridor, an existing noise source, and to minimise impact on urban capable land within the Rosalind Park site.

The Transit Corridor under the Gilead Stage 2 ILP is proposed further to the east of the Rosalind Park alignment, impacting upon urban capable land and resulting in increased urban capable land wedged between the existing Motorway and the Transit Corridor.

We request that the Gilead Stage 2 ILP be amended such that the proposed Transit Corridor crossing of Menangle Creek being realigned further to the west to match and connect with the proposed alignment of the Transit Corridor as submitted in the Rosalind Park PP, being the western boundary of Rosalind Park site. Modelling undertaken by engineers on behalf of LEDA Holding's engineers illustrate that this can occur without any significant impacts on the urban capable land within Gilead Stage 2. Figure 5 illustrates this.

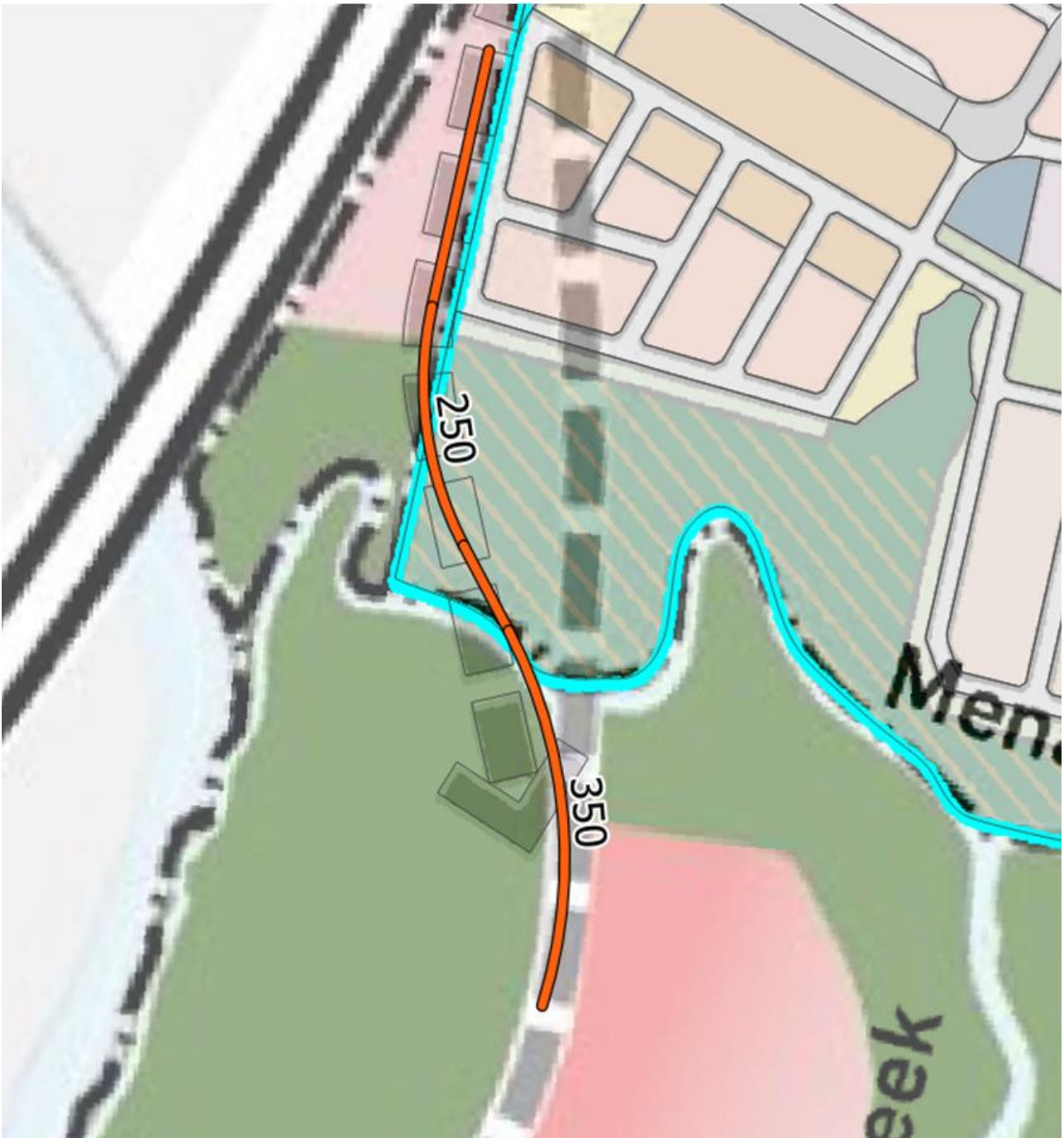


Figure 5: Modelling showing how the Transit Corridor can be aligned across the two ILP's (Source: YSCO)

3.2 Proposed zoning of the land for the Transit Corridor crossing of Menangle Creek

The Gilead Stage 2 zoning map proposes to zone part of the Transit Corridor immediately to the south of Menangle Creek SP2 Infrastructure. This is illustrated on the extract of the proposed zoning map in Figure 6.

The SP2 zoning is unnecessary as roads are permissible within the C2 zone. Therefore, there is no reason why the isolated section of the corridor needs to be zoned SP2.

The impact of zoning this portion of the Gilead Stage 2 site is that it will effectively lock in the location of the proposed Transit Corridor and will make any variation to the alignment of the Transit Corridor at the planning approval stage difficult to achieve. This zoning is unnecessary and should be amended.



Figure 6: Extract of Gilead Stage 2 Zoning Map (Source: DPE website)

We request that the Gilead Stage 2 PP zoning map be amended by deleting the SP2 Infrastructure zone in the location of the Transit Corridor crossing of Menangle Creek and be replaced with C2 Environmental Conservation zone to remove any inflexibility in the zoning of this corridor.

3.3 Proposed apportionment of upgrade works to Medhurst Road and the Medhurst Road/Menangle Road intersection under the VPA

We understand from the Planning Proposal documents that a VPA has been submitted that includes the delivery of the Transit Corridor north of Menangle Creek through to and including a new intersection with Menangle Road. This piece of infrastructure will require the acquisition of land within the Rosalind Park site, from LEDA Holdings Pty Ltd, and has the potential to impact on the existing and ongoing quarrying operations within the Rosalind Park site.

As evidenced in Figure 1 and Figure 2, this piece of infrastructure is proposed along the western boundary of the Rosalind Park Planning Proposal site and is essential infrastructure for the delivery of the Rosalind Park Planning Proposal. For this reason, LEDA Holdings Pty Ltd is proposing to deliver this infrastructure as part of the VPA submitted to Council with the Rosalind Park Planning Proposal.

For this reason, it is illogical and unreasonable for Gilead Stage 2 PP to be including the delivery of such infrastructure as part of any VPA Agreement with the DPE.

We request the deletion of any such costs under the proposed VPA apportioned toward the upgrade of the Menangle Road/Medhurst Road intersection and the upgrade of Medhurst Road to a Transit Corridor north of the Menangle Creek bridge. LEDA Holdings P/L will be delivering the Transit Corridor infrastructure under the Rosalind Park PP and associated VPA, from their southern roundabout through to and including the Menangle Road intersection.

3.4 Confirmation that the Koala Corridor along Menangle Creek complies with the DPE transect requirements;

Integral to both the Rosalind Park PP and the Gilead Stage 2 PP is the delivery of the Koala Corridor along Menangle Creek i.e. Koala Corridor A as identified under the Chief Scientist's report. As part of the submission of the Rosalind Park PP, documentation has been provided confirming that the PP mapping

and Koala Corridor complies with the Koala corridor transects provided by the by the DPE's CPCP Team for the Koala Corridor A along Menangle Creek.

We request that similar documentation be provided to confirm that this is reciprocated within the Gilead Stage 2 PP.

4. Other Issues

One issue raised by Council in the preliminary assessment of the Rosalind Park PP, is the wider opportunities for improved connectivity between surrounding properties. Connectivity between precincts is important to the future residents of these communities in terms of promoting connections between communities and fostering increased use of passive transportation i.e. walking and cycling.

The delivery of the Transit Corridor bridge crossing of Menangle Creek in the north-western corner of the Gilead Stage 2 PP site will obviously provide a level of private vehicle, public transport and walking and cycling connectivity between the two precincts in this point of the two sites.

However, by virtue of the two PP sites sharing a common boundary along Menangle Creek, being Koala Corridor A, no other connections have been proposed under either PP to foster connections between the two precincts.

LEDA Holdings Pty Ltd is supportive of endeavouring to provide a further passive connection between Rosalind Park and the Gilead Precinct, however the planning and delivery of any such additional crossing of Menangle Creek/Koala Corridor A, will require the cooperation of DPE, the DPE's CPCP team, and other landowners to resolve a suitable location and format for any such crossing of this corridor.

5. Conclusion

On behalf of LEDA Holdings Pty Ltd, we confirm that we are generally in support of the Gilead Stage 2 Planning Proposal. The broader environment will benefit from the harmonious redevelopment of both precincts together, most importantly through the delivery of Koala Corridor A together, including the restoration and revegetation of the riparian corridor of Menangle Creek.

Furthermore, the two precincts have the opportunity to deliver a significant portion of the Transit Corridor and required electrical, sewer and potable water services.

For this reason, we support the Gilead Stage 2 Planning Proposal, subject to the following amendments:

1. Realignment of the Transit Corridor across Menangle Creek to match that proposed under Rosalind Park PP;
2. Amend the zoning map to remove the SP2 zoning for the Transit Corridor across Menangle Creek and replace with the C2 Environmental Conservation zone to remove any inflexibility in the Transit Corridor alignment;
3. Deletion of any apportionment of costs towards the Medhurst Road/Menangle Road intersection and the Transit Corridor between Menangle Road and Menangle Creek under any proposed VPA, as this infrastructure will be delivered by LEDA Holdings Pty Ltd; and
4. Confirmation that the Gilead Stage 2 - Koala Corridor mapping complies with the transects provided by the DPE CPCP team for Koala Corridor A.

SUB-3616

Gina Tsiribas

gina.tsiribas@optusnet.com.au

Please note that I strongly object to the following planning proposal and the accompanying rezoning:

- **Gilead Stage 2 (Developer: Lendlease): 876-hectare site for up to 3,300 homes.**

Rapid declines in koala populations are witnessed as land is developed into urban environments. One of the chief scientist's main recommendations was to preserve koalas' ability to travel across the landscape by mandating koala corridors of an average minimum width of 390 metres as well as 30-metre buffer zones. The key piece of information that is missing here is how the width of the corridors has been calculated in the Gilead Stage 2 planning proposal.

This planning proposal fails to apply the planning principle for the Greater Macarthur Growth Area namely, the conservation of biodiversity for the koala population.

The planning proposal fails to show the dimensions for the Koala corridors listed, when the scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

The Nepean Creek corridor, which partly runs through Mount Gilead, is to be fenced off to prevent koala movements. The Woodhouse Creek corridor, which Lendlease has identified as its preferred corridor for Stage 2 of the development, will meander through the middle of a proposed massive housing estate and is not optimal in terms of the recommended average corridor width.

Without being able to see these dimensions, the credibility and transparency of this process is undermined.

The zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not in line with Koala conservation.

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve "is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area." Again this is about human activities and not koala conservation and the koala corridors should be zoned C1, and the ownership and management of these corridors should not remain in the hands of the developers.

The Urbis document prepared for Lendlease shows "Indicative Stormwater Basin Location Stormwater in wildlife corridors" (Urban Design Report 2022:27). This is contrary to the advice of the Chief Scientist and the TAP. In the same document Urbis have located a

“proposed Figtree Hill Reservoir” in the biobank area adjacent to Brown’s Bush which has also been identified as a future Koala Reserve.

It should be a major concern that Lendlease has an “Indicative Sewer Pumping Station” located at the north-west corner of the Site.

All of this proposed infrastructure will sever both Koala Corridors A and B. which were identified by the NSW Chief Scientist, and clearly demonstrates Lendlease’s insincerity to protect Koala Corridors. This is clearly a concern for Super Fund Australian Ethical, who have recently released a statement regarding Stage 2 Mt Gilead saying

""We think it is not a transparent, it is not a fair consultation, and our position is if Lendlease proceeded with the development anyway we would have to divest.""

Why would NSW Planning look to favour the developer and its profits over an endangered species and a nationally significant koala colony? Lendlease have not provided 450 metre wide corridors, they are proposing schools and roads in the corridors according to their maps and in NSW govt maps, and this includes on Condition 22A land.

The Koala is listed as a Threatened Species in Ecological documents not reflecting the Endangered Listing both in NSW and federally. This oversight undermines the credibility of the planning proposal.

Australia and NSW has an ecological crisis and this planning proposal fails to recognise and protect the rich biodiversity that exists in Stage 2. According to one of the Ecological reports, Stage 2 is home to 287 Threatened Species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and fails to protect their ecosystems.

Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and the accompanying impacts on Endangered and Threatened Species including the endangered Koala. Stage 1 Mt Gilead has zero corridors on Lendlease land and on Stage 2 they have only provided 2 corridors when the NSW Chief Scientist identified 6 corridors.

An iconic native species and its protection should be placed above rezoning and developer profits. This species is now endangered because offsetting and planning controls have failed to protect koalas.

Regards,

Gina Tsiribas

SUB-3617

Name withheld

I would like to request proper public consultation be undertaken into how the Mount Gilead development will impact the environment of the area, especially koala habitat. Koalas are now listed as an endangered species in NSW and it is currently unclear exactly how the development will impact one of the last healthy koala colonies left in the state.

Any proposed koala corridors must be disclosed, with measurements, and the government should not permit green credits to offset destruction of the koala habitat and general biodiversity of the area. I call on the government to reject this proposal until Lendlease is more forthcoming with a proper proposal that will genuinely protect the koala colony.

SUB-3620

SherrieCross

sherriecross53@gmail.com

RE: Submission and Objection to Lendlease's Planning Proposal to rezone Gilead Stage 2 from rural to residential to develop a 876-hectare site on the Koala habitat corridors of south-west Sydney

Introduction

The koala colony in the area of the Lendlease Gilead Stage 2 development proposal (referred to here as "the Campbelltown koalas") has exceptionally high conservation value, it being both free of Chlamydia and expanding its range. This submission centres on the question of whether the fauna underpasses, proposed to be built by Lendlease under the upgraded Appin Road, will perform the purpose of enabling these koalas to move through their existing habitat corridors. Scientific evidence is provided to demonstrate the fundamental uncertainty surrounding the efficacy of road underpasses to mitigate the corridor blocking effects of road upgrades and fauna exclusion fencing. This uncertainty is unacceptable when planning for an endangered species. The development should not be approved without the construction of one or more land bridges to provide landscape connectivity for the Campbelltown koalas.

Background

To accommodate the Gilead housing estate developments (and others throughout the Macarthur landscape), Transport For NSW plans to upgrade the Appin Road to four or six lanes, with fauna exclusion fencing to prevent fauna road deaths. The fencing will extend perhaps for 100 kilometres south to Wilton. This prompted a concern on the part of the CSE (Chief Scientist and Engineer) that the habitual east-west movements of the Campbelltown koalas between the Georges River and Nepean River riparian zones would be blocked. In response to the CSE concerns, Lendlease proposes to build underpasses under the Appin Road, on the assumption that this will enable koalas to maintain their east-west movements across the road.

Question: Can road underpasses mitigate the impacts of road upgrades and fauna exclusion fencing on koalas and other native wildlife?

The CSE has recommended that the design of underpasses should take account of the "latest evidence". If underpasses are relied on to facilitate koala movements we must have full confidence in their efficacy. If koalas cannot use them, the result will be east-west corridor blocking and the erosion of the territorial and genetic resources that presently support robust koala populations in the region. In addition, koalas and other wildlife will be trapped in fire grounds when fire comes to the bushland east of the Appin Road. These threats will severely challenge the sustainability of the Campbelltown koalas.

The short answer to the above question is: “We don’t know; further, given our present state of scientific knowledge, we have no means of knowing”. There is no concrete basis for Lendlease’s claim that underpasses will mitigate the impacts of the fauna fencing along the Appin Road. The evidence on koala use of underpasses is at best mixed.

Some studies have shown that koalas can successfully use underpasses if they are modified with appropriate fauna furniture. But one study “which was recently elevated in the media as providing positive evidence that wildlife will use underpasses” could not test for koala usage at all.

In contrast to the Jones study, a study by Ben Allen of the University of Southern Queensland has seriously questioned the efficacy of underpasses in providing safe passage for koalas and other native fauna across major roads. The Allen study was commissioned by the Queensland Department of Transport and Main Roads to study the fauna fenced Toowoomba Bypass in south-eastern Queensland for a twelve-month period. Three types of fauna crossing structures “underpasses, culverts and a viaduct” were studied with camera traps to assess their support of wildlife movements across roads.

Allen’s team recorded 185 confirmed animal crossings. Of all confirmed crossings, over 76% were made by introduced invasive species “foxes, feral cats, dogs and hares. Just one koala was confirmed to have crossed the bypass in twelve months, and this was at the viaduct. No koalas used the underpasses, despite the fact that these installations were large, open structures with ‘fauna furniture’ designed specifically for arboreal species such as koalas. The only native fauna (of over 30 native species recorded in the area) to make any use of the underpasses were red-necked wallabies and goannas. This was a minority usage and 82% of confirmed crossings at underpasses were made by feral cats, foxes and dogs. Both domestic and wild dogs had high use of the underpasses and domestic dogs had significantly higher records in the underpass than in surrounding bushland.

The nil use of underpasses by koalas was not a reflection of low koala numbers in the study area. The study records 29 photos of koalas in surrounding bushland areas (though the number of individual animals could not be specified).

Allen’s report to the Queensland Department of Transport and Main Roads advised that “despite the investment in several fauna underpasses and a viaduct the road remains a substantial barrier to most native wildlife and is instead frequented by feral, invasive species”. Allen notes that the “general lack of robust experimental studies” is a serious failing in our ability to ascertain the impacts of road construction and mitigation strategies on wildlife. A further complicating factor in assessing native wildlife usage of crossing structures is that “determining the most appropriate type can be fraught with difficulty depending on local contexts”.

What does the Allen et al study mean for the Campbelltown koalas?

The science on underpasses is at best unresolved. Our present state of scientific knowledge provides no certainty to determine whether the Campbelltown koalas will successfully use the planned underpasses.

Further, the complicating factor of local context is critically important in respect of the Campbelltown koalas. Allen's finding that domestic dogs had particularly high usage of the underpasses has grave implications for these koalas. Even more concerning is Allen's finding that the dogs concentrated at underpass locations more than at bushland locations. The Gilead area is known for its roving domestic dogs and this mortal threat to koalas will increase with housing development. This brings an additional and grave uncertainty to the question of koala use of underpasses in the Gilead area. It is likely that if we rely only on underpasses, the increasing dog numbers will deter koalas from achieving familiarization with underpasses. This will mean that east-west landscape connectivity for the Campbelltown koalas will be blocked, deleting a vitally important factor in the success of this colony to date.

The best-practice solution for wildlife passage across major roadways

The best-practice infrastructure for ensuring safe wildlife passage across major roads is the land bridge. The CSE recognizes this as the appropriate solution. It recommended that "A land bridge should be considered to allow Koalas and other fauna to cross the Appin Road" and referred to the substantial land bridge then under development for wallabies at Mona Vale. A web search for wildlife land bridges yields a plethora of information on these installations across the USA, Canada, the UK, Europe and Asia.

The above-mentioned Darryl Jones of Griffith University was part of a collaboration to design and build a land bridge across a major roadway adjacent to Karawatha Forest, 18km from the Brisbane CBD. His follow-up studies in 2018 showed that it had been "extraordinarily well used" by native fauna, many of which began to use it immediately. This land bridge is used by multiple species of native mammals, birds, reptiles and amphibians.

This land bridge presents to the animals as a landform, contiguous with the adjoining Karawatha Forest and planted with the same species. It supports routine fauna dispersal as well as escape from fire. And it has several features to provide multiple species with escape from predators. Jones' preferred outcome to mitigate the habitat fragmentation and vehicle collision impacts of road construction is the installation of multiple land bridges.

Recommendations

- 1. Underpasses will facilitate some wildlife movements, so they should be retained. It should be a condition of approval that Lendlease develop and install a design with appropriate fauna furniture to provide opportunities for various native species.**
- 2. The recommendation of the CSE to build a land bridge across the Appin Road should be included as a condition of approval for the proposal. Ideally there should be more than one land bridge. These land bridges should have direct connection with the east-west**

koala movement corridors through the housing estates. If these conditions are met, we will have a reasonable starting point for the maintenance of the east-west movements of the Campbelltown koalas.

Conclusion

To proceed with planning on the assumption that road underpasses alone will be sufficient to mitigate the impacts of road upgrades and fauna exclusion fencing would be radically irresponsible. Given the scientific uncertainty surrounding road underpasses, a plan to rely on them entirely would amount to an experiment. Such an experiment would have unacceptably high risks for the Campbelltown koalas, including entrapment in fire grounds, increased predation and loss of the landscape connectivity that has fostered the robust success of this koala colony to date. No university ethics committee would give approval for it. The fundamental uncertainty that underpins the use of underpasses in the Gilead area cannot be ignored and should not be tolerated when planning for a threatened species. Unproven technologies should not be permitted. For threatened species such as the koala, we cannot be satisfied with less than the best-practice solution.

SUB-3623

Stephen Fenn

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Submission deals with both Gilead Stage 2 and Appin (part) Precincts

19 December 2022

The Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Electronic submission

To whom it may concern

Re Gilead Stage 2 and Appin (part) Precinct planning proposals

Urban Taskforce welcomes the Government's decision to assume responsibility for the assessment of these major planning proposals in Southwest Sydney.

The housing supply and affordability crisis demands that the State Government to show leadership in major housing project proposals. Urban Taskforce has been calling for State-led assessment of major projects for a considerable time and this was a key point raised in letters to the former Minister for Planning and former Premier, as well as the new Premier in October 2021.

It is therefore pleasing to see the Government finally take up this initiative and apply this policy. This response was required three years ago at the very start of the pandemic when the crisis was looming and the economic boost that fast tracked approvals would have delivered for an economy hit by COVID 19.

The two precinct planning proposals on exhibition entail a complexity in assessment that is beyond the capability of local government. Yet the benefit to the broader public is significant – thousands of new homes, a local and town centre, a school in the case of Gilead Stage 2. It does so whilst setting aside considerable open space and environmental lands, preservation of koala corridors.

Urban Taskforce notes that these two Precinct planning proposals, along with the North Appin site, will be the first of several high yield, high value projects that will be fast-tracked through the “state-assessed planning proposal

pathway." Urban Taskforce welcomes this reform. It will provide an opportunity to co-ordinate planning and development across the projects so as to ensure the timely delivery of infrastructure such as the upgrade of Appin Road.

The area which is of greatest contention is the need for an "east-west" link road, given the amplification planned for Appin Road. The arguments for and against should be determined by the opportunity to maximise new housing in this development area.

The NSW Government must ensure Sydney Water completes the necessary design, funding and works required to provide water and wastewater infrastructure to Greater Macarthur. Unless this critical infrastructure is addressed immediately, the slow delivery of water and wastewater infrastructure has the potential to severely limit the achievement of the Government's housing targets including the delivery of the housing envisaged in the subject Planning Proposal.

Urban Taskforce notes the Transit Corridor proposed in the Greater Macarthur Structure Plan receives little focus on its delivery. A high-quality regional transport network within the Growth Area will require a Transit corridor to deliver an efficient and effective transit system linking the growth areas to Campbelltown and the Macarthur sub-regional centre.

Urban Taskforce notes that in addition to these two planning proposals, a third proposal is to be assessed by the Government. It is anticipated that this precinct will be placed on exhibition in early 2023.

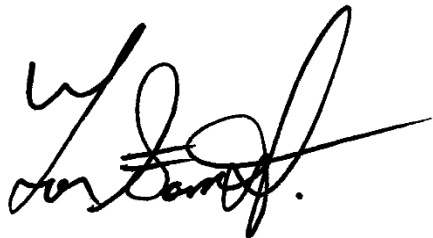
The Government should release this proposal for consultation as quickly as possible to allow it to consider all three proposals in their entirety. There are common issues and infrastructure matters that need to be resolved which will be best done through assessing all three proposals concurrently. Preliminary work should commence on the Gilead Stage 2 and Appin (Part) precincts prior to the release of the third planning precinct.

The housing supply and affordability crisis that has emerged over the past few years is now demanding a stronger response NSW Government. This pressure will only increase with the Federal Government's Housing Accord and the increase in the permanent migration level for 2023.

Urban Taskforce welcomes the Government's decision to assume responsibility for the three planning proposals in the Greater Macarthur Growth Area. Critical to the success of the Government's initiative will be the identification and earlier delivery of critical infrastructure required to service the anticipated 19,000 new homes comprising the three planning proposals.

Should you wish to discuss this matter further, please call our Head of Policy,
Planning and Research, Stephen Fenn on 9238 3969 or via email
stephen@urbantaskforce.com.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tom Forrest', with a stylized flourish extending from the end.

Tom Forrest

Chief Executive Officer

SUB-3626

Lisa McInerney

Lmcine10@gmail.com

The extract below is copied from an Australian Ethical email but it succinctly outlines my stance on the ongoing destruction of wildlife habitats in Australia, and around the world. This must stop if we are to meet our promise to limit emissions to 1.5%. Otherwise GOP, Paris and Kyoto accords etc are just a sham and an exercise in green-washing. LendLease and other developers need to take Climate Change seriously and act with integrity. The Earth and its inhabitants deserve better.

""I am very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements. Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3630

Jade Peace

jade.peace51@gmail.com

I object to this planning proposal and accompanying rezonings:

- 1. no detail on koala corridor widths: According to the NSW Koala Strategy (2022: p21) the koalas in the Campbelltown LGA are the largest chlamydia-free koala population in New South Wales. These two planning proposals provide no dimensions for these Koala habitat corridors - It is not enough to pass a planning proposal using "Indicative Koala Corridors".**
- 2. infrastructure will cut proposed "indicative" corridors. The Greater Macarthur Interim Plan 2040 called for a minimum preferred width of 425 metres for primary corridors, that is, the east side of the Nepean River on the Mt Gilead S2 property. The Chief Scientist called for similar figures (390m + 30m buffers). Proposed infrastructure such as roads, sewer pumping stations, reservoirs, and stormwater basins would cut both Koala Corridors A and B, proving Lendlease has no intention of protecting Koala Habitat Corridors. The Chief Scientist noted ""that it must aim towards a thriving and resilient koala population rather than simply a population ~hanging-on.""; which is not possible with this proposal.**
- 3. the entire ecosystem of many threatened flora and fauna species is compromised. A total of 124 native vertebrate fauna species, comprising 68 birds (two threatened and one migratory species), 17 microbats (including eight threatened species), one megabat (Grey-headed Flying Fox), 11 terrestrial and arboreal mammals (including two threatened species), 11 frogs, 13 reptiles, three fish and one threatened invertebrate, were recorded in the Stage 2 BCAA by ecologists. Development on the subject land will produce noise, pollution, run off into creeks and waterways. The DPE and the Minister for Planning cannot be satisfied that this ecological community will survive this development. "**
- 4. does not consider the uplisting of the koala to endangered status in NSW. This planning proposal should be resubmitted in the light of this up listing and the plans amended to include much stronger koala protections and improve connectivity.**
- 5. against Public Opinion The people of NSW do not want to see Koalas become extinct in the wild and, therefore, their protection is in the public interest. Save Sydney's Koalas collected 20,977 signatures for an e-petition which called upon the NSW Parliament to stop the rezoning of Stage 2 of the Gilead development and review the approval of Stage 1. A YouGov poll undertaken in November 2022 found 91% of NSW residents support a koala green for the edge of Sydney. Over four-in-five (84%) NSW citizens say that koala habitats should be protected from development (including housing, mining, logging, and more).**

In Summary, Koala habitat including effective wide Koala habitat corridors, defined in line with the Chief Scientist's recommendations, must be retained and properly protected. We oppose this proposal as it will not satisfy these requirements.

SUB-3635

Marnie Hawson

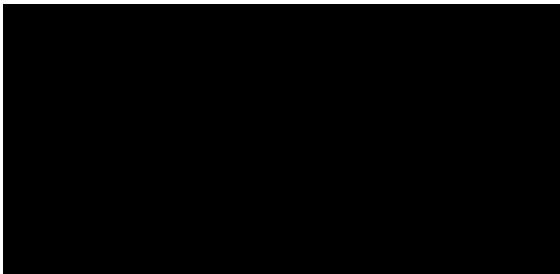
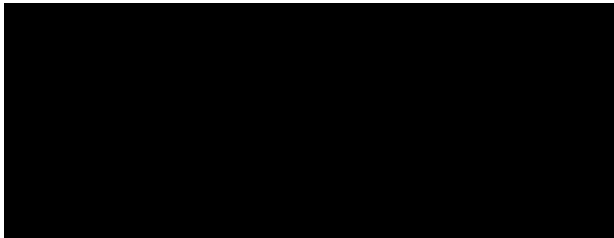
hello@marniehawson.com.au

I am very concerned about the impact of this development on the local koala colony. This colony is one of the last healthy koala colonies left in NSW. The species that has already suffered so much habitat loss it is now endangered in NSW. While I understand Lendlease proposes to take a number of steps to protect koalas, there is a lack of transparency about the impact the development will have. The application should not be approved until there is public consultation on the biodiversity impacts of the development. That consultation must include koala corridor maps with measurements. Further the NSW government should not approve any development that relies on credits to offset negative impacts to koalas. Please stand up for koalas and say no to this application until Lendlease puts forward a public and transparent plan that will genuinely protect the local colony.

SUB-3636

Name withheld

Please find attached a submission made on behalf of the Gilead Landowners Group



Our Ref: 319195_LEO_001_Final

19 December 2022

Department of Planning, Industry and Environment
Attention: Sydney Western District Team
Locked Bag 5022
PARRAMATTA NSW 2124

To whom it may concern,

SUBMISSION ON GILEAD STAGE 2 PLANNING PROPOSAL

This submission has been prepared on behalf of Gilead Landholders Group Pty Ltd ('GLG') in response to the public exhibition of the draft Gilead Stage 2 Planning Proposal (**the draft PP**).


GLG is a group of landowners of land located in Gilead, within the Campbelltown Local Government Area. Collectively the land is known as the South Campbelltown Site. It has an area of 935ha and is a key site within the Greater Macarthur Growth Area. **Attachment A** to this submission shows the strategic context of the South Campbelltown Site within the November 2022 Greater Macarthur Structure Plan.

The GLG congratulates the NSW Government on its initiative in having the Department of Planning assess / progress the Gilead Stage 2 and Appin (Part) Precinct Planning Proposals. These are positive steps towards unlocking housing supply and relieving housing affordability pressures.

Having said this, GLG was surprised and to some extent disappointed that these proposals (and the impending North Appin Planning Proposal) have been selected as 'pilot' projects to kickstart land release of the Appin Road growth corridor without the same participation opportunity afforded to GLG.

The relationship of the South Campbelltown Site to the Gilead Stage 2 lands (as well as the Appin (Part) Precinct and North Appin lands) presents a unique opportunity to integrate land use and infrastructure planning over a substantial part of the Greater Macarthur Growth Area to deliver housing. **Attachment B** to this submission shows that relationship.

As you may be aware, GLG commissioned and had completed a substantial body of technical studies and reports to inform land use planning of the South Campbelltown Site, covering matters including land capability, ecology and transport, water, sewer and social infrastructure requirements and urban design. This culminated in the submission of a planning proposal request to Campbelltown City Council. We note that this request is not shown as 'active' (under assessment) on the NSW Planning Portal.



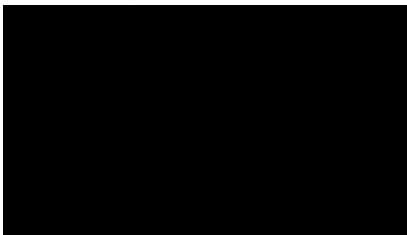
GLG acknowledges the recent announcements about the state assessed planning proposal pathway and is currently considering its eligibility to apply. We note the most recent advice from the Department of Planning may, in its sole discretions, determine whether a proposal is active.

[Rezoning Pathways program - \(nsw.gov.au\)](https://www.nsw.gov.au/rezoning-pathways-program)

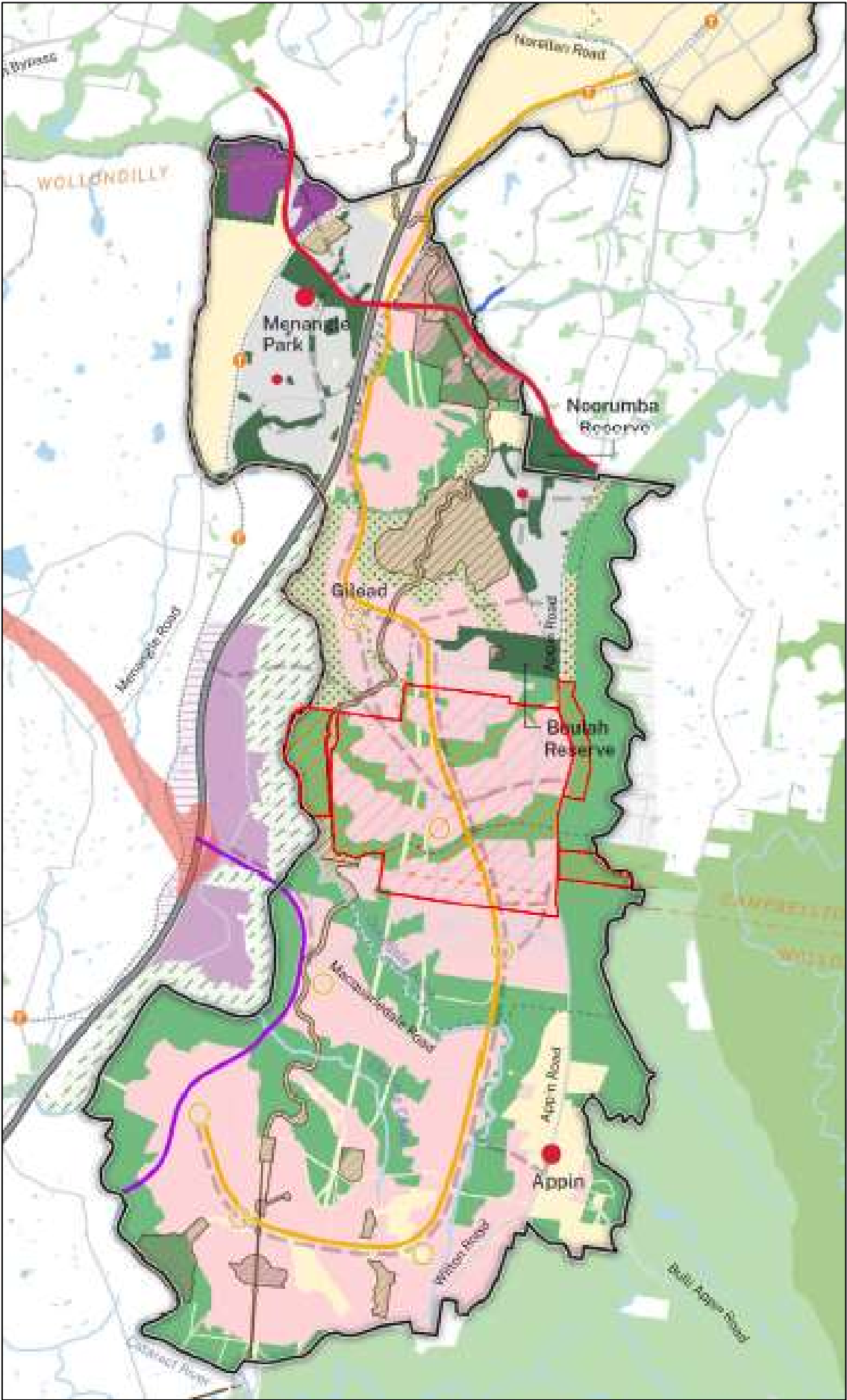
GLG is well positioned to quickly advance further urban land release in the Greater Macarthur Growth Area and is prepared to commit to doing so if given the opportunity.

