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9 October 2020

  
Department of Planning, Industry and Environment  
Green and Resilient Places Division  
Locked Bag 5022  
Parramatta NSW 2124

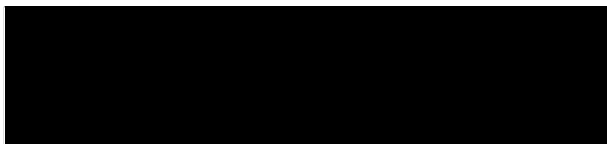
Dear Elizabeth,

## **SUBMISSION ON DRAFT CUMBERLAND PLAIN CONSERVATION PLAN GILEAD LAND-OWNERS CONSORTIUM**

This letter has been prepared on behalf of the Gilead Land-Owners Consortium in response to the public exhibition of the draft Cumberland Plain Conservation Plan 2020-56 (**the draft CPCP**). This submission is made in respect to the multiple land holdings at South Campbelltown, owned by the Gilead Land-Owners Consortium.

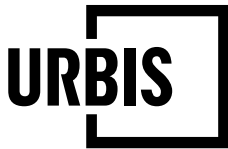
Due to the size and complexity of the site, its multiple land holdings, and the draft CPCP, it is requested that this letter be submitted as a formal, interim submission to the draft CPCP. An update with the detailed site assessment and comments and recommendations will be submitted prior to COB Wednesday, 14 October 2020.

Yours sincerely,









**ANGEL PLACE  
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14 October 2020

Department of Planning, Industry and Environment  
Green and Resilient Places Division  
Locked Bag 5022  
Parramatta NSW 2124

To whom it may concern,

## **SUBMISSION ON DRAFT CUMBERLAND PLAIN CONSERVATION PLAN**

This submission has been prepared on behalf of Gilead Landholders Group Pty Ltd in response to the public exhibition of the draft Cumberland Plain Conservation Plan 2020-56 (**the draft CPCP**).

This submission covers the landholdings held by the Gilead Landholder's Consortium, which is also known as the South Campbelltown Site. The site is located in Gilead, within the Campbelltown Local Government Area (LGA). It is a key site within the Greater Macarthur Growth Area.

We understand that the draft CPCP seeks to offset the biodiversity impacts of future urban development within the Cumberland subregion by identifying strategically important biodiversity areas to ensure a vibrant and liveable city going into the future. The draft CPCP will inform the zoning for certified – urban capable land and non-certified land, land that is either avoided land for biodiversity or other environmental purposes. It also identifies areas that are suited for future ecological reserves and/or offsets.

This letter is supported by a submission provided by Ecological at **Attachment A**.

### **1. THE SITE**

The South Campbelltown Site is comprised of multiple adjoining lots bound by the Nepean River to the east and the Georges River to the eastern most edge of the landholding. The landholding includes and is adjacent to the Appin Road which traverses north – south through the site.

Appin Road provides connections to Appin to the south and to Campbelltown to the north. Access to the landholdings is provided by an existing paved road that travels east-west through the central area of the site (north boundary of Lot 1 DP 707208) The land holding is predominantly comprised of agricultural land uses and rural residential improvements. This includes large expanses of open grassland. Several streams cross the site, including Leafs Gully, Mallaty Creek, Nepean Creek and Woodhouse Creek. Along with the Nepean River and Georges River, the bulk of existing vegetation borders these watercourses with a few patches of vegetation scattered throughout the rest of the site.

The major land holding is located within the Greater Macarthur Growth Area and comprises lands within the North Appin and South Gilead precincts.



The site composition is provided in Figure 1 below. An aerial photograph of the site is provided in Figure 2 below.

Figure 1 South Campbelltown Landholding

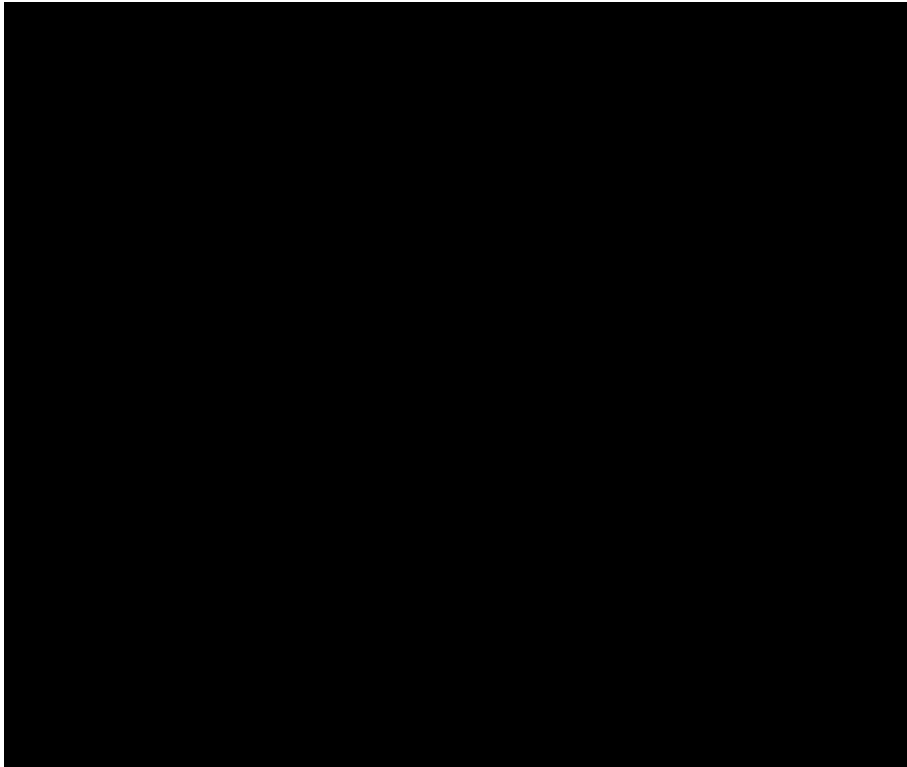
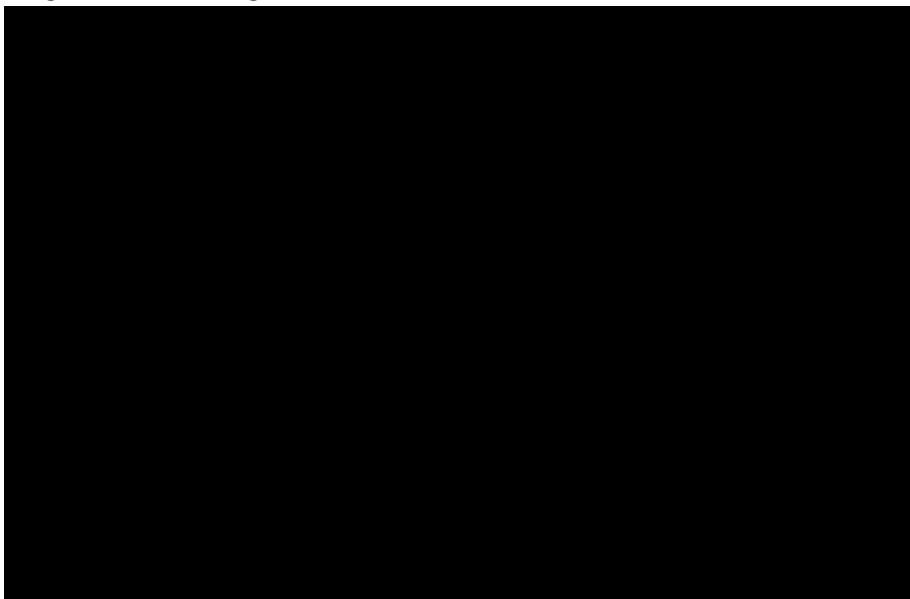


