Appin (part) precinct 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 greatly concerned that the impacts of this massive development with homes for 12000 residential lots fails to detail the true potential impacts upon the native fauna and flora. The Biodiversity Assessment by Niche Environment and Heritage has many aspects where factors and fauna are likely to occur but details are far from finalised or measured.

Koala Impacts

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.

The introduction of urban spawl providing accommodation for approximately **12,000** 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 40,000 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.

Picton Road is proposed as the major arterial road and it has no substantial faunal underpasses.

Vagueness of Niche Environment and Heritage

No specifics are given as is illustrated from

4.4.1 Direct impact to Koala

As discussed in section 2.9, approximately 9.56 ha of non-certified land associated with the proposed SP2 Infrastructure zone occurs within a mapped Koala corridor.

Factors that are likely to affect Koala usage of corridors include, but are not necessarily limited to:

· Width of the corridors (with wider corridors preferred);

o The NSW Chief Scientist & Engineer (2021) recommended a minimum average Koala corridor width of 390 – 425 m, with a 30m buffer on either side where fenced, and wider to ~60m where fencing is not feasible.

· Value of vegetation within the corridor as Koala habitat (preferred areas would include vegetation on more fertile shale soils, mature vegetation with larger trees);

· Length of the corridor (with shorter length corridors preferred);

· Breaks or other restrictions to Koala movement within the corridors (with breaks or interruptions to movements minimised);

· Whilst Koalas can move across cleared paddocks, it is preferred that that corridors provide suitable foraging habitat. Thus, revegetation of cleared areas can also facilitate longer term Koala outcomes. To facilitate this revegetation or rehabilitation of cleared or degraded lands set aside for conservation should occur as early as possible, so as to allow trees and vegetation to establish.

In terms of the width of the Koala corridor, the SP2 Infrastructure does reduce the width of the Koala corridor, however it is not shortened to such an extent that the average corridor width is likely to be less than 425 m.

To minimise obstructions of the Koala corridor, the proponent proposed bridge locations at the Nepean River crossing and the Ousedale Creek Upper Canal to facilitate the movement of Koalas. The design of the bridge layout have not yet been developed, however it is envisaged that this would be done so with the input of a Koala specialist to ensure the Koala integrity of the corridor is maintained.

Concerning Indirect Impacts upons Koalas the report continues

4.5 Indirect impacts

The construction and operation of infrastructure within the SP2 Infrastructure zone may have indirect or prescribed impacts in addition to the direct impacts on biodiversity.

The indirect impacts associated with the SP2 Infrastructure zoning would need to be formally assessed by DPE for the proposed East-West Connection Road and North-South Connection, and suitable mitigation measures documented within the impact assessment.

Indirect impacts are any impact that could adversely affect biodiversity values, such as native vegetation, TECs and threatened species habitat. Indirect impacts may also result from changes to land-use patterns, such as an increase in vehicular access and human activity.

2.7 Fauna habitat

Fauna habitats identified in the Subject Land include:

・ Riparian vegetation along Nepean River, which borders the west of the Subject Land. Other notable watercourses in the Subject Land include Ousedale Creek, Elladale Creek and Simpson Creek. These areas are likely to be used by native frogs, reptiles and water birds.

・ Open forest, woodland and grassland, supporting canopy, shrub and ground layer vegetation. These areas are likely to be used as foraging and shelter habitat for local fauna, including arboreal mammals and native birds.

・ Aquatic habitats associated with watercourses mentioned above. These creeks in the vicinity of the Subject Land support a consistent flow of water and provide habitat for local fauna, including birds, amphibians and reptiles.

・ Microhabitats including hollow-bearing trees, leaf litter and fallen timber. These microhabitats occur throughout the native vegetation (PCTs) of the Subject Land with greater concentrations within the C2- Environmental Conservation zone.

Table 8 page 32 has many general statements concerning fauna such as

“Moderate likelihood for the species to occur -”

As a result this vagueness prevents a proper submission response.