GLG would be happy to meet with the Department of Planning to discuss the above. Should the Department wish to meet or if it has any questions concerning the above, please do not hesitate to contact me.

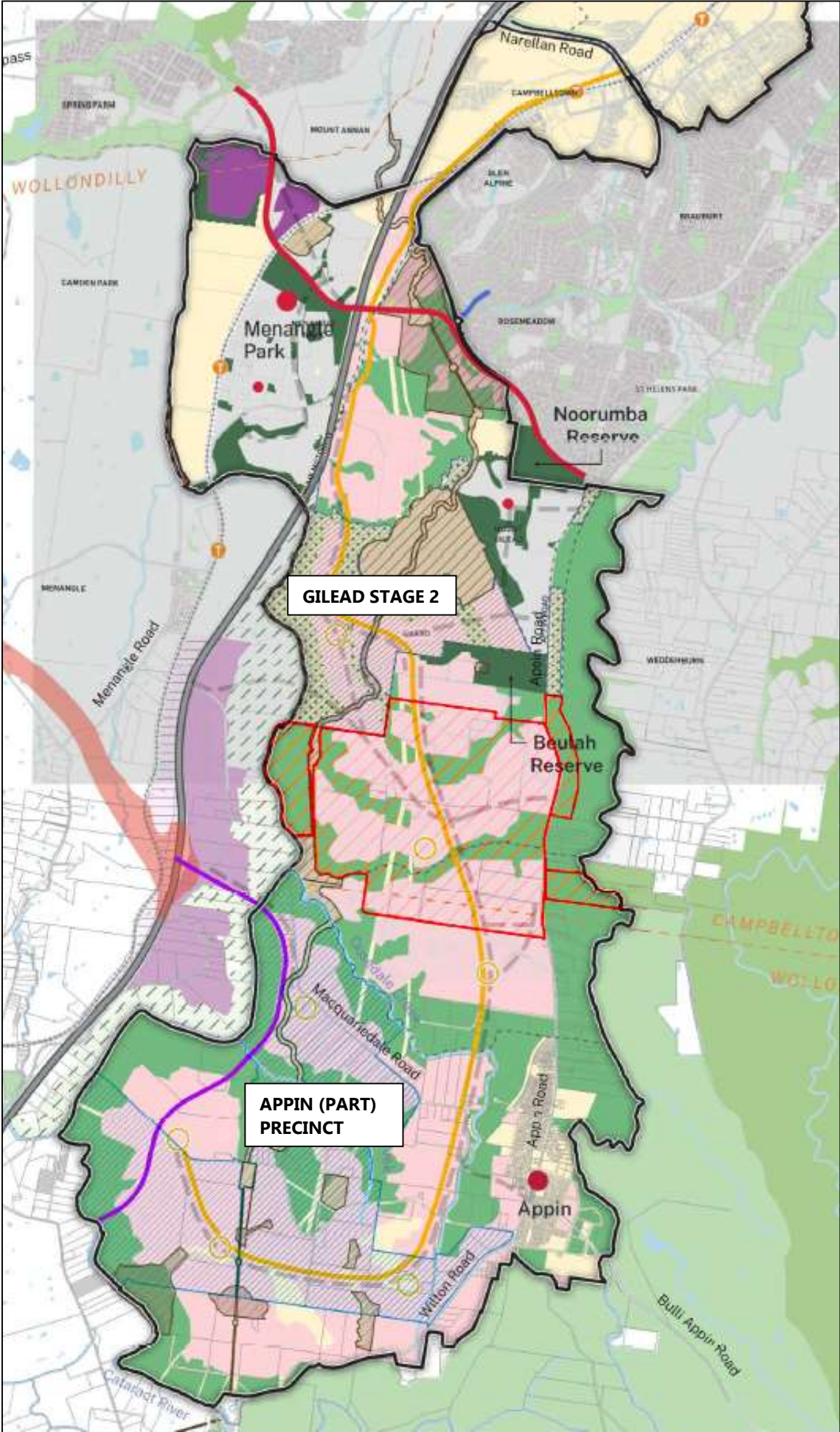
Yours sincerely



Attachments



ATTACHMENT B – RELATIONSHIP TO GILEAD STAGE 2 & APPIN (PART) PRECINCT



SUB-3642

Michael Carnuccio

michaelc@communityhousing.org.au

Please refer to attached submission from Community Housing Industry Association NSW.

19 December 2022

Attention of:
NSW Department of Planning and Environment
Via online submission form

Submission: Greater Macarthur Growth Area—Gilead Stage 2 and Appin (part) Precinct planning proposals

The Community Housing Industry Association NSW (CHIA NSW) welcomes the opportunity to make a submission on the proposed Planning proposals for Gilead Stage 2 and Appin. Noting these are separate proposals, the issues for affordable and social housing are common and this submission covers both proposals.

CHIA NSW is the peak body representing registered, not-for-profit community housing providers (CHPs) in NSW. Our members currently own or manage more than 54,000 homes across NSW for individuals and families who cannot afford to rent or purchase a home on the private market. This includes people in low to moderate income jobs that are essential to supporting the economy, such as health and childcare workers, retail and hospitality staff, and other essential service workers. Since 2012, CHPs have delivered more than 5,800 new homes across NSW, representing an investment of over \$1.82 billion. Critically, these are new homes that the private sector cannot – or will not – deliver in response to housing need.

CHIA NSW welcomes the inclusion of affordable housing commitments in the Gilead Stage 2 Planning Proposal and the Appin (part) Draft Planning Proposal. CHIA NSW strongly supports the proposal to introduce requirements for affordable rental housing contributions in these locations.

As recognised in the planning proposals, the Region Plan, and local strategic planning documents, there is a growing need for affordable rental housing in these locations. As development of the Growth Area proceeds, local housing costs will increase along with amenity and infrastructure upgrades. These large developments provide a critical opportunity to secure a diversity of housing to meet the full range of needs of the community, including for housing available at a price point affordable to lower income and moderate income households.

Scope of affordable housing contribution requirements

Under the proposals, the requirement for affordable housing contributions will only be applied to medium-density developments. Limiting the contribution requirement in this way will reduce the scale of affordable housing delivered, particularly in Gilead where only 15 affordable housing units are expected to be delivered under the proposed planning settings.

CHIA NSW strongly recommends that a contribution requirement is extended to all residential development, including low-density housing. In this regard we note that the Penrith City Council has recently exhibited a planning proposal that demonstrates how such a contribution requirement could be feasibly delivered in greenfield context. Penrith City Council is proposing an initial low initial rate with a moderate increase in requirements over time.

Affordable housing contributions are an efficient, effective measure for supporting housing outcomes. They reduce the burden on local councils seeking to negotiate requirements and provide certainty to developers and the community.

Internationally, as well as in NSW, it has been demonstrated that a broad-based contribution requirement does not impede development, as developers incorporate the contribution into the land purchase price.ⁱ The Centre for International Economics, in its evaluation of infrastructure contributions reforms, also concluded that, over time, infrastructure costs will be factored into lower land values, rather than higher housing prices.ⁱⁱ A higher target is therefore likely to be supported if sufficient notice is provided to the market.

Maximising housing outcomes

Given the quantum of affordable housing likely to be delivered in these locations, and noting that housing costs in the area are anticipated to rise over time, it is imperative that the planning framework requires these dwellings to be secured as affordable housing in perpetuity.

Similarly, CHIA NSW recommends that a requirement be put in place to require any affordable housing delivered to be owned by a not-for-profit registered CHP. Not-for-profit registered CHPs can maximise the housing outcomes from affordable housing contributions as a result of:

- CHP expertise in the provision and management of affordable housing, with a long-term focus.
- Savings in construction and operating costs due to CHPs' not-for-profit status and GST exemptions. Not-for-profit CHPs also do not have large development margins.
- Efficiencies in operating costs from CHPs operating a portfolio of properties.
- Regulatory framework governing CHPs, which ensures ongoing positive outcomes from affordable housing stock.
- CHPs are flexible partners and can bring in other subsidies, grants, and funding which will enable contributions to go further.
- Through ownership of dwellings, CHPs can further leverage to deliver more affordable housing.

The combination of these benefits means that working with CHPs from the outset and ensuring CHPs own dwellings will significantly increase the long-term impact of any affordable housing contributions, particularly in areas with low initial housing potential. CHIA NSW recently commissioned independent analysis of the financial benefits of working with CHPsⁱⁱⁱ. It found that CHPs can deliver a minimum of 27% more affordable housing units as a result of owning the dwellings.

CHIA NSW appreciates the opportunity to provide feedback on the planning proposals. We would be happy to discuss further opportunities to secure long-term affordable housing outcomes in the Greater Macarthur Growth Area through partnership with CHPs.

Kind regards,



Michael Carnuccio
Senior Policy Officer

ⁱ Gurran, N., Gilbert, C., Gibb, K., van den Nouwelant, R., James, A. and Phibbs, P. (2018) *Supporting affordable housing supply: inclusionary planning in new and renewing communities*, AHURI Final Report No. 297, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/final-reports/297>, doi: 10.18408/ahuri-7313201.

ⁱⁱ The Centre for International Economics, (2020) *Evaluation of infrastructure contributions reform in New South Wales - Final Report*, prepared for the NSW Productivity Commission.

ⁱⁱⁱ Paxon Group, *Local Council Partnerships for Provision of Affordable Housing*, October 2022. Commissioned by CHIA NSW.

Political donations disclosure statement



NSW GOVERNMENT
Department of Planning

Office use only:

Date received: ____/____/____

Planning application no. _____

This form may be used to make a political donations disclosure under section 147(3) of the *Environmental Planning and Assessment Act 1979* for applications or public submissions to the Minister or the Director-General.

Please read the following information before filling out the Disclosure Statement on pages 3 and 4 of this form. Also refer to the 'Glossary of terms' provided overleaf (for definitions of terms in *italics* below). Once completed, please attach the completed declaration to your planning application or submission.

Explanatory information

Making a planning application or a public submission to the Minister or the Director-General

Under section 147(3) of the Environmental Planning and Assessment Act 1979 ('the Act') a person:

- (a) who makes a *relevant planning application* to the Minister or the Director-General is required to disclose all *reportable political donations* (if any) made within the *relevant period* to anyone by any *person with a financial interest* in the application, or
- (b) who makes a *relevant public submission* to the Minister or the Director-General in relation to the application is required to disclose all *reportable political donations* (if any) made within the *relevant period* to anyone by the person making the submission or any *associate of that person*.

How and when do you make a disclosure?

The disclosure to the Minister or the Director-General of a *reportable political donation* under section 147 of the Act is to be made:

- (a) in, or in a statement accompanying, the relevant planning application or submission if the donation is made before the application or submission is made, or
- (b) if the donation is made afterwards, in a statement of the person to whom the relevant planning application or submission was made within 7 days after the donation is made.

What information needs to be included in a disclosure?

The information requirements of a disclosure of reportable political donations are outlined in section 147(9) of the Act.

Pages 3 and 4 of this document include a Disclosure Statement Template which outlines the information requirements for disclosures to the Minister or to the Director-General of the Department of Planning.

Note: A separate Disclosure Statement Template is available for disclosures to councils.

Warning: A person is guilty of an offence under section 125 of the *Environmental Planning and Assessment Act 1979* in connection with the obligations under section 147 only if the person fails to make a disclosure of a political donation or gift in accordance with section 147 that the person knows, or ought reasonably to know, was made and is required to be disclosed under section 147.

The maximum penalty for any such offence is the maximum penalty under Part 6 of the *Election Funding and Disclosures Act 1981* for making a false statement in a declaration of disclosures lodged under that Part.

Note: The maximum penalty is currently 200 penalty units (currently \$22,000) or imprisonment for 12 months, or both.

Glossary of terms (under section 147 of the *Environmental Planning and Assessment Act 1979*)

gift means a gift within the meaning of Part 6 of the *Election Funding and Disclosures Act 1981*. Note. A gift includes a gift of money or the provision of any other valuable thing or service for no consideration or inadequate consideration.

Note: Under section 84(1) of the *Election Funding and Disclosures Act 1981* gift is defined as follows:

gift means any disposition of property made by a person to another person, otherwise than by will, being a disposition made without consideration in money or money's worth or with inadequate consideration, and includes the provision of a service (other than volunteer labour) for no consideration or for inadequate consideration.

local councillor means a councillor (including the mayor) of the council of a local government area.

relevant planning application means:

- a) a formal request to the Minister, a council or the Director-General to initiate the making of an environmental planning instrument or development control plan in relation to development on a particular site, or
 - b) a formal request to the Minister or the Director-General for development on a particular site to be made State significant development or declared a project to which Part 3A applies, or
 - c) an application for approval of a concept plan or project under Part 3A (or for the modification of a concept plan or of the approval for a project), or
 - d) an application for development consent under Part 4 (or for the modification of a development consent), or
 - e) any other application or request under or for the purposes of this Act that is prescribed by the regulations as a relevant planning application,
- but does not include:
- f) an application for (or for the modification of) a complying development certificate, or
 - g) an application or request made by a public authority on its own behalf or made on behalf of a public authority, or
 - h) any other application or request that is excluded from this definition by the regulations.

relevant period is the period commencing 2 years before the application or submission is made and ending when the application is determined.

relevant public submission means a written submission made by a person objecting to or supporting a relevant planning application or any development that would be authorised by the granting of the application.

reportable political donation means a reportable political donation within the meaning of Part 6 of the *Election Funding and Disclosures Act 1981* that is required to be disclosed under that Part. Note. Reportable political donations include those of or above \$1,000.

Note: Under section 86 of the *Election Funding and Disclosures Act 1981* reportable political donation is defined as follows:

86 Meaning of "reportable political donation"

- (1) For the purposes of this Act, a reportable political donation is:
 - (a) in the case of disclosures under this Part by a party, elected member, group or candidate—a political donation of or exceeding \$1,000 made to or for the benefit of the party, elected member, group or candidate, or
 - (b) in the case of disclosures under this Part by a major political donor—a political donation of or exceeding \$1,000:
 - (i) made by the major political donor to or for the benefit of a party, elected member, group or candidate, or
 - (ii) made to the major political donor.
- (2) A political donation of less than an amount specified in subsection (1) made by an entity or other person is to be treated as a reportable political donation if that and other separate political donations made by that entity or other person to the same party, elected member, group, candidate or person within the same financial year (ending 30 June) would, if aggregated, constitute a reportable political donation under subsection (1).
- (3) A political donation of less than an amount specified in subsection (1) made by an entity or other person to a party is to be treated as a reportable political donation if that and other separate political donations made by that entity or person to an associated party within the same financial year (ending 30 June) would, if aggregated, constitute a reportable political donation under subsection (1). This subsection does not apply in connection with disclosures of political donations by parties.
- (4) For the purposes of subsection (3), parties are associated parties if endorsed candidates of both parties were included in the same group in the last periodic Council election or are to be included in the same group in the next periodic Council election.

a person has a financial interest in a relevant planning application if:

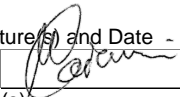
- a) the person is the applicant or the person on whose behalf the application is made, or
- b) the person is an owner of the site to which the application relates or has entered into an agreement to acquire the site or any part of it, or
- c) the person is associated with a person referred to in paragraph (a) or (b) and is likely to obtain a financial gain if development that would be authorised by the application is authorised or carried out (other than a gain merely as a shareholder in a company listed on a stock exchange), or
- d) the person has any other interest relating to the application, the site or the owner of the site that is prescribed by the regulations.

persons are associated with each other if:

- a) they carry on a business together in connection with the relevant planning application (in the case of the making of any such application) or they carry on a business together that may be affected by the granting of the application (in the case of a relevant planning submission), or
- b) they are related bodies corporate under the *Corporations Act 2001* of the Commonwealth, or
- c) one is a director of a corporation and the other is any such related corporation or a director of any such related corporation, or
- d) they have any other relationship prescribed by the regulations.

Political Donations Disclosure Statement to Minister or the Director-General

If you are required under section 147(3) of the Environmental Planning and Assessment Act 1979 to disclose any political donations (see Page 1 for details), please fill in this form and sign below.

Disclosure statement details				
Name of person making this disclosure Community Housing Industry Association NSW		Planning application reference (e.g. DA number, planning application title or reference, property address or other description) PP-2021-3265 Waterloo Estate (South)		
Your interest in the planning application (circle relevant option below)				
You are the APPLICANT YES / NO OR You are a PERSON MAKING A SUBMISSION IN RELATION TO AN APPLICATION YES / NO				
Reportable political donations made by person making this declaration or by other relevant persons				
<i>* State below any reportable political donations you have made over the 'relevant period' (see glossary on page 2). If the donation was made by an entity (and not by you as an individual) include the Australian Business Number (ABN).</i> <i>* If you are the applicant of a relevant planning application state below any reportable political donations that you know, or ought reasonably to know, were made by any persons with a financial interest in the planning application, OR</i> <i>* If you are a person making a submission in relation to an application, state below any reportable political donations that you know, or ought reasonably to know, were made by an associate.</i>				
Name of donor (or ABN if an entity)	Donor's residential address or entity's registered address or other official office of the donor	Name of party or person for whose benefit the donation was made	Date donation made	Amount/ value of donation
Community Housing Industry Association NSW ABN 86 488 945 663	Suite 5, 619 Elizabeth Street Redfern, NSW 2016	NSW Liberal Party	7/2/22	\$3,000
Please list all reportable political donations—additional space is provided overleaf if required.				
By signing below, I/we hereby declare that all information contained within this statement is accurate at the time of signing.				
Signature(s) and Date - 				
Name(s) Michael Carnuccio, Senior Policy Officer, Community Housing Industry Association NSW				

Cont...

Political Donations Disclosure Statement to Minister or the Director-General

Name of donor (or ABN if an entity)	Donor's residential address or entity's registered address or other official office of the donor	Name of party or person for whose benefit the donation was made	Date donation made	Amount/ value of donation

SUB-3645

Name withheld

My submission is attached

Re: Objection to Planning proposal for Gilead Stage 2 (Developer Lendlease) 876 hectares site PP 2022 3978

On the 22nd November 2016 Campbelltown Councillors were told by staff that the only way they would have the Appin/Campbelltown Road upgraded is to allow development on Mount Gilead and the majority vote was to allow the property to be rezoned (Stage 1), since that time we have been shown several sketches of various overpasses, ex Environment Minister Matt Kean was misled into the amount of harm the development would do to the koalas, the Chief Scientist went as far as writing that Lendlease had purported to tell the truth regarding wildlife corridors along the Nepean River

CHIEF SCIENTISTS REPORT (CS))

Response to questions about advice provided in the Koala Independent Expert Panel Report “Advice on the protection of the Campbelltown Koala Population

Why has DPE now decided to zone wildlife corridors C2 and not C1 when this has ignored the Chief Scientist’s recommendation that there be no installations within these areas or the buffer zones but that they can be installed along the Asset Protection Areas?

This development proposal has strayed so far from the recommendations of the Chief Scientist and the Technical Assurance Panel it should be recalled and resubmitted with the width of wildlife corridors clearly marked, all recommendations included and the revised plan submitted to both Panels for comment. Without widths being recorded, there are no wildlife corridors.

Chief Scientist's comments have now been ignored C2 zoning has been given to Wildlife Corridors, Sewerage stations, potable water installations and stormwater basins have been installed and public walking tracks and picnic areas have been planned, the government and the developer have ignored the basic policy of the Greater Macarthur Growth Area GMGA.

A planning principle for the GMGA is the conservation of biodiversity and koala populations (This principle has been ignored.

Wildlife corridors that end with no connection to other habitats can be a considerable risk, in particular where the habitat exposes, wildlife to threats, and in doing so can create population sinks, where wildlife kills occur, causing vacancies in the location which subsequently attract more animals.

The Panel also notes that it is important that the corridors provide functional connectivity, in that the corridors are actually utilised by koalas for east-west and north-south movement.

The Minister has stated that the Chief Scientists' recommendation has been implemented on the property and therefore, all the Panel’s recommendations must be put in place and best practice is the keyword.

The east-west corridor must be retained on the property with corridor widths as recommended by the CS and koala hubs included to ensure that male koalas can pass safely otherwise it will lead to fights and possible death of

young dispersing animals but in this report, the panel makes it clear that corridors of at least 409m in widths should be implemented, and if koala fences are not feasible, then buffer zones –(60 m wide) are required and 30 metres where fencing is possible, plus asset protection areas.

Regarding the Nepean River the CS goes on to state that *both sides of the river must be treated as separate sides therefore, they should be treated as separate corridors that provide symbiotic-like protection to the adjacent riverbank*

It has not been clarified if corridor widths are measured as the crow flies or on the ground, the measurement must be as the crow flies otherwise full protection of the river, flora and fauna and stabilization of the gorges would be compromised.

The CS quotes Dr Steven Phillips's corridor width stating that an optimum width of 409m – 425 m must be maintained, he does not include the word average and these corridor widths should be on both sides of the Nepean River because although they can swim koalas prefer not to.

The CS states that corridors can include land that is not owned by Lendlease but I found that there is no indication that permission in writing has been obtained from owners and conservation agreements put in place

The Nepean Creek contains endangered woodland and flora, with a good stand of core koala habitat trees along its western bank, the creek contains the remains of the Cobb & Co staging dam and is used by several native animals including the Endangered Koala Cumberland Plain Large Land Snail and Vulnerable Squirrel Glider, the creek should therefore have both sides of the banks protected with 409 to 425 wildlife corridor measured from the centre of the creek.

Internet searches find that there are now only 6,400 hectares of the woodland left, the Cumberland Plain Conservation plan (CPCP) and Mount Gilead will destroy another 2,000 hectares leaving only 4,400 hectares of fragmented woodland left and instead of destroying this Critically Endangered community DPE should be planting and protecting its viability.

Areas marked on the map as being conserved such as the back of Macquariedale Road (Appin) and developed areas of Grasmere and Carrington Retirement Village (Camden) appear to be wrongly marked within the CPCP.

It has been made clear that both the Department of Planning and ex-Environment Minister Matt Kean understood that the intention of the Chief Scientist to protect wildlife corridors across Mount Gilead and that the average was no less than 390 to 425 metres, with an additional 3-metre buffer zone on either side of the corridor, that buffers should not have a dual purpose and the intent was to follow the Chief Scientists report and that the span bridge across Appin Road promised by Lendlease would be feasible at Noorumba Reserve

Heritage, the curtilage area of the Mount Gilead property must not be used by Lendlease for wildlife corridors or any other use, the Chief Scientist has made this clear and it is inappropriate for the government to allow any developer to take or use the protected area for any reason.

Background

The OCSE report recommended several measures to improve koala protection

You and the Minister for Planning and Public Spaces asked the OCSE to provide expert advice on how to protect the Campbelltown koala population. This included advice on the proposed conservation measures for the MGS2 biodiversity certification application submitted by Campbelltown City Council.

Key recommendations in the OCSE report for the MGS2 proposal include:

- habitat in the east-west corridors A and B, which fall within MGS2 (Tab 3), should be protected and widened to an average size of 390 to 425 metres, with an additional 30-metre-wide buffer on either side of the corridor
- koala exclusion fencing should be constructed between the buffer and urban areas to separate koalas from urban hazards
- if exclusion fencing is not possible because of steep terrain, a 60-metre buffer either side of the corridor containing only non-feed trees, and with monitoring to track predators, will be needed (Tab 4)
- buffers should not have a dual role as an APZ or for any other purpose.

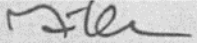
The OCSE also recommended options to address koala connectivity on Appin Road including:

- the construction of an underpass near Beulah biobanking site (corridor B), noting that Lendlease provided the OCSE a conceptual drawing of a possible Appin Road underpass with the crossing emerging adjacent to (not within) the Beulah biobank site
- corridor A only be used if an effective connectivity structure for koalas can be constructed. If the crossing is not feasible, the koala habitat at Noorumba will not function as connected koala habitat and should be fenced off at Appin Road.



Planning, Industry & Environment

Review of the Lendlease Draft Gilead Koala Conservation Plan against the findings of the Chief Scientist

Purpose	To advise of the outcomes of Environment Energy and Science's (EES) initial review of Lendlease's draft Gilead Koala Conservation Plan (Tab 1) against the findings of the Office of the Chief Scientist and Engineer (OCSE) on the protection of the Campbelltown koala population.
Analysis	EES's review (Tab 2) of Lendlease's latest draft (version 3) of the Koala Conservation Plan for its Mt Gilead Stage 2 (MGS2) proposal identifies several inconsistencies with the findings of the OCSE with respect to corridor widths, buffers and exclusion fencing. At a meeting on 3 November 2020, Lendlease was adamant the corridors in its koala plan were sufficiently wide but acknowledged that buffers included asset protection zones (APZs) and other uses, contrary to the OCSE's advice.
Signature/ comment	<div> The Hon Matt Kean MP Minister for Energy and Environment Date: 27.1.21</div> <div>I do not wish to sign off on Environmental affairs unless consistent with Chief Scientist dec's.</div>

It has taken Lendlease and or the government 6 years to admit there are 26 Critically Endangered, Endangered and Vulnerable species of both flora and fauna on the property but instead of giving these threatened species more protection wildlife corridors have been given C2 zoning and buildings such as potable water storage, and sewerage pump out stations along with walking tracks will obstruct and endanger any plant growing or animal trying to move through them, the light from development will not allow microbats to find their prey and as native

animals are nocturnal they will be easy prey for owls and try to move away from the area but with so much development there is nowhere for them to move.

Now that 26 threatened species have been found government must realise the environmental and heritage importance of the Mount Gilead property and accept that development cannot go ahead, otherwise, the destruction of these species will make a mockery of The Threatened Species Conservation Act 1995 (TSC.Act) and their heritage value.

Red Flag Areas. The policy states that development cannot impact these areas of land except in certain circumstances. Under no circumstances can development for dwellings be considered special, therefore, these areas must be protected, and the Pomaderris Brunnea should be added as a red flag population as 253 shrubs cannot be translocated and they will be endangered from development along with residents stepping on regenerating shrubs, picking flowers, or trying to relocate them to their gardens.

The Squirrel Glider population should be another Red Flag population or populations as they stretch across the property and on the eastern side of Appin/Campbelltown Road, a full study should be undertaken to ensure that they are protected as it is not known if they are one large family moving throughout the property and eastern side of the road or several family groups but as Squirrel gliders have relatively small territorial areas the latter may apply, either way, if the population is to thrive they need to move across the property to expand and breed.

Further studies should be undertaken along the ridgeline to Appin to ensure that all threatened species are identified and protected before any further land is considered for rezoning for development as the government is well aware that Lendlease misled ex-Environment Matt Kean into the amount of harm the development would do to koalas and Landcom advised that koalas did not need to be protected as there were so few present, but so far 24 have had to be rescued from the suburb of Airds.

With 19 koalas found on or near Mount Gilead, the Campbelltown Koala population must now be protected and the Conserving Koalas in Wollondilly and Campbelltown Areas rewritten to ensure the future health of one of, if not the last large, expanding Chlamydia free populations left in NSW.

Of the 26 threatened species living or visiting the property, excluding the Cumberland Plain Woodland (CPW) and its associated forest communities, which will be destroyed, there are only 6,400 hectares of CPW left in Western and SW Sydney from its original 124,000 hectares, and the Mount Gilead development plus the Cumberland Plain Conservation Plan will further reduce this Critically Endangered woodland by another 2000 hectares resulting in there only being 4,400 hectares of fragmented woodland left.

Only approximately 15,000 hectares of CPW and its associated woodlands are left and they cannot remain viable if further loss is permitted.

Photographs supplied within the URBIS Urban Design Report and the Ecological fauna and flora studies show a well-run farm that has included ample space for Critically Endangered, Endangered, Threatened and Vulnerable Species that share space with other more common native species and Endangered Plants and birds that can at this time escape in times of bushfire or drought.

Endangered animals and birds cannot move into territory already held by other animals of the same species, in doing so they will need to fight existing animals to establish a home range, but then the older animal will be left homeless and this is one of the main reasons Koala populations have declined or been lost and continue to be lost.

Koalas will fight to the death to secure territory if not at the time the fight takes place, then later, they usually die from bites they received during the fight. (Campbelltown Koala Research and Database Close R, Durman B.

This is what has happened to most other koala populations along the east coast, in Victoria they have once again been found starving to death and overcrowded mainly because of the amount of logging that has taken place within their territories, north of Sydney stress from overcrowding has contributed to whole populations being in decline or extinct because of Chlamydia induced by stress. (Vanishing Koala Conference Coffs Harbour)

The Barrenjoey/Avalon koala population was rendered extinct because of development but instead of learning from this, the government is doing the same thing to the Campbelltown Koala population.

The combined number of threatened native species across the Royal National Park in Sydney, Heathcote National Park and Garrawarra State Conservation Area only add up to 41 species and yet the 26 in the much smaller area of Mount Gilead are being allowed to die out, animals from loss of habitat and wildlife corridors and plants from a change of direction of water, rainwater storage basins, and people either walking on them, picking the flowers or pulling up the whole plant hoping to grow it at home. Nowhere is the inequality of the suburbs more plainly seen than when threatened species are allowed to be destroyed along with heritage homes, and the lifestyle and the health of residents.

The high number of threatened species and heritage values of Mount Gilead should be protected and the whole property turned into a Heritage Nature Reserve as there would be more Critically Endangered, Endangered, Threatened and Vulnerable species along with more common species of flora and fauna on Mount Gilead than many National Parks, for instance, the combined number of threatened species across the Royal National Park, Heathcote National Park and Garawarra SCA only have 41 between all three.

It is not logical for the Campbelltown Koala Population to be managed from the Royal National Park and the southern part of the population at Appin and the Southern Highlands Koala Population to the south to be managed by NPWS Illawarra, the Illawarra Branch has successfully protected bushland in the Dharawal National Park, Appin and along the Georges River for many years, but the staff at the Royal National Park have never shown any interest in this region, neither have they carried out any regeneration or public meetings and the lack of interest by staff within the Royal National Park may be one of the reasons the Campbelltown Koala Population has been given no protection.

There are a high number of Wombats living on Mount Gilead, quite a few of these animals would have been already chased out of Noorumba Reserve and the Mount Gilead Retirement Village they may not yet have been given a vulnerable species listing, but mange continues to drastically reduce their numbers along the eastern seaboard and yet they have been given no protection, in this proposal and there is no plan to rescue them before they are buried in their burrows along with Echidnas or any other burrowing animal, this should be rectified.

The only reason aquatic animals will be rescued when dams are dewatered is that the Local Planning Panel issued an order that this should happen, but now the Panels have been cancelled I doubt any level of government will order the rescue of burrowing animals on the property, but this is inhuman and they must be saved.

Lendlease has planted Cumberland Plain Woodland species of bushes of which at least 40% have died beside Noorumba Reserve and plantings beside the Heritage Dam have mostly died, these areas need to be replanted and next time including core koala feed trees.

The planting of trees or bushes should always include the future maintenance of the plants otherwise they die of lack of water or they are accidentally destroyed.

Without Attachments N and O being released to the public how can we make a responsible submission of their content and how can we be assured that they are complete, as these two reports were not included the proposal should be withdrawn and re-submitted to the public for comment as a matter of urgency.

The right of citizens to have clean air to breathe, and enough safe drinking water appears to have been ignored with no reports undertaken or released to the public into the effect development will have on their health in the future, if this is so a breach of the government's duty of care has taken place and it will bring hardship and a greater number of residents will suffer from respiratory disease.

Government is duty-bound to ensure the safety of residents and it would be unethical to not release reports undertaken to the public regarding the effect of future heat from Climate Change when buildings and roads replace farms and bushland, or run-off and flooding from these same developments to local and downstream residents and businesses.

The 30 minutes commute is a fallacy that is already impossible to deliver and Campbelltown has already descended into a city dependent on the motor car to drive to work, shops or for parents to take their children to school, Lendlease says they will make a site for a school available but has neglected to say when or by whom the school will be built and space for new buildings within Campbelltown has reached a state that the well designed and much-loved library will have to be demolished to make way for a new Cancer Clinic and the only space available would be in ovals that have been put in place to create stormwater basins, which has resulted in children not being able to play their chosen sport for many weeks.

Despite Campbelltown being considered a low economic region more parents than ever are enrolling children into private schools because they realise that local schools are either unavailable or becoming overcrowded, and they are not situated within walking distance from home, more children are also travelling by train to other schools in Sydney. (A submission released to the public 22/11/2016 made it clear that there would be no room for children moving into dwellings at Mount Gilead)

A further fallacy is that homes will need to be built in Campbelltown and Macarthur to staff the Aerotropolis as there will be no public transport in place before the airport opens and roads are congested, and yet there appear to be no plans to put any option in place in the short time to rectify this situation.

The inequality of Campbelltown and western Sydney has been highlighted within the State of the Environment report (2021) which led to ex-Minister Robert Stokes arranging to have a few trees planted in Rosemeadow but

this was quickly followed by mature trees, bushes and grasslands being destroyed for more housing, thus eliminating any good the tree planting had done.

During the time we have lived in Campbelltown, we have seen the city go from a safe and thriving, happy place to live with very good medical facilities, schools, plenty of open space and local farm produce to an overcrowded, unhappy city lacking in basic infrastructure, overcrowded schools and a hospital in crisis because of lack of staff, the Mount Gilead development will further degrade lifestyle in Campbelltown as the development will only bring more residents to the region, extra air pollution, and excessive heat, along with flooding which contaminated Noorumba Reserve and Menangle Creek with mud for several months from Lendlease Stage One site



(Photograph 03.12.2022 Noorumba Reserve 200-year-old dam)



Photograph 1. lack of erosion control on Mount Gilead, 2. Flooding into Menangle Creek 3. The historical Noorumba dam 08 and 09. 03. 2022.

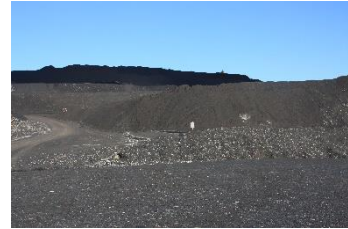
There is no scientific evidence that destroying open pastures, paddock trees or woodland communities will increase the number of threatened species including koalas on the property and no proof that the present owner would not further enhance the habitat in the future to cater for a higher number of native species, the Campbelltown Koala population was mentioned within the National Koala Recovery Plan as one of the last large, expanding Chlamydia-free populations left in the NSW, The Koala Strategy stated that the population is a priority population for protection, but the Conserving Koalas in the Wollondilly and Campbelltown Areas gave the Campbelltown koala population no protection but instead suggested that koalas can walk all the way to Appin and cross to the Nepean River if the Ouzedale Creek wildlife corridor is created or walk under the Kings Falls Bridge which will lead them into the South 32 Pit Top as South 32 have fenced from the River to their gate.

The Georges River Koala Park will take up to 30 years to be put in place and there are dead ends at the northern and southern ends of the park with no guarantee that these areas will not be developed in the future, with the southern end running into private homes, where dogs and vehicles may harm them, the northern end where the land flattens out, and there is no safeguard that this will not be developed for dwellings in the future.

Further, Campbelltown Council has been granted 15 million dollars to install bike and walking tracks, picnic areas and access to the river along the Georges River, space is running out in Campbelltown for any of this type of activity which will put further stress on the Georges River corridor, and is not in keeping with the (OSCE) report

At least one koala has had to be rescued from outside the South 32 Pit Top but If koalas and other native species manage to move south into the drinking water catchments, they will meet up with the Southern Highlands koala population which has Chlamydia and as the Southern Highlands koala population move north this is an imminent danger.

The other alternative at this point is for animals to travel into the South 32 Emplacement Area (reject coal dump) or into the swampland within the Dharawal National Park which is not suitable koala habitat at this point but is of high quality and must be protected to ensure the pristine waters of the O'Hares Creek catchment are not harmed



Photograph of Emplacement Area

The Billabong appears to be the only development to allow residents to meet in the open with friends and family but plans indicate that a multi-story car park will be included in the sports oval area and these facilities will only be enough to accommodate the existing human population but this development has not increased open space within the CBD.