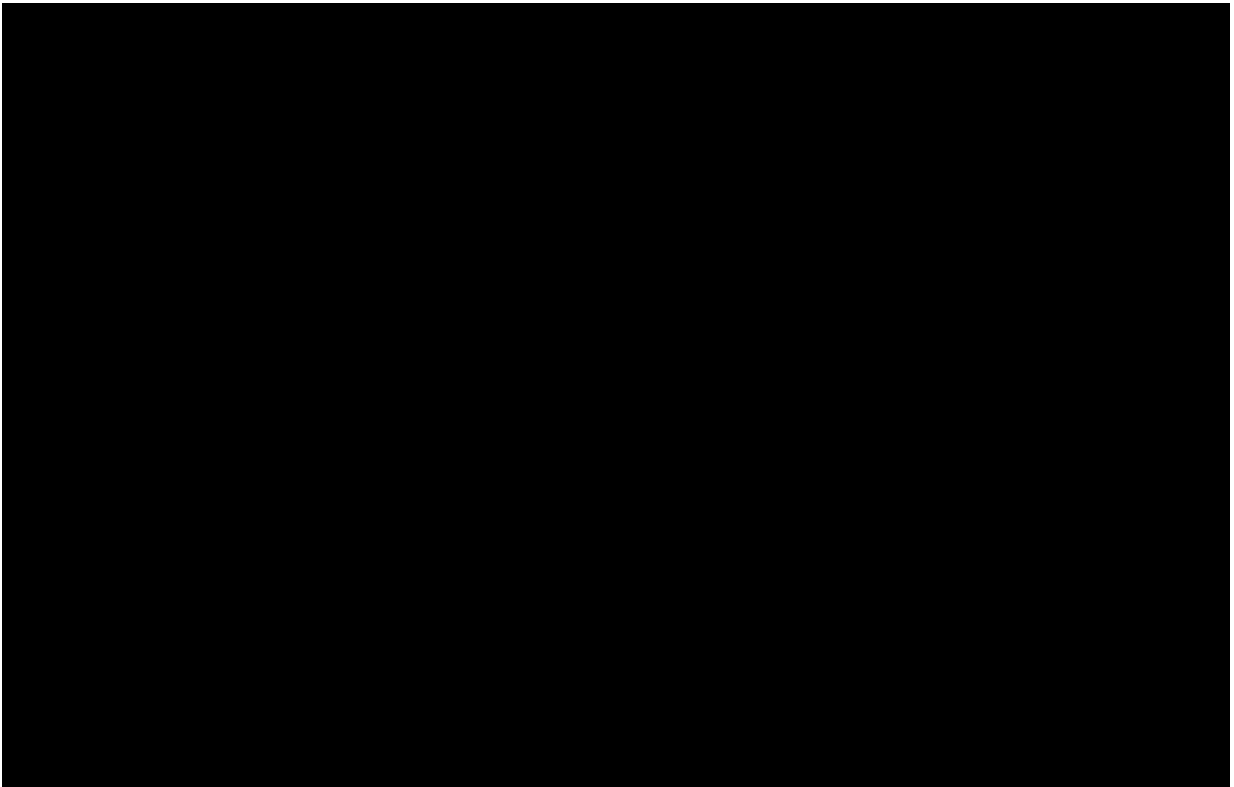
Figure 2 Aerial Image of Site



## 1.1. PLANNING CONTEXT

The bulk of the site is currently zoned as RU2 Rural Landscape under the Campbelltown LEP 2015. The existing zoning across the landholding is illustrated in Figure 3 below:

Figure 3 Existing Land Zoning



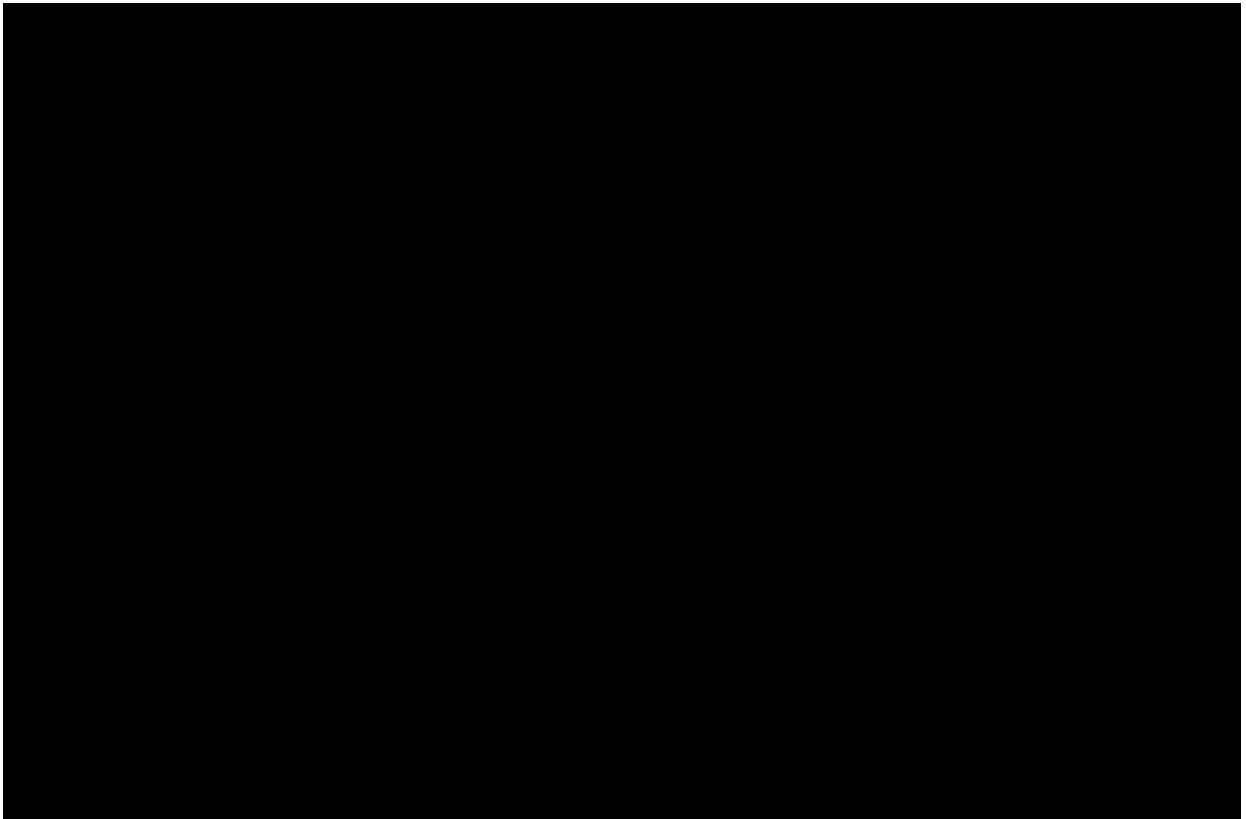
The site has high strategic planning weight due to its inclusion within the Greater Macarthur Growth Area. The site is located within the North Appin and South Gilead precincts. The Greater Macarthur 2040 plan identifies the bulk of the site as urban capable and appropriate for low and medium density residential development. Of note, the plan identifies that the Gilead precinct is capable of providing approximately 15,000 dwellings and the North Appin precinct provides the opportunity for approximately 5,000 dwellings. The plan also identifies future rezoning of land as a specific action to meet the vision of the Greater Macarthur Growth Area.

Accordingly, the Gilead Landholding Consortium has been planning for the site over a number of years and have prepared a master plan for the urban redevelopment (see Figure 4).