A major omission in the Table Appendix 1 Likelihood of occurrence of threatened biodiversity in the Subject Land is that of wombats which frequent the area.

Native Vegetation

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.

This is illustrated in Figure 6 page 40 of the Biodiversity Assessment report.

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Approximately 4.29 ha of native vegetation may be directly impacted by the SP2 Infrastructure that occurs in non-certified land.

A biodiversity impact assessment would need to be completed for all direct impacts to native vegetation

that occur outside of certified land in accordance with a relevant biodiversity impact assessment process.

The true impacts upon the vegetation are not able to be assessed due to the statements made on page 46

4.3 Direct impact to threatened flora

Direct impact to threatened flora within the certified land has already been assessed as part of the CPCP.

Based on an assessment of likelihood of occurrence in Table 7, 16 threatened flora have been attributed to a moderate (or higher) likelihood to occur within the SP2 Infrastructure zone and UD Urban Development Zone that is not certified, including: *Acacia bynoeana, Acacia pubescens, Epacris purpurascens* var. *purpurascens, Grevillea parviflora* subsp. *parviflora, Hibbertia puberula, Leucopogon exolasius, Leucopogon fletcheri* subsp. *fletcheri, Melaleuca deanei, Persoonia glaucescens, Persoonia hirsuta, Persoonia nutans, Pimelea curviflora* var. *curviflora, Pimelea spicata, Pomaderris brunnea, Pterostylis saxicola* and *Thesium australe*.
A threatened flora field survey and/or expert report would need to be completed to inform the biodiversity impact assessment within the SP2 Infrastructure zone which is not certified. The biodiversity impact assessment would also assess the impacts on threatened flora listed on the EPBC Act (Appendix 1).

4.4 Direct impact to threatened fauna

Impact to threatened fauna within the UD Urban Development Zone have already been assessed as part of the CPCP.
A total of 29 candidate threatened fauna would need to be assessed during a biodiversity impact assessment for the SP2 Infrastructure zone which is not certified. Of the candidate species, 14 threatened fauna have been attributed to a moderate (or higher) likelihood to occur (Table 8). Threatened fauna that have potential to occur within this area include: Bush Stone-curlew, Gang-gang Cockatoo, Glossy Black-Cockatoo, Large-eared Pied Bat, Cumberland Plain Land Snail, Little Bent-winged Bat, Large Bent-winged Bat, Southern Myotis, Barking Owl, Powerful Owl, Koala, Red-crowned Toadlet, Masked Owl and Sooty Owl.
A threatened fauna field survey and/or expert report would need to be completed to inform the biodiversity impact assessment within the SP2 Infrastructure zone which is not certified. The biodiversity
impact assessment would also assess the impacts on threatened fauna listed on the EPBC Act (Appendix 1).

Clearly there will be an enormous increase in vehicular access and human activity.

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. 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.

Urban Heat Problems

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.

The mention of using a lighter coloured asphalt which would reduce heat absorption and reduce the UHl is fanciful.

Traffic

The content available concerning traffic studies in the reports is insufficient and fails to recognize 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 12000 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 38.400 to 60.000 vehicles many of which will enter the Appin Road system.

The addition of the Appin west 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 faunal road kills.

The impacts of this proposal upon traffic on Boughton pass is not acceptable.

Conclusion

This is a massive proposal which will have gigantic negative impacts upon the native fauna and flora as well as the transport systems of this area.

There is not sufficient data in either the Niche Environment and Heritage to adequately address these impacts. The report fails to acknowledge or list the native wombats which frequent the area

The current road system in unprepared for the expansions proposed as is the capacity of Campbelltown or Macarthur to deal with the usage which would arise. Expansion of the road system as foreshadowed will bring great and unnecessary adversity to the resident Chlamydia free Koala population. It will also impact the other native fauna mentioned.

No mention is made of extensive faunal underpasses in the reports or the proposed transport systems required in such an environmentally sensitive area with a high abundance of native fauna.

I am so concerned with the lack of information and planning that I favour refusal of the project.

Yours Sincerely

Ian Hill