Sydney has Centennial Park, the Royal National Park, the Domain, and several other open areas for residents Campbelltown has mostly rainwater basins that fill up in times of heavy rain which renders them useless for children to play sports in wet times.

SW Sydney is now one of the most neglected regions in the Sydney Basin and this development will add to the loss of lifestyle, create more road congestion, and add to the lack of new schools and medical facilities, promises of future infrastructure should be ignored because so far none of the promises has been fulfilled in southern Campbelltown.

This development will not increase employment within the Campbelltown Council region other than a small number of shops.

The findings of the Technical Assurance Panel NSW have been ignored

This development and the CPCP ignore the principles of the Greater Sydney Commission, the Greater Macarthur Growth Plan, the Macarthur Development Plan, and the Macarthur 2040 Plan, regarding the protection of heritage, environment, lifestyle, and health of the community, or the 10 or 30-minute commute

The Save Sydney's Koalas group collected 20,977 signatures on a petition that was handed in but the petition has been cancelled by NSW Government and will not be debated, this goes against government policy and is undemocratic as the only response will be a letter from the LNP who are responsible for the loss of public open space and are systematically eliminating the Campbelltown Koala Population and the quality and health of human residents.

AIR QUALITY

What reports have been undertaken to understand and monitor air pollution in the future and how will turning farms and bushland into hard surfaces and buildings, the new airport at Badgerys Creek and thousands of new vehicles have on the Campbelltown Macarthur region?

How many new cases of Lung Cancer in adults, Asthma in children and other respiratory diseases will there be and how will this affect the economy and businesses?

In April 2014 Mike Baird announced Badgerys Creek Airport and he would become Minister for Western Sydney

<https://www.couriermail.com.au/news/new-premier-mike-baird-to-become-a-western-warrior-when-he-announces-new-cabinet/news-story/5cdf105e60221caba6c87636e58b2140>

South West Sydney appears to have not been included in any of the recent reports regarding air pollution from the airport and PM2.5 has not been monitored in Campbelltown as it was thought that it was not a problem in SW Sydney, but this assumption has now been found to be incorrect, (Metropolitan air quality report 2020) however according to the SMH 12.3.2018 extra deaths in areas that were studied amount to over 300 extra deaths per year.

Campbelltown will have 100 new cases - 57.7 per 100,000 population - more than double the rate of Ku-ring-gai and Lane Cove, which will have the lowest lung cancer rates (26.2 and 27.1 per 100,000 respectively). (Cancer Council)

<https://www.smh.com.au/national/nsw/people-diagnosed-cancer-your-suburb-2018-20180307-p4z3b9.html>

EXCESSIVE HEAT

What reports have been undertaken into the heat effect of farm and bushland in the Campbelltown Macarthur region regarding Climate Change and the effect of bush and farmland being turned into hard surfaces and buildings?

The *Benchmarking Heat Across Campbelltown (October 2019)* Dr Sebastian Pfautsch and Susanna Rouillard found that heat in Campbelltown had reached 43.8 degrees and that Campbelltown does not have any monitoring stations to record heat.

World temperatures have risen by 1.5 degrees, and we are told that urban growth on top of Climate Change will increase temperatures by at least 3 degrees on top of Climate Change as farms and bushland are turned into buildings and hard surfaces, the government has ruled that at least one tree should be planted in the front and backyards of all new properties but there is not enough room on a 200m square lot for a tree to grow without damaging pipework, buildings or cause neighbourhood disputes from leaves and twigs dropping into yards, or creating too much shade.

The DPE Report Urban Heat highlights Rosemeadow as an area of extreme heat a few trees were planted but then a very large area had all mature trees, shrubs and grass removed and further development is now going ahead, the report only suggests that the increase from urban heat will only be between 1 and 3 degrees but then goes on to state that the temperature between SW Sydney and the eastern suburbs can at the moment be 10 degrees higher.

<https://www.dpie.nsw.gov.au/premiers-priorities/greening-our-city/greening-our-city-grant/rosemeadow>

There appear to be no reports available on the number of deaths from excessive heat in the Campbelltown region but there are several reports regarding Western Sydney where a 13% mortality rate has been recorded

<https://wsroc.com.au/media-a-resources/releases/heatwaves-are-killing-the-people-of-western-sydney>

DRINKING WATER What plan has the government put in place for the guarantee of drinking water supplies to Campbelltown and Macarthur in the future

Drinking water supplies are a concern as according to NSW Water each new home will require 900 litres of water per day which equates to 42,000 homes along Appin Road requiring 37,800,000 per day or 13,797,000,00 per year and as the Cataract Dam stopped delivering water to the system and water during the drought and had to be pumped to the Campbelltown Macarthur region from the Shoalhaven River to the detriment of the river and oyster farms, how does the government intend to ensure residents have sufficient water when the next drought occurs?

During the 2019 drought Cataract Dam ceased delivering water to the network and residents who depend on water from the southern catchments were only days away from their drinking water being turned off.

Despite all the rain today (18.12.2022) Cataract Dam only has 70% of its capacity.

Nothing has been put in place to ensure that enough drinking water can be supplied to existing residents and with at least another 100,000 families moving into the area drinking water will run out, no new dams are planned and it would be impossible for a desalination plant on the coast to supply the Campbelltown Macarthur with water.

GLENFIELD SEWERAGE PLANT

When will the Sewerage Plant at Glenfield, bushland and the Georges River be upgraded to ensure the river will not be further compromised in the future and that overtopping of the holding dams will cease?

Plans are in place to build thousands of new units in high-rise buildings throughout the Campbelltown Council area, when was the last audit on the number of units planned undertaken as these will all need to connect to the Glenfield Sewerage Plant and the plant will not be able to cope with the units plus the planned sprawl of dwellings across the council region plus Appin developments.

With the Plant regularly overtopping from the holding dams when high amounts of rain are received, this has resulted in poor water quality and excessive weed growth, in the river, and surrounding bushland downstream of the Sewerage Plant. Up until that point, the river is one of the cleanest in Sydney and is frequently used for swimming and other recreational uses. the water leaves the O'Hares Creek system at the junction of Woolwash it is pristine and has been used as a benchmark for water quality testing of other waterways in the Sydney basin in the past.

There are no plans in place for an upgrade of the Plant and this should have been completed before the overdevelopment of this region for homes, perhaps a water recycling system may be an idea at this point but built before any more development is allowed.

FLOODING

When will there be a flood modelling report released to the public and how does the government intend to control flood water, sediment, litter, and household chemicals leaving all development sites within the CPCP and Mount Gilead?

It is interesting to note that the Rhelm report *Mount Gilead preliminary Flood Modelling* did not take into consideration that flood water contained a large amount of sediment that flooded into Noorumba Reserve, the dam and Menangle Creek for several months, ~~but~~ when I made a complaint to Campbelltown City Council the only

response, I received was that Lendlease were working to their conditions of consent. EPA did not answer my request.

Why didn't the Council or EPA evoke the protection of the Environment Operations Act?

First noted in March 2022 and as of 03.12.2022 the dam is still dark chocolate brown and polluted 9 months later.

Flood water has always entered the reserve as it cascades down from the ridge, and enters the property from the eastern side of the road, the eastern ephemeral creek has been encased in a pipe and will reach the inadequate holding dam faster than in the past, if the company were working to their conditions of consent it would suggest that in future this flooding will continue but will also contain household chemicals and litter and as Noorumba Reserve has been Bio Banked and the creek enters the Nepean at this point this should not be allowed to continue.

Turning farms and bushland into buildings and roads will see a huge increase in the height and frequency of flooding to homes, our home and contents insurance has risen by \$600 this year as bushfire and flooding spread throughout NSW. Future residents may not be able to gain insurance, or it will be too expensive for the average family to afford.

If homes are flooded on the property, or residents are unable to obtain insurance who will be responsible, the Council, the Government or will residents be left to their fate?

BUSHFIRE

How will DPE ensure that evacuation and aid are capable of coping, SES and the Police will not have the staff or capacity to deal with the number of residents in times of flood and bushfire as it is DPE who decide where development and how many dwellings are built that department must accept responsibility for the quick and easy evacuation and not just blame SES when people get harmed or killed?

Although DPE is responsible for the increase in development in this region they passed the safe evacuation of families into the hands of the police and SES and reports indicate that there will be an unknown number of new homes built within the Greater Macarthur Growth Plan along Appin Road between Mount Gilead and Appin Village, but if the Cumberland Plain Conservation Plan goes ahead we can expect a far greater number of families to move into the vicinity on top of existing residencies including Menangle Park and I doubt it will be possible to safely evacuate families from all of these dwellings, the Department should not assume volunteers from SES and the police can carry out the safe evacuations from this area.

The last bushfire commenced in Appin when electricity cables started a fire in grass and was destroying homes at Helensburgh four hours later, properties in Appin and Wedderburn were also damaged.

The Canberra bushfires taught us that fire spreads through homes as quickly as it passes through bushland and it is very little that will stop it other than a change of wind and as the Holsworthy Military Reserve is to the east of the development and drinking water catchments are to the south the threat of bushfire will remain.

HERITAGE LOST

HERITAGE ABORIGINAL AND EUROPEAN

Why has DPE ignored the principles of the Greater Macarthur Growth Plan, the Macarthur 2040 Plan and the Sydney Basin Commission by showing a lack of respect and devaluation of the Mount Gilead property,

Meadowvale, Hillsborough, Camden Park House, Glen Lorne, Beulah, Kilbride Denfield House, St Helens Park House and dam, The Water Canal, Hume Wood and their surrounds with views from Menangle Park, Camden Park House and several other points in the wider region and along Appin Road?

This Cluster of heritage properties should have been entered into the NSW Heritage Register years ago and would be one of the largest collections of heritage properties in NSW if not Australia.

Heritage, the curtilage area of the Mount Gilead property must not be used by Lendlease for wildlife corridors or any other use, the Chief Scientist has made this clear and it is inappropriate for the government to allow any developer to take or use the protected area for any reason.

Heritage properties throughout Campbelltown have either been destroyed for development or devalued by development, Aboriginal drawings and carvings throughout the Campbelltown council area, including Mount Gilead, indicate the Dharawal people were active in the region and the high number of artifacts found on the property and within Noorumba Reserve prove that the property was frequently used or home to Aboriginal families Captain Willis and his troupers camped on Mount Gilead and then marched to Appin where they massacred at least 14 innocent men, women and children. (More than Bricks & Mortar Andrew Allen) (The First Frontier Peter Turbet)

Heritage records show that there are more Aboriginal drawings and etchings within the Campbelltown Council region than any other suburb in the Sydney Basin, deceased members of NPA Macarthur Keith Longhurst, Hugh Bairnsfather and the Historical Society identified these many years ago and their records are held by NPWS

Mt Gilead was the gathering place for three Aboriginal clans and the place where the troopers camped who carried out the massacre of Aboriginal men, women and children at Cataract Gorge which has recently been included in the Heritage Register of NSW, that it is thought the last of Aboriginal wars took place.

The Aboriginal heritage of Australia is of concern to most residents whether they are Aboriginal or not and it is upsetting to see this very important aspect of Australian history being constantly destroyed for development, vandalism or for housing and mining.

The whole of the artificial lake should have been included within the heritage site as this has been seriously impacted by flood water and sedimentation over several months and the lake should have been protected from the commencement of development and that protection continued.



The Bull Cave before the vandalism

The barrier wall along Appin Road will make the visual landscape of One Tree Hill and the Mill impossible to see when driving along the road and yet this was one of the main topics voiced by members of the public who sent in submissions regarding the loss of Mount Gilead.

It should be noted that the farm is older than any of the UNESCO-listed properties in Australia and has been a much loved and respected view by residents which will be lost to us forever, there is no going back once development is allowed to go ahead.

VARROWVILLE Governor L. Macquarie loved our region and on one of his visits to Varrowville named Campbelltown after his wife Elizabeth Campbell Macquarie whilst visiting Varrowville, the walk he and his wife did

then is still in place but will be blocked with graves in future, he also visited Mount Gilead and was pleased by the agriculture he saw on his visits. Varrowville was the home to Charles Sturt and other well-known and respected pioneers, this property will be devalued as it is wrapped around by a Catholic Cemetery.

MOUNT GILEAD home of an ancestor of John Macarthur will see the loss of heritage views, Aboriginal and European Heritage and is one of the last viable and lucrative farms on the Cumberland Plain from the early 1800s, it should be noted that the farm is older than any of the UNESCO listed properties in Australia. The property was the meeting place of three Aboriginal tribes and contains the original Aboriginal Pathway which was used by Cobb & Co whose staging dam still exists on the property.

Five young airmen met their deaths on the property during the Second World War and their plane lay on the property as a memorial to them until recently, when development was proposed the plane disappeared, now there is not even a plaque to mark their sacrifice, how will future owners of the property accept that their home is built on a war grave, will the government buy back the home?

BEULAH ABD HUME WOOD Home to Hamilton Hume whose historic walk to the south is noted by the Hume Highway being named after him and the route of his expedition. Both the back and sides of this property will be devalued and vandalized by dwellings surrounding the property once development occurs at Mount Gilead and Hume Wood contains one of the oldest bridges built in Australia which has been restored along with one of the best stands of Cumberland Plain Woodland in the Sydney Basin.

CAMDEN PARK HOUSE Part of its heritage value is the open views to Mount Gilead these views will be destroyed, and dwellings will once more endanger its Heritage value.

The list of heritage properties being destroyed or devalued is too long to include but the book *More than Bricks and Mortar* (Andrew Allen 2018) lists 16 properties lost due to development, other properties have been devalued with dwellings wrapped around them without adequate room left around them to give them any privacy.

CONTAMINATION OF SITE

Who will be responsible for any future damage to property caused by salinity, mine subsidence, flooding, or bushfire?

Has the government held discussions with the Insurance Council of Australia to ensure that affordable household and contents insurance will be available in the future for new property owners?

In the past, Douglas Partners found that part of the property had a problem with salinity and that groundwater was only 45cm below ground level, this seems to have been omitted from recent reports but the *Preliminary Site Investigation (Contamination)* which will be the company's third report still states that 13 sites need to be investigated, these sites must be investigated before development or rezoning is allowed.

It has been found that trees that have been inundated with water have died because they contain high amounts of salinity, (*pers com* Australian Botanic Garden – Mount Annan)

NSW'S LACK OF PROTECTION – Badgerys Creek Airport

What reports or surveys has DPE undertaken to ensure that the new airport at Badgerys Creek will not affect the health and welfare of residents in the Campbelltown Macarthur region?

Campbelltown should not still be considered a dumping ground for anything not wanted in other areas with a higher social economic standing and as there will be no public transport to the new Badgerys Creek airport and driving from Campbelltown at the moment takes approximately 50 minutes none of the development in this region can be claimed as staff for the airport, the only employment suggested for residents in low wage retail or on unsustainable building sites without long term employment potential.

Rather than creating areas to mitigate the problems of excess heat, air pollution and flooding from the Badgerys Creek Airport and development the Berejiklian/Perrottet announced the following development plans.

The Macarthur Development Plan

The Macarthur Growth Plan

Wilton Development Plan

Airds Bradbury Renewal Scheme

Menangle Park Development Plan

And now the Cumberland Plain Conservation Plan

The total number of dwellings these developments will produce cannot be found but in Campbelltown high rise buildings are taking over the landscape within the CBD and surrounding bush and farmlands are being destroyed although we accept that high-rise buildings will replace existing areas within the CBD we should not also see our environment and Aboriginal and European areas and homesteads being trashed and devalued.

The Airds Bradbury Renewal Scheme where Landcom has stated that their consultants found that there were so few koalas within the suburb that no protection or wildlife corridors were required but over 24 koalas have had to be rescued (WIRES) and they are now wandering around the streets of St Helens Park and Bradbury trying to find their traditional corridor through these suburbs.

Smiths Creek Reserve and its wildlife corridors have been protected since the early 1800s when the land was owned by Jeremiah Smith, but this reserve has now been isolated and native animals including koalas cannot move in or out of the reserve.

Mount Gilead One of the oldest farms on the Cumberland Plain and built as a gateway to the Cowpastures, Stage One has been allowed to move forward without any corridors included 1999 (quoted by Lendlease at Campbelltown Council meeting) bushes were planted next to Noorumba Reserve on land owned by the Macarthur Trust, but no koala trees were included and approximately 40% of the plants have since died.

Appin Village will soon see the last of its bushland cleared to make way for 12,000 dwellings.

The only way koalas can now move out of the development sites is by turning back into the existing population resulting in overcrowding, stress and sickness, south under the Kings Falls Bridge to head south and meet up with the Southern Highlands koala population that has Chlamydia, into the South 32 coal reject emplacement area (a vast area where reject is stored and systematically bushland is cleared and replaced with a mountain of coal reject, these areas are regenerated once dumping is complete, or be left to die in areas where their habitat has been destroyed.

URBAN DESIGN REPORT (URBIS)

Why has DPE allowed the development to move forward when only 3,300 dwellings are included in the application when the Department knows that a higher number of dwellings will be built?

This report indicates that 15,000 dwellings will be built on the property and not just the 3,300 quoted within the development application, we were hoodwinked into thinking Stage One would be Low Density, but instead, the zoning was changed to Medium Density and an area that could have become a wildlife corridor will now contain a community centre after Bio certification was allowed, the true number of dwellings should be included, it is a shame that the community has no faith in the honesty of the company or State Government.

Page 16 indicates that only preliminary flood modelling has been completed and considering floodwater and sediment flowed out of the property into Noorumba Reserve, and Menangle Creek for several months and that the dam and creek are still polluted by this sediment these reports should be undertaken before permission is granted to move forward. (Photographs included)

Water-withholding dams should be installed within Asset Protection Zones and on development land. Not within the wildlife corridors or buffer zones as shown, as they will stop animals moving through the landscape.

What the report does not note is that the ridge in the centre of the property runs from Campbelltown, south through Appin and beyond and is not a small area within the property.

Page 29 The map of Asset Protection Zones has not included any protection along the northern perimeter of the property but as Menangle Creek runs through Noorumba Reserve at this point and continues downhill to the Nepean River an APZ needs to be included on the property.

Pages 32 to 33 show a property that has been well maintained with rich farmland and bushland and the property should remain as is and not developed for housing to ensure that (a) production of food for Sydney can continue and (b) that Endangered and Vulnerable species, living and thriving on the property remain.

Pages 34 to 35 show multiple routes of transport and if installed in an area of higher social economic value would be installed in tunnels, the Spring Farm Parkway is a typical example of this it will either run behind homes north of Noorumba Reserve or through Mount Gilead where new homes and unsuspecting families will buy properties but so far there has been no indication of where the road will run once it meets the Appin Campbelltown Road and this section of the road is one of the most environmentally sensitive areas in the region.

Whichever option is adopted wildlife corridors and ancient trees will be destroyed.

The barrier wall along Appin Road will make the visual landscape of One Tree Hill and the Mill impossible to see when driving along the road and yet this was one of the main topics voiced by members of the public who sent in submissions regarding the loss of Mount Gilead.

As mentioned, before it should be noted that the farm is older than any of the UNESCO-listed properties in Australia and has been a much loved and respected view by residents which will be lost to us forever, there is no going back once development is allowed to go ahead.

CUMBERLAND PLAIN CONSERVATION PLAN

The 200,000-hectare Plan will see the construction of at least 73,000 dwellings mostly in the Campbelltown Macarthur region, once it is in place the public will not be allowed to comment on any development and any threatened or critically endangered native species even if found after Bio Certificate has been awarded can be eliminated if Bio Certification is allowed or funds can be donated to the government if a replacement area cannot be found.

There do not seem to be any reports available to the public regarding flooding, excessive heat or air pollution, no new schools are being built or planned within the next few years, and Campbelltown hospital midwives, nurses and doctors were holding peaceful demonstrations outside the hospital before COVID to highlight the danger to patients because of shortage of staff this problem has not been addressed.

No new roads have been commenced and traffic congestion is getting worse every day, public transport is not coping with the number of commuters that are using the system and trains are normally not running to their full capacity, most weekends with buses replacing trains and sometimes during the working week.

The report goes on to try to persuade the reader that the development of the property will create a utopia but instead, air pollution and excessive heat, will make life very difficult because no new schools have been or will be built soon, and this despite the Dept of Education warning Campbelltown Council that local schools are full to capacity and there will be no room for children who move on to the property (Council agenda 22.11.2016) with no employment suggested other than in retail or unsustainable work on building sites which are normally carried out by contractors from outside the area

The only suggestion the development company has suggested is that parents take their children to Broughton College a private school which now will require a long drive and that they have planned a school site to build be by someone else in the future.

Potable Water, pump-out sewerage and a limited supply of electricity suggests that DPE will accept a third-world development on a Mine Subsidence Area with a high chance of bushfire.

FUTURE FOOD SUPPLY TO SYDNEY RESIDENTS

Where are the reports on how the government intend to maintain affordable food when it has to be either trucked into Sydney from other areas in Australia or imported from other countries where there is no guarantee sprays and farm practices are not acceptable in Australia?

Farms situated along the Nepean River with rich soils and irrigation supplied from the Nepean River are being destroyed for dwellings, the cost of fresh fruit and vegetables are becoming too expensive for many families, and they are resorting to using frozen food from outside Australia or modifying their diets to filling but not healthy food.

Bringing produce into Australia has already seen the importation of viruses and insects that have resulted in the mass destruction of animals and the latest being bee hives, as more food is imported these problems will grow and we cannot rely on intensive farming in factory hydroponic situations or cattle being housed in small yards where extra chemicals must be used to ensure animal or plant health.

CONCLUSION

The Stage Two development proposal should not go ahead because of the high number of threatened species that have been found on the property because koalas are heading for extinction, squirrel gliders have established a home range on the property, Cumberland Plain large Land Snail will be lost once earth movement commences and water flow is contained in stormwater basins, microbats will not be able to forage at night because of the light penetrating their habitat, flooding contaminated by sediment has already entered Noorumba Reserve, the dam, Menangle Creek and the Nepean River.

Critically Endangered shrubs including Pomaderris Brunnea will be eliminated by development and residents walking on the plants, picking flowers, trying to remove them to plant in gardens, and the changes in water flow, or stormwater dams being created where they are growing.

Reports and Attachments are incomplete with several needing further investigation or clarification.

Future Air Pollution, Flooding and excessive heat from development and the new Badgerys Creek airport have been ignored.

The development will be of no use to Campbelltown, it will not increase long-term employment, it will bring children into an area where schools are already overcrowded and bring further vehicles onto Appin Road that is not coping with existing traffic. And further stress the Campbelltown hospital.

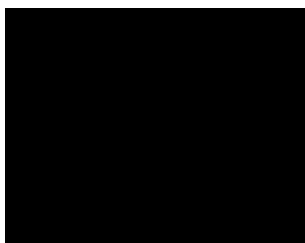
Stage One should be put on hold until it can be guaranteed that wildlife corridors will run across the property in both east-west and north-south directions (as requested by NPWS 22/11/2016 submission) and that underpasses large enough to allow the largest animal who will require them to gain safe passage across the road adjacent to Noorumba Reserve and Beulah. i.e., the Wallaroo which stands 1998cm tall.

The Heritage value of Mount Gilead and surrounding heritage homes will be devalued and vandalism will occur to buildings along with theft of property.

Aboriginal heritage and pathways will be lost and Aboriginal drawings will be endangered by vandalism.

Mount Gilead is a lucrative farm and has been for over 200 years which will see the loss of farm produce, jobs within the Agricultural industry including staff on the property, and loss of businesses such as produce stores and associated businesses that supply farm implements, vehicles, and farm machinery.

Flooding to development which will endanger new homes and pollute the Georges and Nepean Rivers in the region is being ignored (see Attachment A)



ATTACHMENT A



Runoff from **Mt Gilead** to Noorumba Reserve, Menangle Creek & Nepean River 8th March 2022 and 23rd May 2022



Menangle Park with flood indicator sign outside the entrance of the development. The road that which originally lead into the estate has been eliminated and the development re contoured to I assume to try to stop flooding April 2022



Camden 1977 & 1988 I spoke to two business people one in the middle of the main street said he could not obtain flood insurance and another whose premises were flooded this month said he would claim this time but he doubted he would be able to afford insurance next year and also said that the floods in 1956 were much worse Homes were also flooded



Appin Village Statement from a resident

The water from Kennedy Creek rose to a level that I've never seen before, right to the edge of our place which has been there for over 30 years. This was always a dry creek bed given we have been here for over 60 years. Took our fences with it which were concreted deeply into the ground & the torrent of water left behind rubbish which we identified as coming from Appin Rise off the main road of Appin. Of course WSC has brushed it off as a one in whatever year event but I don't think so!



Menangle This photograph supplied by Sue Gay says it all and does not need an explanation

SUB-3651

Name Withheld

Please see attached letter.

19 December 2022

Mr Tim Raimond
Deputy Secretary Planning and Land Use Strategy
NSW Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Attention: Gary Hinder
Email: gary.hinder@planning.nsw.gov.au

Dear Tim

RE: PLANNING PROPOSAL (DEPARTMENT REF: PP-2022-3978): TO AMEND STATE ENVIRONMENTAL PLANNING POLICY (PRECINCTS—WESTERN PARKLAND CITY) 2021, TO REZONE THE GILEAD STAGE 2 SITE FOR URBAN DEVELOPMENT AND CONSERVATION PURPOSES, AND ASSOCIATED AMENDMENTS.

This submission has been prepared in response to the exhibition of Planning Proposal 2022-3978 (the Planning Proposal) to rezone the Gilead Stage 2 site for urban development and conservation. We commend the New South Wales government for recently updating the Greater Macarthur Structure Plan which forms the framework for the consideration of the Planning Proposal (see Figure 1).

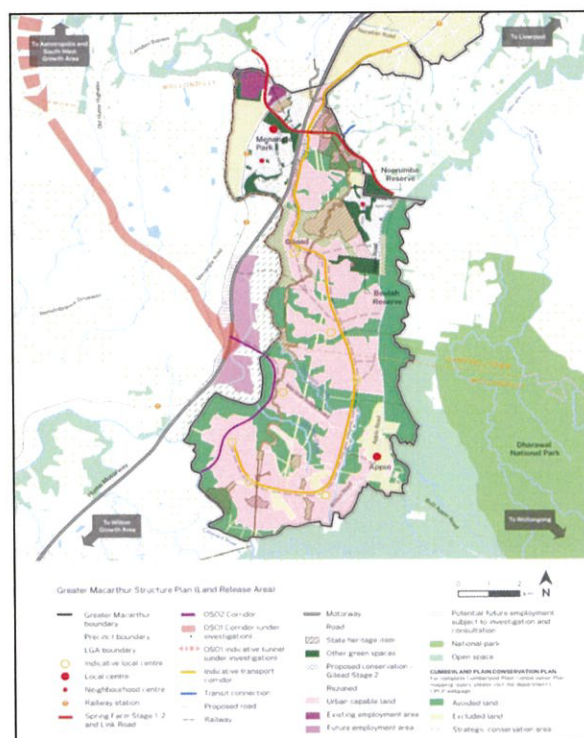


Figure 1. Greater Macarthur Growth Area Draft Structure Plan

1. We support the purpose of the Planning Proposal because it will accelerate the delivery of infrastructure and housing supply in South West Sydney in accordance with the Greater Macarthur Structure Plan.
2. We are preparing a similar proposal for our land within the [REDACTED] which will be on exhibition early in 2023.
3. Due to the advanced stage of the precinct design for our planning proposal we have a detailed understanding of requirements for a successful development in the Greater Macarthur Growth Area which informs our assessment of the Planning Proposal.
4. The Planning Proposal envisages 3,300 new homes, a local retail centre of approximately 5,200 square metres of gross floor area and it contains measures to achieve both the protection and the management of endangered fauna corridors.
5. The Planning Proposal envisages the delivery of enabling road transport infrastructure, including upgrades to Appin Road, as part of a combined offer that includes existing contributions from the proponent's adjoining Figtree Hill development.
6. We support the Planning Proposal's delivery of key upgrades to Appin Road including the duplication of the existing two-lane road described in Figure 24 as *Appin Road Figtree Hill* (\$80.3m) (see Figure 2).

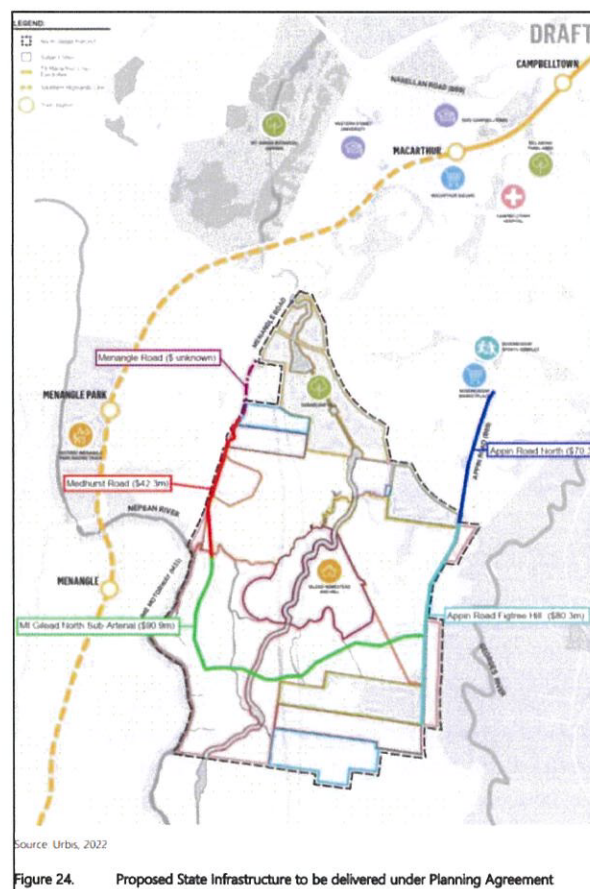
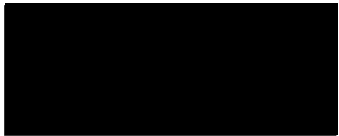
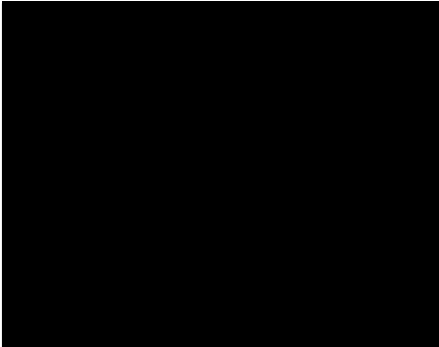


Figure 2. Figure 24 extract from the Planning Proposal showing the Appin Road upgrade

- 
7. Using our assessment lessons from the Mamre Road industrial precinct and Aerotropolis employment lands, we expect the New South Wales Government to accelerate the Appin Road upgrade's strategic business case, design, budget provision and construction to ensure the timely completion of the upgrade works envisaged in the Planning Proposal.
 8. We expect the NSW Government to simultaneously pursue the same accelerated process for upgrading Appin Road south of the Planning Proposal area to the existing Brian Road intersection. This will capture economies of scale and provide for the efficient delivery of a regional road network that is fit for purpose and delivered when it is needed.
 9. We expect the New South Wales Government will ensure Sydney Water completes the necessary business cases, design, funding and completion of the works required to provide enabling water and wastewater infrastructure to the Greater Macarthur Growth Area.
 10. The enabling infrastructure justification, design and provision process must work in parallel to consideration by the Department of Planning and Environment of the Greater Macarthur Growth Area's planning proposals if we want to deliver the housing supply targets in the Planning Proposal. The planning process extends beyond core planning tasks to underpinning the delivery of the key factors that are required for a successful assessment.
 11. We recommend the delivery of the Transit Corridor, in a location that will provide for fast and convenient passenger journeys, be included in the final Planning Agreement negotiations between the Proponent and the Government. The successful delivery of a high-quality regional transport network within the Greater Macarthur Growth Area will link the growth precincts, including the Planning Proposal, to multi-modal transport options, existing retail centres and services in Campbelltown and other established areas further to the north.
 12. We are committed to working with Wollondilly Shire Council, the Department of Planning and Environment, key NSW government agencies and our development industry peers to ensure new development across the Greater Macarthur Growth Area:
 - Supports the conservation of native flora, endangered fauna, waterways and Cumberland Plain Conservation Plan areas;
 - Respectfully supports the growth of Appin village in a way that improves services and liveability for existing residents;
 - Supports regional growth with timely delivery of enabling infrastructure;
 - Recognises and respects the area's important first nation's history and culture; and
 - Delivers role model communities that become supply-led solutions to the NSW housing affordability challenge.
 13. Due to the close proximity between the Planning Proposal and our pending planning proposal, the Department of Planning and Environment has the opportunity to tightly coordinate the planning, prioritisation and delivery of enabling infrastructure like the required upgrades to Appin Road.

We appreciate the opportunity to provide our comments on the Planning Proposal. Please contact me at email: [REDACTED] with your further queries.

Sincerely



SUB-3654

Sue Gay

sg180@bigpond.net.au

Submission against Mount Gilead Stage 2 Planning Proposal.

I draw your attention to the Mt Gilead-Biodiversity Certification Assessment & Biocertification Strategy, p59 by Ecological Australia Pty Ltd, where it says

Much of the BCAA comprises a red flag area with two of the five biometric vegetation types within the BCAA (SHW and SSTF) identified as a critically endangered or endangered ecological community listed under the TSC Act or EPBC Act and being classified as in ~moderate to good' condition (Table 9)

AND

The distribution of all red flag vegetation (EECs in moderate to good condition), red flag areas (riparian buffers) and threatened species that cannot withstand loss across the BCAA is shown in Figure 21.

AND

In addition, one flora species recorded within the BCAA (*Pomaderris brunnea*) is identified in the Threatened Species Profile Database as a species which cannot withstand further loss in the Hawkesbury Nepean CMA.

Figure 21 indicates 1 *Pomaderris brunnea* plant will be impacted by LendLease's Planning Proposal and the rest will be protected in ""corridors"". But my question is how will all the *Pomaderris Brunnea* plants and other threatened species be protected in corridors where the public has 24 hour access? They will either be destroyed by careless bush walkers and their dogs or removed by gardening enthusiasts wanting a rare and free plant for their gardens.

After all Wollemi National Park had to close entry to parts of the park to preserve their pines.

What safeguards are proposed to prevent the extinction of *Pomaderris Brunnea* and other species at the Gilead site? Who ensures those safeguards are implemented and maintained and who pays? Would the Wollemi pines afford such protection. After all colony has over 200 plants.

Regards Sue Gay

SUB-3655

Frances Gay

sg180@bigpond.net.au

Reasons to REJECT Planning Proposal PP-2022-3978

- 1. Two Appendices are not attached to the GLN Planning Proposal Report**
- 2. Some of the details in the Figures are so small it is impossible to read them. For example the Pentelic advisory report on page 5 of Appendix R has a map about Transport Infrastructure and services which is unreadable.**
- 3. Some of the figures in the GNL Planning Proposal report are wrong. For example Figure 9 on page 39 seems to include the historic homestead as part of the development ""site"".**
- 4. Air Quality is mentioned on page 57 of the GNL report in 2 short paragraphs . No mention of regional air quality being the worst in the Sydney basin as found by air quality studies in the 1980's. See Hyde & Whyte.**
- 5. No potable water infrastructure in place for Stage 2 site.**

No sewage infrastructure except for a 600 house capacity left over from Stage 1.

No electricity spare capacity and new substations need to be built

No gas connection

Much of site is Bushfire prone land

Mine subsidence area.

- 6. GLN Report acknowledges the site forms a significant catchment that conveys water to the Nepean River. page 61 GLN report**

Recent floods have shown how flood waters scour the creeks and how this water fills the Nepean River with mud and contaminants. This will have a detrimental affect for downstream users who rely on Nepean river water for irrigation and recreation.

- 7. Developer Lendlease promises (page 62 GLN report) to provide new infrastructure funding to the amount of \$224M of which \$192M is for road upgrades for Stage 1 and Stage 2. That sounds good but will this developer deliver? Lendlease is trying to set aside the its VPA obligations for upgrading Appin Road.**

John Gay

Concerned person.

SUB-3657

Kate Banister

sg180@bigpond.net.au

Objection stage 2 planning proposal Mt. Gilead PP2022 3978

I object to this absurd proposal for the following reasons.