This master plan maps the appropriate distribution of residential development space as well as new employment areas, community infrastructure, open space and conservation lands. The plan also identifies an internal road layout. This master plan accounts for the existing watercourses as well as the areas of high ecological value which will be protected in perpetuity. The master plan was prepared with the advice of land use experts including high quality ecological evaluation and assessment. Of note, the access road as identified in Section 1 of this report is a key element of the intended urban development.



Figure 4 South Campbelltown Master Plan



It is anticipated that any future rezoning, planning proposals and development applications will be based on a refined version of this master plan.

## 1.2. EXISTING ECOLOGICAL CONDITIONS

As identified in section 1.1 of this report, the bulk of the site has been cleared for agricultural land uses and rural residential development. The bulk of the site contains open grassland, comprising mostly exotic species and pasture grass. The site contains some areas of ecological communities as well as riparian corridors. This includes vegetation communities such as the *Cumberland Plain Woodland (CPW)* and *Shale Sandstone Transition Forest*.

It is noted that the draft CPCP identifies large portions of the landholding as non-certified land (Western Sydney Aerotropolis / Avoided for Other Purposes / Avoided for Biodiversity) (refer to **Figure 5**). The intent of this mapping is for these areas to be zoned as E2 – Environmental Conservation which will prohibit urban development and protect existing biodiversity.

Similarly, the draft CPCP identifies large areas of the landholding as Strategic Conservation Area (SCA) (refer to **Figure 5**). The draft CPCP notes that SCAs are areas that include large remnants of native vegetation, provide important connectivity and/or has ecological restoration potential. Accordingly, these SCAs are identified as suitable for offsetting biodiversity impacts by either securing new conservation reserves or by establishing a biodiversity stewardship site.



Whilst the objective of this mapping is understood, it has been applied inaccurately and does not properly represent the ecological context of the site.

The CPCP team has confirmed that ground truthing was not undertaken across the site in preparing the draft CPCP. Of note, the draft CPCP mapping have identified several 2<sup>nd</sup> Strahler Order streams that do not exist on the ground.

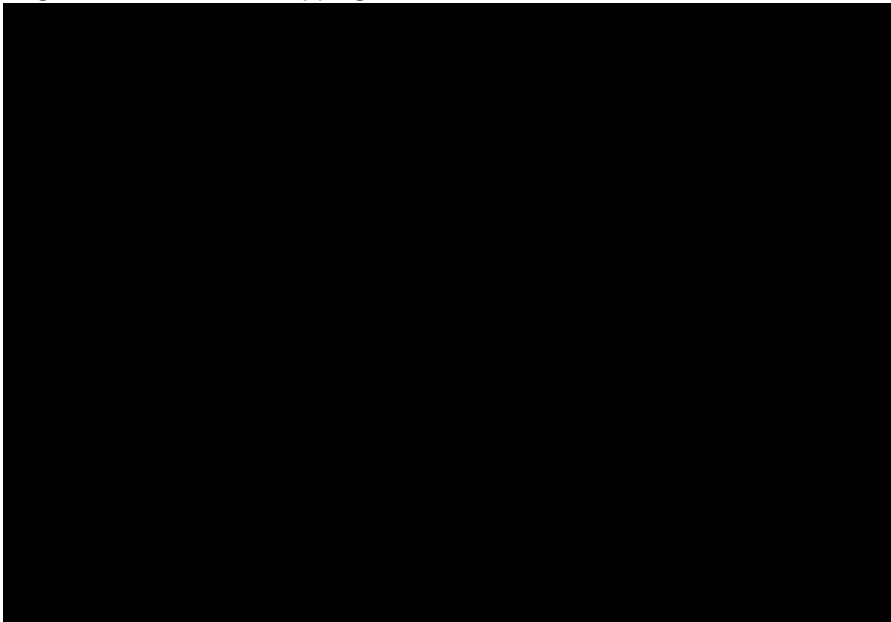
Additionally, the Department has used limited spatial data and the identification of non-certified / E2 zoned land was not conducted at a detailed, local planning scale. Consequently, some areas that are composed of poor quality and/or degraded vegetation and indiscernible creeks have inappropriately been identified as non-certified land / E2 zoned land.

Similarly, it is noted that some large patches of healthy vegetation suited to be SCAs have not been appropriately mapped. Of note, there are two easements corridors that cross north-south throughout the site. These corridors are mapped as excluded within the draft CPCP (refer to Figure 5). These easement areas are not developed or protected and consequently, this mapping is inappropriate.

It is noted that the Georges River Corridor accommodates high quality koala habitat. The protection of this habitat is supported, however, the draft CPCP mapping has identified the cleared areas east of Appin Road as E2 land which is inappropriate. It is noted that the creation of a new SCA on the eastern side of Appin River would lead to a greater environmental benefit.

Further details on these matters are provided at Section 1.3 of this submission and **Attachment A**.

Figure 5 Draft CPCP Mapping



The non-certified mapping under the draft CPCP conflicts with the proposed Master Plan's land use distribution. As identified in the sections above, the Master Plan was informed by an analysis of the ecological values of the site. Consequently, following further assessment conducted by Eco-logical, following amendments at Section 1.3 of this submission will ensure the best biodiversity and urban design outcome is achieved.



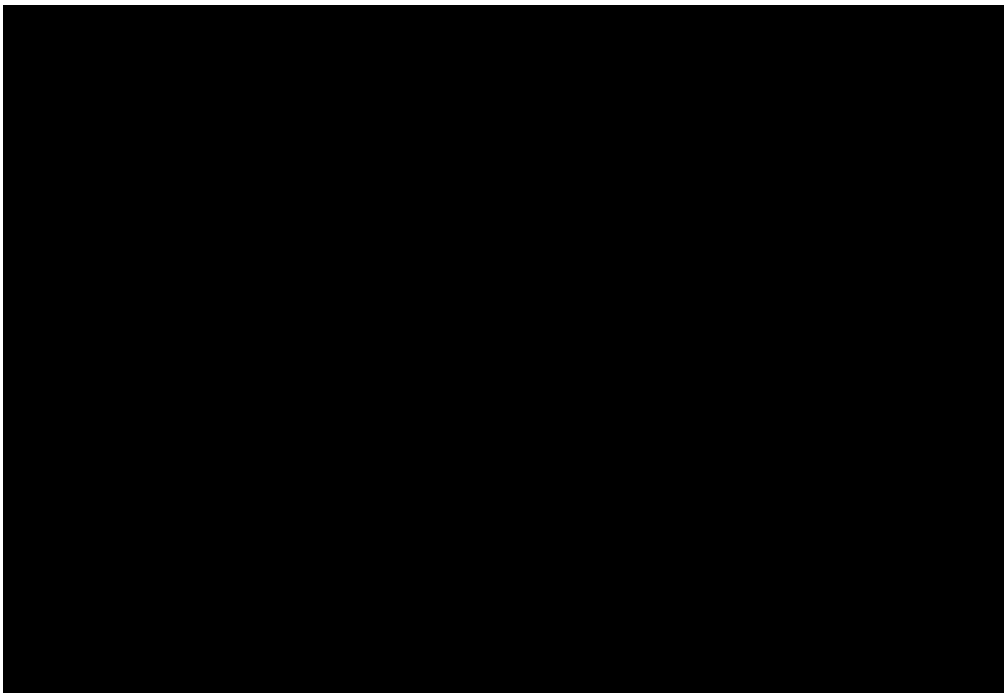
### 1.3. PROPOSED MAPPING / BIODIVERSITY OFFSET

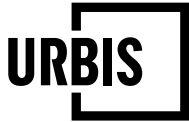
The objective of the non-certified / E2 mapping is supported. However, the proposed mapping does not properly consider the context of the site and will unreasonably compromise the development potential of the site. Of note the non-certified mapping and subsequent E2 zoning will prohibit any urban development within some lands which have little identified ecological value. Similarly, the mapping does not reflect the suitable biodiversity protection measures for the high ecological values that are at the site.

