

To whom it may concern,

I represent the landowner of [REDACTED] Appin (Lot [REDACTED] see **Figure 1**), an almost [REDACTED] hectare property with a frontage of [REDACTED] metres to Appin Road. The site is identified under the Draft Cumberland Plain Conservation Management Plan as:

- Shale Sandstone Transition Forest;
- Georges River Koala Reserve;
- Restoration for Important Koala Habitat in the Georges River Koala Reserve;
- Non Certified – Avoided for Biodiversity;
- Strategic Conservation Area; and
- Proposed Environmental Conservation Zoning.

I oppose the designation of the site under the above categories on the following grounds:

- The site generally cleared of trees, with the exception of a few scattered trees at the rear and a mix of native and exotic landscaping trees forward of the existing dwelling. The site is currently used for agricultural and residential purposes which have been ongoing for many years. Revegetation within the short or medium term is therefore highly unlikely.
- If the site is revegetated, bushfire risk and to existing development on the western side of Appin Road will be severely increased.
- Continuing a band of development along the eastern side of Appin Road to a specified depth (e.g. 200 metres), enables partial revegetation of the eastern edge of lots, as well as the provision of a linear north-south open space buffer managed as APZs by private landowners. The open space could potentially accommodate playing fields, amenities and walking and cycling tracks constructed at the developer’s cost for the benefit of existing and future residents.
- Whilst the Draft Cumberland Plain Conservation Management Plan points to the Chief Scientist Koala Report as justification for the proposed Georges River Koala Reserve, the Chief Scientist Koala report does not provide a clear evidence base for the width of the corridor.
- The site does not meet the requirements for conservation in accordance with the “conservation steps” as shown in **Table 1** below.

Table 1: Review of the site against the Conservation land selection steps

Conservation land selection steps:		Comment:
1)	Secure offsets from priority areas within the Plan’s strategic conservation area, with a preference for (in order):	
a)	target TECs10 with the greatest impact, based on the 2019 impact assessment (Cumberland Plain Woodland, Shale Sandstone Transition Forest, River-Flat Eucalypt Forest)	Limited scattered trees on site.
b)	target TECs that have the highest percentage cleared status (as identified in the BioNet Vegetation Classification database for the corresponding PCTs)	Limited scattered trees on site.
c)	target TECs or species habitat where there is a shortfall, based on offset reconciliation accounting (this includes sites with restoration potential)	Limited scattered trees on site.
d)	areas that provide potential habitat for target species	Cleared, agricultural

Conservation land selection steps:	Comment:
(identified in the Plan) or for the following EPBC Act-listed key species: i) Grey headed flying fox ii) Regent honeyeater iii) Green and Golden Bell Frog	lands, unlikely to provide habitat.
e) areas with additional conservation benefits (that is, connectivity; riparian habitat; refugia for threatened species; and adjacency to existing protected areas).	Cleared, agricultural lands, unlikely to provide habitat.
2) Secure offsets from elsewhere within the Plan’s strategic conservation area following the same ecological criteria specified in Step 1.	As above.

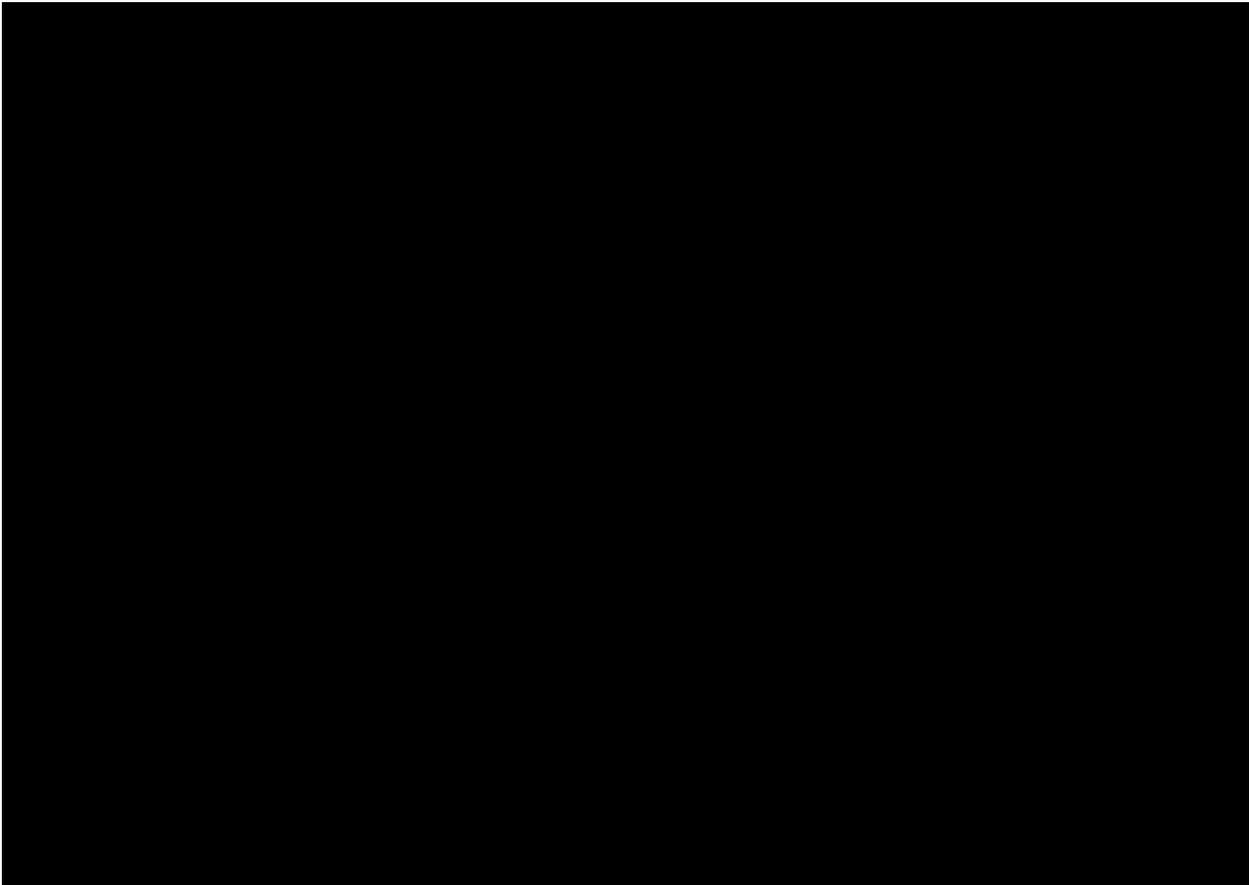


Figure 1: Site aerial – note cleared of vegetation except scattered trees and proximity to existing urban areas