The PP is inconsistent with the s9.1 Direction as it involves rezoning RU2 Rural landscape for residential purposes' attempted justification on page 7 Appendix Y, about this land being identified as a land release area fails.

It was always intended as scenic protection and rural p to September 2015 when The Greater Macarthur land release investigation was announced. That investigation was very flawed & conducted in conjunction with Mr. Brendan O'Brien who has now left DPIE & works Lend Lease on this project. It has not been identified as a land release area in the Greater Sydney Region Plan, the Western Parkland City District Plan or as been urban capable in the Greater Macarthur 2040 Plan until after the 2015 announcement. Thus, attempted justification is a sham, it's not genuine.

Further the Gilead planning Report on p56 reports misleadingly of a shift away from agricultural production on the area with the agricultural value and output not being deemed efficient or significant enough to warrant the retention of the existing grazing activities. This was the "justification" used to diminish the agricultural importance of the smaller stage 1 Figtree Hill site so it would be rezoned urban. The Mount Gilead farmlands have until now consistently supported around 500 breeding cows (1000 head), including through the last drought with the use of the pivot irrigated lands. High quality beef is produced and sold for domestic consumption.

Further the original Greater Macarthur Land Release Investigation in 2015 as did the Greater Sydney Commission promise no irrigation lands would become urban development land.

Stop taking valuable farmland to benefit developers. Even if farmland is not being used for market gardening now it may be needed to provide Sydney with fresh produce in the future.

Yours sincerely

Kate Banister.

SUB-3658

Brian Williams

wag2571@gmail.com

Wilton Action Action objects to the rezoning of Mt Gilead Stage 2 on the basis of the attached submission



Gilead Stage 2 rezoning DUE 19 th DEC

Developer: Lendlease (876-hectare site for up to 3,300 homes.)

<https://pp.planningportal.nsw.gov.au/ppr/under-exhibition/gilead-stage-2>

WAG Summary

The Mt Gilead proposal when examined in its entirety is really a sleight of hand exercise especially in relation to preservation of koala habitat and corridors and with no sustainable costed plan for delivery of water and wastewater infrastructure for 2100 homes. Its application of the Urban Development Zone adopted from the Wilton South East is also fraught with problems.

WAG concerns

- To appear to protect the resident koala population in line with the Chief Scientist's recommendations whilst ignoring the recommendations of the Chief Scientists to follow the advice of Dr Stephen Phillips on koala corridor widths etc as below and the statements by the Campbelltown Council Local Planning Panel on same
- This seems to be a pattern that runs through so much of the DPE/developer planning proposals that seems to treat expert analysis as something to be discarded when it doesn't suit the proponent and their drive for maximum yield.
- The rezoning of Wilton South East State One is a relevant case in point. In September 2017 the OEH recommended that Wilton South East NOT be rezoned until a proper koala management plan was in place. Dr Stephen Phillips was then brought in by the DPE to deliver a report in February 2018, which agreed with the OEH recommendation and laid out specific koala protection measures the proponent should implement. This was ignored by the Minister who rezoned Wilton South East in April 2018, which was then subject to legal challenge by Wollondilly Shire Council on the basis of the OEH recommendations. And now with the Mt Gilead Stage 2 we have the Chief Scientist standing in place of the OEH with Dr Stephen Phillips' inconvenient recommendations apparently to be ignored again. The apparent arrogance and disregard of Lend Lease and the DPE for delivering real and effective koala protection is driven by the fundamental belief that the environment is a luxury that cannot be afforded when developer yield is the paramount concern. It continues to disgust and alarm a growing number of people to which the developer and the Department are simply tone deaf. So the opposition to such behaviour will only grow to the great discredit of the developer and the department.
- The community also now knows how this pattern keeps repeating with all its ramifications. In the Cumberland Plain Conservation Plan (CPCP) The CPCP relies on utterly defective biodiversity offsets as shown in the recent NSW Auditor General's report, will not protect habitat in the face of developer demands, and so will not preserve pristine habitat or vegetation due to endlessly repeated out clauses like 'where possible', 'wherever practical', and 'achieving developer flexibility' etc. There can be no pretence that somehow the CPCP

represents an enforceable plan when it is clear that is an 'opt in' plan that will just capitulate to developer demands whenever and wherever they are made.

- The constraints on housing supply are not the provision of rezoned land. There has been scientific analysis of this and developers themselves have plenty of rezoned land already - they constrain the supply in bringing blocks to market to preserve profit margins. Ref: <https://www.tandfonline.com/doi/abs/10.1080/07293682.2021.1920991?journalCode=rapl20>
- On water and wastewater infrastructure delivery, our analysis of the Mt Gilead Stage 2 Infrastructure Services report is below. From our experience of Sydney Water's performance on Wilton South East Stage One in not even delivering a concept plan for wastewater three (3) years after its DA approval in October 2019 does not bode well for Mt Gilead Stage 2. And given the real likelihood of the recurrence of an even more severe El Nino drought event soon that will see rapid depletion of the four dams supplying the Greater Macarthur area as in late 2019, the Mt Gilead developer will be subject to even greater public scrutiny as to how potable water supply at current average consumption levels and indeed for the Wilton and Appin developments. So far all we have is a deafening silence from Sydney Water on this subject. With the out of sequence/ concurrent developments of this proposed development with Appin and Wilton, now under way, there appears a deliberate blindness by all parties – developers, DPE Council, Sydney Water and consultants etc- to any recognition that water is the essential constraint that cannot be ignored.
- Again be on notice that another extended drought will see the current massive sprawl development from Wilton Appin Campbelltown subject to increasing public scrutiny. And increasing calls for common sense to be applied to act upon this climate shift driven constraint and the scaling back of such enormous, dangerous and obsolete development ambitions.
- In that respect, the NSW Chief Scientist's recommendations from its Water Data review of 2020 should be closely examined now for implementation : See:
- <https://www.chiefscientist.nsw.gov.au/independent-reports/water-data-review>
- WAG sees similar problems with the Urban Development Zone (UDZ) proposed for Mt Gilead which has been adopted from Wilton South East's proposed UDZ
- Finally, although it may seem a remote possibility to Lend Lease, the Council and DPE, but climate change is something that has to be now considered for development decisions. See this advice from Tier One law firm Minter Ellison on this subject:
- <https://www.minterellison.com/articles/climate-change-risks-for-local-governments>
- In short the Mt Gilead Stage 2 rezoning proposal should not be approved.

Koalas and Mt Gilead Stage 2 - Chief Scientist recommendations should be implemented without avoidance and re-definition

Mt Gilead Stage 2 – Biodiversity Certification Assessment & Biocertification Strategy



The Chief Scientist's First Koala Report highlighted the importance of habitat connectivity for koalas:

It is critical to ensure connectivity between important patches of koala habitat. Large connected areas linking various koala habitats sustain populations by facilitating dispersal of populations, supporting breeding, providing resources for feeding and protecting against localised extinctions (NSW Government, 2020c).

Ensuring as far as possible that the habitat has multiple connections can help to prevent the formation of dead ends and population sinks and ensure that koalas

(and other species) have routes to escape threats such as bushfires.

In its response to questions about advice provided in the Chief Scientist's First Koala Report', the Chief Scientist was critical of Lendlease for not adhering to the advice of Dr Steve Phillips, the author of the Campbelltown City Council's Comprehensive Koala Plan of Management. The Chief Scientist questioned why the design of the Woodhouse Creek Corridor (Corridor B), which connects with the Browns Bush underpass through the Beulah biobank site, was not in line with the methodology of Dr Steve Phillips. It stated that:

- An optimum width of 409m–425m be maintained as desirable.
- The means of which these measures are to be validated must also be transparent and statistically robust, to which end we propose a series of width measurements at 200 m intervals along the entire length of the SLA, each of which must evidence the minimum width requirement of 250 m.

It further commented that:

Based on the Figure provided by Lendlease, the (Campbelltown Council Local Planning) Panel does not understand how this methodology of Dr Phillips was applied by the proponent which is purported to be in accordance. For example, there is no consistency in the application of the 200 m intervals between the transects along the length. For example, the distance between A8 to A9 is much greater than the distance between A17 to A18. Further, there are irregularities in the orientation of the transects: for example, A4 is at an unusual angle to the other measures, and to the corridor (i.e. oblique, rather than perpendicular), and this is noted for a number of the other transects.

It was also critical of Lendlease for not following the principles of best practice design for koala habitat corridors: The buffers in the proposed MGS2 development serve the dual purpose as a buffer for the Woodhouse Creek (and other) koala habitat corridor and as an APZ for the development, with infrastructure such as byroads and walking trails including in the outer buffer zone (Figure 10). The Panel sees the design as suboptimal as it permits threatening activities in close proximity to koalas with no barrier to interaction between the koala and the hazard. There is also the inclusion of stormwater retention ponds within the buffer zone.

It seems Lendlease has not modified the design of the Woodhouse Creek (Corridor B) on Mt Gilead Stage 2 to address the Chief Scientist's criticisms.

Similarly, the history of the design of Corridor A (Noorumba - Menangle Creek) casts doubts on the seriousness of Lendlease's intentions of securing a koala habitat corridor of adequate width on its Figtree Hill residential estate (Mt Gilead Stage 1). Lendlease chose to retire biodiversity offset credits by enhancing the existing Noorumba Reserve, for example, rather than increasing the length and width of koala habitat corridors on its own property. Subsequently, the Campbelltown Council Local Planning Panel imposed a minimum koala habitat corridor width of 250 metres as a Condition 22A for a Development Application (16 December 2020) in order to bring the dimensions of this corridor more inline advice by the Chief Scientist and Dr Steve Phillips. Previously, in some places, this corridor was only 80 metres wide.

The Campbelltown Council Local Planning Panel also imposed a condition on Lendlease's DA for subdivision of land to create 138 residential lots on the Figtree Hill Estate. It required the removal of 10 lots from the subdivision to allow more space for the proposed

Glen Lorne underpass adjacent to the Noorumba Reserve (24 August 2022).

WAG strongly believes that the design of the koala habitat corridors on the Mt Gilead residential estate needs to be assessed in concert with the location and design

of the underpasses. As the Chief Scientist's First Koala Report highlighted, "the protection of habitat along Woodhouse Creek to secure corridors is fundamental to the viability of the corridor" - and obviously by extension, the utility of the proposed underpasses.

WAG final comment: Lendlease should not be allowed to ignore, water down or compromise the recommendations of Dr Stephen Phillips for Mt Gilead koala protection.

Specifically:

1. No detail on koala corridor widths: According to the NSW Koala Strategy (2022: p21) the koalas in the Campbelltown LGA are the largest chlamydia-free koala population in New South Wales. **These two planning proposals provide no dimensions for these Koala habitat corridors - It is not enough to pass a planning proposal using "Indicative Koala Corridors".**

2. Infrastructure will cut proposed "indicative" corridors. The **Greater Macarthur Interim Plan 2040** called for *a minimum preferred width of 425 metres for primary corridors*, that is, the east side of the Nepean River on the Mt Gilead S2 property. The Chief Scientist called for similar figures (390m + 30m buffers). Proposed infrastructure such as roads, sewer pumping stations, reservoirs, and stormwater basins would cut both Koala Corridors A and B, proving Lendlease has no intention of protecting Koala Habitat Corridors. The Chief Scientist noted *"that it must aim towards a thriving and resilient koala population rather than simply a population 'hanging-on.'"* which is not possible with this proposal.

Water Infrastructure:

Our position on Mt Gilead water infrastructure is in alignment with our opposition to the Appin and next staged developments in Wilton in the light of no detail for how potable water can be supplied and wastewater disposed of without severely polluting the Upper Nepean and Georges Rivers and associated creeks and tributaries.

Summary:

There is insufficient raw water supply (upper Nepean Scheme, operated by Water NSW) to provide water that can be treated for potable water consumption for the existing committed housing supply, so further rezoning must not occur without government commitment to augmentation of this supply including details of siting, funding and timeline.

The dams got below 30% in the last drought - with the existing population. There are to be 50,000+ people at Wilton, and another 150,000 in the urban infill in the Macarthur supply zone. The water filtration plants are currently struggling to produce adequate volumes due to the poor river and dam water quality after significant flooding in 2022 (Sydney Water advertisements on TV). This is a critical risk for this area and rezoning should be halted until it is resolved.. It is very important that future rezonings do not compromise what has already been committed. We have significant climate risks going forward that will further compromise water supply (flood, fire and drought all impact heavily on the ability to supply water, as does peak demand on heat wave days etc) - this has not been fully evaluated. We cannot be confident that the proposed Mt Gilead Appin and Wilton communities will have adequate access to water supply at this current point in time. Water NSW already submitted on previous rezonings "subject to augmentation" but no detailed analysis or plans were forthcoming.

This situation is getting very serious, and entirely overlooked by all levels of government. This is unfair to future generations, and may potentially be the cause of social fabric breakdown and conflict in the future if adequate planning does not occur now. You cannot put more people in a region than your water supply can support. You must not progress this rezoning for this reason alone.

WAG analysis of Infrastructure Services report for Mt Gilead Stage 2 - jpg extract below

3 Utilities Infrastructure

3.1 Potable Water Servicing

3.1.1 Potable Water Servicing Short List

There are a number of servicing strategies available to provide potable water services to the Gilead development, with the following options considered to be appropriate:

1. Install an initial development stage connection to the planned elevated potable water reservoir located on Lendlease owned land, east of Appin Road. This reservoir is expected to have spare capacity taking into consideration the ultimate Figtree Hill development (also by Lendlease). The Figtree Hill reservoir is serviced by a trunk main connection to the Rosemeadow Water Supply Zone.
The remaining ultimate Gilead development demands could then be met through one of the remaining options below;
2. Connect to the existing DN1200 Trillity Pipeline to supply part of or all of the Gilead development;
3. Construct a potable water reservoir to the north of Gilead, with a connection to the Rosemeadow Water Supply Zone, to supply all or part of the Gilead development; and/or
4. Construct a lead-in watermain from the Appin Water Supply Zone to the Gilead development to supply part or all of the Gilead development.

3.1.2 Potable Water Servicing

3.1.2.1 Option 1 – Connect to Figtree Hill Potable Water Reservoir

Option 1 is the preferred option and comprises an early development stage connection to Sydney Water's potable water network. It includes supply for the eastern portion of the development (approx. 600 residential dwellings) to the potable water reservoir planned to be constructed to the east of Appin Road. Refer to Figure 2 for the proposed location of the potable water reservoir.

The Figtree Hill reservoir is serviced by the Rosemeadow reservoir, via a trunk main that runs from the north along Glendower Street. A booster pumping station is also planned to be installed at the northern end of the Figtree Hill development to ensure sufficient pressure in the network to feed and fill the Figtree Hill potable water reservoir.

The Figtree Hill potable water reservoir has been designed to provide capacity to service 2,100 residential dwellings. It is proposed to extend the trunk water main running from the Figtree Hill reservoir and provide a connection to the easternmost portion of the Gilead development. Once the spare capacity in this reservoir has been utilised, the balance of the Gilead development would be serviced through the delivery Options 2, 3 or 4 as outlined in Sections 3.1.2.2 to 3.1.2.4 below.

Alternatively, investigation into the increase in sizing of the Figtree Hill reservoir can be undertaken to service the ultimate development of the combined Figtree Hill and Gilead developments. It is proposed that the location of this upsized reservoir remains in the same position, to the east of Appin Road.

WAG analysis: Potable Water Servicing

Developer seems to be attempting to limit costs of constructing large reservoirs and trying to get away with smaller ones.

Option 2 is unlikely to be viable, for reasons of ownership of pipeline and it being large trunk infrastructure. (Just like you can't usually tap into a gas pipeline either)

Option 3 involves building a reservoir outside of the development footprint, possible land ownership and easement difficulties?

Option 4 unlikely to be viable due to distance, small Appin reservoir already having to service Appin and Wilton, and difficulty maintaining disinfection over long distances (Appin supply is chlorinated only, Campbelltown supply has longer lasting chloraminated water).

The circled 'alternatively...' option detailed at the bottom of option 1 (3.1.2.1) almost as an afterthought, is the most likely, but we suspect would also be very costly - the reservoir would need to be sized to service the entire development, be very large, and presume it would need to be built early on in the development staging process. It does not seem to have been investigated further - perhaps it would make the development unviable.

Wastewater: Glenfield Treatment plant as the preferred wastewater treatment plant for Mt Gilead Glenfield. When was the last time Sydney Water indicated there was capacity in the Glenfield plant? it may have been years ago. That plant seems to treat wastewater from just about everywhere. Concern should be raised as to how many other connections have been also committed to, and if the ultimate capacity is really there / still there?

Stormwater: EHG raised concerns that the stormwater basins may not be adequately sized. Lendlease should review the basins to ensure their sizes are adequate as this may have implications for the final structure plan

WAG notes the following from the TAP letter of 21 Sept 2022 attached

From Catherine Van Laeren
Chair, Technical Assurance Panel
Executive Director, Metro West

To: Mr Brendan O'Brien
Head of Strategic Planning, Residential Communities
Lendlease
Level 14, Tower Three, International Towers Sydney
Exchange Place, 300 Barangaroo Avenue,
Barangaroo NSW 200

p.3 extract:

Update Part 2 of the draft proposal (Explanation of Provisions) to propose a concurrence clause and associated clause application map to apply to the site's portion of Koala Corridors A and B and the Nepean Corridor. This clause is proposed to be similar to the clause 7.28 in the Campbelltown Local Environmental Plan (LEP) 2015 currently applied to Corridor A in Figtree Hill. The concurrence will apply to proposed development in the koala corridors. In deciding whether to grant concurrence, the Planning Secretary must consider the impact of the proposed development on:

- a. the protection of the Campbelltown koala population, and
- b. the maintenance and delivery of the koala corridor.

The Department is preparing an update to the Greater Macarthur 2040 Interim Plan. This update will provide further guidance on this concurrence clause. For example, proposed development within the koala corridors will need to address matters such as:

- if native vegetation is proposed to be cleared,
- the size of the development and the consequential loss of land in the koala corridor available for revegetation,
- accessibility from the UDZ land for construction and maintenance, given roads aren't permissible in the C2 area,

- any mitigation measures such as revegetation, and
- consistency with the Chief Scientist's advice and recommendations.

WAG comment: In other words, the Minister will be able to allow development within koala corridors even after consideration of critical matters listed above. The koalas in Mt Gilead will no have no future on it but will have take their chances on Appin Road with no underpasses

This is yet another black mark against a development which purports to protect koalas but ensures their destruction

Then finally this

6. Include a proposed SEPP map of C2- Environmental Conservation land that does not form part of a koala corridor. This conservation area that is outside a koala corridor is proposed to have the following additional permitted uses:

- a. Building identification signs,
- b. Business identification signs,
- c. Eco-tourist facilities,
- d. Information and education facilities,
- e. Roads,
- f. Kiosks,
- g. Recreation areas,
- h. Water supply systems.

WAG comment: How on earth can a conservation area have the above amenities and how can it not guarantee further incursion into koala corridors?

Then this from that letter:

Department of Planning and Environment

2

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150

Locked Bag 5022, Parramatta 2124

is to note the final structure plan will be prepared following exhibition and consideration of submissions. Attachment C outlines the intended hierarchy of plans.

I note that the current draft structure plan also shows Stage 1 (Figtree Hill) and the State Heritage Listed Mt Gilead Estate. The structure plan should be amended to be clear that only the Stage 2 site is proposed to be rezoned.

2. Update Part 2 (Explanation of Provisions) to propose a new provision in the State Environmental Planning Policy (Western Parkland City) 2021 (WPC SEPP) to require a final structure plan to be adopted by the Planning Secretary and published on the Department's website prior to development consent being granted. The provision is to propose that the Gilead Stage 2 site within the final structure plan must include:

- a. at least 29.1ha of open space not located within the koala corridors, and comprising:
 - at least 20.9ha of active open space and
 - at least 8.2ha of passive open space,
- b. medium and low density residential development,
- c. Koala Corridors (as proposed in the draft structure plan and proposed land use zone map) and other areas of Environmental Conservation,
- d. local or neighbourhood centre,
- e. school site,

- f. road hierarchy,
- g. koala underpasses at Appin Road,
- h. the Transport Corridor with an appropriate width and scale as per the cross section in the Greater Macarthur 2040 Interim Plan, and
- i. any other information considered relevant.

This proposed provision is to ensure sufficient flexibility so the future DCP can accommodate minor changes of uses within the urban development zone, and be adopted without requiring the structure plan to be re-exhibited and updated. This is to be achieved in the new SEPP provisions which will include aims such as:

- to rezone land to allow for development to occur in the manner envisaged by the Gilead (Part) Precinct structure plan,
- to protect conservation land and koala corridors consistent with the Gilead (Part) Precinct structure plan, and
- to guide the bulk and scale of future development within the Gilead (Part) Precinct generally consistent with the Gilead (Part) Precinct structure plan.

It is at Lendlease's discretion to include the Height of Building (HOB) controls on the structure plan or continue to propose a SEPP HOB map. I note that the structure plan for the North East Wilton Precinct includes HOB controls. The Department is currently updating the structure plan for the South East Wilton Precinct to indicate the HOB controls.

WAG Comment:

So how does all this align with the previous commitments in this TAP letter, in relation to koala corridors etc? Is this the infamous developer flexibility for Lendlease to mix and match as it pleases in the UDZ?

On the UDZ here is our broad analysis of its shortcomings in Wilton South East and therefore its potential for creating yet more environmental destruction, koala corridor impact and less residential value in Mt Gilead.

- i. No regulatory provisions for the flexible UDZ have been established under the EP&A Act. And its update: <https://www.planning.nsw.gov.au/Policy-and-Legislation/Environmental-Planning-and-Assessment-Act-updated/Guide-to-the-updated-Environmental-Planning-and-Assessment-Act-1979/Part-1-New-objects-of-the-Act>
- ii. There are no measurable UDZ performance objectives and public reporting requirements.
- iii. The '*Explanation of Intended Effect*', for Wilton North was published after South East Wilton's proposed amendments to the SEPP and EP&A Act. To support the flexible UDZ arrangements, the Wilton North EIE proposed amendments that would require 'site verification certificates' to ensure development 'generally accorded' to the Precinct Plan and the LUIIP. The legislative provisions made for Wilton South East SEPP do not include provisions for site verification certificates. The inconsistency here is bemusing. Are site verification certificates required for Mt Gilead Stage 2
- iv. The NSW Planning and Walker Corporation (the developer) have not adequately demonstrated the need for a new flexible UDZ. Has Lend Lease done so for Mt Gilead Stage 2?

- v. We have no confidence or evidence that the new zone will bring improved benefit to communities and the environment over existing zoning practices.
- vi. There has been inadequate community and local government consultation and insufficient detail on regulatory compliance required in new flexible urban development zones.
- vii. Housing accommodation does not require development consent in the flexible UDZ, yet there is no published development control plan that guides the performance-based outcomes that should be met by housing subdivision developments. To this extent the developer appears to have all control over all place-based outcomes.
- viii. The decision to implement this type of zoning arrangement, should have been supported with the exhibition of urban design requirements that establish the performance measures to be met in the public realm (i.e the space between private buildings), fitting to the creation of a modern new city in a rural setting. Without this we are faced with a 'free for all' market at the hands of developers.

Finally, we cannot find research evidence to demonstrate the effectiveness of flexible UDZs in managing social and environmental outcomes.

Brian Williams
President
Wilton Action Group
www.facebook.com/wiltonactiongroup

SUB-3659

Name withheld

Transparency about the specifics of the wildlife corridors ” and allowing consultations on them”seem necessary conditions for them to be effective.

Koalas and other species were only very recently greatly impacted by bushfire. Let’s work better to not contribute to their threats, especially when we have the opportunity to provide some forms of safeguard.

SUB-3661

Dennis Murray

dmurray0058@gmail.com

It seems Lend Lease is involved in yet another development that is contributing to the decline of at risk native species. So many areas of bushland around the Sydney region are being developed with the result that species like koalas are suffering "the death of a thousand cuts" as their habitat becomes fragmented.

It is vital that important protections are put in place to protect our rare species. Yet it seems that you are refusing to be transparent about how you determined the extent of the wildlife corridors in this project. Without such transparency your protection measures are worthless.

This project must not be approved without more open and public disclosure.

SUB-3665

Name withheld

I oppose this development proposal. It will damage koala habitat and put further pressure on the koala population.

SUB-3668

Claire Bettington

cbettington@bigpond.com

Please see pdf attached.

Submission to Gilead Stage II regarding Koala Corridors by C Bettington, 19-12-2022

Thank you for the opportunity to “have my say” about Lendlease’s proposed large housing development at Mt Gilead estate in SW Sydney, which cuts across important Koala corridors.

I have been with Australian Ethical (AE) Super for decades, as I believe in their ethics which align with mine; up until now, AE have had substantial investments in Lendlease shares, believing them to be an ethical company. Over the last 4 years, AE have engaged with Lendlease over their proposal to develop the old Mt Gilead property for housing. AE & many others have pointed out repeatedly that Mt Gilead is situated between the Nepean and the Georges Rivers at a place where the rivers are relatively close, and that the Koala colony along the Georges River is healthy, thriving and expanding, so inevitably, Koalas must roam in search of mates and food east-west, across Mt Gilead.

Koalas prefer to eat the leaves of the trees which grow along the river corridors (which are roughly aligned north-south). To cross from one river to the other, Koalas move across the Mt Gilead landscape from east to west and from west to east. Mt Gilead was cleared for farming in 1812, and had remained farmland until very recently, thus the Koalas were fairly safe to cross the land at will, using remnant Eucalypts as shelter & fodder trees. Only a few years ago, local wildlife rescue organisations noticed a dramatic increase in road strike injuries and roadkill deaths of Koalas on Appin Rd, which is aligned north-south, where Koalas try to cross the road and move east-west. This was a sign that the koala colony was expanding, and Appin Rd at Mt Gilead has unfortunately become a Koala roadkill hotspot. It is absolutely horrendous to see pictures of dead and dying Koalas on social media week after week, and absolutely nothing being done to stop it. I have seen this for at least the last 3 years, and have written letters and emails to MPs, government, TfNSW, the newspapers, all to no avail.

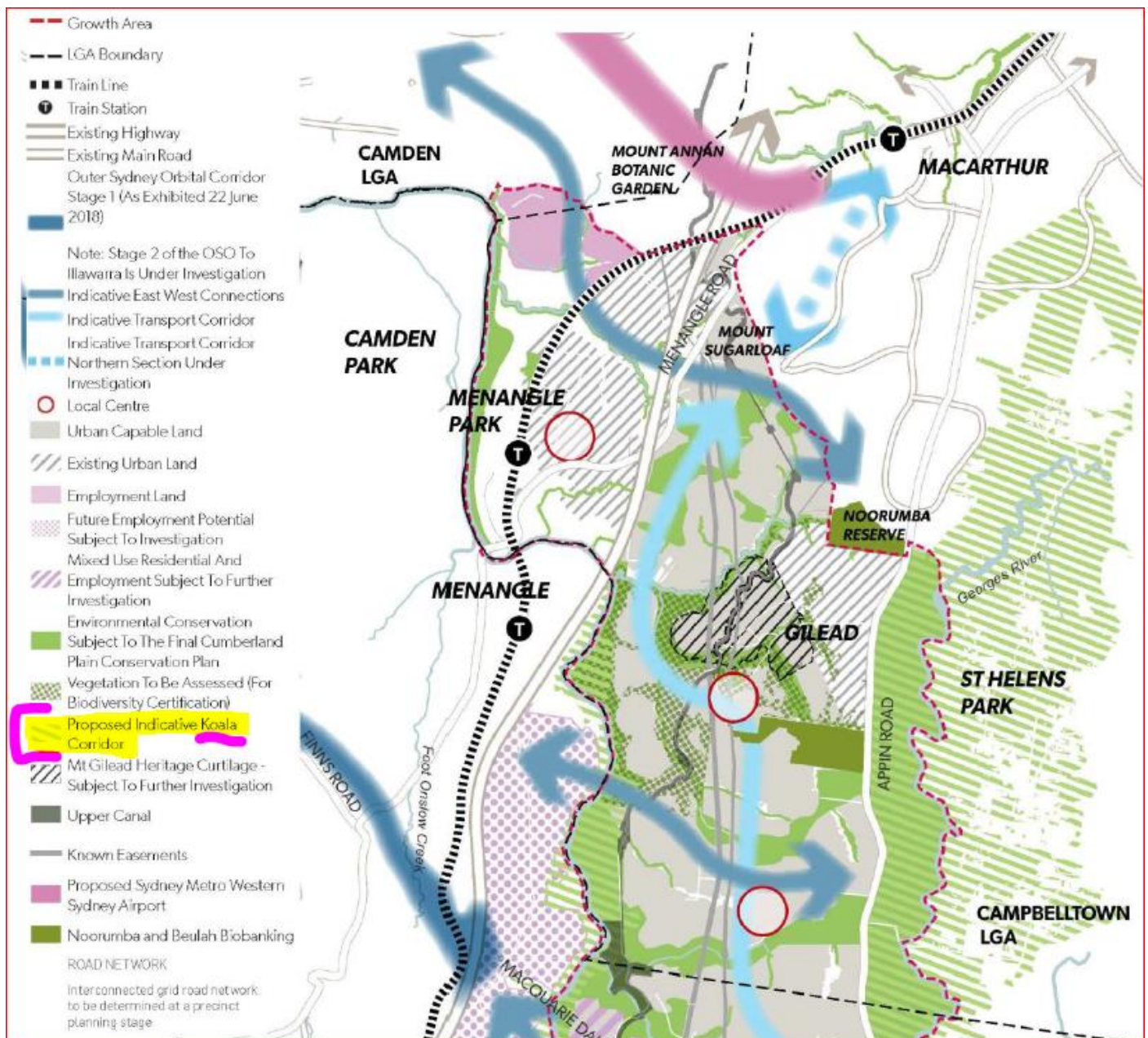
However, I see that in the past couple of weeks, after many years of suggestions from the public and wildlife organisations, at long last Lendlease and Transport for NSW (TfNSW) have agreed to put in 2 fauna underpasses when they expand Appin Rd from 2 to 4 lanes. These underpasses are not the usual design of a box culvert, but circular pipes – the northern one is adequate, but the other one consists of two much smaller pipes as a “temporary” underpass. I have made a separate submission on the inadequacy of this solution, suggesting that a proper wildlife overpass be constructed instead, or at the very least, a proper box culvert design be placed under Appin Road, and that there should be more of them (as at Ballina, Northern NSW) at regular intervals, and that they should be permanent. The wildlife carnage on the roads would then stop.

Gilead Stage II includes Koala corridors, but the maps are inadequate in my opinion. I agree with AE that there should be more corridors, or corridors should be better designed. Why for example is there only one crossing of the Upper Canal (Sydney’s drinking water canal) which runs through Mt Gilead estate? Why can’t Lendlease construct another one, or several?

The corridors are designed wrongly, AE believes, and I agree. It is really hard to discern from the numerous maps in the numerous reports, Appendices, Plans, etc, where the planned Koala corridors actually are. Apparently, the NSW Chief Scientist recommended that Koala corridors should be 390m wide. Looking at the maps in the ELA report¹, I came across this one on page 12 (see copy next page).

As a former cartographer, first I have to say that this map is a horrible mess and virtually unreadable. Secondly, it is almost impossible to discern where the east-west Koala corridor(s) are to be. I have put a yellow highlighter & a pink line in the key where it says “**Proposed indicative Koala corridor**”, which is supposed to be represented on the map by diagonal green stripes. I can see these stripes along the Georges River (north-south alignment – on the right of the map, but the east-west corridors through Mt Gilead estate are totally unclear. What is clear are the blue arrows all over the map indicating that numerous roads will be constructed right through this future suburb, and right through any east-west Koala corridor. This entire landscape is going to be rapidly changed from a bucolic rural setting into one of intense urban sprawl cross cut with highways, noise and pollution.

¹ Ecological Australia, Mt Gilead - Stage 2, Biodiversity Certification Assessment Report & Biocertification strategy, prepared for Lendlease Communities (Figtree Hill) Pty Limited. 15-11-2022



Above: copy of map on page 12 of the ELA report², supposedly showing east-west Koala corridors through Mt Gilead.

I doubt Koalas can co-exist in such a place – just look at what happened in Coomera, SE Queensland: dead Koalas everywhere, a once thriving colony deliberately destroyed for development & a major highway. Hundreds of Coomera Koalas were “translocated” to a place 30-40 km away, where someone thought it would be good Koala habitat; a year later only one was still alive. If the world knew how we treat our unique iconic Koalas they would be horrified. Let’s not make the same mistake at Mt Gilead.

Another (horrible) map from the same document, page 13, is no clearer (see next page). It shows a lot of “**Protected Koala Habitat**” in yellow diagonal stripes *around the edges of the Mt Gilead estate*, much of which appears to be devoid of trees! Koalas need trees! And not just any old tree, but mature ones of the right species. They simply won’t eat the leaves of the ones they don’t like. The more maps I look at, the more I think that Koalas are not being given the priority they deserve in this landscape they have called their own for millions of years. This is not good enough when they have been declared and endangered species in NSW, likely to go *extinct by 2050*! I want Lendlease to do more for this colony of Koalas. After all, they stand to make millions if not billions of dollars from this huge sprawling housing development, while potentially destroying a currently-thriving Koala colony. Adding a few measly corridors as an afterthought is just not good enough! Instead, Lendlease could take the opportunity to showcase how humans and Koalas can co-exist. It would bring real kudos to Lendlease, instead of the current greenwash.