As such, it is essential that the proposed non-certified / E2 mapping be amended as follows:

- The draft non-certified / E2 Environmental Conservation and Strategic Conservation Area mapping needs to be amended and consistent with the mapping as provided in Figure 6 and Attachment A.
- The draft non-certified / E2 mapping is to be deleted for the east-west road corridor at the northern border of Lot 1 DP 707208, in accordance with the master plan in Figure 4. This area is to be mapped as certified urban capable land
- The draft non-certified / E2 mapping is to be deleted for areas with limited biodiversity values, including the cleared areas east of Appin Road. These areas are to be mapped as certified urban capable land.
- New Strategic Conservation Area are to be mapped at areas with large patches of avoided vegetation. A new Strategic Conservation area is recommended to be mapped on the east side of Appin River.
- The two corridors mapped as 'excluded' are to be mapped as 'Certified - Urban Capable Land'.

Figure 6 Amendments to Non-certified / E2 Zoning and Strategic Conservation Area mapping





The amendments in non-certified / E2 mapping as well as exclusion areas will better reflect the ecological context of the site.

The amended strategic conservation areas will better equip the site for future biodiversity conservation and offsets, to the benefit of the site and the overall Growth Centre. This will also support the draft CPCP's objective of achieving an offset target of 5,475ha.

The amendments will ensure accurate and thorough consideration of the site's ecological values whilst reducing unnecessary complication and conflict with the intended urban development at the site. This will enable appropriate housing, employment, and service development at the site whilst also allowing for a more effective biodiversity outcome. This is consistent with the CPCP vision to "support the delivery of infrastructure, housing and jobs for the people in the Western Parkland City while protecting important biodiversity".

## **2. CONCLUSION**

For the reasons outlined in the previous sections and Ecological's response to the draft CPCP, we provide suggested amendments as detailed above as to adjust the mapped non-certified and excluded areas whilst recognising Strategic Conservation Areas.

We acknowledge the effort of DPIE to prepare such an extensive conservation plan and thank the Department of Planning, Industry and Environment for the opportunity to respond in anticipation of delivering a collaborative plan.

However, the draft CPCP mapping does not properly reflect the ecological and planning context of the site. The proposed amendments outlined in this submission will result in a logical and acceptable conservation process that better accounts for the fragmented and isolated ecological land as well as the koala habitat.

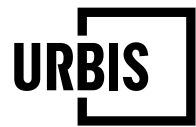
We respectfully request that the proposed non-certified / E2 rezoning, excluded areas and strategic conservation area mapping be adjusted to achieve a better biodiversity and ecological outcome. This will ensure that the urban development of this site can progress effectively so that the important housing and employment development can continue.

The consortium area is a key urban element of the Greater Macarthur Growth Area. It needs a balanced conservation outcome so that the urban development objectives of this critically important Growth Area can be achieved. There are limited identified Growth Areas in South Western Sydney. The identified urban potential of the land needs to be kept to ensure that a viable new community can emerge. The conservation outcomes for the area are respected and supported. However a more balanced outcome is sought based on the recommendations in this submission and Attachment A prepared by Ecological.

Please do not hesitate to contact us with any queries on this submission. We would welcome the opportunity to meet with you to discuss this submission.







Yours sincerely,



13 October 2020

Our ref: [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Attention: [REDACTED]

Dear [REDACTED]

**Submission on biodiversity outcomes of the draft Cumberland Plain Strategic Assessment and Conservation Plan**

I refer to your request on behalf of the Gilead Landowners Group (GLG) seeking advice/comment on the proposed certified urban capable land and biodiversity conservation outcomes arising from the draft Cumberland Plain Strategic Assessment Report (CPAR) and Cumberland Plain Conservation Plan (CPCP) and how it affects you groups landholdings.

**Background**

As you are aware, Eco Logical Australia (ELA) was commissioned by the GLG in December 2016 to undertake preliminary ecological and bushfire investigations to support a planning proposal (ELA 2018-**Annexure A**). The resulting report and spatial data was provided to the Department of Planning, Industry and Environment (DPIE) in March and October 2019.

However, in 2017/18, along with other major landholders in the Growth Areas, the GLG were approached by the DPIE to participate in the 'Cumberland Plain Strategic Assessment' as part of delivering the Western Parkland City and sought consent to enter your lands to undertake ecological survey work. The GLG granted permission for the Department's consultants to enter your land holding in October 2019 to undertake these field investigations.

**Explanation of Growth Areas Strategic Assessment process and benefits to landholders.**

On the 26 August 2020, the Department of Planning, Industry and Environment (DPIE) placed the draft Cumberland Plain Strategic Assessment Report (CPAR) and Cumberland Plain Conservation Plan (CPCP) on public exhibition, inviting comments/submission by 9 October 2020. The reports follow work commenced by the Department in 2017 and early stakeholder consultation with major landholders in 2018/19 (including the GLG).

The Strategic Assessment covers nearly 200,000 ha in four Growth Centres (Greater Macarthur Growth Area(GMGA), Wilton, Aerotropolis and the Greater Penrith to Eastern Creek Investigation Area) and

identifies extensive areas of 'Urban Capable Lands' in the GMGA which it proposes to 'biodiversity certify' under the NSW *Biodiversity Conservation Act 2016* (BC Act) and seek approval for development under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

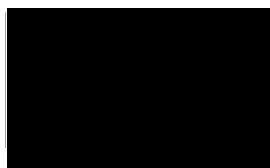
If approved, the Cumberland Plain Strategic Assessment and Conservation plans have significant benefits for landholders such as the GLG (i.e. the land will be identified for rapid rezoning and you will not be required to undertake further ecological assessments of the lands or obtain further approvals under the BC and EPBC Acts when submitting development applications).

However, as you are aware, these landholdings, despite their long history of agricultural use, still retain significant areas of remnant native vegetation, comprising critically endangered Cumberland Plain Woodland (CPW), Shale Sandstone Transition Forest (SSTF) and habitat for threatened flora and fauna, most notably the Koala, which are protected under NSW and Commonwealth environmental legislation. In identifying urban capable land, the Department has applied a number of 'avoidance criteria' to demonstrate under relevant environmental legislation that impacts to areas of 'high biodiversity conservation value' have been avoided, minimise and/or mitigated to the maximum extent possible before committing to offsetting residual impacts.

The Conservation Plan proposes to 'protect' lands containing high-value vegetation that has been 'avoided' with environmental conservation (E2) zoning to support the conservation objectives. The Plan also identifies approximately 29,000 ha of 'Strategic Conservation Areas' (both inside and outside of the Growth Centres) where the Government (via the Office of Strategic Lands (OSL) and the Biodiversity Conservation Trust (BCT) will prioritise the 'voluntary' acquisition of lands, and prioritise the targeting of environmental levies to secure 'Biodiversity Stewardship' sites to meet the plans 5,475 ha biodiversity offset targets.

The following attachment outlines what the plans proposes for the GLG landholdings with a number of suggested minor changes to the proposed E2 lands that could be taken into consideration now or at the precinct planning stages to achieve a better urban and conservation outcome. Subject to the suggested changes, the plan strikes a balanced outcome for the land holdings similar to the Masterplan and I recommend that it should be supported.

