

SAVESYDNEYSKOALAS



NSW Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta 2124
Submitted online via
biodiversity@planning.nsw.gov.au

02 November 2020

To Whom it May Concern

Re: Objection to Draft Cumberland Plain Conservation Plan:

Save Sydney's Koalas goal is to secure the continued growth of the Koala colony in Sydney's south west - the largest recovering Koala colony in NSW, in a state where Koalas are on a trajectory to extinction by 2050 - accelerated by the 2019/20 bushfires. **Fundamental flaws in the Draft Cumberland Plain Conservation Plan will fail to protect Koalas in South West Sydney.**

Koalas were appearing, albeit in small numbers all around the edge of the Sydney basin - Kuring-gai, Arcadia, Kurrajong and even Mulgoa before the recent bushfires devastated surrounding areas. The bushfires, however, left the colonies in South West Sydney relatively unaffected, and the growth in Koala sightings south of Sydney from Menai to the Royal National Park appear to be the result of Koalas radiating out from the healthy Campbelltown and Wilton colonies. This is the brightest spot on the otherwise depressing trajectory of Koalas in NSW.

Protecting Cumberland Plain woodland protects Koalas. Koalas can survive in sandstone country, as they have on the Holsworthy Military but they thrive on the nutrient rich Cumberland Plains shale geology. Koala numbers per hectare and their general health reflect the nutrient richness of the soil¹. The Campbelltown colony only substantially increased when

¹ Stalenberg, E., Wallis, I. R., Cunningham, R. B., Allen, C., & Foley, W. J. (2014). Nutritional correlates of koala persistence in a low-density population. *PloS one*, 9(12), e113930. <https://doi.org/10.1371/journal.pone.0113930>

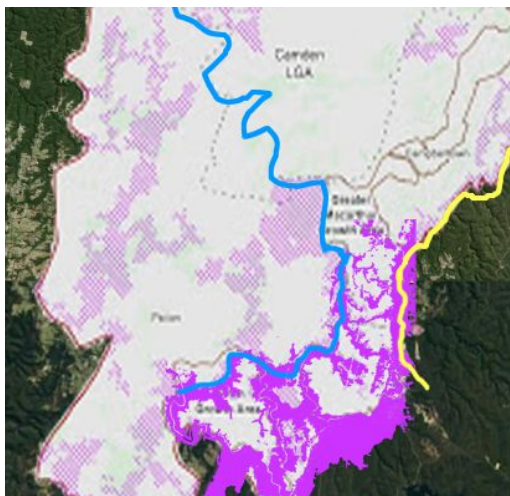
it moved to the Sandstone Shale Transition Forest along the western bank of the Georges River.

The long-term survival of Koalas and the Cumberland Plain Woodland, both rely on the maintenance of large habitat patch areas and connectivity, this is the fundamental basis for conservation worldwide. As the NSW Chief Scientist pointed out in 2016.

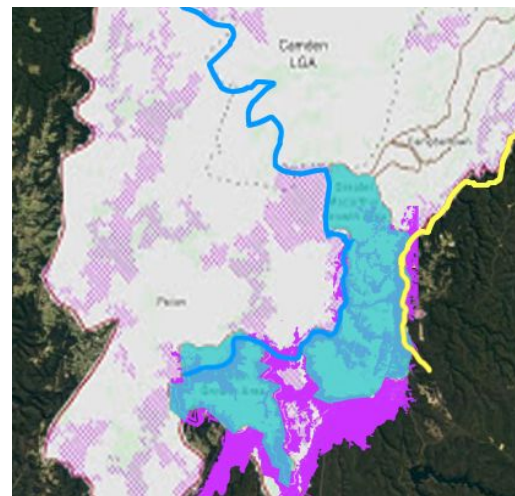
*'Koala populations need large areas of connected habitat to maintain their viability. Habitat loss and fragmentation has resulted in population decline and has been identified as a significant threat to the species persistence in NSW.'*²

While the CPCP's landscape scale and focus on biodiversity connectivity is welcome, it appears as a plan to make property development easier rather than to ensure Koala survival. Our deep reservations about the intent, sincerity and practicality of the Department of Planning's plan are these:

1. The Department of Planning's new housing **growth areas for Greater Macarthur and Wilton land almost directly on top of NSW largest recovering Koala colonies.** This is inexplicable and has created a Koala crisis where there was none. **The Department of Planning must reverse this decision.**