² Ecological Australia, Mt Gilead - Stage 2, Biodiversity Certification Assessment Report & Biocertification strategy, prepared for Lendlease Communities (Figtree Hill) Pty Limited. 15-11-2022

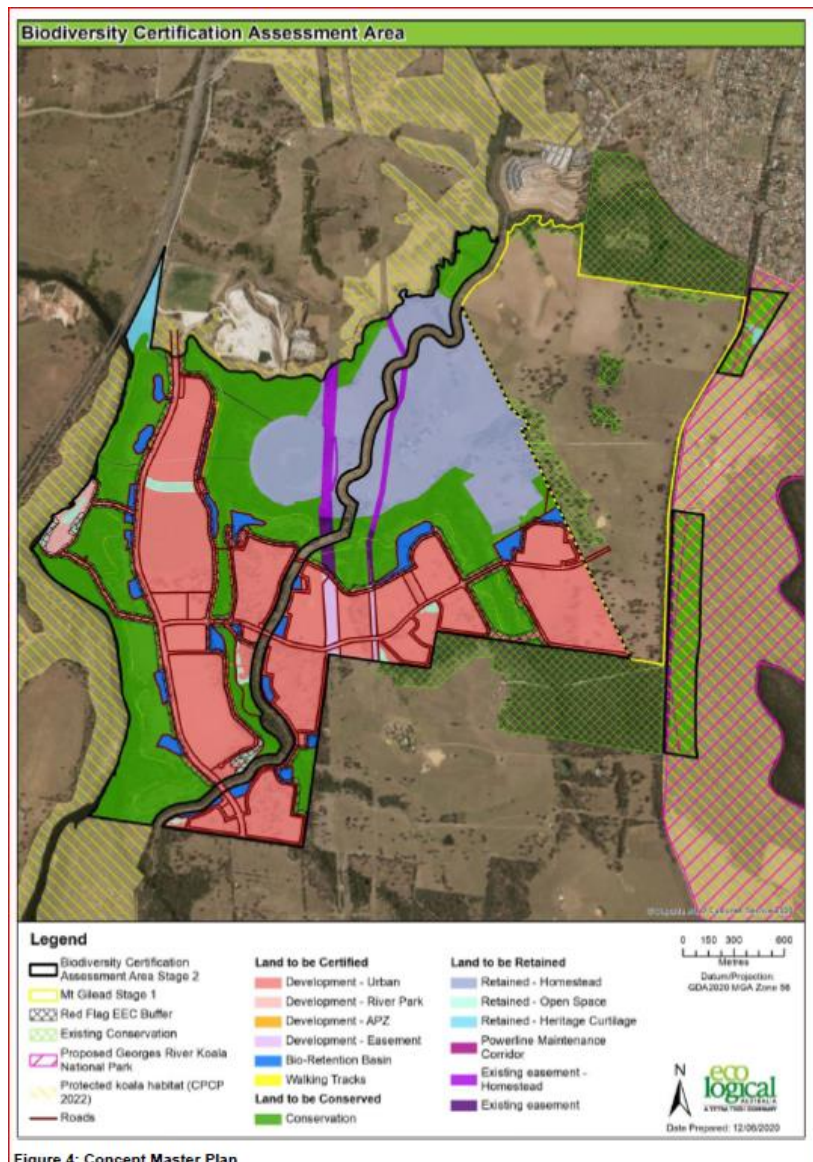


Figure 4: Concept Master Plan

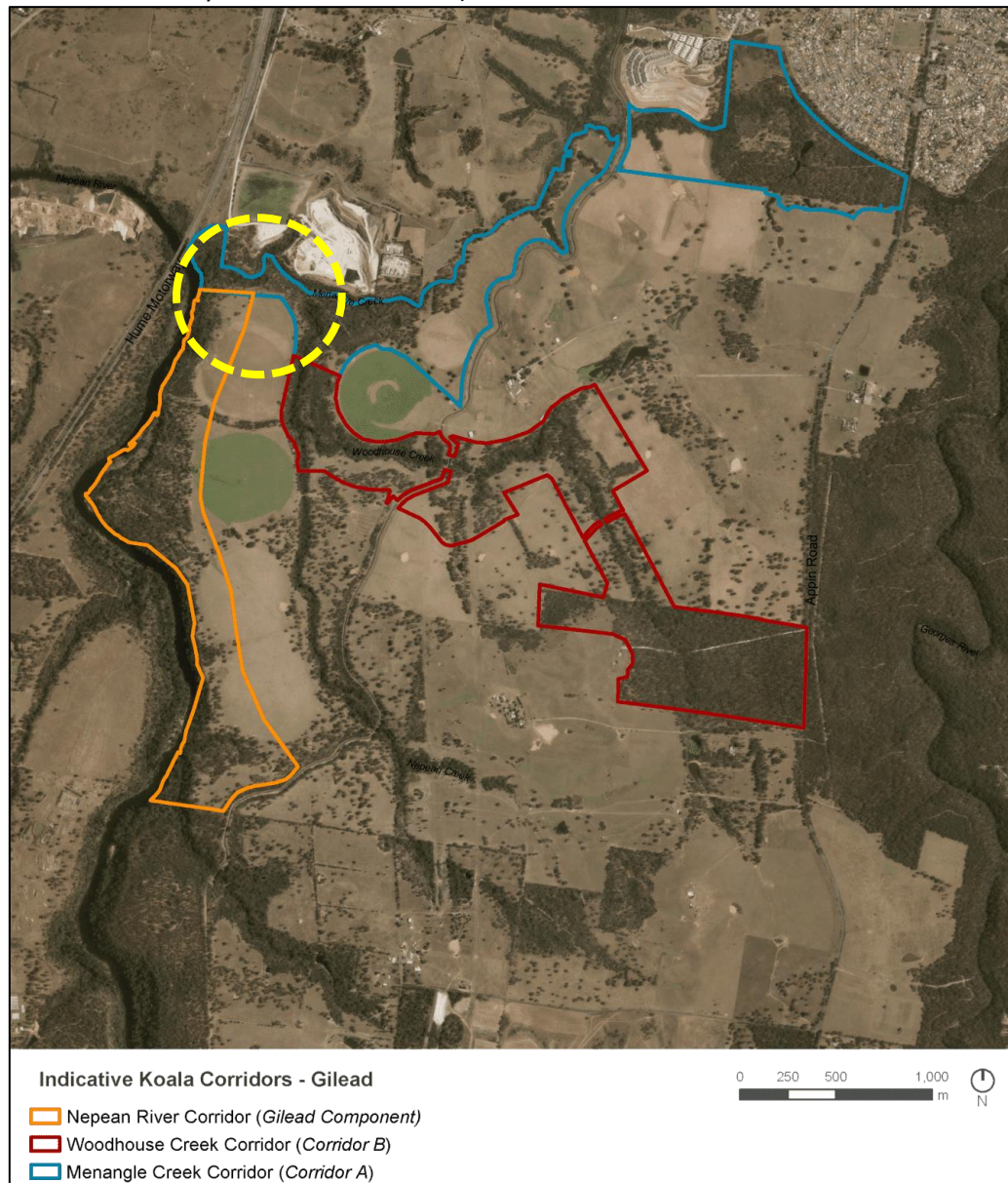
Above: copy of map on page 13 of the ELA report³, supposedly showing east-west Koala corridors through Mt Gilead.

I hope Lendlease doesn't repeat what they did at Gilead Stage 1 ("Fig Tree Hill") – clearing every tree in site ready for construction of roads and houses. Some of those trees were hundreds of years old, it was a shocking desecration of the landscape, and so unnecessary (see photo of the chainsaw massacre below, taken by Pat Durman, January 2021).



³ Ecological Australia, Mt Gilead - Stage 2, Biodiversity Certification Assessment Report & Biocertification strategy, prepared for Lendlease Communities (Figtree Hill) Pty Limited. 15-11-2022

I see that the last map in the ELA document⁴ (see copy below, from page 245) has some indication of where and how wide the Koala corridors will be. They seem to converge at the same point (near the quarry) where a **major road** is to be built (not shown on the map below, but shown on other maps. Surely 3 corridors converging on a single point where the corridors are narrow, and there is to be a major road built there as well – surely this is NOT a good design? (I have added a dashed yellow line in the area)



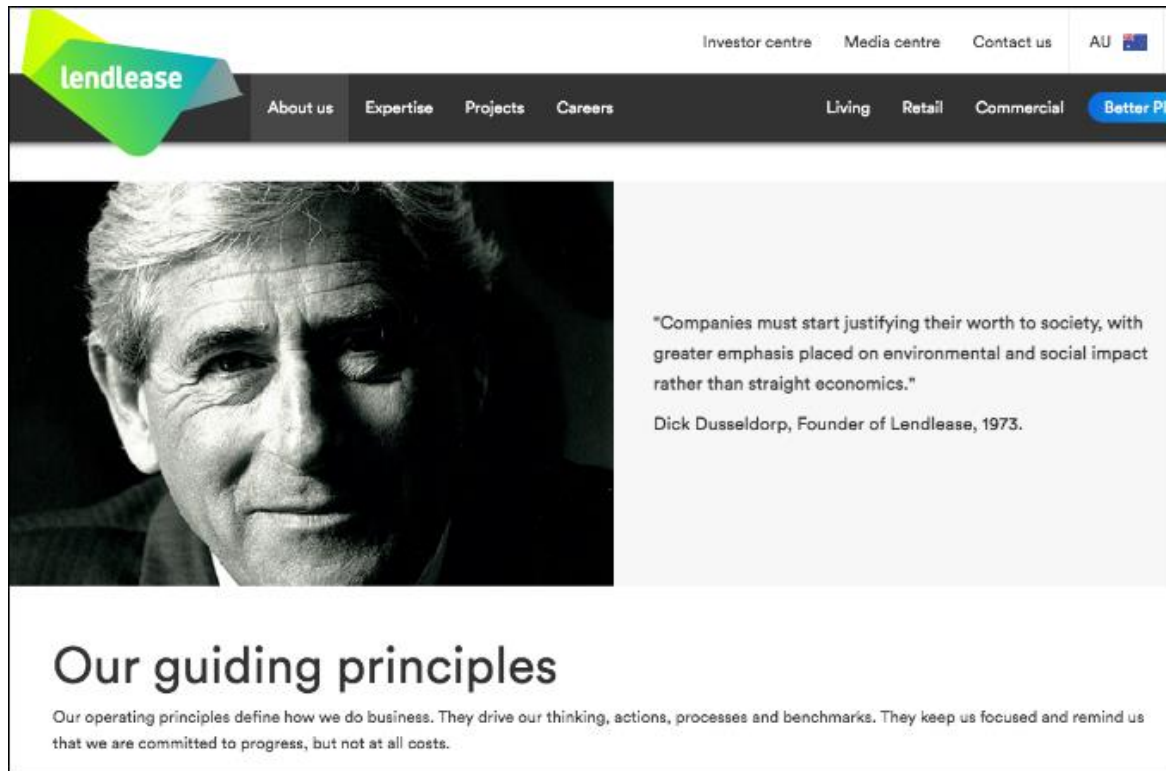
Some parts of Corridor B, Woodhouse Creek are truncated, leading nowhere; they may become dead ends. Is this some sort of trick of calculation, so that the *average* width is maintained above the minimum, to make up for areas where the width of the corridor(s) is very obviously *NOT* wide enough, as stated by the Chief Scientist?

Great areas of the “Koala Corridors” seem to be completely free of trees; I read somewhere that Lendlease is going to revegetate these corridors, but Koalas need mature tree leaves to eat, they cannot eat young tree leaves, and they cannot climb saplings. Even if they could climb saplings and eat the leaves, they would likely fall out or bend and break the trees with their weight. It will probably take a good part of 50 years to grow the necessary habitat and food trees in these denuded areas, especially given the very low rainfall usually experienced in this part of Sydney. Indeed, Mt Gilead is often in drought. Is Lendlease proposing to water the trees? If not, the usual summer heat here will kill them. And I haven’t even mentioned Climate Change and bushfires. Recently studies have revealed that Koalas do not get all their moisture from leaves, and as droughts and Climate Change dries out the vegetation, they will climb down to the ground more often in search of water. This renders them more vulnerable to dog attack

⁴ Ecological Australia, Mt Gilead - Stage 2, Biodiversity Certification Assessment Report & Biocertification strategy, prepared for Lendlease Communities (Figtree Hill) Pty Limited. 15-11-2022

of course. If this colony of Koalas grows they may put significant pressure on the existing trees & cause dieback through excessive browsing. Nature is clearly out of balance in SW Sydney, building huge sprawling treeless housing estates and roads will do nothing to help, and might put the final nail in the coffin of our precious Koalas.

A note on Lendlease: I came across this on their website a while ago (copy below), extolling Lendlease's principles: *"...they keep us focused and remind us that we are committed to progress, **but not at all costs**".*



Apparently, Lendlease's founder declared in 1973 that *"Companies must start justifying their worth to society, with greater emphasis placed on environmental and social impact rather than straight economics"*.

There's a video by Michael West, Business Journalist⁵, asserting that Lendlease haven't even paid income tax in Australia, perhaps for the last 10 years, yet huge dividends are paid out to shareholders – which includes AE of course. Lendlease reap massive profits from their operations in Australia, so this is reprehensible, especially when the ordinary person cannot get away with paying no tax. It's unethical and probably immoral; and it's a bad look.

This is a company who loudly claim to "live every day" by the "core values" of "Respect", "Integrity", "Excellence" & "Trust"; yet no tax was paid by Lendlease on an estimated profit of \$10.4 Billion in 2020. This fact alone, if true, tells a lot about the importance of money to Lendlease. Are they at least putting something back into the community they are extracting huge profits from? The video states that Lendlease gets lucrative government contracts, and probably pays large political donations, but how would anyone know? Do they deserve their "good" reputation?

I feel that Lendlease has lost its way, and needs to regain people's trust, now especially relevant to Mt Gilead and how Lendlease treats our Koalas there. Already, stories have appeared about Lendlease & the Koalas in overseas media. Are Lendlease in danger of losing their "good reputation"? I think so. I will urge my Super Fund, AE, to divest their shares if Lendlease doesn't start getting serious about the Koalas at Mt Gilead, and design **proper Koala corridors** which will function as intended, not the proposed ones which seem to be an afterthought, squeezed in to the landscape - to fob us off. A great many of us are heartily sick of being ripped off, exploited, and bamboozled by large companies who pay no tax, yet reap billions. Lendlease: it is time to lift your game & save your reputation. This is a perfect chance to "do the right thing" by our Koalas.

Thank you.

⁵ <https://www.facebook.com/save.mount.gilead.inc/videos/730300011240273> Date of video uncertain – possibly December 2020.

SUB-3670

Name withheld

The submission may be ""in-confidence"" or ""commercial-in-confidence"" as the proposal to have a different ""Planning Solution"" has already been responded to by NSW GOVT representatives.

The alternative is complimented by the appropriate FLOOD MITIGATION within Western Sydney, and finding a Bio-diversity Solution to the 60% decline in the Greater Glider population within the World Heritage National Park / Blue Mountains National Park.

There is an international goal to have 30% of Land as ""Natural Habitat"" and that aim in Australia may be controlled by Australian Govt.

TOPIC "" Proposed Stage 2 Gilead Estate

The project should be abandoned and the area become a preserved rural Landscape as has been achieved in the Barossa Valley in South Australia and Napa Valley in California.

The way to increase "regenerative agriculture+ and increased "Urban Growth" may be to "Refine the balance with multi-level factory and apartment dwellings" with the practicality of "better public transport" or "better low-emissions Transport"

The CPCP has not yet been approved by the Australian Govt, and the Chair of the NSW Upper House Koala Inquiry has been critical of the need to preserve the Koala Corridor thru the Gilead Estate area, between the Georges River and Napean River.

So looking at the Auditor-Generals review, and increase in "Bushfire resilient Landscapes" with adequate supply of clean water could be provided within the "ALTERNATIVE VISION"

It can supply habitat for the Greater Glider, and Koala and Swift Parrot, and bush stone-curlew plus habitat for ground moving Native Fauna.

This may require a "REVIEW" of the Housing Estate Layout to improve the "Pathways for Native Fauna" and "Green Space" for children to play within.

From Pittwater Online News ::

Mark Pearson MLC of the NSW Animal Justice Party has pointed out:

"The NSW Biodiversity Offsets scheme is a sham. As I said in a speech in Parliament last month, this project is used to justify maiming, distressing and killing animals and harming the environment and it's absolutely not acceptable.

Not only is it unacceptable that individual animals are killed under this scheme, but it is a scheme that does not protect biodiversity.

The Auditor-General's review found there is an undersupply of in-demand credits for numerous endangered species. Seven endangered and 10 vulnerable flora species are likely to have a large credit undersupply, as are at least three endangered and 15 vulnerable fauna species, including the swift parrot, eastern pygmy possum and bush stone-curlew.

Biodiversity gains made through the scheme will not be sufficient to offset the losses resulting from development and the outcome of irreversible habitat and species loss. The Auditor-General found that the Department of Planning and Environment has not established a clear strategy to develop the biodiversity credit market or determine whether the scheme's operation and outcomes are consistent with the purposes of the Biodiversity Conservation Act 2016.

Gilead Stage 2 Development

The proposal for Gilead Stage 2 has been [opened for submissions](#) with the **closing date of December 19th, 2022**. The documents show the application proposes to 'directly impact' 268.72 ha of the assessment area of which 53.50 ha is mapped as native vegetation and threatened species habitat, including the local population of koalas. The [Save Sydney's Koalas Facebook page](#) lists ideas for submissions, having been through the reams of documents.

The planning proposal, which has already been approved through a gateway decision by the NSW Department of Planning, seeks to rezone land at Gilead Stage 2 to facilitate around **3,300 dwellings**.

The proposal was announced as one of three being 'fast-tracked' by the NSW Department of Planning by Minister for Planning Anthony Roberts on November 2nd, 2022.

Mr Roberts said while planning proposals are normally lodged with councils in the first instance, the State will assess these proposals.

“The Department of Planning and Environment will undertake the assessment of these proposals, which are all located in the Greater Macarthur Growth Area, so councils don't need to. However, it will be required to work closely with councils and other agencies to resolve any potential issues,” he said.

“Nothing about the assessment process changes including the important need for community consultation.”

The webpage underlines this approach, notifying that any decision will not be made public and follows on for the approach taken by the state government in regard to their being both the proponent partner and decision maker in the proposal for Lizard Rock at Belrose.

Visit: [NSW Government 'Fast-Tracks' Destruction Of Endangered Wildlife, Habitat For Local Species and Community Consultation](#) - Issue 561

The application proposes to permanently protect and manage for conservation, 225.76 ha of lands, 218.93 ha of which, the documents state, will generate ecosystem credits.

These same BSA sites, the biodiversity report states, will generate 6,232 species credits; 1,348 for Koala, 1,347 Squirrel Glider, 1,181 Cumberland Plain Land Snail, 856 Southern Myotis and 1,500 Pomaderris brunea species credits i.e. there will be a deficit of 108 Koala credits and significant surpluses for all other species.

The deficit of Koala credits (108) will be met by retiring 99 Koala species already held by Lendlease (Credit ID holder 650) from the Campbelltown Koala population purchased from the Noorumba Reserve Biobank site (BA239) and the purchase of 9 Koala credits from registered biobank sites outside the BCAA or Biodiversity Stewardship sites or the BCT (subject to an assessment of credit equivalency).

The initial application for Biodiversity Certification was publicly exhibited for 64 days by Campbelltown City Council between 15 December 2020 and 17 February 2021. The Council received 626 submissions during the exhibition period and a further 53 after the close of exhibition.

The Biodiversity assessment report states it has been updated in light of these submissions.

The submissions raised a number of concerns in regards to a lack of a strategic approach, the inadequacy of surveys for threatened species, unacceptable impacts to the Campbelltown Koala population (inadequate Koala corridors) and unacceptable impacts to listed endangered ecological communities.

Those who have campaigned or written feedback for the earlier version have stated the Biodiversity document, its latest edition, amounts to stating that it is alright to destroy over 268 hectares of habitat because you're not going to destroy a portion of that habitat and that koalas living there, even though now listed as Endangered in NSW, can still be killed or displaced if you purchase 'koala credits'.

Other species found at the site were six species of threatened microchiropteran bats, all listed as Vulnerable, the Squirrel Glider was recorded in seven locations (with only the 'higher quality vegetation' being mapped as habitat, isolated individual trees and small patches of vegetation without a mid-storey and greater than 30 m from intact vegetation were not considered suitable habitat), along with hundreds of species of fish, amphibians, reptiles, bird species, mammals (non-flying, and mammals (flying).

However, at present, only Koala, Squirrel Glider, Southern Myotis and Cumberland Plain Land Snail are species 'credit species' and have been identified as being impacted by the land to be certified. The other species that have been recorded or have the potential to occur within the BCAA which are species credit species (Little Bentwing Bat, Eastern Bentwing Bat, Large-eared Pied Bat and Grey-headed Flying Fox) are only species credit species when breeding habitat is being impacted. No breeding habitat was recorded within the land to be certified so these species do not require further assessment as species credit species in this assessment.

All the other species don't count at all - 'another way to underline why our nation has the highest extinction rate in the world'.

Subject to the Minister's approval of the request for a red flag variation, the proposal, the documents state, can meet an 'improve or maintain' outcome and is eligible for biodiversity certification.

Once the Minister confers biocertification on the requested land, which has been the stated and published intent from the incumbent government's Minister for Planning, the local Council, as the consent authority for future development applications, is;

"no longer required to assess impacts to 'biodiversity values' as these have already been addressed by the Minister and 'conservation areas' will be required to be managed in perpetuity for conservation".

Mark Pearson MLC of the NSW Animal Justice Party has pointed out:

"The NSW Biodiversity Offsets scheme is a sham. As I said in a speech in Parliament last month, this project is used to justify maiming, distressing and killing animals and harming the environment and it's absolutely not acceptable.

Not only is it unacceptable that individual animals are killed under this scheme, but it is a scheme that does not protect biodiversity.

The Auditor-General's review found there is an undersupply of in-demand credits for numerous endangered species. Seven endangered and 10 vulnerable flora species are likely to have a large credit undersupply, as are at least three endangered and 15 vulnerable fauna species, including the swift parrot, eastern pygmy possum and bush stone-curlew.

Biodiversity gains made through the scheme will not be sufficient to offset the losses resulting from development and the outcome of irreversible habitat and species loss. The Auditor-General found that the Department of Planning and Environment has not established a clear strategy to develop the biodiversity credit market or determine whether the scheme's operation and outcomes are consistent with the purposes of the Biodiversity Conservation Act 2016.

We are slipping backwards with species and habitat loss. The Government's 2020 NSW Biodiversity Outlook Report estimates that, without effective management, only 50 per cent of species and 59 per cent of ecological communities that are listed as threatened in New South Wales will still exist in 100 years. The NSW State of the Environment 2021 report identifies habitat destruction and native vegetation clearing as presenting the single greatest threat to biodiversity in the State—not introduced wild animals. Demand for offset credits is growing rapidly, predominately driven by major projects.

The Government needs to curtail development in sensitive areas. Intuitively, clearing land for development and killing animals in one place and then paying for a credit to protect animals elsewhere is not acceptable.'

May 20, 2022

Koala endangered listing must push NSW Government to protect habitat

Today's announcement that koalas will be finally listed as Endangered under the *Biodiversity Conservation Act* is a huge wake up call for protecting koala habitat in New South Wales.

"The devastating endangered listing of koalas comes as no surprise in a state where the government refuses to protect habitat. Koala numbers have been in freefall for years and the NSW Government must act immediately to protect their habitat" **Nature Conservation Council Deputy Chief Executive Jacqui Mumford said.**

"The reality is koalas are dwindling across New South Wales and we don't have a proper mechanism to protect their habitat."

"If you want to save koalas you have to protect their trees. It is not complex. But koala habitat continues to be destroyed because of weak government policy that prioritises land clearance for grazing, agriculture, urbanisation, timber harvesting and mining."

"The recently released NSW Koala Strategy was inadequate for protecting the species and we are seriously lacking a state-wide mechanism to bring this iconic species back to a healthy population. Any party looking to lead NSW into the future needs to have this as a commitment."

"We are calling on the NSW Government to immediately:

- Ban the destruction of koala habitat, on both public and private land;
- End native forest logging; and

- Expand the National Parks estate to protect high quality koala habitat including the proposed Great Koala National Park”
-

The NSW Threatened Species Scientific Committee found:

“Human activities including deforestation and land clearance for grazing, agriculture, urbanisation, timber harvesting, mining and other activities have resulted in loss, fragmentation and degradation of koala habitats” (page 3)

“Large areas of forest and woodland within the koala’s range were cleared between 2000 and 2017 (Ward et al. 2019) with clearing for grazing accounting for most of this loss of koala habitat”. “Land clearing continues to impact habitat across the koala’s range” (page 3)

“Clearing of native vegetation’ is listed as a Key Threatening Process under the Act.” (page 4)

“Modelled climatic suitability from 2010 to 2030 indicates a 38-52% reduction in available habitat for the koala and a 62% reduction in koala habitat by 2070 has been forecast” (page 4)

“... it is facing a very high risk of extinction in the near future...” (page 5)

Losing Species Weakens Ecosystems

A third line of research asked a different question: When ecosystems lose species, [can they still function and provide services](#)? This work was driven mainly by experiments where researchers directly manipulated the diversity of different types of organisms in settings ranging from laboratory cultures to greenhouses, plots in fields, forests and coastal areas.

By 2010, scientists had published more than 600 experiments, manipulating over 500 groups of organisms in freshwater, marine and land ecosystems. In a 2012 review of these experiments, colleagues and I found unequivocal evidence that when ecosystems lose biodiversity, they become [less efficient, less productive and less stable](#). And they are less able to deliver many of the services that underlie human well-being.

For example, we found strong evidence that loss of genetic diversity reduced crop yields, and loss of tree diversity reduced the amount of wood that forests produced. We also found evidence that oceans with fewer fish species produced less-reliable catches, and that ecosystems with lower plant diversity were more prone to invasive pests and diseases.



A standard lawn, at left, is a monoculture that supports very little life. A more mixed, diverse version, at right, offers food for pollinators. [woodleywonderworks/Flickr](https://www.flickr.com/photos/woodleywonderworks/), CC BY

We also showed that it was possible to develop robust mathematical models that could predict reasonably well how biodiversity loss would affect certain types of valuable services from ecosystems.

BARCELONA - EXAMPLE

The example of Barcelona is a LONG WAY from the GILEAD, Macarthur with the PUBLIC TRANSPORT using Green Hydrogen

The “SIMPLISTIC” urban development model to replace Agricultural lands has been “Modified” in Barcelona, but in Sydney there is now lots of apartment buildings of “Poor Design”

So the apartment design needs “Refinement”.

Plus evidence of BLOCKAGE of wildlife across busy roads.

THE GILEAD ESTATE STAGE 2.

Taking the example of Northern Beaches Council to “abandon the Ingleside Urban Growth Project” by instead “Increasing the potential for circa 3,000 plus dwellings within the Brookvale Town Centre,

The proposal to do the same “Differently within the existing Campbelltown area is a “Practical option” that is proposed within the Northern Beaches LGA.

The Macarthur “Growth Area” could be “Reviewed” to achieve a Cultural Preservation Area, that has been applied in South Australia to preserve the Wine Growing areas of Barossa Valley and Maclaren Vale.

I already have a response from the NSW Environment and History Minister, but the “Detail history” needs to be reviewed.

The example of South Australia, may need a “Govt Solution” that is a “Variation to the proposed Urban Rezoning “ of the Macarthur Growth Area.

South Australia Character Preservation (Barossa Valley) Act **2012** An Act to provide measures to protect and enhance the special character of the Barossa Valley region; and for other purposes.

The “under-design” of the regional WILDLIFE CORRIDOR SOLUTION thru to Royal National Park and Appin Road may be “CRITICAL SAFE MOVEMENT” for Native Fauna. (Having listened to a webinar run by Southernland Shire Environmental Centre, the options may have been discussed in the Talk.

The Koala Population could “GROW” and the variety of Wildlife may be wider

So the criticism of the Bio-diversity Law Reform is Questioned by the NSW UPPER HOUSE MP.

The FLOODS in the Napean River area, have “delayed the investigation period” as some dwellings may need to “MOVE TO HIGHER GROUND “.

This may be a CLIMATE CHANGE issue that has FLOODING in Western NSW and South Australia.

SUB-3671

Ian Hill

steamnsurf@yahoo.com.au

I oppose the Gilead Stage 2 proposal as detailed in my attached submission.

The Lend Lease Gilead proposal is fraught with unacceptable concerns across a range of significant areas. Mere extension of Sydney urbanisation along transport corridors as an ongoing proposition has many concerns as a policy. In the Campbelltown Appin precinct at Gilead this will bring increase the mortality through road kills and decrease the range of the already endangered Koalas to the area. It will similarly adversely impact the native fauna and introduce pest species and non native animals specifically cats and dogs. Importantly there is no mention of faunal crossings on Appin Road but rather further amplification. The proposal will cause the removal and loss of 20.74% of the native flora including red flagged vegetation. Alarminglly no details are provided as to which vegetated zones are to be restored and how much for each vegetation type. No details are provided as to the restoration of Red flagged vegetation communities.

There is great concern for the loss of Shale Sandstone Transition Forest (SSTF) and Cumberland Plain Woodland (CPW) vegetation which have a conservation status in NSW of being Critically Endangered.

Further problems as outlined include weed infestations along asset protection zones and use of herbicides along riparian zones for weed suppression and the unsustainable rise in heat emissions from a further suburban road network. The traffic problems at Campbelltown and Appin point to a system being slowed by yet more traffic lights, intersections and 50km zones. The entire road system in the towns and major traffic arteries at present is currently beyond capacity.

For the reasons outlined the best step forward would be to determine the Gilead proposal by way of refusal.

GILEAD Stage 2 Submission

37 Station Road

Otford

NSW 2508

19-12-2022

Dear Sir,

I would like to thank the Department of Planning for the opportunity to comment on the Gilead Stage 2 Proposal.

I am concerned with a multitude of areas that this proposal will cause which I outline as follows.

Environmental concerns

The signature item of concern is Greater Sydney's only disease-free and growing koala population at a time when as of 20-05-2022 it was listed as endangered with the NSW government acknowledging the beloved furry marsupial is at risk of becoming extinct. The single most cause for species extinction has been habitat loss due to its destruction by human activities. Koalas were in large numbers over Sydney in the early 1900s including the Kurnell peninsular and have been losing habitat due to vegetation clearance from urbanisation and road kills.

In the last two decades the numbers of koalas is estimated to have fallen by 50 per cent according to the Chairperson of the NSW Threatened Species Scientific Committee Anne Kerle.

Concern arises from the promotion of two planning documents by the Department of Planning and Environment (DPE) since 2015 as justification for the overall process and land rezoning for urbanisation. These two documents are the Greater Macarthur Land Release Investigation and the Greater Macarthur 2040 have been prepared in advance of and ignorant of the detailed environmental information available in the ecological study which is Appendix C of the Gilead Stage 2 documentation.

The emerging concerns from this study is the future violation of clear Koala wildlife corridors by the imposition of urbanised sprawl and further eradication of red flagged native vegetation communities with no details as to their replacement other than by offsets.

As noted in the Executive Summary of the Gilead Planning Report on page vii (8/204), Lendlease Communities (Figtree Hill) Pty Ltd (Lendlease) significant landholding at Gilead, specifically Lot 2 in DP 1218887, Lot 2 in DP 249393, Lot 2 in DP 603674, Lot 1 in DP 603675 and part of Lot 5 in DP 1240836. This land is located within the Greater Macarthur Growth Area under State Environmental Planning Policy (Precincts – Western Parkland City) 2021 (WPC SEPP) and has been identified as being capable of urban development by the Department of Planning and Environment (DPE) since 2015 as part of the Greater Macarthur Land Release Investigation with the overall structure plan

refined over time through the adoption of the Greater Macarthur 2040: An Interim Plan (Greater Macarthur 2040).

Also, on page 56 of the Gilead Planning Report it is stated that the Greater Macarthur 2040 establishes Government's position of suitability of development within the Greater Macarthur for a range of environmental effects such as loss of agricultural, air quality and extractive industries etc.

The current proposal has the benefit of fresh information in the form of the ecological study which is Appendix C - 221115-Ecology-ELA-R07-GileadStage2-BCAR dated 15-11-2022 which introduces key concerns and red flags which the previous two planning documents would not have been able to access. This exposes the lack of appropriate care and knowledge of the impacts the two planning documents will cause.

Koala Impacts

The impacts on Koalas from this proposal stem from the loss of broad area wildlife corridors. Reference is made to Appendix C page 12 which is a mapping repeated below. Three maps in Appendix C illustrate where the Koalas area found and their wildlife corridors.

Understanding the areas of habitation by Koalas begins with the first map showing the vegetation types. Following this comes the map of Koala habitat and movement corridors through and finally the map showing Koala records and habitat. The correspondence is immediate. In areas with high vegetation cover the Koalas are found to frequent and where a possible corridor via a linkage of trees exists the Koalas use for migration. The three mapped Koala corridors in the second map reinforce this concept. As is shown below.

Biometric Vegetation Types



Legend

- Biodiversity Certification Assessment Area Stage 2
- Mt Gilead Stage 1

Biometric Vegetation Type

- HN526: Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats
- HN528: Grey Box - Forest Red Gum grassy woodland on flats
- HN529: Grey Box - Forest Red Gum grassy woodland on shale

- HN538: Grey Myrtle dry rainforest
- HN556: Narrow-leaved Ironbark - Broad-leaved Ironbark - Grey Gum open forest
- Track
- Dam
- Cleared

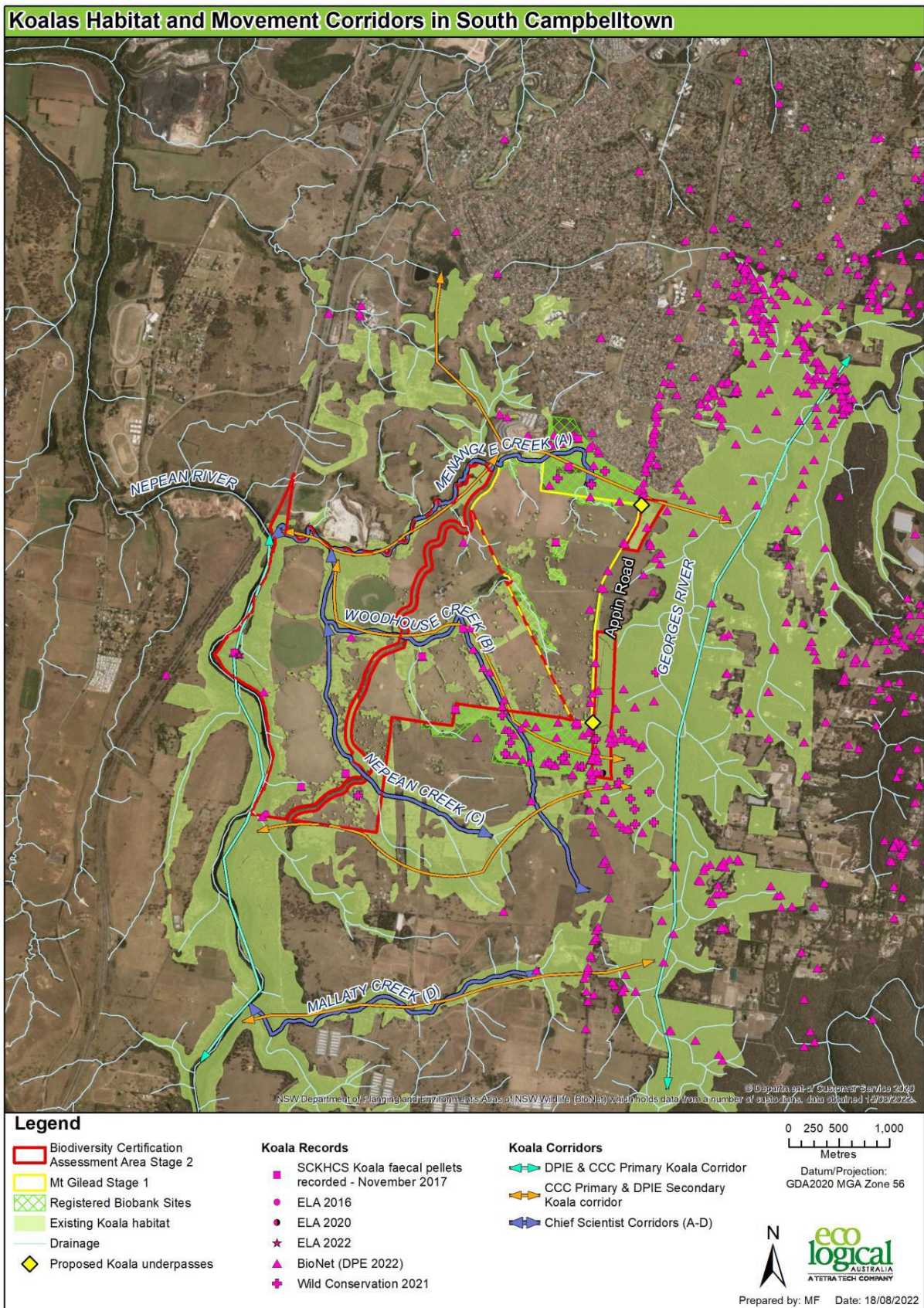
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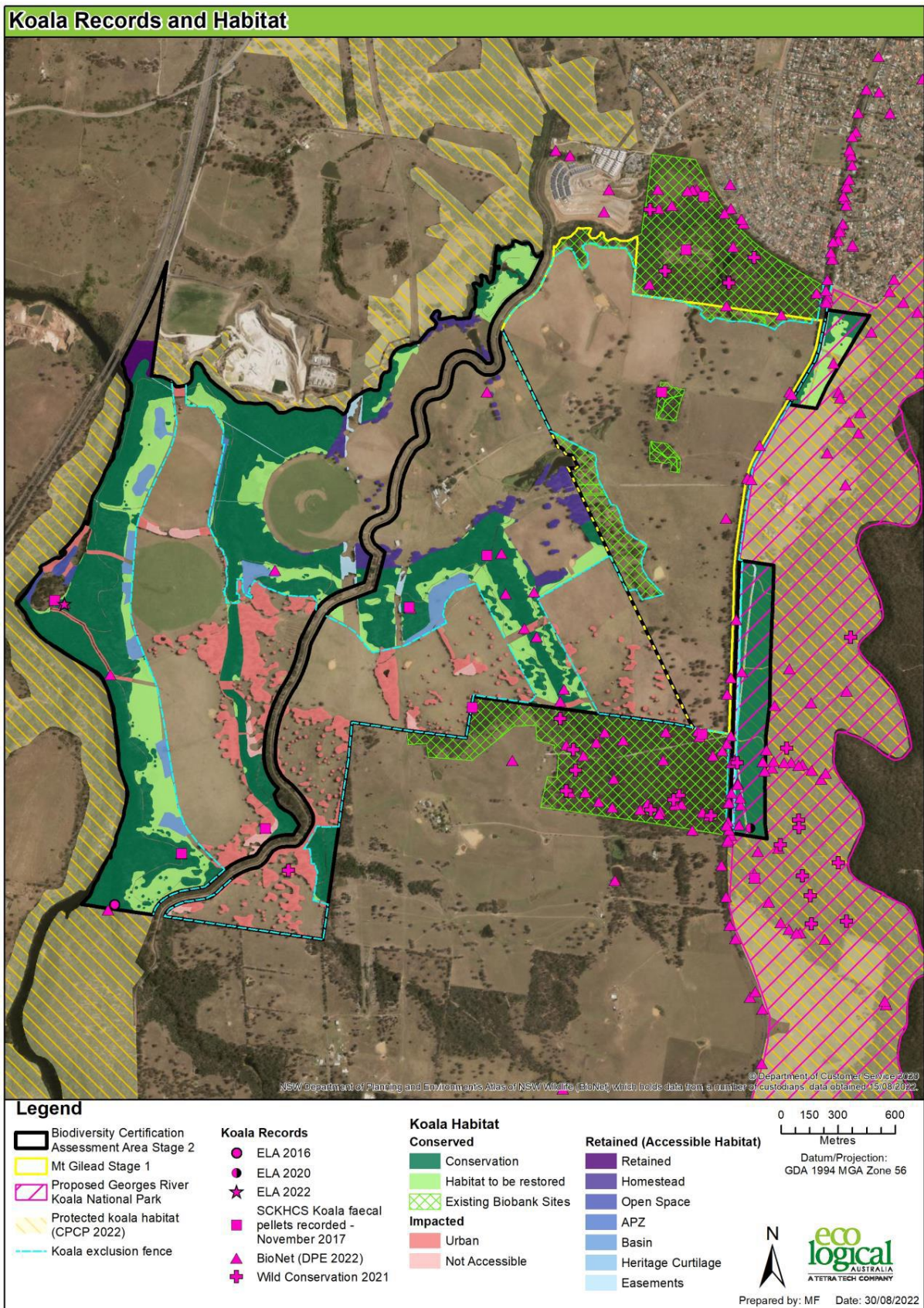
Datum/Projection:
GDA2020 MGA Zone 56



eco
logical
AUSTRALIA
A TETRA TECH COMPANY

Prepared by: MF Date: 15/08/2022





Clearly the more the appropriate natural vegetation the greater the State has of supporting a healthy Koala corridor.