Regards,



**Senior Principal Consultant - Biodiversity Offsets, Eco Logical Australia**

**Annexure A:** ELA 2018. South Campbelltown Biodiversity Overview. Report prepared for Gilead Landholders Group Pty Ltd, February 2018.

## Attachment 1: Review of draft Cumberland Plain Strategic Assessment Report (CPAR) and Cumberland Plain Conservation Plan (CPCP) outcomes for Gilead Landowners Group

It should be noted that the Strategic Assessment report is a large scale assessment covering nearly 200,000 of land, and accordingly the level of detail/ecological data collected for the assessment is high level and has not been as extensively ground-truthed as a normal more local release area would be.

The Departments consultants have undertaken very limited field based survey of the GLG landholdings (refer to **Figure 1**) compared to the assessment undertaken by ELA in 2017/2018 (**Figure 2**) and have relied to a major extent on regional scale vegetation mapping (updated and refined with more recent aerial photographs), limited over the fence validation of vegetation condition (particularly where landholders have not granted access permission), expert opinion on the presence and extent of threatened species habitat (in the absence of target survey) and use of other databases (i.e. 1:25,000 scale hydro-lines to show the extent of 2<sup>nd</sup> order and higher streams to be avoided). An assessment of these creek lines indicates that several 2<sup>nd</sup> order sections mapped by the Department do not exist on the ground, or have a poorly defined channel resulting from many years of agricultural land management, and are constrained by existing structures (farm dams)

The Department has made limited use of the spatial data provided by ELA in 2019 (**Figure 2**) and have developed an updated vegetation condition layer that maps the vegetation as 'intact', 'thinned', 'scattered trees' or 'derived native grassland' (**Figure 3**).

As a result, the Department acknowledges that the proposed boundaries for Urban Capable Land and E2 zoning will need 'refining' at a more detailed, local planning scale (i.e. Precinct Planning), which I recommend is supported. I also note that the DPIE has stated it will only make changes to the Urban Capable Land boundary that are consistent with their 'avoidance criteria'.

I note that the Departments Urban Capable land boundaries are generally consistent with the GLG 2018 MasterPlan (**Figure 4**) and should be supported in Principal, subject to the following suggested minor amendments (based on our more detailed knowledge of the land holdings) as numbered A, B, C etc on **Figures 5** and **6**. The comments are generally consistent with the avoidance principles used in the assessment report and result in a similar area of urban capable land and more consolidated and viable conservation areas. The suggested amendments are provided on a non-prejudicial basis.

**Figures 5** shows the extent of Urban Capable Land (proposed by DPIE for biodiversity certification) and areas avoided for biodiversity values that are proposed to be zoned E2 Environmental protection. **Figure 6** shows areas considered to be 'Important koala habitat' across the GLG landholdings and which have been identified as secondary koala corridors by DPIE 2019. **Table 1** is a breakdown of these areas by landowner.

	Abbott	Alloggia	Cenatiempo	MIR	Other	Total
Urban Capable Land	43.53	59.8	24.91	373.3	46.92	548.46
Environmental Protection Zoning	17.29	12.82	15.10	306.13	0.20	351.55
<b>Total Land holding</b>	<b>60.82</b>	<b>72.62</b>	<b>40.01</b>	<b>679.43</b>	<b>47.12</b>	<b>900.00</b>
<b>Proportion proposed as Urban Capable (%)</b>	<b>71.5%</b>	<b>82.3%</b>	<b>62.2%</b>	<b>54.9%</b>	<b>99.6%</b>	<b>60.9%</b>
Strategic Conservation Areas***	14.30	0.00	0.00	293.76	0.00	308.06

\*\*\* a subset of land proposed as E2

1. The **Excluded Areas** within the GLG landholdings (defined by the CPAR as areas already protected) include two existing easements. These areas are not already protected and should be included in the 'Urban Capable Land' to avoid any problems with areas within the development footprint being certified and not certified (i.e. roads crossing the easements) and thus requiring separate assessment/approval at a later stage. Parts of these excluded areas are mapped as vegetation and if not included in the land to be certified – Urban Capable, will require separate assessment and approval
2. **Access to Landholdings** – The South Gilead landholdings are currently accessed via an existing paved road along the northern boundary of Lot 1 DP 70208 (Label A). The draft CPCP maps this access as E2 and as a Strategic Conservation Area. The mapping in this area needs refining to maintain and enhance this main access point within Lot 1 DP 70208.
3. Based on the map showing the extent of on-ground survey undertaken by the Departments consultants (**Figure 1**), there are large areas of the property, including large patches of vegetation and several creek lines, that have not been verified for condition, despite the Departments vegetation condition mapping indicating the vegetation is either 'intact' or 'thinned' (refer to **Figure 3**).
  - a. As a result several 2<sup>nd</sup> order creeks (Woodhouse, Nepean and tributaries of Mallaty Creek – Labels D, E, K and L) that have been identified as 'avoided for other reasons' that are poorly defined, have no discernible channel and would likely be supported by the NRAR for removal, are not included in urban capable land.
  - b. Similarly, areas of poor quality vegetation (low canopy cover, few shrubs, high proportion of exotic woody vegetation (African Olive) and extensively modified ground cover) (mapped as 'thinned' by the Strategic Assessment – refer to **Figure 3**) and/or patches that are extremely narrow (and have large edge to area ratios that has had a long history of agricultural land use, pasture improvement and cropping) and consequently have very limited biodiversity value have been identified for E2 Zoning (Labels B, D, E, H, I, J & L). The boundaries of these areas need refining and where clearly not of high conservation values should be categorised as Urban Capable or retained as part of RE1 zoning, mixed in with open space use, as proposed in the Concept Master Plan for South Gilead.
4. All or most avoided vegetation, regardless of current condition, has been identified for E2 Zoning, including narrow strips of degraded vegetation along 2<sup>nd</sup> order creek lines that currently suffer from edge effects (e.g. labels B, D, E, I, J & L) that will be exacerbated by the proposed surrounding Urban Capable Land. It would make a better long term, viable conservation outcome if these areas were included in Urban Capable Land and the other key avoided areas (e.g. Mallaty Creek and Leaf's Gully )were consolidated.
5. Following from the point above, there are large patches of avoided vegetation identified as E2 that are not also identified as Strategic Conservation Areas (SCA) (see parts of label M)
  - a. These areas are >10 ha, several 20-30 ha, and have an area equal to or greater area than average registered Biobank site in western Sydney and thus with active conservation management can remain viable.
  - b. These areas should be classified as SCA and prioritised for acquisition within the Growth Centres to meet offset targets before Environmental Levies are used to encourage registration of Stewardship sites outside the Growth Centre area.