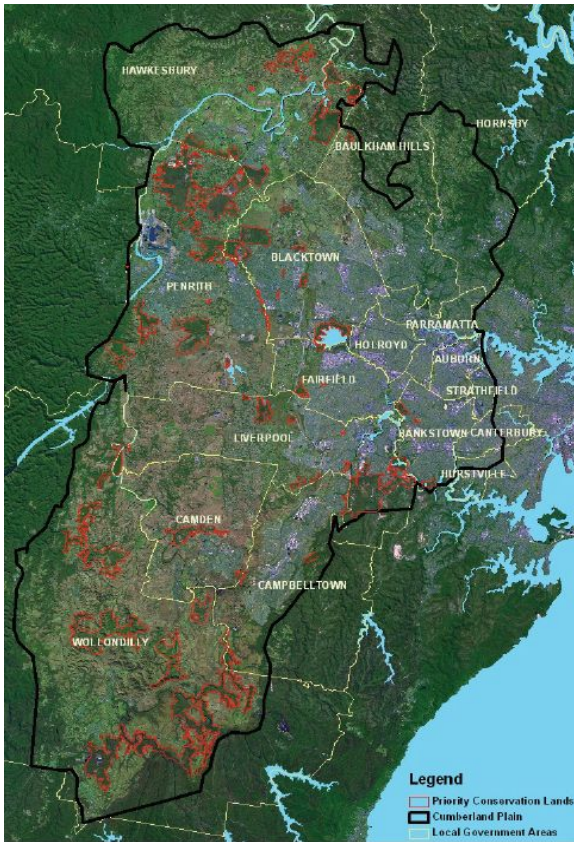
At the bottom of the CPCP area (the grey areas), Koala habitat and corridors have been identified by OEH (highlighted in deep purple)



The Greater Macarthur Growth Area (top right aqua area) and the Wilton Growth Areas (bottom left area) have been placed almost directly over the identified Koala habitat and corridors.

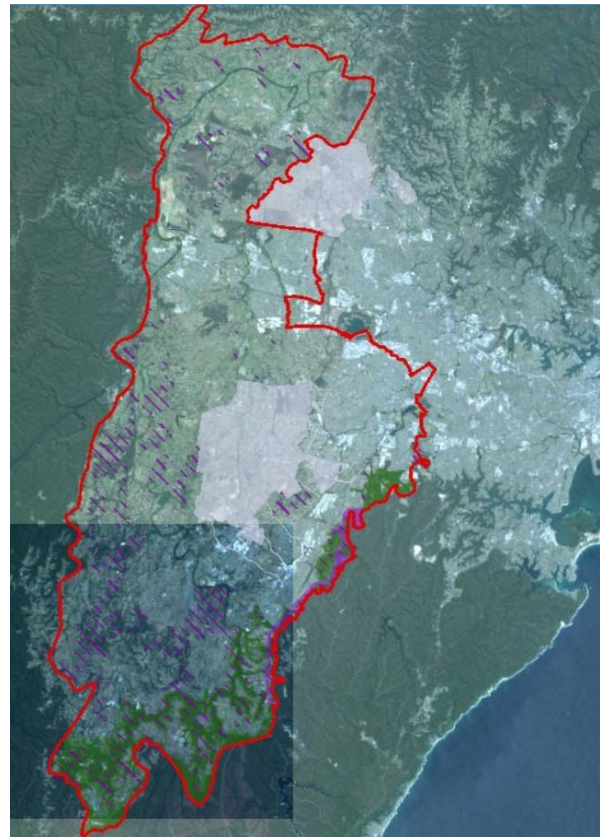
² NSW Chief Scientist & Engineer (December 2016) Report of the Independent Review into the Decline of Koala Populations in Key Areas of NSW

2. **The 2011 Cumberland Plain Recovery Plan is still relevant and should be enforced.** If the 2020 Cumberland Plain Conservation Plan, has only been created so that the 2011 Plans identified Priority Conservation Land can be developed, which is what Walkers Macquariedale and SE Wilton developments are doing, on the Allens Creek and Ousedale Creek koala corridors, then what credibility do these plans have.