The eradication of natural vegetation across the Biodiversity Certification Assessment area for in part “Lands proposed for biodiversity certification” where such vegetation is to be removed for housing and its loss traded for credits will jeopardise the future of the Koala population.

The introduction of urban sprawl providing accommodation for approximately **3,300** residential lots will necessitate an array of hard surfaced tarred roads and neighbourhoods colonised by dogs will form no go areas for Koalas over a landscape which as farmland is at least an option for Koala movements. The large numbers of people will introduce large numbers of cars and most likely 6,600 which as is planned will require 4 lane highway along Appin Road causing increased numbers of Koala road kills. There is no planning for a raised road way or extensive faunal crossing along Appin Road or other road arteries in this proposal.

Other Native Fauna

The concerns expressed above hold for the Squirrel Glider and Cumberland Plain Land Snail recorded in the survey for Mt Gilead Stage 2. Six species of threatened microchiropteran bats recorded. There seems to have been insufficient study time to record Eastern Grey Kangaroos and native snakes and lizards.

Six species of threatened microchiropteran bats were recorded and the loss of native vegetation proposed will lessen their available habitat over the greater area. Confining them to the proposed conservation zones will increase predation and lessen the habitat range.

Native vegetation

On page 2 of the Executive Summary in this document it is stated that

“The application proposes to directly impact 268.72 ha of the assessment area of which **53.50 ha** is mapped as **native vegetation** and threatened species habitat in various condition states, and includes **4.42** ha of a Shale Sandstone Transition Forest (SSTF) and **7.75** ha of Cumberland Plain Woodland (CPW) Shale Plains Woodlands (SPW) in ‘moderate to good’ biometric condition, 2.23 ha of vegetation within riparian buffers, and 2 individuals of the endangered plant *Pomaderris brunnea*, which are categorised as ‘**red flag areas**’ or ‘*area of high biodiversity conservation value*’ by the BCAM.”

It is important to note that both Shale Sandstone Transition Forest (SSTF) and Cumberland Plain Woodland (CPW) have a conservation status in NSW of being Critically Endangered. Amongst the threats listed to these communities are

- Threat of further clearing for urban or rural development, and the subsequent impacts from fragmentation including increased roadkill of fauna.
- Urban heat island effect and persistent dry/low rainfall conditions.

The red flag areas concerned features four communities all in Moderate to Good condition detailed on pages 60 and 61 of Appendix C and they are

Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion over an area quoted as being 29.51 and a site score of 39 where values greater than 34 are red flagged.

Narrow-leaved Ironbark - Broad-leaved Ironbark - Grey Gum open forest of the edges of the Cumberland Plain, Sydney Basin Bioregion over an area of 104.38 with a score of 83

Narrow-leaved Ironbark - Broad-leaved Ironbark - Grey Gum open forest of the edges of the Cumberland Plain, Sydney Basin Bioregion describes as Thinned/Shrubby over an area of 10.16 with a score of 41

Narrow-leaved Ironbark - Broad-leaved Ironbark - Grey Gum open forest of the edges of the Cumberland Plain, Sydney Basin Bioregion over an area of 5.05 with a score of 35

The authors failed to prescribe the units of area for this table. It is presumed to be hectares.

On page 69 of Appendix C it appears that an area totalling 5.70 ha of Red flagged vegetation is to be cleared. This is unacceptable.

On page 73 of Appendix C it is stated that:-

The land subject to conservation measures (post-biodiversity certification) is 225.76 ha, of which 176.91 ha is currently vegetated land, with 47.72 ha to be restored.

Alarming no details are provided as to which vegetated zones are to be restored and how much for each. No details are provided as to the restoration of Red flagged vegetation communities.

The Lendlease Draft Structure Plan for the Site shows the red flagged areas obliterated and an insufficient width to the Koala corridor identified by the Chief Scientist as is shown below.

On page 64 of the Appendix C it is admitted that a loss of 20.74% of the native flora will occur due to the proposal.

Efforts should be being made by Government to arrest the destruction of such communities for more residential development.

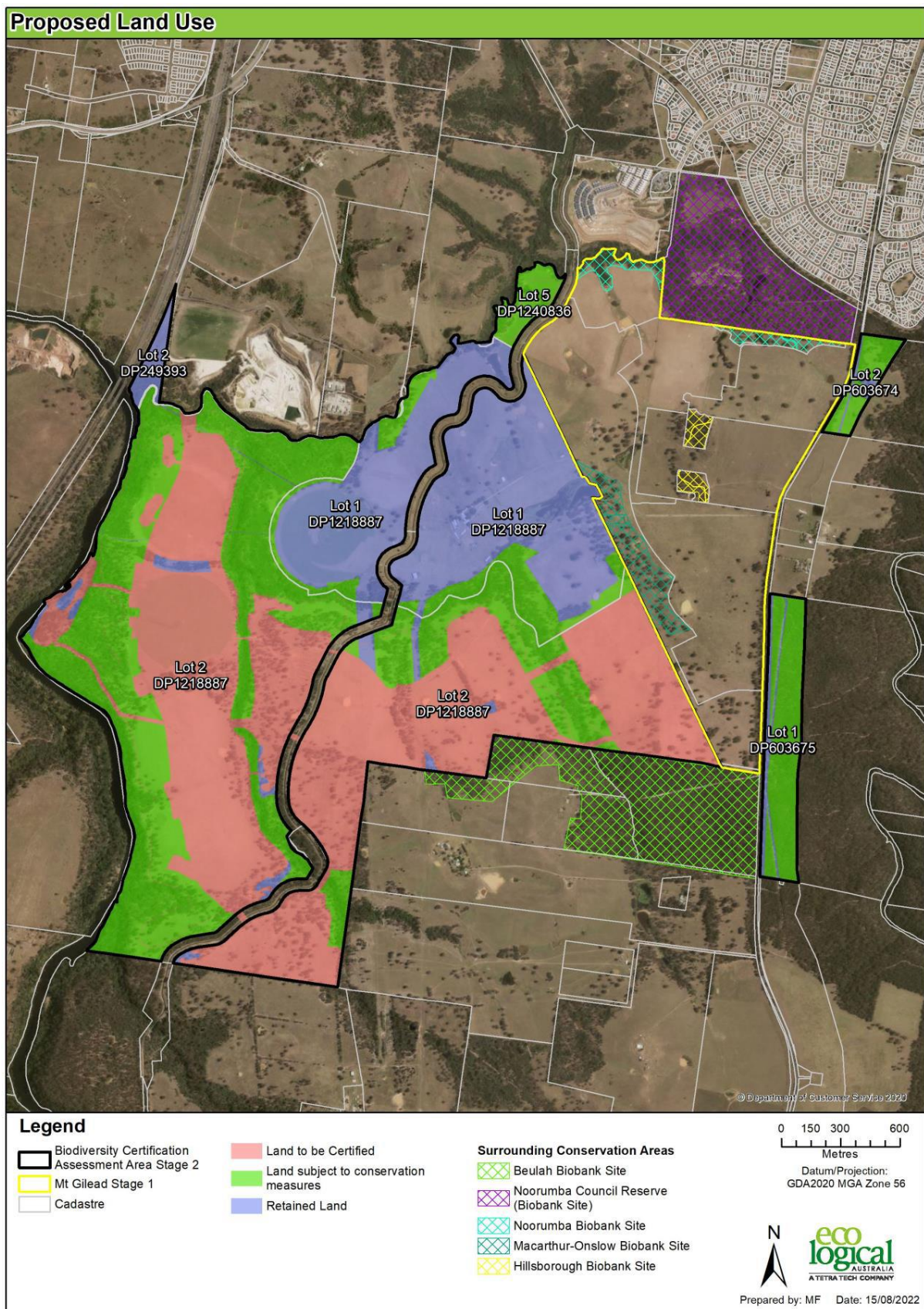


Figure 5: Mt Gilead Biodiversity Certification Assessment proposed land use Page 14 Appendix C



Figure 1-1 Schematic showing layout of the area proposed for rezoning (Gilead) Source: Urbis 2022

Riparian Plan Gilead – rezoning phase page 15

This map shows large urban areas where the following mapping which shows the critically endangered Shale Sandstone Transition Forest (SSTF) illustrates the partial spread of this community across the proposed urban areas. Cumberland Plain Woodland (CPW) is shown in strength east of the Upper Canal as a large patch of purple in the centre of the plan and in the proposed housing area east of Wood house Creek yet all this current critically endangered vegetation is proposed to be removed. The scattering of these communities across the areas cleared for farmland shows their potential for reforestation if given the chance.

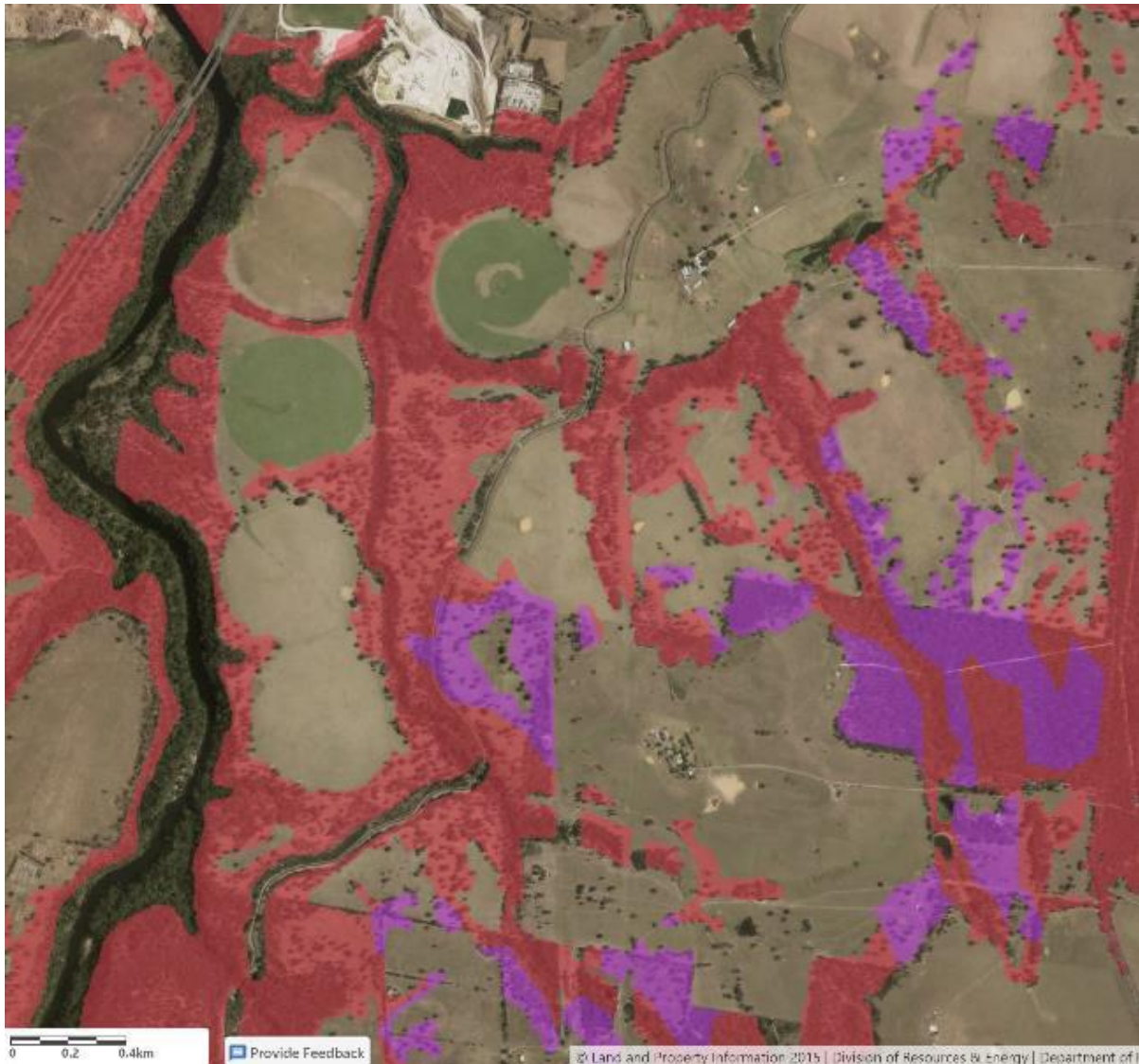


Figure 2-4. Map Critically Endangered Ecological Communities onsite. Source: SEED portal data June 2022.

Riparian Plan Gilead – rezoning phase Page 24

The Nepean Creek Wildlife corridor is unacceptably small in width. The area proposed for housing will have an unacceptable impact on the native fauna and flora.

The fauna Little Eagle, Swift Parrot, Powerful Owl, Koala, Grey-headed Flying Fox, and some migratory species listed under the EPBC Act were identified as having potential to occur in the Stage 1 BCAA given the presence of suitable habitat.

In the light of the above the area proposed for housing should be revegetated with the appropriate vegetation communities which have been removed for grazing. The housing should be refused.

Efforts should be made to create large faunal crossings for Koalas under Appin Road. These crossings should also be beneficial to native reptiles, echidna and wombats.

The IUCN is encouraging countries to head for the 30 by 30. Restorative activities in the ecosystems is required and the whole Lend lease project would be a good area to begin minus the urbanisation.

Areas of concern over urbanisation

Introduced Fauna

Urban lands enable a range of pest and introduced bird species to flourish ranging from starlings and Indian Mynas to Sparrows. Residents will introduce dogs and cats. There will be unwelcome impacts including dog walking into areas now free of them. Dogs leave scents which cause native animals such as wallabies to stay clear and thereby be excluded. None of the planning documents deal with this.

Weed Infestations

Weed Infestations along asset protection zones.

An unavoidable impact will be the spread of weeds. The following mapping shows the large perimeters which will be fertile lands for weeds. Any location over the back fence will be subject to invasion. This will include croftan weed, scotch thistle, lantana camara, cotton weed, purple top and paddy's lucerne.

There is no planning proposed to limit this. The ecologists seem to be unaware of this along with the planners. Spraying chemicals to limit the weeds will enter the riparian corridors with adverse impacts.

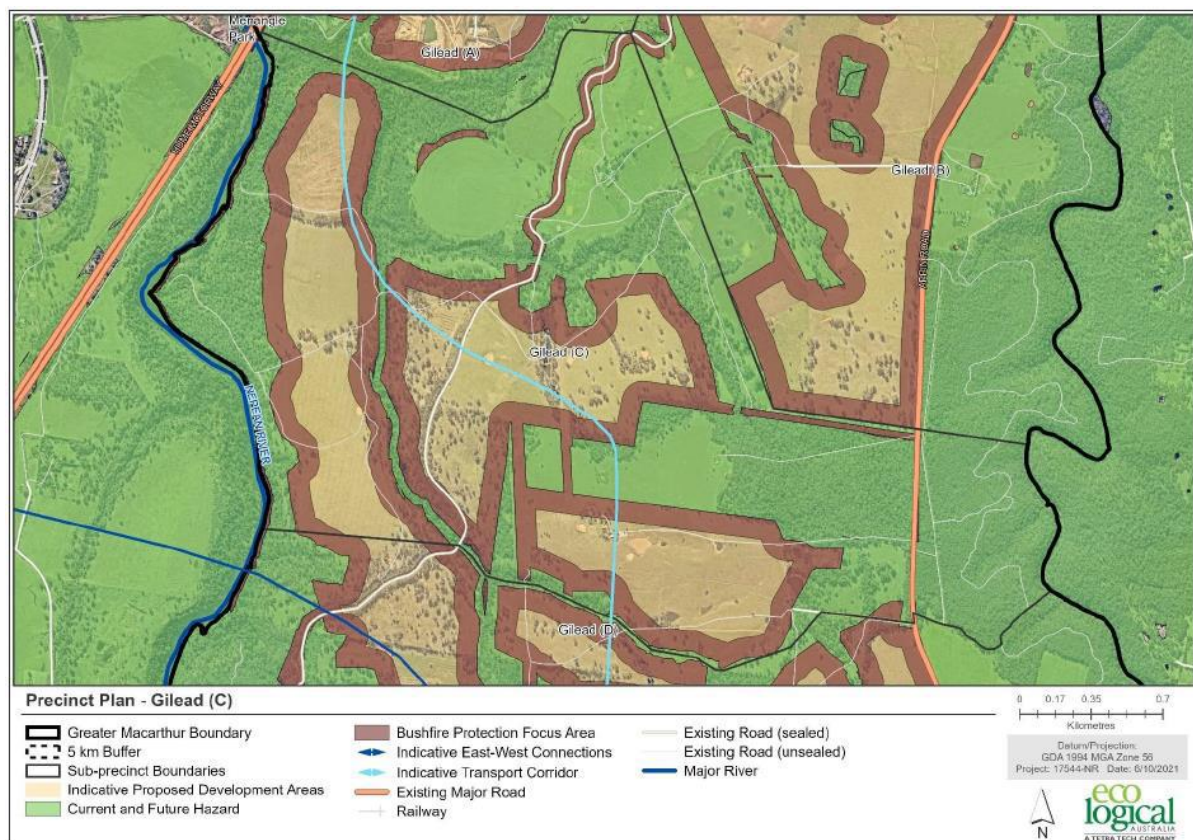


Figure 06: Precinct Plan – Gilead (C) and (D) – Strategic Bushfire Study Greater Macarthur Growth

Heat Island Impacts

The introduction of a maze of dark coloured tarred streets will increase the heat emissions from the proposed urbanised area compared to the current paddocks. Summer Temperatures have reached above 48 degrees and no amount of sustainable roofs or appropriately coloured houses will be able to arrest or counter this unwanted heat emission.

Traffic

The content available concerning traffic studies in the reports is vastly insufficient and bears no testimony to the current hiatus of the road system from Appin to Campbelltown and the chronic inadequacies of the street system of Campbelltown and Macarthur Square to cater for the volumes of traffic requiring their use. The road system in the towns and major arteries is currently beyond capacity. In peak times the system is a car park.

Vast amounts of traffic use Appin Road to head for Wollongong of a morning Monday to Friday as well as weekends for trips to the south coast beaches. Traffic jams begin at Oxley Street and Bradbury Oval and progressively build at 500m intervals with all the flat junctions from there to Rosemeadow. They all have traffic lights which impede progress and waste fuel and include Therry Road, St Johns Road, Woodland Road, Kellerman Drive and Fitzgibbon lane and then a narrow two lane road to the roundabout at southern end of Kellerman Drive. The suburbs Ambarvale, Bradbury Rosemeadow and St Helens Park all contribute vehicles to others from Campbelltown and beyond.

Southwards to Appin the traffic jams begin at all the new roundabouts Armstrong Road, Rixon Road and the traffic lights in Appin at Market Street. Vehicles travelling at 80km along Appin Road soon compress into traffic jams upon reaching the 50km zones of Appin. At times the jams are parking lots. Cement trucks from Baines Concrete, quarry trucks and occasional coal trucks and other heavy vehicles add danger at times and on other occasions slow the system.

Of an evening much of the traffic heads north from Appin to Campbelltown. Traffic to and from Narellan faces the same problems.

The concern with the proposed Lend Lease development is that 3300 homes will be home to 3.2 cars per house or as many as 5 cars for families with teenagers or 4 cars and a boat or caravan. This will yield some 10560 to 16500 vehicles many of which will enter the Appin Road system.

The addition of the Lendlease Gilead suburb will add to the incapacity to the extent that it is not advisable to go ahead with the development. Amplification to four lanes along Appin Road will cause loss of significant tree cover and exacerbate the congestion through the two lane suburb of Appin. More vehicles will lead to more traffic lights and 50 km areas with more road kills.

Planning system

These documents presented reveal a lack of public consultation from the Department of Planning preparation of the Greater Macarthur Land Release investigation and Greater Macarthur 2040.

Clearly in depth environmental studies should have preceded these plans and earlier public communication of the ramifications of these reports as they are emerging as wrecking balls to the precious environmental fauna and flora and existing communities and traffic systems and a threat to the significant chlamydia free Koala population of the area.

Conclusion

The Lend Lease Gilead proposal is fraught with unacceptable concerns across a range of significant areas. Mere extension of Sydney urbanisation along transport corridors as an ongoing proposition has many concerns as a policy. In the Campbelltown Appin precinct at Gilead this will bring increase the mortality through road kills and decrease the range of the already endangered Koalas to the area. It will similarly adversely impact the native fauna and introduce pest species and non native animals specifically cats and dogs. Importantly there is no mention of faunal crossings on Appin Road but rather further amplification. The proposal will cause the removal and loss of 20.74% of the native flora including red flagged vegetation. Alarming no details are provided as to which vegetated zones are to be restored and how much for each vegetation type. No details are provided as to the restoration of Red flagged vegetation communities.

There is great concern for the loss of Shale Sandstone Transition Forest (SSTF) and Cumberland Plain Woodland (CPW) vegetation which have a conservation status in NSW of being Critically Endangered.

Further problems as outlined include weed infestations along asset protection zones and use of herbicides along riparian zones for weed suppression and the unsustainable rise in heat emissions from a further suburban road network. The traffic problems at Campbelltown and Appin point to a system being slowed by yet more traffic lights, intersections and 50km zones. The entire road system in the towns and major traffic arteries at present is currently beyond capacity.

For the reasons outlined the best step forward would be to determine the Gilead proposal by way of refusal.

Yours Sincerely

Ian Hill

SUB-3672

Rachel Buchan

rachelbuchan@hotmail.com

I am very concerned about the proposed Gilead stage 2 development. The Federal Government has made a commitment to ensure extinctions are avoided, but this development will destroy the habitat of one of the last healthy koala colonies in NSW. After all the fires and stresses upon this species, there are very few intact areas of koala habitat in NSW. It is vital that there be independent scientific evidence about the impact this development will have. The burden of proof rests with Lendlease to prove there will be no adverse effects of this development. Unfortunately, this self-accounting by the vested interest is doomed to fail in favour of the developer and disadvantage of the koala. Currently there is a lack of transparency about this impact such as a lack of koala corridor maps with dimensions to ensure they are adequate and fit for purpose. With any urban expansion additional stresses are introduced with increased traffic and pets that will adversely affect the colony. Before this development goes ahead there needs to be a full public investigation and consultation into the effects on the local biodiversity. Habitat destruction cannot be replaced by planting trees which take decades if not centuries to reach maturity. It needs to be demonstrated that there will be no net loss of territory or quality habitat for the koalas. Lend lease need to demonstrate that its koala protection infrastructure will be maintained under the strongest legal mechanism available. It is useless to have conditions if they are not enforceable by law, penalties and reparation. The NSW government should not approve any development that relies on credits to offset negative impacts on koalas. Try and tell the koalas this is a fair deal as their habitat is fragmented. With so much koala habitat being logged by NSW forestry commission it is vital that no further stresses be added to preserving this iconic species and all the other less 'sexy' species in this habitat. In line with the Federal government's commitment to halt extinctions, please say no to this application. Lend lease need to put forward a public and transparent plan that provides enforceable and sufficient corridors and habitat retention and protection before this development should be considered. There is too much at stake if this is inadequate. Extinction is forever.

SUB-3673

Saul Deane

saul.deane@tec.org.au

19th December 2022,

Dear Minister for Planning and Homes Anthony Roberts,

RE: Submission and Objection to Lendlease's Planning Proposal to rezone Gilead Stage 2 from rural to residential (urban development zone) to develop a 876-hectare site on the Koala habitat corridors of South West Sydney.

The Importance of Koala Corridors: As of this 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 planning proposal is located. Putting aside the ecological significance of this colony to the state, 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. Koala protection therefore must be the priority if you are building within the Koala habitat corridors of Macarthur. Only a strict adherence to the Chief Scientist's 3 reports can ensure their survival, if these can't be met, this rezoning must be abandoned. People can live anywhere in the Sydney basin, Koalas cannot.

The Process of Approval: The Minister's decision to simultaneously fast track the approval process for both Lendlease's Gilead Stage 2 (826 Ha), and Walker's Appin (part) Precinct (1,284 Ha) the largest incursion into Macarthur by determining them as state significant development undermines their Koala protection. It speeds up a process that is critical for Koalas and removes Council oversight leaving approval solely at the Ministers discretion. This process undermines oversight and thus Koala protection, as seen in DPE's previous approval of Lendlease's Gilead Stage 1 which was approved without any functional Koala corridors, despite them being flagged in the Campbelltown Koala Plan of Management, and it was only through the Council's Local Planning Panels intervention, that Koala corridors were re-established. Will the DPE act in Koala interests this time ?

The Criteria : Within the Chief Scientists recommendations we can identify three criteria necessary for Koalas to survive in any developed landscape: large corridor widths, multiple corridors and well protected corridors. This proposal fails all three criteria.

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. This Lendlease plan puts aside some land for conservation along all these corridors. If corridors A, B are functional the Chief

Scientist believes C might not be essential. Their functionality largely depends on their width and contiguity. Unfortunately as we can see later, the width and contiguity of Corridors A and B at the confluence to the Nepean River is heavily compromised thus alternative connections to the Nepean River must also be found, the Campbelltown Koala Plan of Management identified these other connections to the Nepean River within Stage 2.

2. Koala Corridor Widths: Koala corridor widths and their contiguity are the single most important criteria as to their functionality. This planning proposal 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. This time the department has commissioned a Biosis report referred to in the Cumberland Plain Conservation Plan, but it again shows no corridor widths for Lendlease's Stage 2, though the Gilead Stage 2 Planning Proposal - Koala Corridors says Lendlease will be assessed by the Chief Scientist guidelines for Stage 2. So how is this assessment achieved against the chief scientists' report without dimensions ?

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 have also identified they rarely (if ever) have a minimum home range that was less than 400m wide.

The Menangle Creek Koala corridor confluence is blocked : Three Koala corridors rely on the confluence of Menangle Creek and the Nepean River. That is Corridor A (Menangle Creek), B (Woodhouse Creek), C (Nepean Creek). Yet this confluence would be less than 100m wide (on the Lendlease side), and in that exact point that is narrowest a bridge and a sewage treatment works (Enspire (2022) Gilead Infrastructure and Servicing Strategy Connors & Vella) is planned. And seen in this image from the Infrastructure and Services Gilead Urban Design Report (November 11th 2022) Urbis.

The vegetation to be removed at the confluence is shown in pink in the image adjacent, this will block the strategically important confluence effectively making all the other Koala corridors useless too. This in no way meets even the basic requirements of the Chief Scientist, not an average nor an absolute minimum.

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. Koala Protection Zones inadequate : Zoning, Ownership and Biobanking arrangements are all essential to get right to protect Koala corridors.

Zoning, with a C2 zoning (Conservation zoning) as proposed the Minister can put other activities in this zone, under C2 we can already see drainage basins, riversider reserves, sewage treatment works, and water reservoir infrastructure being allowed, and in fact educational projects could also be placed in these zones. These corridors need a stronger zoning protection of C1 instead. Already at the Menangle Creek corridor (A) near Noorumba (Condition 22A) Lendlease is proposing a C3 zoning so they can sell off this Koala corridor as residential lots.

Ownership is also important, as it currently remains with the developer, the pressure to change the zoning at a later date and possibly sell it off later remains, ownership needs to be invested with the Government or a Trust.

Biobanking and Red Flagged areas under this fast tracking process are not transparent at all, and do not appear to stop water reservoirs, etc being placed within in them. For example the Georges River Koala National Park area despite being red flagged, and biobanked has a water reservoir (Enspire (2022) Gilead Infrastructure and Servicing Strategy Connors & Vella) marked in it, there is no report to indicate the process that allows this to happen.

Voluntary Planning Agreements there appears to be planning agreements in this proposal but as we cant see them they too are impossible to assess.

This planning proposal does not fit the Chief Scientists recommendations and must be rejected, the corridors are too narrow along the Nepean River, the confluence of Menangle Creek and the Nepean River has been cut, and there appears to be little observance of the protection of Koala corridors. If you have any questions please do not hesitate to contact me on 9211 5022.

Yours sincerely

Saul Deane

Total Environment Centre.

Department of Planning and Environment (DPE)
PO Box 973, Parramatta CBD, NSW 2124
cc. gary.hinder@planning.nsw.gov.au

19th December 2022,

Dear Minister for Planning and Homes Anthony Roberts,

RE: Submission and Objection to [Lendlease's Planning Proposal to rezone Gilead Stage 2](#) from rural to residential (urban development zone) to develop a 876-hectare site on the Koala habitat corridors of South West Sydney.

The Importance of Koala Corridors: As of this 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 planning proposal is located. Putting aside the ecological significance of this colony to the state, 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. Koala protection therefore must be the priority if you are building within the Koala habitat corridors of Macarthur. Only a strict adherence to the [Chief Scientist's 3 reports](#) can ensure their survival, if these can't be met, this rezoning must be abandoned. People can live anywhere in the Sydney basin, Koalas cannot.

The Process of Approval: The Minister's decision to simultaneously [fast track the approval process](#) for both Lendlease's Gilead Stage 2 (826 Ha), and Walker's Appin (part) Precinct (1,284 Ha) the largest incursion into Macarthur by determining them as state significant development undermines their Koala protection. It speeds up a process that is critical for Koalas and removes Council oversight leaving approval solely at the Ministers discretion. This process undermines oversight and thus Koala protection, as seen in DPE's previous approval of Lendlease's Gilead Stage 1 which was approved without any functional Koala corridors, despite them being flagged in the Campbelltown Koala Plan of Management, and it was only through the Council's Local Planning Panels intervention, that Koala corridors were re-established. Will the DPE act in Koala interests this time ?

The Criteria : Within the Chief Scientists recommendations we can identify three criteria necessary for Koalas to survive in any developed landscape: large corridor widths, multiple corridors and well protected corridors. This proposal fails all three criteria.

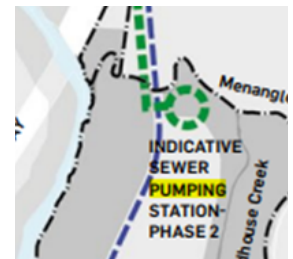
1. Koala Corridors numbers: There are 4 Koala corridors that pass through Gilead Stage 2, as identified by the Chief Scientist. Noorumba - Menangle Creek (A), Beulah - Woodhouse Creek (B), Nepean Creek (C), and the Nepean River. This Lendlease plan puts aside some land for conservation along all these corridors. If corridors A, B are functional the Chief Scientist believes C might not be essential. Their functionality largely depends on their width and contiguity. Unfortunately as we can see later, the width and contiguity of Corridors A and B at the confluence to the Nepean River is heavily compromised thus alternative connections to the Nepean River must also be found, the Campbelltown Koala Plan of Management identified these other connections to the Nepean River within Stage 2.

2. Koala Corridor Widths: Koala corridor widths and their contiguity are the single most important criteria as to their functionality. This planning proposal 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. This time the department has commissioned a [Biosis report](#) referred to in the [Cumberland Plain Conservation Plan](#), but it again shows no corridor widths for Lendlease's Stage 2, though the [Gilead Stage 2 Planning Proposal - Koala Corridors](#) says Lendlease will be assessed by the Chief Scientist guidelines for Stage 2. So how is this assessment achieved against the chief scientists' report without dimensions ?

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 have also identified they rarely (if ever) have a minimum home range that was less than 400m wide.

The Menangle Creek Koala corridor confluence is blocked : Three Koala corridors rely on the confluence of Menangle Creek and the Nepean River. That is Corridor A (Menangle Creek), B (Woodhouse Creek), C (Nepean Creek). Yet this confluence would be less than 100m wide (on the Lendlease side), and in that exact point that is narrowest a bridge and a sewage treatment works (Enspire (2022) *Gilead Infrastructure and Servicing Strategy* Connors & Vella) is planned. And seen in this image from the [Infrastructure and Services Gilead Urban Design Report \(November 11th 2022\)](#) Urbis.



The vegetation to be removed at the confluence is shown in pink in the image adjacent, this will block the strategically important confluence effectively making all the other Koala corridors useless too. This in no way meets even the basic requirements of the Chief Scientist, not an average nor an absolute minimum.



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.

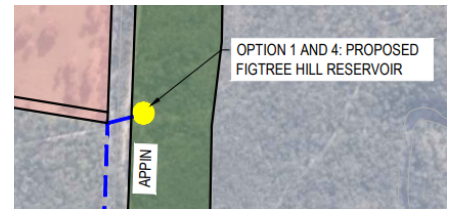


3. Koala Protection Zones inadequate : Zoning, Ownership and Biobanking arrangements are all essential to get right to protect Koala corridors.