- c. As the proposed E2 zoning does not require active management, it is very likely that these lands will degrade in condition over the long term unless actively managed. Management by Local Government as 'Community Land - Local Bushland Reserves' will provide better long-term protection than simply zoning E2), with adjacent open space/recreation opportunities
  - d. These areas will be cheaper to secure as the lands have limited residual value to current land owners once adjoining lands are developed and can be used to reduce environmental levies whilst still meeting 'like for like' offset targets.
6. The proposed **Georges River Koala Reserve** and **priority areas for restoration of Koala habitat (Figure 4)** is based on meeting DPIE's and the Chief Scientist's koala habitat management reports (DPOE 2019 & NSW Office of Chief Scientist and Engineer 2020) most crucial link between the 'Campbelltown/Southern Sydney' koala population and the Southern Highlands. The Georges River corridor has existing high quality koala habitat along most of its length ranging in width from at least 400m to over 1km wide and rightly has been identified as a 'Primary' koala corridor by DPIE 2019 and an "Important Koala habitat' in the CPCP, however, it has not taken into consideration the existing habitat on the eastern side of the Georges River corridor, and instead identifies areas of cleared land to be prioritised for 'restoration' within the Growth Centre to widen this corridor (Label A in **Figure 6**). It is argued that a greater environmental benefit could be achieved by identifying lands on the eastern side of the Georges River as 'Strategic Conservation Areas' and targeting these lands for registration of Stewardship sites.
  7. Similarly, the proposal to erect koala exclusion fencing along the eastern side of Appin Rd, where there are multiple small rural lot dwellings requiring daily access could achieve the same outcomes for Koalas if the exclusion fencing followed the existing treed areas behind or to the east of the cleared land as shown in **Figure 6**. Smaller areas behind this fence could then be prioritised for restoration (Label F).
  8. The draft CPCP identifies **Important Koala Habitat** (defined as areas mapped by DPIE 2019 as primary and secondary corridors and as being critical to the long-term viability of koalas) along each of the creek lines within the GLG landholdings (Mallaty, Leaf's Gully and Nepean Creeks), however, other than parts of the proposed Mallaty Creek E2 corridor, all are currently too narrow to support viable breeding units of koala (as defined by Biolink 2018) and without significant enhancement (widening by tree planting) will suffer significant edge effects. Further, and consistent with the Chief Scientist's report, these smaller corridors have functional dead ends (i.e. do not connect to anything).
    - a. Whilst DPIE 2019 and the Chief Scientist report 2020 do not specify how many east-west koala corridors connecting the Georges and Nepean River should be protected, the CPCP identified only one east -west crossing at Ousedale Creek to the south of the GLG landholdings to be protected as a koala corridor. In addition to this, Lendlease has publicly committed to two crossings at Noorumba and Beulah. However the Chief Scientist's report identifies Mallaty Creek (its Corridor D) as an important corridor to protect as it can achieve an "achievable crossing". It is not clear how an effective crossing can be secured at Appin Road for Mallaty Creek not to be a 'functional dead end' as the land to the east is subdivided into several small rural lots with extensive clearing (see label C).
    - b. Similarly the eastern end of the Nepean Creek corridor and the smaller creek to its south (label E) adjoins proposed development areas in Gilead, and will also have 'functional dead ends' and accordingly should not be identified as 'Important Koala habitat' or for koala exclusion fencing.

Parts of the higher quality larger patches of remnant bushland along these creek lines can still be protected for vegetation community protection and open space as proposed in the GLG Masterplan (**Figure 4**).

## References

Biolink 2018. South Campbelltown Koala Habitat Connectivity Study. Final report to Campbelltown City Council, updated April 2018.

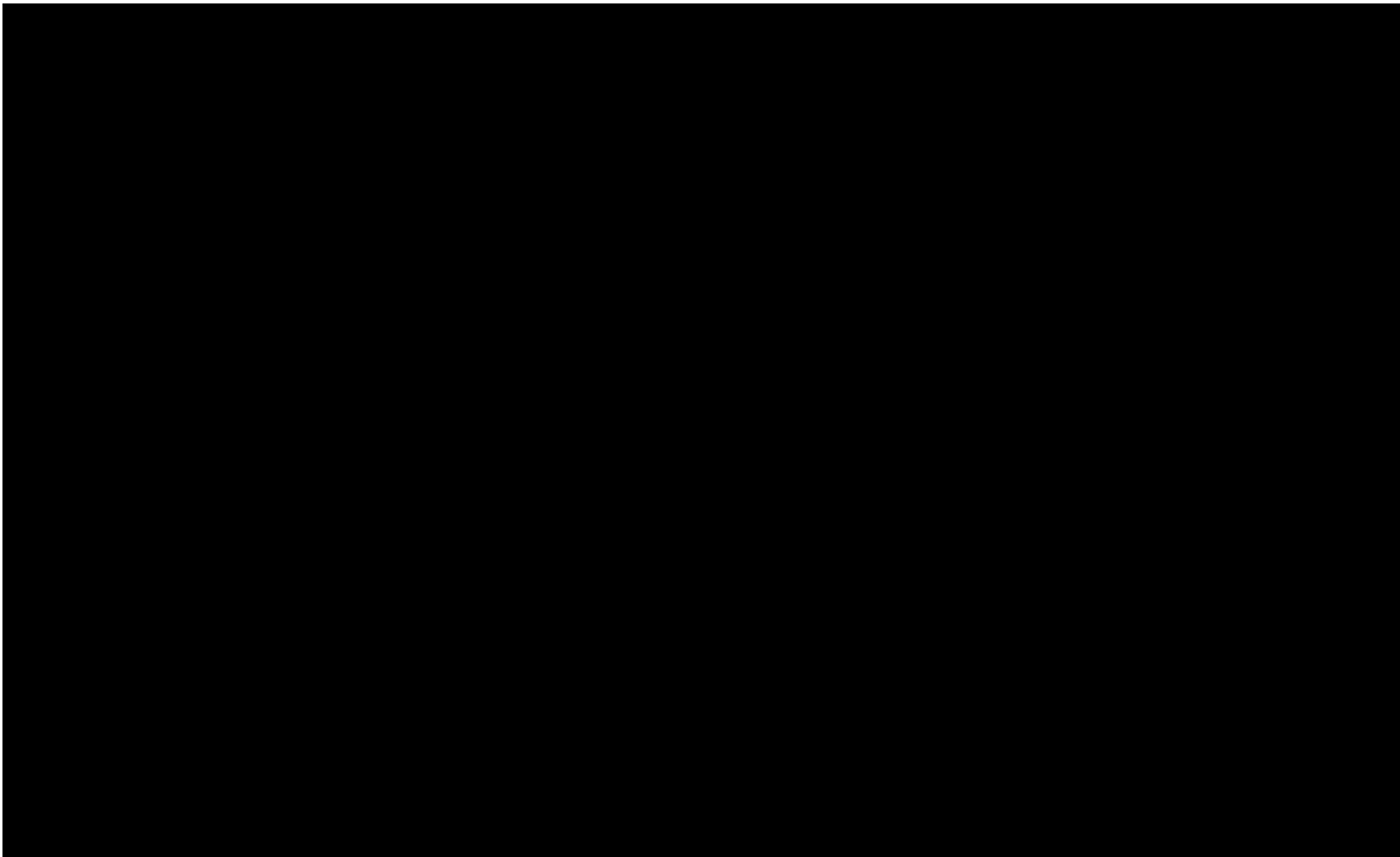
Department of Planning, Industry and Environment (DPIE) 2019. Conserving Koalas in the Wollondilly and Campbelltown Local Government Areas.

Office of NSW Chief Scientist and Engineer 2020. Advice on the protection of the Campbelltown Koala population. Koala Independent Expert Panel, 30 April 2020.