The **2011 Cumberland Plain Recovery Plan** - 268,789 Ha, was created to show how the impact on the Cumberland Plain would be minimized. As new housing growth areas of the **South West** and **North West** were released. (shown in mauve in the adjacent diagram)

This Recovery Plan identified priority conservation lands (PCLs areas outlined in red in adjacent image) a total of 11,754 ha of the targeted threatened ecological communities (Cumberland Plain Woodland, Shale Sandstone Transition Forest) and a network of corridors on the Cumberland



The **2020 draft Cumberland Plan Conservation Plan** - 198,789 ha, is smaller than the previous 2011 plan the NW growth area has been removed. Conservation areas in the north have been dramatically lowered, since the 2011 plan .

And four new development growth areas have been added. The Western Sydney Aerotropolis, Greater Penrith Eastern, Wilton and the Greater Macarthur Growth Area. The number of PCL areas now called Strategic conservation areas (SCA - purple hatching), have increased in the areas south west of the Nepean.

Plan. This plan was an offsets/biobanking plan to be sourced using the \$530 million Growth Centre Conservation Fund in Western Sydney surrounds.

The targeted conservation areas of the 2011 plan have yet to be achieved, many are now lost under the new proposed growth areas.

3. The CPCP relies on Biobanking for Biodiversity goals, however, **Biobanks standards are so lax that they have little meaning as biodiversity offsets.** Lendleases Gilead stage one development saw the Department of Planning approve Koala offsets that were zoned rural not environmental, and were applied to an existing Council Bush Reserve (Noorumba and Beulah), Bushland that the DPIE was planning to stop Koalas getting to with their exclusion fencing! **Koalas need additional/accessible bushland when they lose bushland.**
4. **Biobank negotiations cannot ensure connectivity.** Connectivity needs an underlying structure that can be enforced. The only ones that have worked are vegetated riparian setbacks demanded by Water NSW. Koalas too use riparian corridors as identified in the Campbelltown Koala Plan of Management (CKPoM) and the Chief Scientists 2020 Koala report (CS2020KR). **Absolute setbacks of 450m for Koala corridors must relate to the strahler riparian scale with the widest reserved for rivers and creeks, and be applied right across Wilton and the Greater Macarthur Growth Areas.**
5. **The Department of Planning does not enforce Koala corridors when inconvenient to development.**
 - a. In Lendleases Gilead stage one - red flagged habitat was left isolated and unconnected within the middle of the development.
 - b. The Department of Planning advocates for exclusion fencing all the way from Campbelltown to Appin to stop East-West Koala migration and to stop Koalas getting into development sites. Despite the CKPoM and the CS2020KR.
 - c. The state governments Landcom - Newbrook is building over the Smiths Creek Koala corridor in Airds, one of the most successful Koala corridors.
6. **The Department of Planning gives greater emphasis to their own internal and developers Koala assessments, rather than independent assessments.** The Department of Planning wrote the Conserving Koalas in Campbelltown and Wollondilly report, which said no East-West connections between the Georges and Nepean rivers were required, this echoed an earlier Lendlease Assessment. This is despite the CKPoM and the CS2020Koala Report saying they were essential. **Independent assessments need to have greater weight than Developer commissioned reports.**

7. Under a Bilateral agreement with the Federal government the NSW Department of Planning would be in charge of Biodiversity Certification, this would be a disaster for Koalas, as Koalas evidently play second fiddle to housing development for the DPEI. **The Federal Government must continue to play an oversight role**, and the state needs a **Koala Commissioner or Koala Recovery Team to be the final approval authority** for any development in the CPCP that affects Koalas.
8. **The Department of Planning ignores/plays down Biodiversity Certification** against the long-term interests of Koalas
 - a. For Lendleases Gilead the Department of Planning used their own Conserving Koalas Report to approve it.
 - b. For Walkers SEWilton development DPIE created a new zoning regime and did not require Biocertification.
 - c. For Walkers Macquariedale, the project is once again being fast tracked.
9. The **Campbelltown Koala Plan of Management** and the **Chief Scientists 2020 Koala** reports must be adopted in full within the CPCP.
10. A **Wollondilly Koala Plan of Management** written by Council, the Department of the Environment and the Koala Commissioner must be approved before any land is rezoned or developed.
11. **All the recommendations of the 2020 NSW Upper House Koala Inquiry** that are applicable to CPCP need to be adopted.

While the NSW Department of Planning must start taking its role in stopping the extinction of the Koala seriously, so far there is little on the ground evidence that they do, this must change.