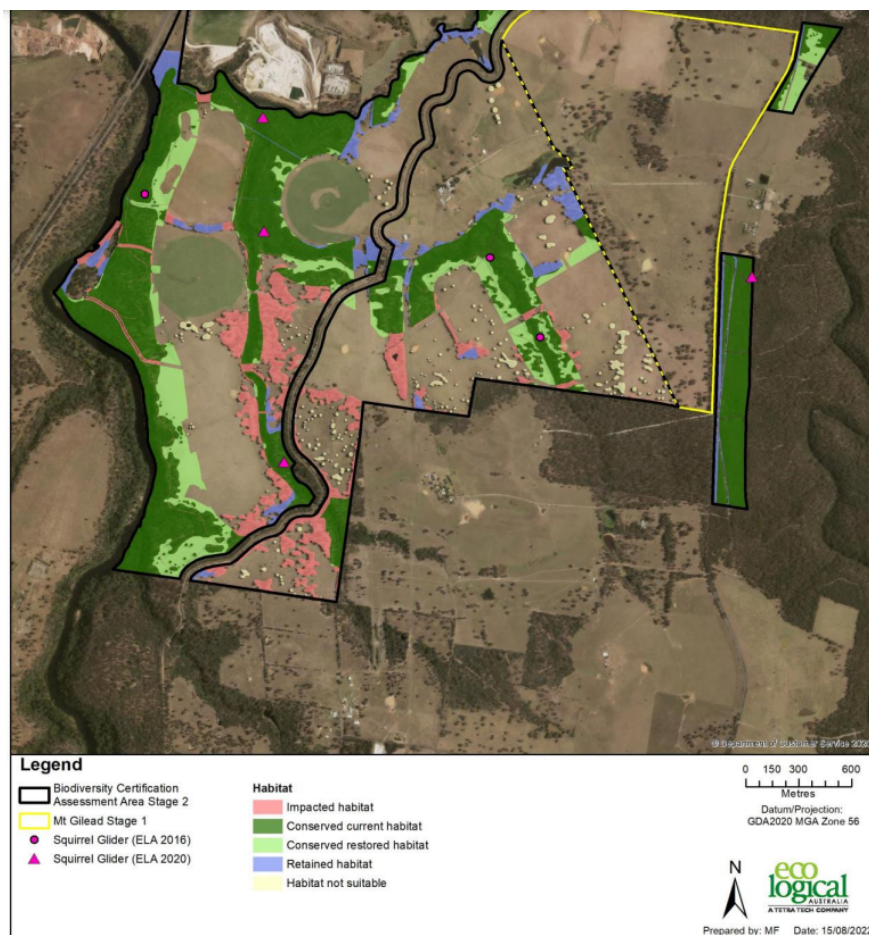
Zoning, with a C2 zoning (Conservation zoning) as proposed the Minister can put other activities in this zone, under C2 we can already see drainage basins, riverside reserves, sewage treatment works, and water reservoir infrastructure being allowed, and in fact educational projects could also be placed in these zones. These corridors need a stronger zoning protection of C1 instead. Already at the **Menangle Creek corridor (A) near Noorumba (Condition 22A) Lendlease is proposing a C3 zoning** so they can sell off this Koala corridor as residential lots.

Ownership is also important, as it currently remains with the developer, the pressure to change the zoning at a later date and possibly sell it off later remains, ownership needs to be invested with the Government or a Trust.

Biobanking and Red Flagged areas under this fast tracking process are not transparent at all, and do not appear to stop water reservoirs, etc being placed within in them. For example the **Georges River Koala National Park** area despite being red flagged, and biobanked has a water reservoir (Enspire (2022) *Gilead Infrastructure and Servicing Strategy* Connors & Vella) marked in it, there is no report to indicate the process that allows this to happen.



Voluntary Planning Agreements there appears to be planning agreements in this proposal but as we cant see them they too are impossible to assess.



This planning proposal does not fit the Chief Scientists recommendations and must be rejected, the corridors are too narrow along the Nepean River, the confluence of Menangle Creek and the Nepean River has been cut, and there appears to be little observance of the protection of Koala corridors. If you have any questions please do not hesitate to contact me on 9211 5022.


Yours sincerely

Saul Deane

Total Environment Centre.

Emailed submissions

Name Withheld



Subject: NO TO Gilead Stage 2 (Developer: Lendlease): 876-hectare site for up to 3,300 homes.
Date: Tuesday, 20 December 2022 12:29:22 PM

Dear Mr Hinder,

RE: Gilead Stage 2 (Developer: Lendlease): 876-hectare site for up to 3,300 homes.

This proposal fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

Without being able to see these dimensions the credibility and transparency of this process is undermined.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation.

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve “is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area.”

Koala corridors should be zoned C1 and the ownership and management of these corridors should not remain in the hands of the developers.

The Urbis document prepared for Lendlease shows “Indicative Stormwater Basin Location Stormwater in wildlife corridors” (Urban Design Report 2022:27). This is contrary to the advice of the Chief Scientist and the TAP. In the same document Urbis have located a “proposed Figtree Hill Reservoir” in the biobank area adjacent to Brown’s Bush which has also been identified as a future Koala Reserve.

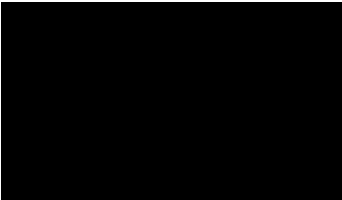
Even more worrying, Lendlease has an “Indicative Sewer Pumping Station” located at the north-west corner of the Site.

The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease’s insincerity to protect Koala Corridors.

The Koala is listed as a Threatened Species in Ecological documents not reflecting the Endangered Listing both in NSW and Federally, this oversight undermines credibility of the planning proposal.

The planning proposal fails to recognise and protect the rich biodiversity of Stage 2, according to one of the Ecological reports Stage 2 is home to 287 Threatened Species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and fails to protect their ecosystems.

Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala.



Emailed submission

Barry Durman – NPA NSW

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Macarthur Branch

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Stage 2 Rezoning of Mount Gilead.

We object to the proposal for the rezoning of this development.

The National Parks Association of NSW (NPA) is one of the state's peak environment groups and was established in 1957. NPA Macarthur Branch is the region's oldest established environment group, operating as a sub-branch of the Sydney Branch since 1975 and as a full branch since 1987. The Macarthur branch has been the instigator of the Dharawal National Park, Bargo-Nepean National Park, and the Upper Georges River National Park proposals.

In addressing the issue of rezoning for Mount Gilead we have been struck by the number of threatened species, both flora, and fauna, that are listed. This alone would make a very good basis for a National Park. The list includes but is not limited to: -

Biometric Vegetation types: -

Cumberland River Flat Forest
Cumberland Shale Plains Woodland
Cumberland Shale Hills Woodland
Cumberland Shale Sandstone Transition Forest

Flora Species

Pomaderris brunnea

Mollusc

Cumberland Plain Land Snail

Birds

Brown Treecreeper
Dusky Woodswallow
Glossy Black Cockatoo
Scarlet Robin (BioNet)
Powerful Owl (BioNet)
Square-tailed kite
Little Lorikeet
Varied Sittella (Biolink 2018).

Threatening Process

Loss of hollow-bearing trees

Mammals and Micro Bats

Phascolarctos cinereus (Koala)

Petaurus norfolcensis (Squirrel Glider)

Myotis macropus (Southern Myotis)

Miniopterus australis (Little Bentwing Bat)

Miniopterus schreibersii oceanensis (Eastern Bentwing Bat)

Mormopterus norfolkensis (Eastern Coastal Freetail Bat)

Falsistrellus tasmaniensis (Eastern False Pipistrelle)

Saccolaimus flaviventris (Yellow-bellied Sheath-tail Bat)

Scoteanax rueppellii (Greater Broad-nosed Bat)

Chalinolobus dwyeri (Large-eared Pied Bat)

Pteropus poliocephalus (Grey-Headed Flying Fox)

- The land in question falls between the Georges and Nepean Rivers, both classified as the primary habitat for koalas, yet based on the European and Aboriginal heritage alone there is more than enough reason to have this proposal refused and the land designated as a National Park. It is interesting to note that there are only 26 threatened species in the Royal National Park which is the same as Mount Gilead. This land has been used for farming since settlement and, as can be seen, by the number of threatened species that are still present and expanding, it is a testament to past and present farming practices of leaving paddock trees and shade clusters. This has been not only good for farming but also the distribution of wildlife. The question is, will they all be there in another 10 years as Councils will not be able to manage all the creeks from weed invasion? This can be seen by just looking at any creek that backs up against suburbia.

The Gateway map (Figure 1 Draft Structure Plan) and all others don't show the widths or size of the proposed corridors or open spaces so a clear and transparent assessment can't be made on how they relate to the Chief Scientist's Report. This is of great concern when we know that there have been so many reports done regarding this subject. We also note the non-listing of Appendix N: Gilead Koala Management Plan and Appendix O: Construction Environment Management Plan. We request that these plans be put on exhibition as a matter of urgency, giving the general public the chance to comment on them.

It would appear that the points raised by the Technical Assurance Panel (TAP) letter dated 21/09/2022 have not been included in these reports. If the TAP's recommendations were to be included, the layout would be different from that which is on exhibition.

Riverside Reserve and Koala Corridors

- A key objective of planning for the site was to understand its contribution to the Nepean River Koala Corridor in conjunction with finalising the Cumberland Plain Conservation Plan (CPCP). As agreed with the Department in late 2021, the site proposed for the Riverside Reserve is located within the Nepean Corridor and is required to meet the average corridor width of at least 390m. Progressing with the Riverside Reserve as proposed would require it to be omitted from the Nepean Koala Corridor which would then not meet the recommendations of the Chief Scientist. One option is to expand the corridor in other locations to compensate for the Riverside Reserve. Although this approach is possible, the Department does not support this because it would require resolution of consequential matters such as fencing and additional koala underpasses for access roads. Further, the proposed reserve would risk bringing urban threats through and into the Nepean corridor

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Zoning

In December 2019, the Hon. Matthew Kean MP, Minister for Energy and Environment, and the Hon. Rob Stokes MP, Minister for Planning and Public Spaces requested advice on the protection of the Campbelltown koala population. The Chief Scientist & Engineer (CSE) came back with 31 recommendations and included in these were directions for activities permitted in Koala Wildlife Corridors. This report and advice were only given for the protection and welfare of the koala population that is not only expanding but chlamydia free at the moment. **None of the other threatened species were taken into account**

At the time the CSE could have said that all Koala Wildlife Corridors must be E2, but instead, he listed what can and can't be within a Koala Wildlife Corridor. The Koala Wildlife Corridors of both Stages 1 & 2 must not be classified as C2 because doing so will be going against the recommendations of the CSE, allowing structures to be placed within the corridor or buffer zone. This downgrading of the CSE's recommended Koala Wildlife Corridors is clearly seen within the document "Urban Design Report" on page 65 (Figure 1). This show indicative stormwater basins throughout Stage 2 have mostly been placed into the Koala Wildlife Corridors, and some are alongside the Heritage Water Canal which we are sure will not be supported by Sydney Water as it will put at risk the Water Canal in times of flooding. The list of permitted uses within C2 lands as stated on the web is:- Environmental facilities, Environmental protection works, Flood mitigation works, Information and education facilities, and Roads. All of these works will require the removal of trees and bring light and noise into the Koala Wildlife Corridor.


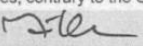
 Planning, Industry & Environment	
Review of the Lendlease Draft Gilead Koala Conservation Plan against the findings of the Chief Scientist	
Purpose	To advise of the outcomes of Environment Energy and Science's (EES) initial review of Lendlease's draft Gilead Koala Conservation Plan (Tab 1) against the findings of the Office of the Chief Scientist and Engineer (OCSE) on the protection of the Campbelltown koala population.
Analysis	EES's review (Tab 2) of Lendlease's latest draft (version 3) of the Koala Conservation Plan for its Mt Gilead Stage 2 (MGS2) proposal identifies several inconsistencies with the findings of the OCSE with respect to corridor widths, buffers and exclusion fencing. At a meeting on 3 November 2020, Lendlease was adamant the corridors in its koala plan were sufficiently wide but acknowledged that buffers included asset protection zones (APZs) and other uses, contrary to the OCSE's advice.
Signature/comment	 The Hon. Matt Kean MP Minister for Energy and Environment Date: 27.1.21 <i>I do not wish to sign off on Environmental APZs unless consistent with Chief Scientist dec's.</i>

Figure 1 letter sent to LendLease sign by Hon Matt Kean MP

This letter dated 27-1-21 from the then Minister of Energy and Environment, the Hon. Matt Kean MP shows that he was not signing off on the Lendlease Draft Gilead Koala Conservation Plan as it did not meet the OCSE findings. In Figure 1 and Figure 2 there is a list of the measures to improve koala protection and it states - **with an additional 30-meter buffer on either side of the corridor**

Background

The OCSE report recommended several measures to improve koala protection

You and the Minister for Planning and Public Spaces asked the OCSE to provide expert advice on how to protect the Campbelltown koala population. This included advice on the proposed conservation measures for the MGS2 biodiversity certification application submitted by Campbelltown City Council.

Key recommendations in the OCSE report for the MGS2 proposal include:

- habitat in the east-west corridors A and B, which fall within MGS2 (Tab 3), should be protected and widened to an average size of 390 to 425 metres, with an additional 30-metre-wide buffer on either side of the corridor
- koala exclusion fencing should be constructed between the buffer and urban areas to separate koalas from urban hazards
- if exclusion fencing is not possible because of steep terrain, a 60-metre buffer either side of the corridor containing only non-feed trees, and with monitoring to track predators, will be needed (Tab 4)
- buffers should not have a dual role as an APZ or for any other purpose.

The OCSE also recommended options to address koala connectivity on Appin Road including:

- the construction of an underpass near Beulah biobanking site (corridor B), noting that Lendlease provided the OCSE a conceptual drawing of a possible Appin Road underpass with the crossing emerging adjacent to (not within) the Beulah biobank site
- corridor A only be used if an effective connectivity structure for koalas can be constructed. If the crossing is not feasible, the koala habitat at Noorumba will not function as connected koala habitat and should be fenced off at Appin Road.

Figure 2 letter sent to LendLease with the measures needed sign by Hon Matt

This is what the Environment Minister and the Planning Minister wanted at the time as both **instigated this states buffers should not have a dual role as APZ or for any other purpose**. Since then the OCSE recommendation has been downplayed to suit this development, and we can see that this new zoning of C2 will only add to the downgrading of the OCSE report.

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- On the 2nd of November 2022, Mount Gilead Stage 2 was made a fast-track development which is the same as a state-significant development (SSD). Under an SSD, an EIS must have a declaration by a registered environmental assessment practitioner (REAP) unless transitional arrangements apply. Eco-logical has two qualified personnel, namely Rachel Murray and Andrew Butler,(From the Find a CEnvP Directory) yet we note that neither of these names appears to be on the documents that have been supplied by Eco-Logical. A registered environmental practitioner is a suitable experienced, qualified, and skilled environmental assessment practitioner who has been certified under an accredited scheme. These two accredited practitioners have not put their names to these documents, knowing that there are undoubtedly critically endangered species and vulnerable species within Stage 2 that have not been properly assessed within this process. Therefore, unless some transitional arrangements apply, a full EIS must be applied as stated in the REAP. Therefore we call upon the government to halt this process and insist that a full EIS be applied, giving assurance that no impact will occur to the flora and fauna that have been identified in Mount Gilead Stage 2.

Storm Water or Retention Basin

The report “Mt Gilead -Biodiversity Certification Assessment &BiocertificationStrategy” (MGBCABS) talks about Stormwater and Retention basins, but both have different uses. A detention basin/pond temporarily stores stormwater runoff. The basin is designed to manage stormwater runoff by storing it and releasing it gradually until completely drained. However, unlike a detention basin, **a retention basin or pond is designed to permanently hold water**. Figure 3 shows where the retention basins are but not where the STORMWATER BASIN is Located.

<https://info.wesslerengineering.com/blog/stormwater-basins-detention-retention-ponds>

On page 113 *These bio-detention basins are all located outside of the riparian buffers and within the urban footprint*. According to the layout in Figure 3 it can be seen that these basins are within the buffer zone and the Wildlife corridor.

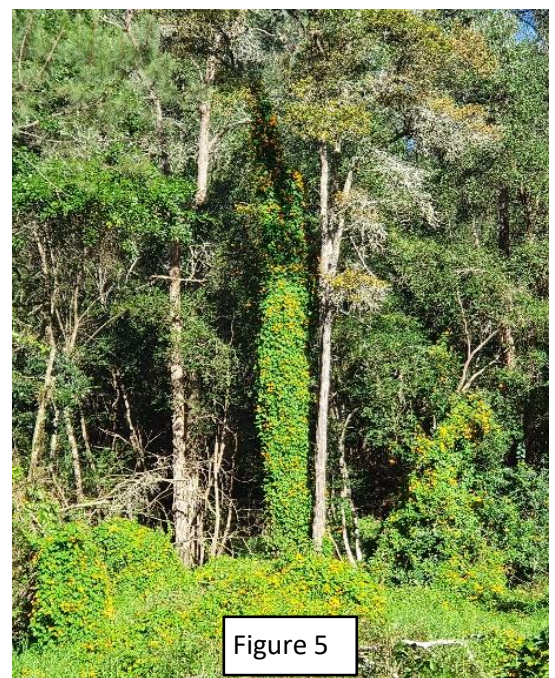
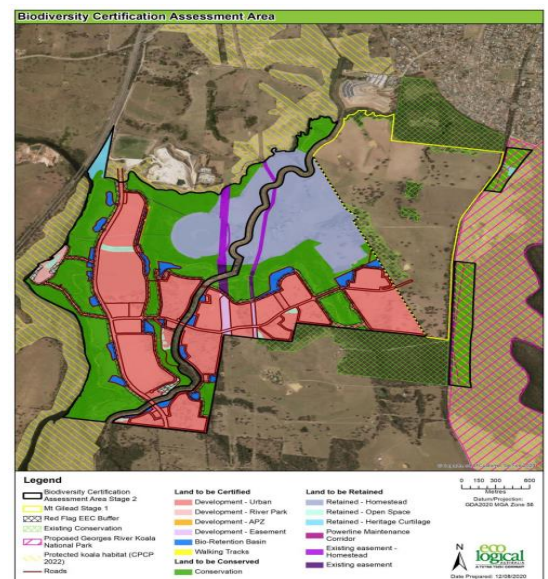


figure 4 & Figure 5 Typical stormwater basin at Smiths Creek Campbelltown put in some 20 years ago it is now surrounded by weeds. Figure 4 shows Black eye susan escaped from gardens into the creeks and taking over the native trees

Page 122 of the same report states *appropriate mitigation measures are put in place to minimise indirect impacts to threatened fauna including koalas, Squirrel gliders, and microbats.* Page 79 states - *making these basins will create a disturbance on vegetation outside of the works shown resulting in fragmentation of movement corridors. ... While impacts on vegetation outside those shown on plans will be minimal, there will be some disturbance associated with ancillary works, such as stormwater pipes discharging to streams and sewer mains crossing under vegetated areas. Wherever practicable they will be aligned with proposed or existing disturbances such as road crossings of corridors, existing easements, and cleared areas. Impacts outside of this are anticipated to affect less than 1-2% of the vegetated areas and will be re-vegetated. ... The detention basins will include appropriate plantings around the banks that will provide habitat for birds, frogs, and foraging/nesting resources for bats, birds, and arboreal mammals, including Koala.* This will provide a strong buffer area between the urban development interface and the proposed conservation areas. We would think that koalas will not be able to use these as it is stated on page 113 that all these structures are located within the urban footprint and away from the buffer zone where koala-proof fencing will be installed to keep wildlife within the wildlife corridors. So it's clear that the layout in Fig.3 is inconsistent with the text above and that it appears Figure 3 is not drawn correctly.

The steady decline of our native flora and fauna brings disgrace to Australia both here and overseas. This will only add to that disgrace.

The Save Sydney Koalas petition had over 21,000 signatures. All these people were asking the Government to do the right thing, and that was to protect our wildlife by rejecting this development, yet this government has made this a FAST TRACK DEVELOPMENT which sends a message that this is going to be done whatever the cost. As far as wildlife is concerned THE PRICE IS TOO HIGH.

The proposals to use roads as part of the regulatory required impact buffer around red flag conservation areas (p.78/91) and that roads be considered part of the 'conservation area' are both ludicrous - roads being one of the biggest impacts of the development. OEH condoned this approach for stage 1 which is a terrible precedent.

Sewer pumping stations

We note that on page 43 of the Urban Design Report (Figure 6) there are three indicative sewer pumping stations. All are within the Koala Wildlife Corridor which again is not permissible according to the CSE report. This has also been brought to the attention of Lendlease by the technical Assurance Panel (TAP) letter dated 21-9-2022 -*Sydney Water has advised that they are available to meet to continue discussing potable and wastewater servicing options. Sydney Water has noted that one of the options for potable water servicing (the Figtree Hill Reservoir) is not supported due to its location within a koala corridor. Sydney Water advises that wastewater options assessment will commence in late 2022 with a target date of a preferred servicing option in August 2023*

The proposed Figtree Hill Reservoir being placed within a proposed Biobank site is also not consistent with the CSE report. It would appear that all these development structures are being proposed outside of the urban area.

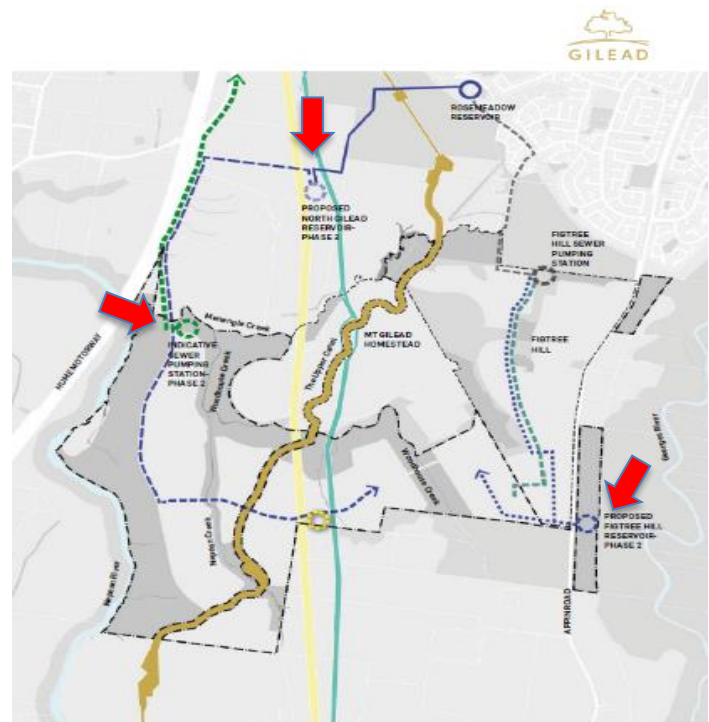


Figure 16 Infrastructure and Services

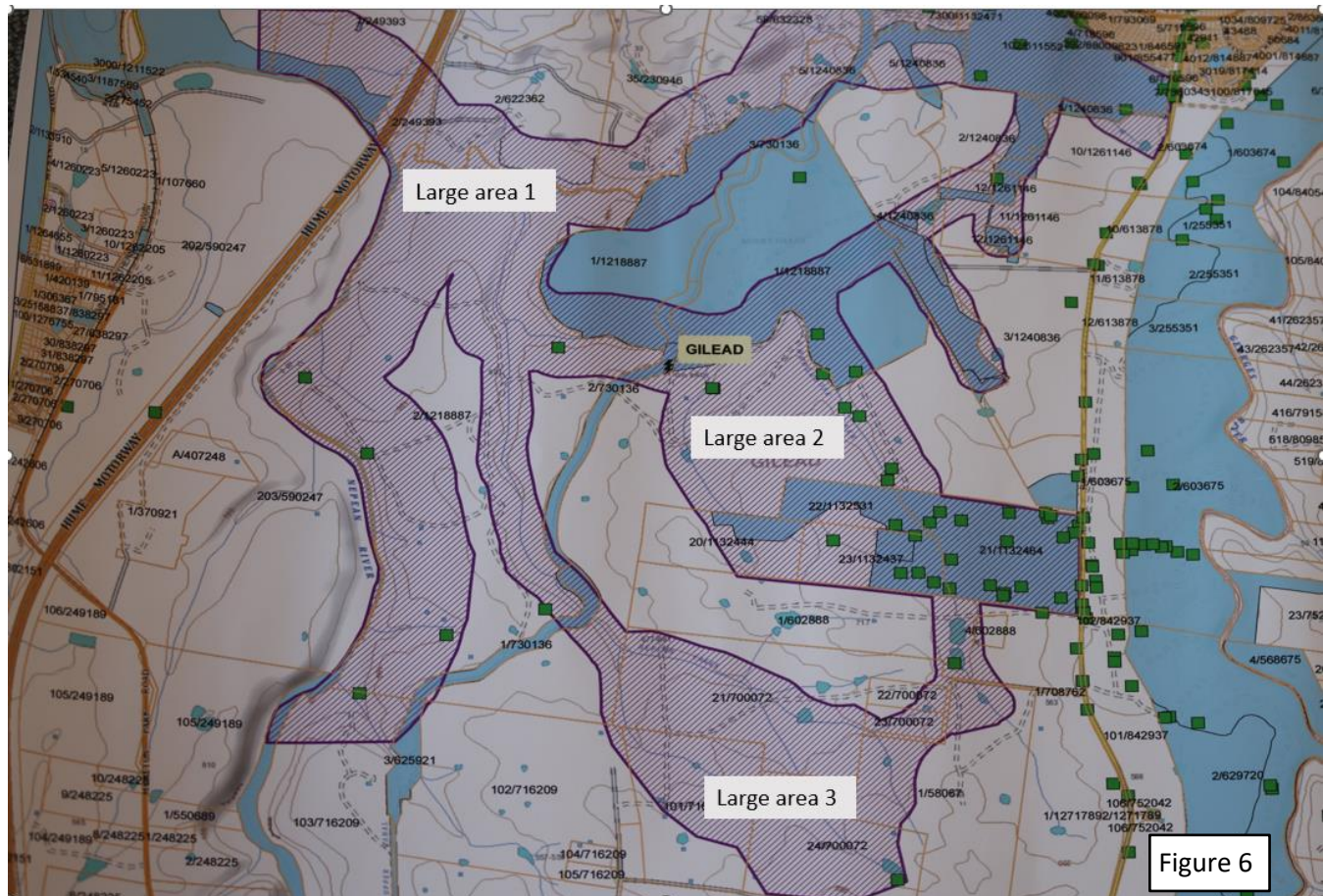
Figure 6 Sewer pumping stations

Koalas

- Assoc. Prof. Robert Close found the home range of female koalas to be between 10 to 52 hectares. This is the average home range for the Campbelltown population, yet other places can have 2 per hectare as the trees are much denser and taller, therefore providing koala food trees without them moving too far. We, therefore, have to provide enough space for movement and dispersal through the landscape and this can only be achieved if authorities recognise this. At the moment this is not happening.

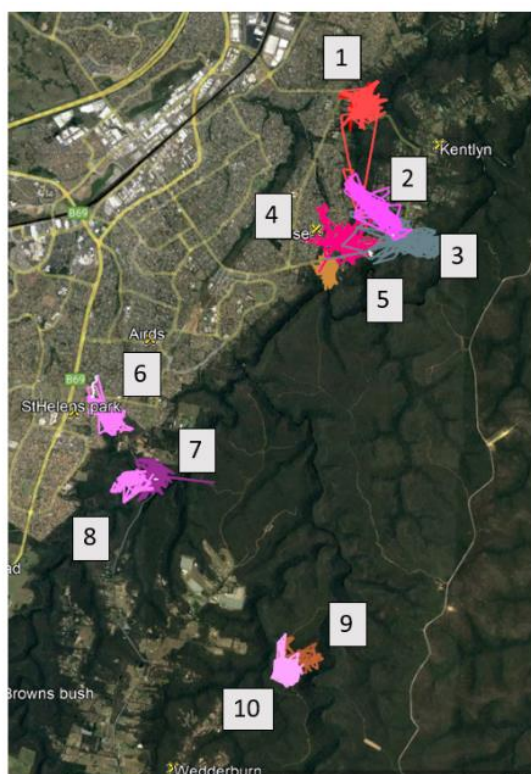
- Corridors form a conduit between koala home range hubs. The present layout does not produce female home ranges (koala hubs) which in turn can create territory fighting and likely result in a slow decline in the otherwise healthy koala population. Figure 7 shows that the Campbelltown koalas prefer to expand into the suburbs rather than become overcrowded in the land on the eastern side of the Georges River. Campbelltown Koala Research and Database shows that koalas have also created three hubs. Found within these hubs is plenty of room for female koalas to make home ranges, and for other koalas not to invade their territory, which is essential to the well-being and health of koalas

- The corridors that have been proposed in this development document cannot create these hubs where females can create a home range. It can be seen by this independently drawn map (Figure 8) that if 425 wide corridors were in place, koala hubs will be produced in three places. These hubs are essential, so that female koala can have enough area to create a home range.



- Assoc. Prof. Robert Close's report <https://campbelltownkoalaresearchanddatabase.com/> has all the information that was collected over the 27 years of research that it spans. Also on Google Earth, you can access the information about these 10 female koalas (Figure 9) and then measure the length and widths of each koala's range. The result is quite alarming regarding how much space is required. It can also be seen that they do not interact with other koala spaces; each one is a separate home range. The information that you can gather from Figure 9 can then be translated to the corridors proposed and you see that they are quite inadequate.

- This development does not come close to providing the space required to produce these hubs which are shown in Figure 7. If we are going to protect koalas then we must make sure the home ranges and corridors are protected. This can only be done if proper commitments are made to protect their needs. The present trend is going in the wrong direction and must be reversed if we are going to continually have a healthy expanding population.



Koalas Name	Length	Width	Colour	Years Tracked
1 Amanda	708	697	Red	12.7
2 Lyn	1193	620	Pink	11.7
3 June	1682	901	Grey	8.9
4 Charlotte	876	565	Magenta	5.5
5 Shirley	679	403	Orange	11.8
6 Courtney	562	334	Pink	9.0
7 Martine	636	517	Purple	13.3
8 Elle	590	401	Pink	12.11
9 Franchesca	880	486	Pink	11.5
10 Molly	604	555	Brown	11.9

Figure 7 Size of female koala home ranges in meters

- At the recent koala conference at Coffs Harbour, eminent consultants gave very disturbing reports on how science is showing that koala populations are on a downward trend. If we are going to change that trend, then radical commitment is needed not just by the public but by all levels of governments and developers. It may mean that places like this should not be developed as the cost to loss of biodiversity is too great.

- At the conference, Dr. Kara Youngentob demonstrated that koalas are very fussy when it comes to eating, and only like particular trees but even though they may be the right species of tree, individual trees vary in their palatability. Her study is just one of the many that have been looking at koalas over the last 30 - 40 years. As a result, we now know that koalas can't handle stress. A report *Physiological Stress in Rescued Wild Koalas Are Influenced by Habitat Demographics, Environmental Stressors, and Clinical Intervention* - Narayan E., Vanderneut T.(2019) confirms this. In its current layout, this development will add to that problem.

Squirrel Glider

- The assessment rules out 20 hectares of the best Squirrel Glider habitat in the central southern area (just north of Nepean Creek) and far east (near Appin Road). This habitat constitutes open woodland ('scattered trees') with no trees isolated by more than 35m. See the areas outlined in red attached Figure 10. Yet the NSW Scientific Committee listing of the Squirrel Glider August 2008 states - *The Squirrel Glider's habitat is severely fragmented, with severe population fragmentation in rural areas because of the Glider's limited dispersal ability, and hence the inability to recolonise.* Although listed as Vulnerable in NSW in 2008, since then all wildlife has suffered due to wildfires and the loss of habitat from development, logging, cats, and loss of hollow-bearing trees figure 11, the numbers are not known, but what is known that a decline in ringtail and brushtail possums may indicate a decline of the Squirrel Glider (Kerle 2004; Paull & Kerle 2004).

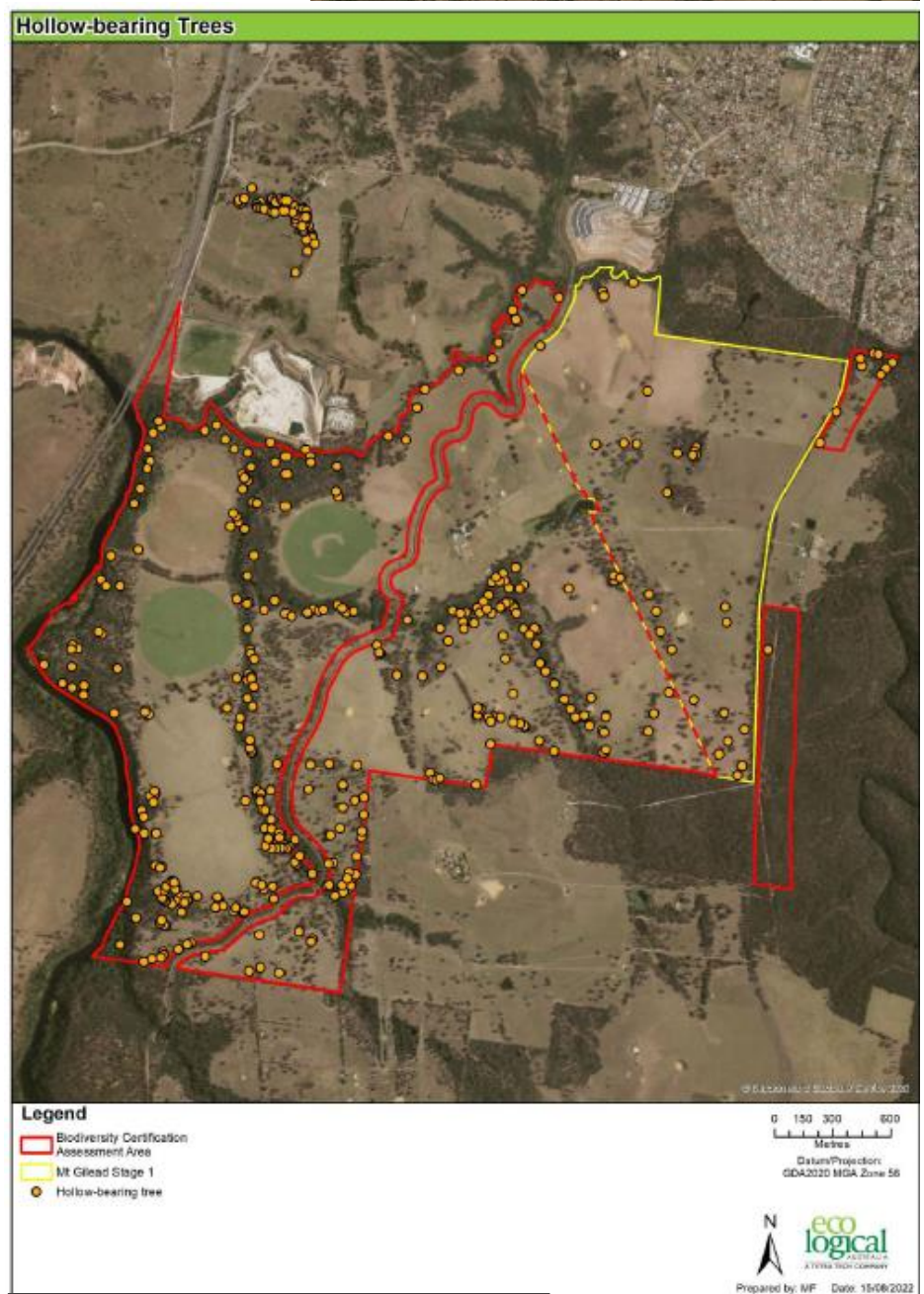
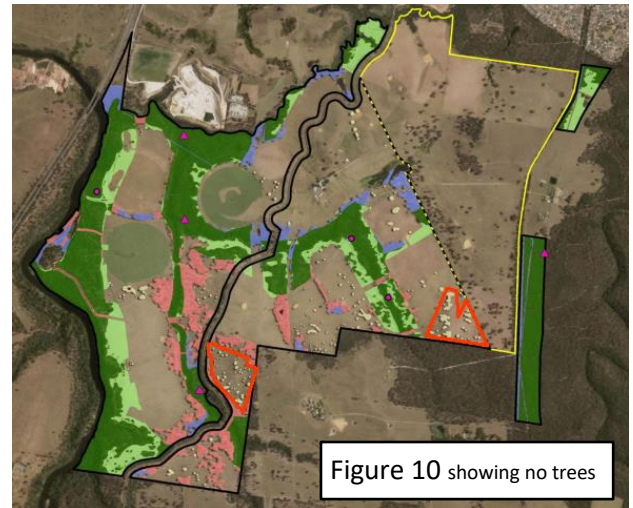


Figure 11 hollow-bearing trees that are prime habitat

The glider has a home range of between 3-4 ha, according to the NSW Scientific Committee listing, which converts to 195-252 meters in diameter (Sensors one Calculator). Figure 12 shows a circle 250 meters around the location identified from the Eco-Logical report. The circle represents the largest home range of 5 hectares, larger than as stated by the Scientific Committee listing. It can be seen that none of these home ranges interact with each other so it can therefore be assumed that 7 family units are present on this site which may be of the same population that is dispersing through the landscape.