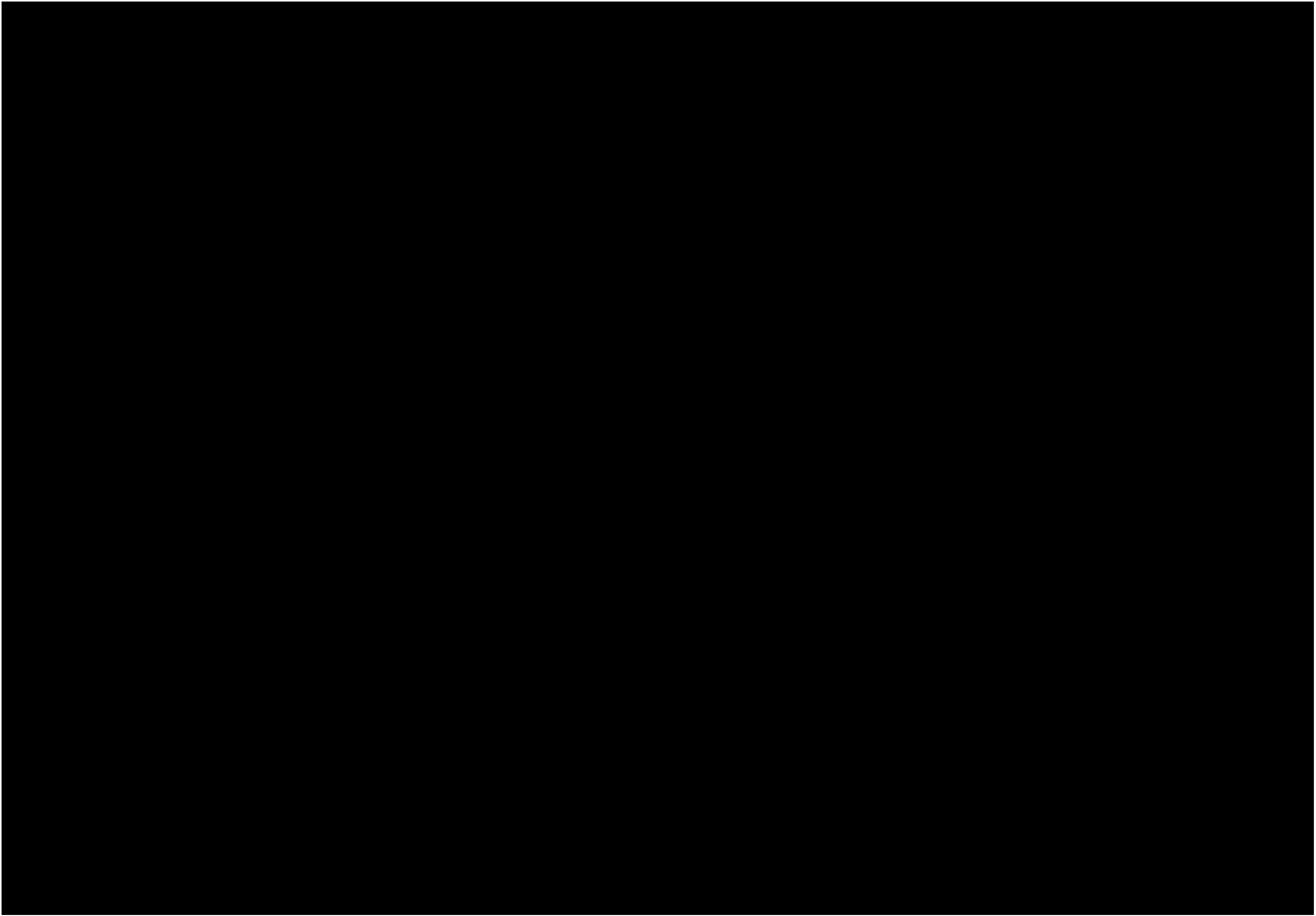


**Figure 1: Extent of DPIE survey effort across South Gilead landholder groups land holdings**

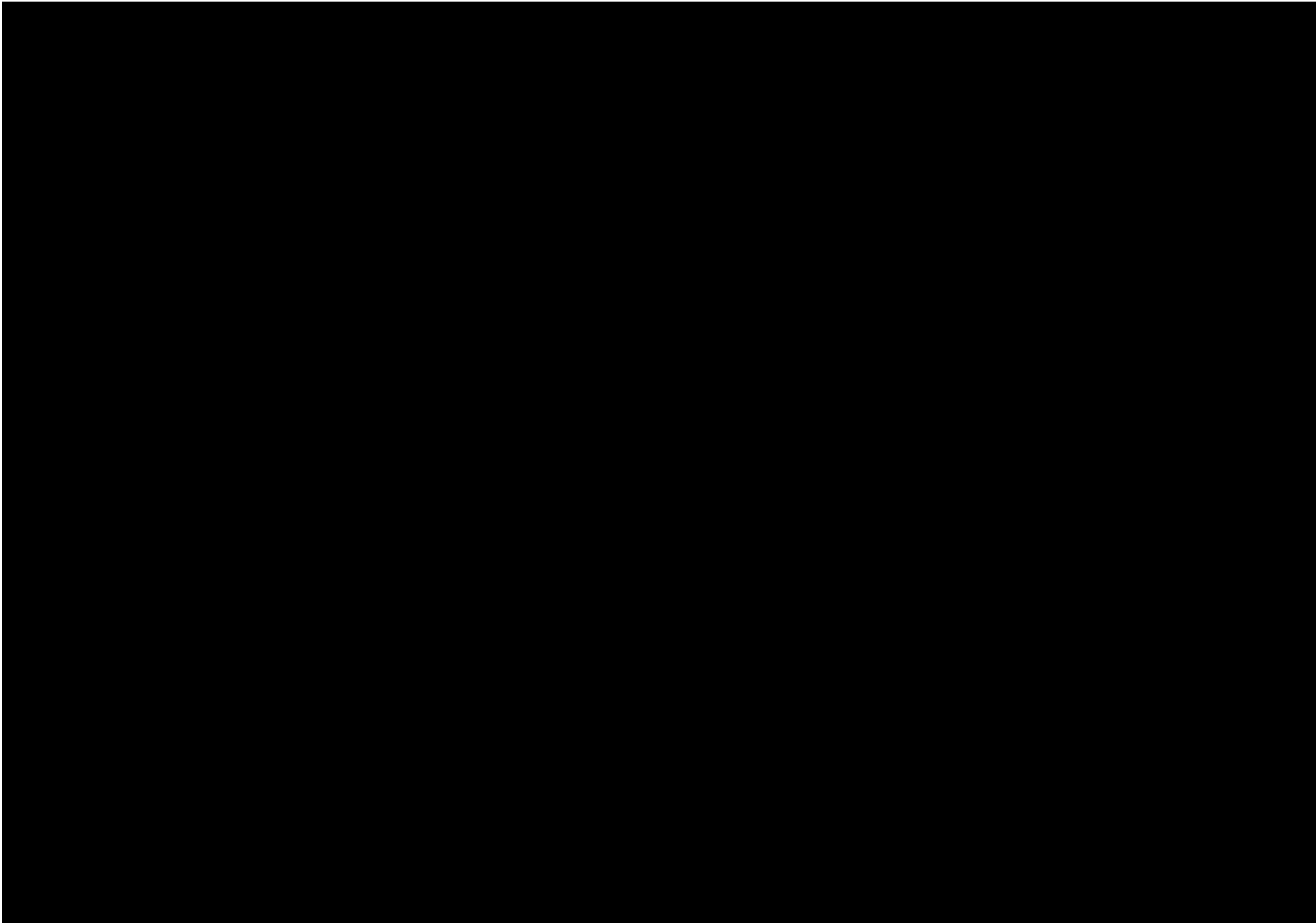




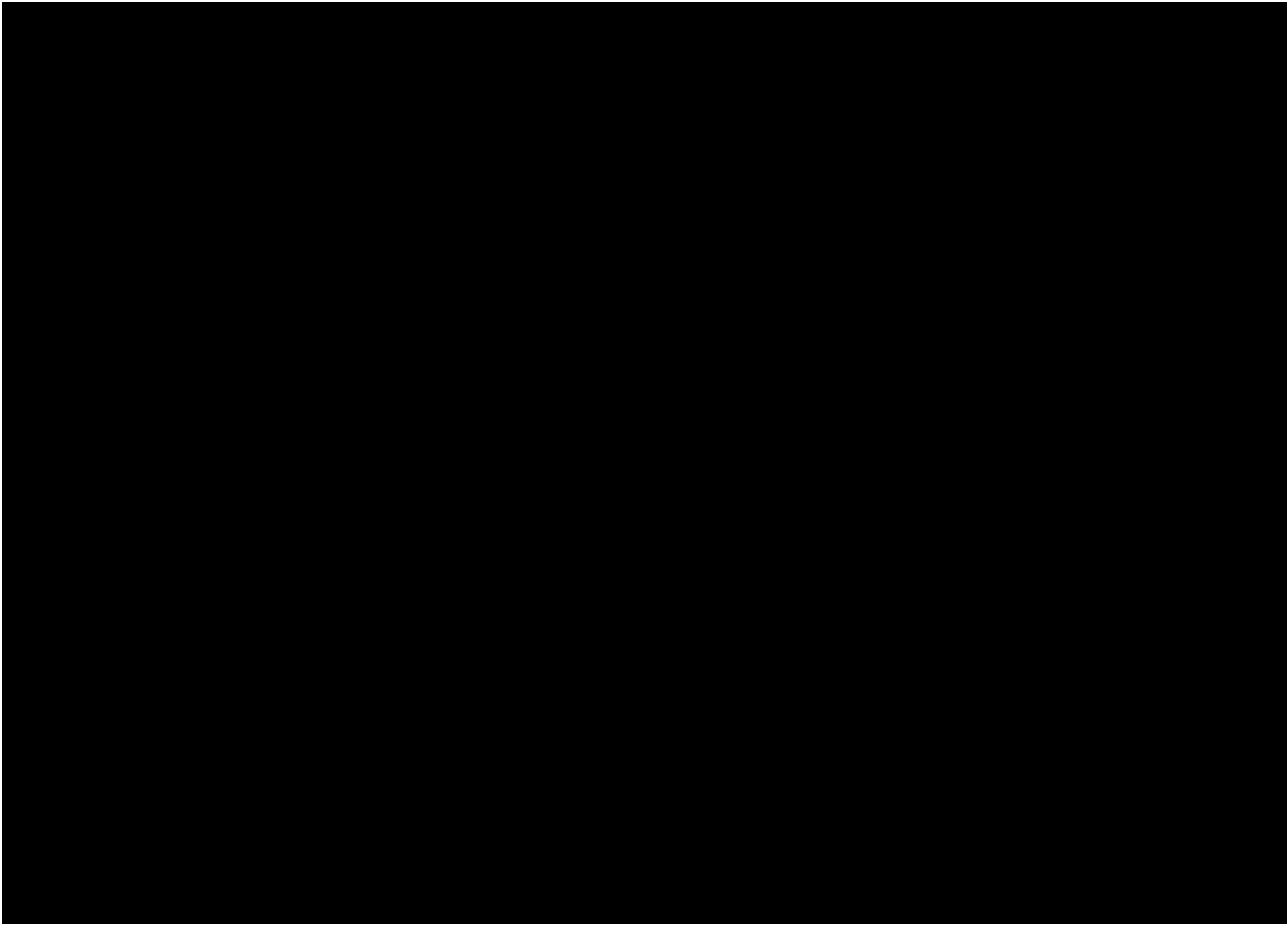
**Figure 2: Extent of ELA preliminary survey effort across South Gilead landowner groups landholdings in 2018**



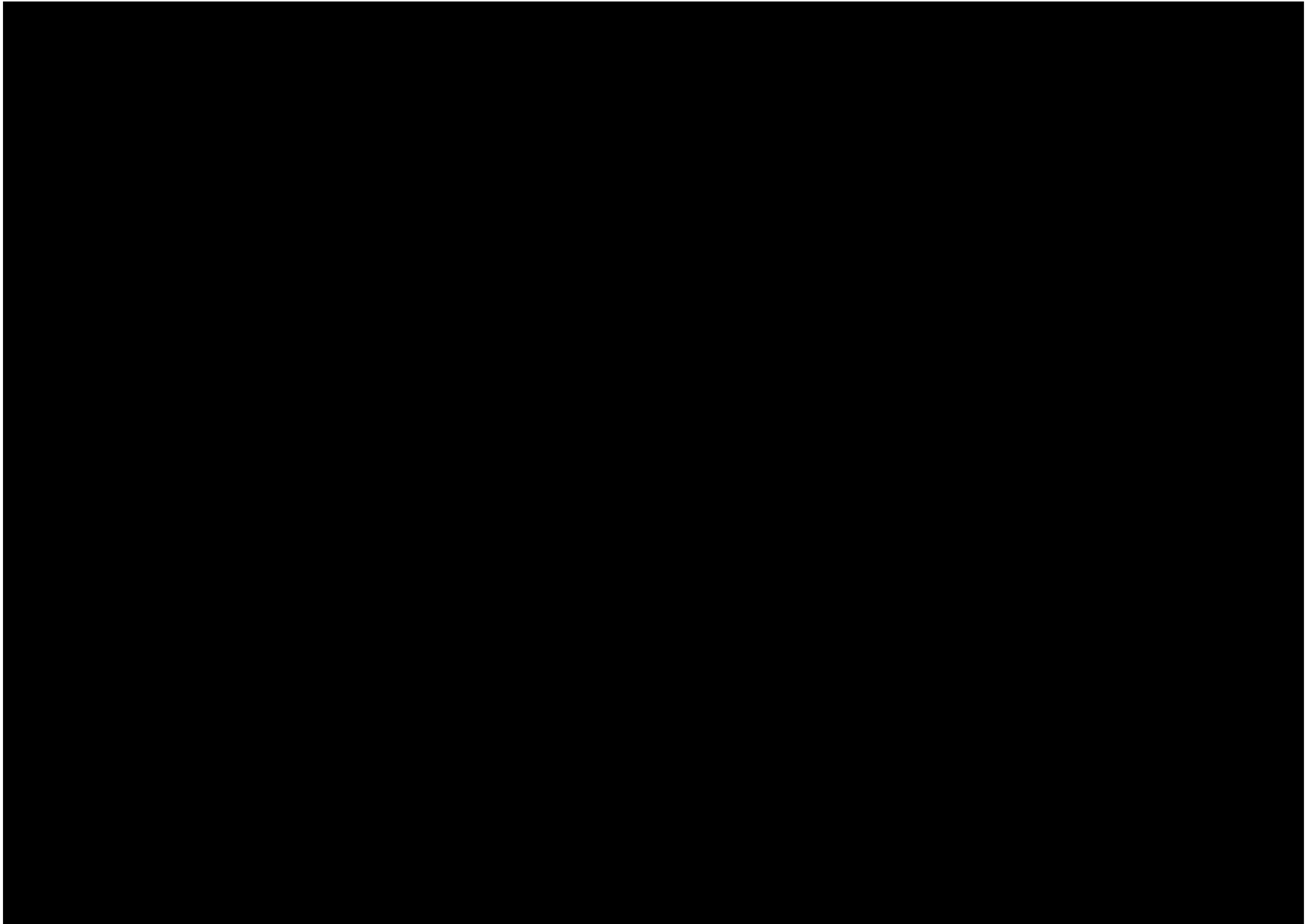
**Figure 3: Vegetation condition across the South Gilead landowner groups landholdings as mapped in the Strategic Assessment**



**Figure 4: South Gilead Landowners Group Concept Master Plan 2018**



**Figure 5: Comments on the proposed Urban Capable Land and E2 Zoning – South Gilead**



**Figure 6: Comments on the identified Important Koala habitat and corridors – South Gilead**