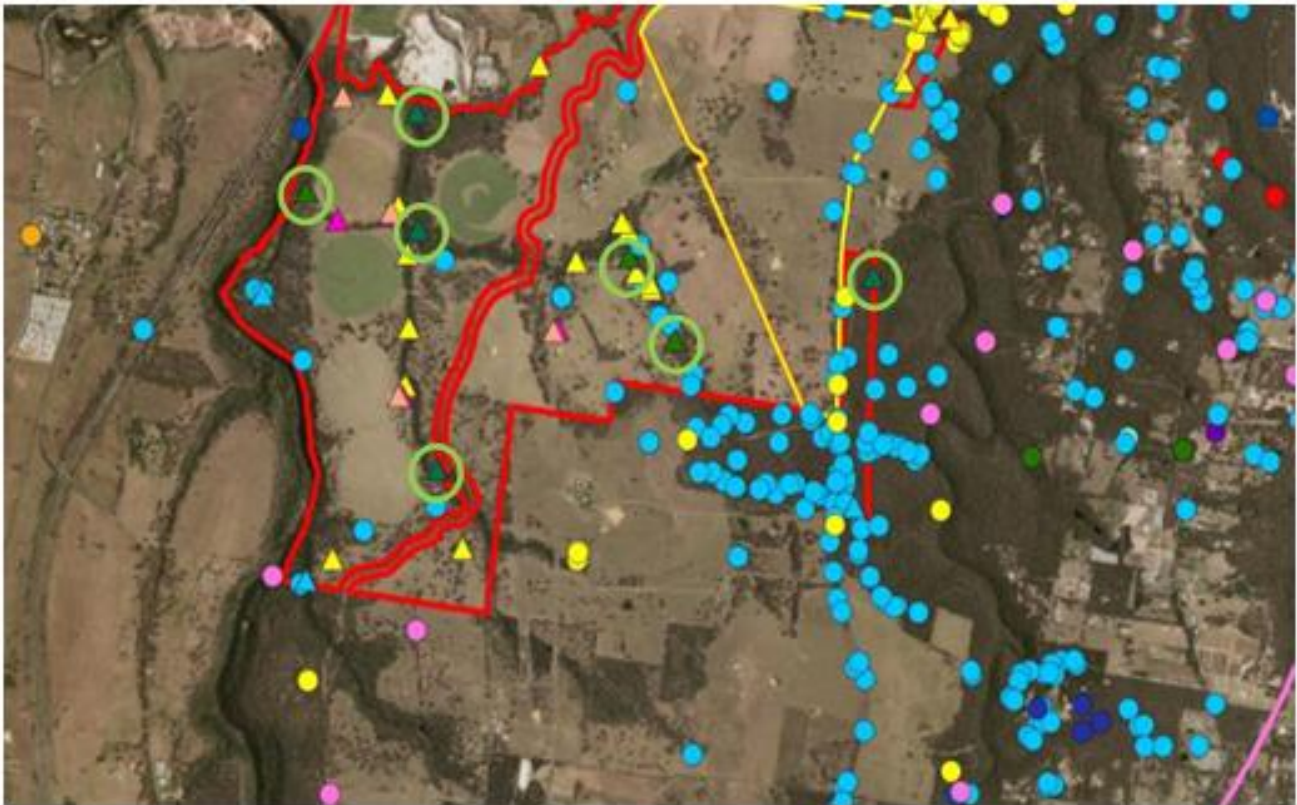


Figure 12 Squirrel Glider showing family unites.

As we can see there were sightings from Wedderburn, Georges River then over to Mount Gilead, and finishing at the Nepean River. As they shelter in hollow-bearing trees during the day, these old trees with hollows are of high environmental value and must be maintained and kept. Figure 10 shows the hollow-bearing trees identified in the MGBCABS report that are within the Mount Gilead Stage 2 proposal.

The MGBCABS is based on a maximum distance of '30 m from intact vegetation' (an undefined classification that comprises dense trees). However the probability of occupancy in a habitat separated by gaps of 35 m remains at 50%, and with gaps, as much as 100 m is still 20% (Smith 2002). The MGBCABS claims are not compatible with substantial existing research on this species' movement behavior and habitat requirements. This error greatly reduces the claimed impact on Squirrel Glider and the offset required for the species. (Smith, A. P., & Murray, M. 2003). *Habitat requirements of the squirrel glider* (*Petaurus Norfolkensis* and associated possums and gliders on the New South Wales central coast. Wildlife Research, 30(3), 291-301.

The significance of the Squirrel Glider population is greatly underplayed. Gilead hosts most post-2000 records of this species in the Cumberland Plain and may be the last stronghold for this species in the Interim Biogeographic Regionalisation for Australia (IBRA). The open woodland ('scattered trees') on the property are prime habitat for this species but has been entirely discounted from assessment and conservation. No less than 7 new road crossings are proposed to cut the biodiversity 'offset' areas, however, no assessment is made of their impact on the Squirrel Glider or Koala movement or the impact of roadkill on either species.

BATS

These four threatened species of bats all roost in hollow-bearing trees or other structures, taken from the OEH threatened species on bats habitat and ecology.

Falsistrellus tasmaniensis(Eastern False Pipistrelle)

Listed before 1996. Prefers moist habitats, with trees taller than 20 m. They are slow, careful fliers with very soft echo-location calls. They have enormous ears that they use to passively listen for moths. So this Bat will be severely impacted by light and noise. This bat will all be impacted by light pollution and habitat removal reducing the amount of insect prey.

Scoteanax rueppellii (Greater Broad-nosed Bat)

Listed before 1996. This species usually roosts in tree hollows but it has also been found in buildings. Because of this development, it will be impacted as they feed on flying beetles, other insects, and small invertebrates as they fly slowly through woods and agricultural lands for their prey. This bat will also be impacted by light pollution and habitat removal reducing the amount of insect prey.

Mormopterus norfolkensis (Eastern Coastal Freetail Bat)

- Listed before 1996. Roost mainly in tree hollows but will also roost under bark or in man-made structures. *This SoS strategy aims to ensure that the species is secure in the wild in NSW and that its NSW geographic range is extended or maintained and maintains its conservation status under the Biodiversity Conservation Act 2016 No63- NSW legislation.(NSW Department of Planning and Environment Saving our Species management.) This bat will also be impacted by light pollution and habitat removal reducing the amount of insect prey.*

This development will not maintain its range but rather it will decrease its range, going against the BC ACT.

Saccolaimus flaviventris (Yellow-bellied Sheathtail Bat)

- Listed before 1996. Roosts singly or in groups of up to six, in tree hollows and buildings; in treeless areas, they are known to utilise mammal burrows. Only 14% of this species distribution is within National Parks, leaving the remaining 86% in places like this development. Under the Action toolbox for the species it has all the points for conserving this species but not for development. Under the management objectives, *it again states This SoS strategy aims to ensure that the species is secure in the wild in NSW and that its NSW geographic range is extended or maintained and maintains its conservation status under the BC Act.* The Yellow-bellied Sheathtail bat is Australia's largest insectivorous bat and they are quite rare around suburban areas.

The next four threatened species of bats all roost in caves or other structures, taken from the OEH threatened species site and the bat's habitat and ecology.

Miniopterus schreibersii oceanensis (Eastern Bentwing Bat)

Caves are the primary roosting habitat, but also use derelict mines, storm-water tunnels, buildings, and other man-made structures. Disturbance by recreational cavers and the general public accessing caves and adjacent areas, particularly during winter or breeding. Taken from the OEH threatened species site.

Miniopterus australis (Little Bentwing Bat)

Little Bentwing-bats roost in caves, tunnels, tree hollows, abandoned mines, stormwater drains, culverts, bridges, and sometimes buildings during the day, and at night forage for small insects beneath the canopy of densely vegetated habitats. Disturbance of colonies, especially in nursery or hibernating caves, may be catastrophic. Taken from the OEH threatened species site

Myotis macropus (Southern Myotis)

Listed before 1996. Generally, roost in groups of 10 - 15 close to the water in caves, mine shafts, hollow-bearing trees, Figure 14 stormwater channels, buildings, under bridges, and dense foliage. Taken from the OEH threatened species site.

Southern Myotis are vulnerable to the destruction of roost sites in caves by mining, tree hollows by clearing, disturbance by human visitors to cave roosts, changes to feeding areas by forestry and agricultural activities, and pollution of rivers. Taken from the Australian museum.

The bat was positively identified by Eco-Logical on the balance lands in 2017 which was the latest survey done. Polluted urban run-off and the removal of farm dams and covering of drainage lines will be the biggest threats to the Myotis.

Chalinolobus dwyeri (Large-eared Pied Bat)

This Bat has a conservation value of Vulnerable in both NSW and the Commonwealth, last updated 1 Dec. 2017. In the Eco-Logical report page, 22 states that no suitable caves were recorded, yet the MGCABS states on page 226 - *Potential roosting habitat for this species was identified across much of the creek line systems present within the study area.* And again, on page 176, it states the habitat association is quite different from the assertions made on page 22.

Along the steep banks of the Nepean River, there would be many such overhangs for such a bat as well as the caves and overhangs that are on Mount Gilead. These bats remain loyal to the same cave over many years. *Within NSW, based on available records, the largest concentration of populations appears to be in the sandstone escarpments of the Sydney basin and northwest slopes of NSW. Much of this habitat occurs within state reserves and should be the subject of recovery actions. Recreational activities such as bushwalking, caving, and abseiling are potential threats to the large-eared pied bat. To date, there have been no genetic studies undertaken on the large-eared pied bat. The movement of this species between areas has not been recorded and its dispersal ability and habits are not known.* Taken from the National Recovery Plan for the Large-eared pied Bat page 12.

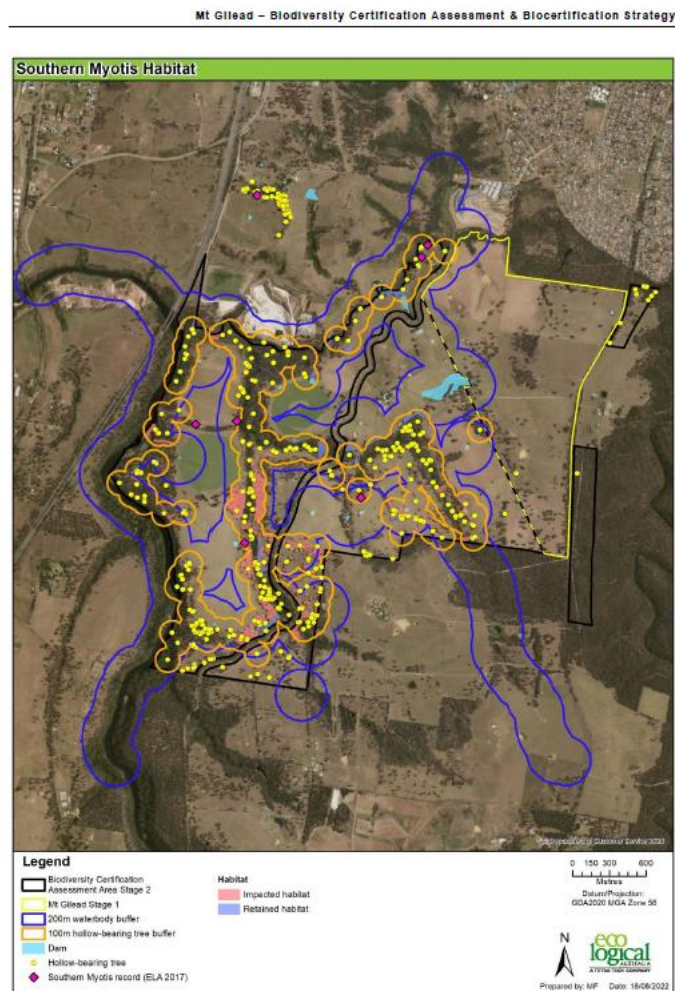


Figure 19: Records and habitat polygon for Southern Myotis prior to impacts and dam-dewatering
Note: Prospect Canal not included as a water body suitable as foraging habitat as water is heavily chlorinated

Figure 14 Hollow-bearing trees with a zone around them this zone is nearly the same as the koala corridors proposed in figure 8

As can be seen not much is known about this bat. It is widely distributed, but still uncommon and patchy within its distribution, in the sandstone areas of the Sydney Basin. With positive sightings being recorded on site (Eco-Logical report page 176) this bat must be given the protection that all NSW threatened species deserve. It will be impacted by light pollution and habitat removal reducing the amount of insect prey.

As stated in the recovery plan one of the threats is recreational use, let alone being placed next door to urban development which would be a major threat to this species. Roosts in caves (near their entrances), crevices in cliffs, old mine workings, and in the disused, bottle-shaped mud nests of the Fairy Martin (*Petrochelidon ariel*), frequenting low to mid-elevation dry open forest and woodland close to these features. Females have been recorded raising young in maternity roosts (c. 20-40 females) from November through to January in roof domes in sandstone caves and overhangs. They remain loyal to the same cave over many years.

The above list of microbats are all threatened species and there are further nine microbats that are not threatened species that were recorded

Grey-Headed Flying Fox

Listed as vulnerable by OEH and EPBC Act. Although they are not at present roosting at Mount Gilead, they are using this site to feed. They seem to make extensive use of the Forest Red Gum, Coastal Grey Box, Thin-leaf Stringybark, Broad-leaf Ironbark, and Spotted Gum when they are in flower as well as Blackbutt and Grey Gum. We know that loss of habitat and urbanisation is one of the major threats. By removing their feeding grounds you are adding to the extinction of this species.

*Grey-headed Flying-foxes accommodate this by migrating in response to food availability, sometimes travelling hundreds of kilometers. In addition, during periods when native food is limited, Grey-headed Flying-foxes disperse from colonial roosts, often foraging in cultivated gardens and fruit crops. **This species occasionally inflicts severe crop damage during periods of native food shortage.*** Taken from the Scientific listing EPBC.

Cumberland Plain Large Land Snail

The Cumberland Plain Large Land Snail was listed in 2000. Cumberland Plain Woodland was originally listed in 1995 as an Endangered Ecological Community, but as there has been no stopping to the clearing of this vegetation community, the NSW Scientific Committee has since listed it as Critically Endangered. *Less than 6% of Cumberland Plain Woodland remains and is distributed over highly fragmented patches. Only 2% of the woodlands is protected with almost all the protection provided in National Parks.* Taken from the Conservation Volunteers Australia. *Based on aerial photography flown in November 1998, Tozer (2003) estimated the total extent of woody vegetation referred to as Cumberland Plain Woodland was 11 054 ($\pm 1\ 564$) ha (upper and lower plausible bounds, Keith et al. 2009), representing 8.8 (± 1.2)% of the pre-European distribution of the community* Taken from the Cumberland Plain Woodland in the Sydney Basin Bioregion - critically endangered ecological community listing.

As can be seen, the amount of vegetation has greatly been reduced but the status of the Cumberland Plain land snail now has remained. The recent proposal of the Cumberland Plain Conservation Plan reduces the area size of the Cumberland Plain Woodland once again thus putting pressure on the conservation of the Cumberland Plain Land Snail. This report does not reflect the new pressures that will be placed on this Snail. Under the OEH list of threats for this Cumberland Plain land snail are - *clearing and degradation of Cumberland Plain Woodland's remnants, weeds are considered a threat to this species altering the composition of the litter that grows the fungi on which the species feeds, fires not only wildfires but also hazard reduction these will be carried out more often because of the human impact on the area.*

Biometric Vegetation types: - Cumberland River Flat Forest, Cumberland Shale Plains Woodland, and Cumberland Shale Hills Woodland, Shale Sandstone Transition Forest

These are all endangered ecological communities, which, along with the over-arching Cumberland Plain Woodland, are now on the critical list of both EPBC and OEH. The Cumberland Plain Conservation Plan will reduce these threatened communities even further as well as the other communities that make up the Cumberland Plain Ecological Community.

This development wants to reduce this and other communities. If this happens, it will put place even greater strains on the otherwise already fragile environment.

This is also where the koala lives. We cannot keep on taking from the bushland if this government wants to double the koala numbers. This government has to say enough is enough.

It reminds us of the old saying “death by a thousand cuts.”

The critical listing shows that it is agreed that the Cumberland Plain Woodland is critically endangered and no further degradation and loss of this Ecological Community should occur. Yet this is exactly what Lendlease wants as the red-flagged areas in Figure 15 are for more degrading of this Ecological Community.

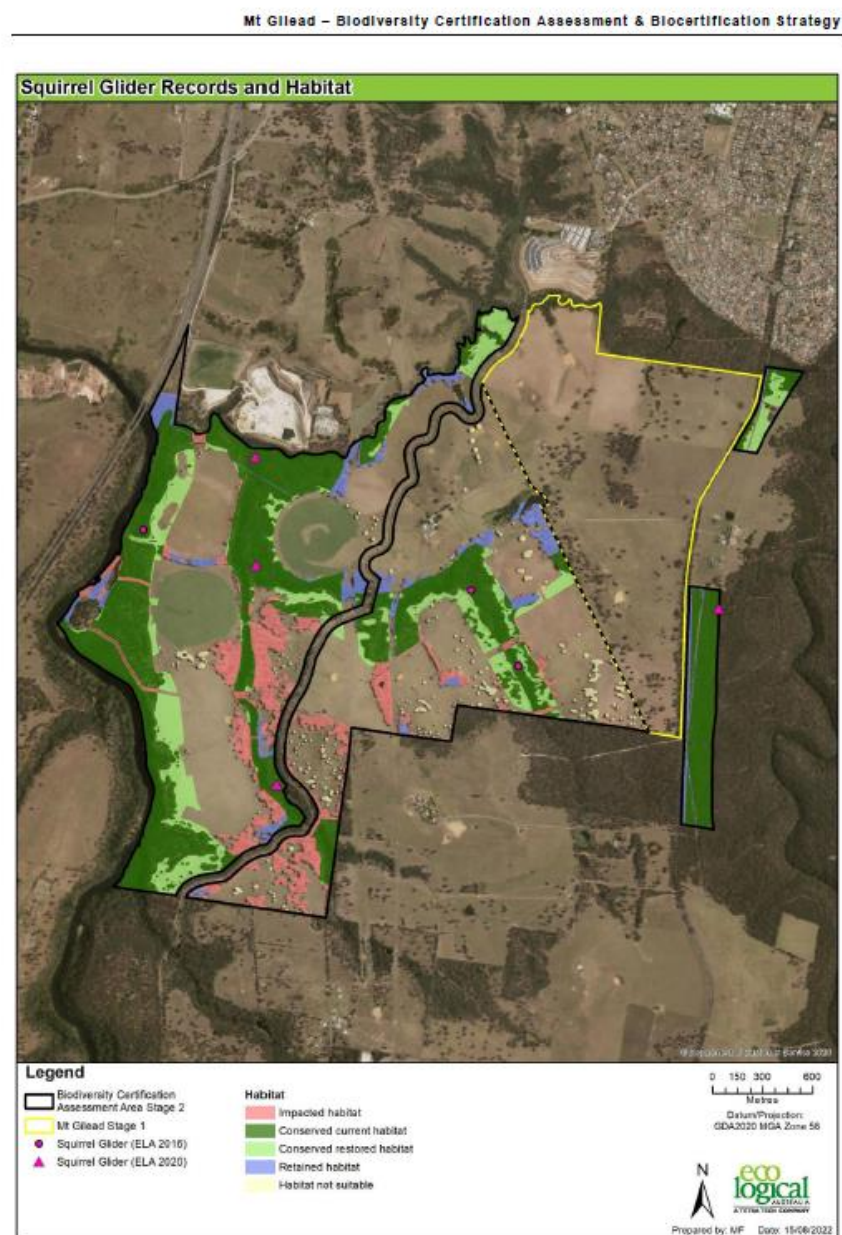


Figure 17: Records and habitat polygon for Squirrel Glider

Figure 15 Red flagged areas that are proposed to be cleared

Flora Species

Pomaderris brunnea

Listed as an Endangered Species in 2014 by NSW and Vulnerable by APBC in 2000. *The main factors that make the species eligible for listing in the Vulnerable category are the small number of individuals in the entire population and in each subpopulation and the continuing decline of some subpopulations. Known subpopulations in NSW contain at least 1200 plants (Sutter 2011; ALA 2020) Pomaderris rely on the germination of soil-stored seed for post-fire regeneration (Patykowski et al. 2014). Rufous Pomaderris is threatened by direct and indirect effects of mining, invasive weeds, browsing, low genetic diversity, and damage by vehicles and track maintenance (Table 2). The species is threatened by several fire-related threats, including high-frequency fire, fire-drought interactions and fire promoted weed invasion. In addition, the impacts of stormwater runoff may also be a threat to populations in urban areas of western Sydney by causing physical damage, soil erosion, sedimentation and/or soil nitrification, although the impacts of this threat on Rufous Pomaderris are not well known.* Taken from Conservation Advice for Pomaderris brunnea (Rufous Pomaderris)

This document states that this plant “**cannot withstand loss**” yet if we place the concept master plan on page 13 figure 15 together with the Bio-Retention Basins (figure 16) that are planned, this coincides with where the *Pomaderris brunnea* is shown. More plants will be affected by the making of these Bio-Retention Basins, both with the basin itself or the movement around the perimeter by machinery during the construction. As These basins are for stormwater, which is one of the threats to this plant, as mentioned in the listing, it will be greatly affected by this process. It is also quoted that 253 plants are on the Mount Gilead Stage 2 site. That is about 21% of the whole NSW distribution as only 1200 plants are known to occur in NSW. It can also be seen that there are some large clusters of up to 109 plants making this a very healthy and thriving contribution to the numbers of this threatened species. Another reason for the listing is the small number of individuals in the entire population and each subpopulation.



Figure 16 location Retention basins

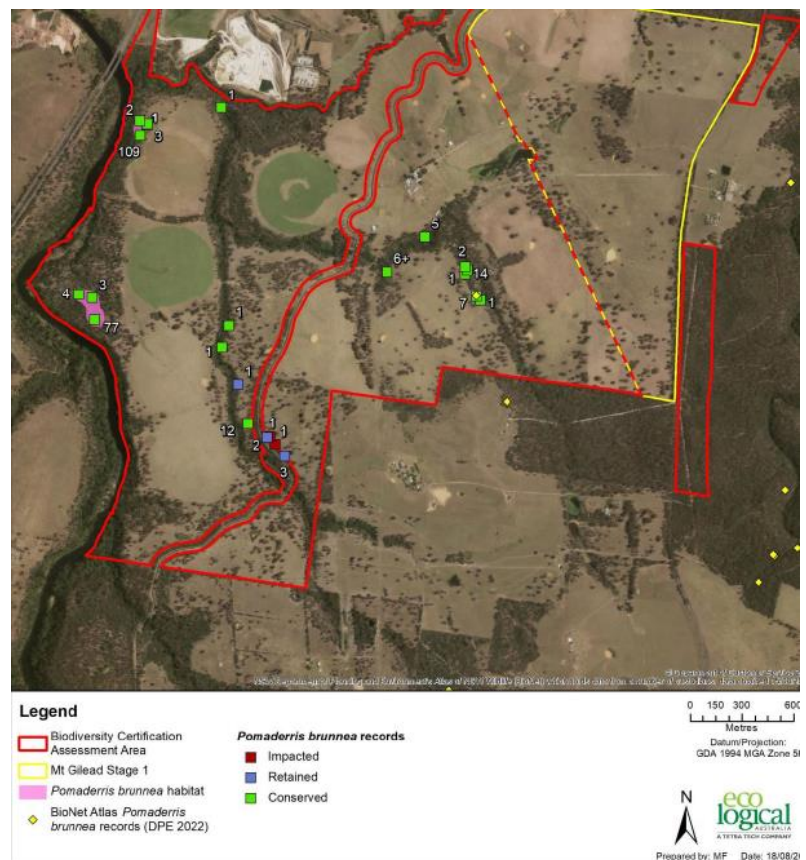


Figure 15: Location of *Pomaderris brunnea* within the BCAA and habitat polygon

Birds

Brown Treecreeper, Dusky Woodswallow, Scarlet Robin (BioNet), Powerful Owl (BioNet), Square-tailed kite, Little Lorikeet, and the Varied Sittella (Biolink 2018). Are all Vulnerable under OEH except the Glossy Black Cockatoo which is now listed as Vulnerable on the EPBC. The Glossy Black Cockatoo is yet another example of the decline in our threatened birds, and the listing by EPBC (2022) shows that this bird is not on the increase, even though it has been listed in NSW for over 27 years and is now more in trouble and has moved nearer to extinction. New research by the "Threatened Bird Index", has stated that there has been a decline of more than 60% on average over 30 years and, therefore any loss of habitat and the impact of urbanisation will have a very significant effect on these birds.

Conclusion

It is clear the impact on so many vulnerable or critically endangered species that this development of Stage 2 will bring and yet the only one that has been looked at in close detail is the koala by the Chief Scientist's Report. If this report had been applied as Figure 6 shows, it would have protected most of the other 25 vulnerable or critically endangered species. Therefore we request a full EIS in line with REAP legislation.

Within the MGCABS report, there is a lot of discounting of what was proven to be found there and the downgrading of species, for example - **"Cumberland Plain Land Snail, Koala, Squirrel Glider are all species identified in the TSPD and BCAM as species which can withstand further loss"** page 23. Yet the koala has just been upgraded to Endangered which is disgraceful as it shows to the world that Australia is not looking after its world-renowned wildlife.

Another example of discounting **A total of 154 flora species, comprising 67 native species and 87 introduced species, and 82 fauna species, were recorded. The fauna species recorded were comprised of 58 birds, 13 microbats, five other mammals, three frogs, one reptile, and two fish. No threatened flora species were recorded, but six threatened bat species and one threatened bird species were recorded.** (MGCABS report, p.16)

The Endangered Species *Pomaderris brunnea* requires great care. This is what has been lacking over the last 200 years. If this development goes ahead in its current form, this and most of the other species will be lost either by the weeds encroaching, changing soil types, human impacts, etc. Another example is on page 22 - ***Pomaderris brunnea* is therefore a red flag species. As 6 individuals will be impacted in the land to be certified (5 in APZ areas), a red flag variation request has been prepared (Section 5).** Yet on page 77, it states *Pomaderris brunnea* is an endangered shrub that is classified in the TSPD as a species that "cannot withstand loss". **Two plants may be impacted in land proposed for certification that are adjacent to the Prospect water canal.** How many plants will be affected will not be known as who will referee such a task?. As this plant is so rare the Botanic Gardens must do an independent survey and plot all plants before any are destroyed.

It must be considered that most of the micro-bats namely Large-eared Pied Bat, Eastern False Pipistrelle, Greater Broad-nosed Bat, Eastern Coastal Freetail Bat, and Yellow-bellied Sheathtail Bat will all be impacted by light pollution and habitat removal reducing the amount of insect prey.

Nepean Creek has been shown to have high environmental habitat, yet this is not being acknowledged by this development as it has been greatly reduced in size including all the vegetation that would be used as a source of food either the catching of insects or by paddock trees. Nepean Creek is where some of the Cumberland Plain Large Land Snails were found. These two will be impacted by weeds and human impacts, both of which have been identified as threats to this snail and all of which will happen if this development goes ahead.

The Squirrel Glider has not been properly assessed. The 7 new road crossings proposed are cutting through the biodiversity 'offset' areas have been made, and no assessment is made of this impact on the Squirrel Glider or Koala movements or the impact of roadkill on all species. The density of trees MGCABS claims is not compatible with substantial existing research on the Squirrel Glider, therefore the impact is not yet known.

Given all our concerns, we are strongly opposed to the rezoning proposal, especially in its current form. Adopting in full, the recommendations of the Chief Scientist's Report regarding wildlife corridors would go some way towards averting an otherwise disastrous result for the acknowledged significant environment of the site.

Barry Durman
President
National Parks Association of NSW Inc
(Macarthur Branch)
21December

(Submitted to PP-2022-3979 Appin (part) precinct)

Name withheld

Objections to Planning proposals for Appin (part) precinct, Wollondilly

I hereby lodge my objections to the above proposals, which would certainly have devastating, long-term, irreversible impacts on the habitats of wildlife (including koalas, among other threatened species), and drinking water catchments.

This comes at watershed times in human history, when the whole World is suddenly awakening to the costly impacts of Climate Change and species extinctions (of which Australia is, shamefully, the worst culprit), due largely to ignorance, greed and frequently-exposed corruption.

Remarkably, also at a time when our (enlightened) Federal Government is signing Pacts with the (enlightened) USA, to better protect NATURE.

I cannot find better words than to quote:-

This development will destroy part of the critically endangered Cumberland Plain Wodland and negatively impact Koalas and other threatened species, as well as endangering the water running into the Nepean and Georges Rivers and drinking water catchments.

The planning principle for the Greater Macarthur Growth Area is the conservation of biodiversity for koala population yet this planning proposal fails to adequately conserve biodiversity and the Planning Minister cannot be confident the Endangered Species like Koala will survive long term.

This planning proposal is underpinned by the Cumberland Plain Conservation Plan (CPCP) currently being assessed by the federal Department of Climate Change, Energy, the Environment and Water.

The Chief Scientist identified one Koala Corridor across Wilton Road south of Appin Village and Ousedale Creek within the Village. The Chief Scientist was also concerned about whether the CPCP's preferred east-west koala habitat corridor - Ousedale Creek - could be properly set aside as a workable koala habitat corridor, noting that its function is dependent on land purchases and restoration that will take an indefinite time to deliver.

The Nepean and Georges River are both Primary Corridors but no 425m minimum wide corridors have been included in this planning proposal. The majority of advice given to DPE by the NSW Chief Scientist has not been adequately incorporated in the CPCP.

The CPCP Assessment Report acknowledges that only approximately 13 percent of the pre-1970 extent of native vegetation in the Cumberland Plain subregion remains intact, with an additional 12 percent occurring as heavily degraded communities (e.g. scattered trees) in disturbed areas.

The CPCP will impact 1,753.6 hectares of threatened ecological communities including Cumberland Plain Woodland, Shale Sandstone Transition Forest and River-Flat Eucalypt Forest.

Alarming, the CPCP also notes that "biodiversity loss significantly increases once habitat fragmentation by clearing exceeds 70 per cent of the landscape." This threshold has already been passed and will accelerate if the CPCP is implemented in its current form.

The importance of the Aboriginal heritage has been identified by the listing of the Massacre Site on the NSW State Heritage Register but will the NSW State Government protect the site from development?

In their petition, No development at Appin Massacre Area, the Dharawal and Gundungurra family groups are calling on the NSW Government to protect the Appin massacre site from future development. "This area should never be built on. It's a place of trauma, great sorrow and death.

Development on this land will yet again trigger that trauma for our communities."

Appin and North Appin are now being considered as Priority Precincts, according to Minister Roberts (Daily Telegraph Dec 5th) which means the CPCP has grossly underestimated the amount of dwellings and the accompanying impacts on Endangered and Threatened Species including the Koala."

also

Gilead Stage 2 (Developer: Lendlease): 876-hectare site for up to 3,300 homes.

This proposal fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

Without being able to see these dimensions the credibility and transparency of this process is undermined.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation.

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve "is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area."

Koala corridors should be zoned C1 and the ownership and management of these corridors should not remain in the hands of the developers.

The Urbis document prepared for Lendlease shows “Indicative Stormwater Basin Location Stormwater in wildlife corridors” (Urban Design Report 2022:27). This is contrary to the advice of the Chief Scientist and the TAP. In the same document Urbis have located a “proposed Figtree Hill Reservoir” in the biobank area adjacent to Brown’s Bush which has also been identified as a future Koala Reserve.

Even more worrying, Lendlease has an “Indicative Sewer Pumping Station” located at the north-west corner of the Site.

The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease’s insincerity to protect Koala Corridors.

The Koala is listed as a Threatened Species in Ecological documents not reflecting the Endangered Listing both in NSW and Federally, this oversight undermines credibility of the planning proposal.

The planning proposal fails to recognise and protect the rich biodiversity of Stage 2, according to one of the Ecological reports Stage 2 is home to 287 Threatened Species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and fails to protect their ecosystems.

Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala."

(Submitted to PP-2022-3979 Appin (part) precinct)

Christine Davey

chris.davey3@gmail.com

Please make koala protection a priority.

I strongly object to the fast tracking and rezoning of Appin Village and surrounding areas for more than 12,000 homes. This development will destroy part of the critically endangered Cumberland Plain Woodland and negatively impact Koalas and other threatened species, as well as endangering the water running into the Nepean and Georges Rivers and drinking water catchments.

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Please make protection of all koalas a priority.

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The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease’s insincerity to protect Koala Corridors.

The Koala is listed as a Threatened Species in Ecological documents not reflecting the Endangered Listing both in NSW and Federally, this oversight undermines credibility of the planning proposal.

The planning proposal fails to recognise and protect the rich biodiversity of Stage 2, according to one of the Ecological reports Stage 2 is home to 287 Threatened Species of flora, 124 native vertebrates, 8 species of birds, 11 native mammals and the Cumberland Plain Land Snail and fails to protect their ecosystems.

Gilead is now being considered a Priority Precinct according to Minister Roberts (Daily Telegraph Dec 5th) which means the Biodiversity Certification application by Lendlease will have significantly underestimated the amount of dwellings and accompanying impacts on Endangered and Threatened Species including the Koala.

(Submitted to PP-2022-3979 Appin (part) precinct)

Name withheld

I OBJECT to the following planning proposal and to rezoning rural land to residential

●Gilead Stage 2 (Developer: Lendlease): 876-hectare site for up to 3,300 homes.

This proposal should be rejected because it fails to apply the planning principle for the Greater Macarthur Growth Area namely , the conservation of biodiversity for the koala population.

The planning proposal fails to show dimensions for the Koala corridors listed, scientific advice recommends corridors be at least a minimum of 390-450 metres wide.

Without being able to see these dimensions the credibility and transparency of this process is undermined.

Zoning of Koala corridors (and buffers) as C2 rather than C1 allows for other uses that are not compatible with Koala conservation.

This concern was also brought up by the Technical Assurance Panel (TAP) for example, the proposed Riverside Reserve “is located within the Nepean Koala Corridor, it cannot support uses such as access roads, built structures, barbeques, lighting, dog walking, playgrounds, etc. The types of uses permissible in all koala corridors is consistent throughout the Greater Macarthur Growth Area.”

Koala corridors should be zoned C1 and the ownership and management of these corridors should not remain in the hands of the developers.

The Urbis document prepared for Lendlease shows “Indicative Stormwater Basin Location Stormwater in wildlife corridors” (Urban Design Report 2022:27). This is contrary to the advice of the Chief Scientist and the TAP. In the same document Urbis have located a “proposed Figtree Hill Reservoir” in the biobank area adjacent to Brown’s Bush which has also been identified as a future Koala Reserve.

Even more worrying, Lendlease has an “Indicative Sewer Pumping Station” located at the north-west corner of the Site.

The proposed infrastructure will sever both Koala Corridors A and B (identified by the Chief Scientist), demonstrating Lendlease’s insincerity to protect Koala Corridors.

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(Submitted to PP-2022-3979 Appin (part) precinct)

Amarjit Singh Brad

amarjit.brad@gmail.com

Majority of Gilead land is occupied under ownership of three companies Walker Corporation, Inghams Rural Enterprises and MIR group, All are developers and either they have applied for rezoning or in the pipeline of applying for rezoning. Who will be left behind? small individuals like me who have small holding and are not strong links with govt NSW or local councils. I feel it is not fair. Either there should be no rezoning or at least full Appin precinct should be rezoned so that every one in the area feel equally treated. I am against what being done so for

my property is 490 Appin road Gilead and all around me are small land holders 5-10 acres. I beleive my case is strong enough to be heard or I should be replied why it can not be.