

General Manager
Campbelltown City Council
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council@campbelltown.nsw.gov.au
CC: Mike Freeland MP, State MPs, Federal MPs, Councillors

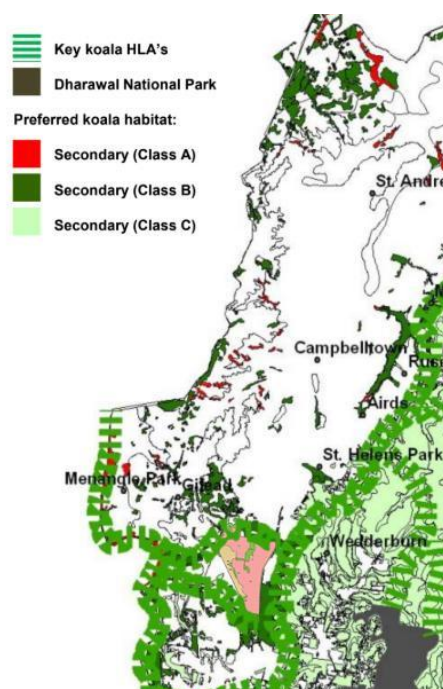
19th August 2021

Dear General Manager Lindy Deitz,

RE: Objection To Gilead Rezoning - Planning Proposal - PP 1702/2019 – Stage 1 Gilead. It threatens the survival of the Macarthur Koala colony.

We ask Council to reject Lendlease’s request for increased density as set out in this rezoning request. This planning proposal must include a 425m wide Noorumba - Menangle Creek Koala corridor as required under the Campbelltown Koala Plan of Management.

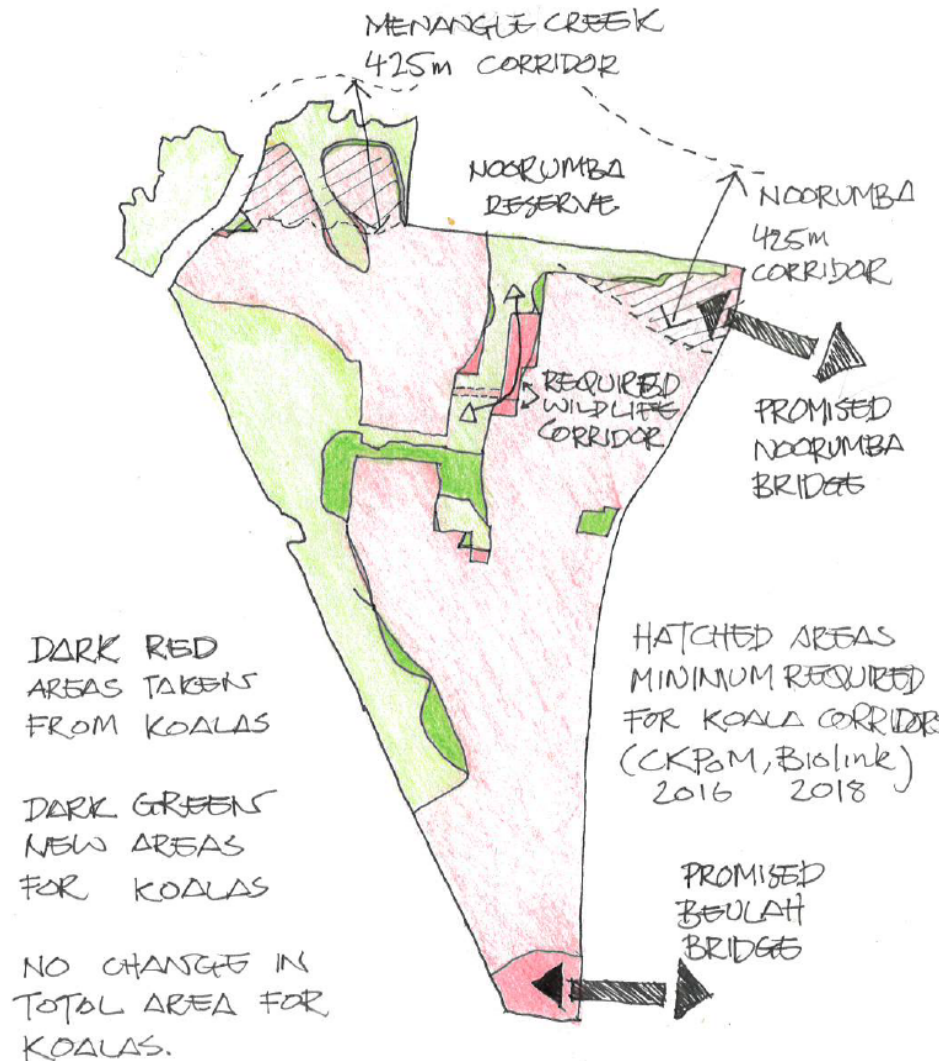
This new rezoning proposal does not increase the open space available to Koalas or wildlife, it shifts the open space areas around, it removes the ecological buffer area to Beulah, using this area to re-connect the two Red Flagged ecological lands via a notional (much less than 200m wide) wildlife corridor through Gilead. It also rezones Biobanked lands as Environmental rather than Public Recreation. The *link* and *zoning* changes fix obvious flaws identified in the original proposal by TEC that undermined their protective credibility. However **this planning proposal is primarily about increasing urban density for Lendlease, and still avoids resolving the fundamental issue, which is its negation of the Koala corridor along Menangle Creek - Noorumba.**



It is rare, perhaps unprecedented, that the importance of a particular corridor to the long-term survival of a colony is so well documented, as that of the Menangle Creek - Noorumba Corridor: Council’s *South campbelltown koala habitat connectivity study* 2017, the planning instrument’s *Campbelltown Koala Plan of Management* 2018 (CKPoM), and the *NSW Chief Scientists 30 April 2020 Advice on the protection of the Campbelltown Koala population* (CSA), all prioritize this corridor's importance, and require widths of 425m (CKPoM), or between 390 to 450m (CSA). The *Campbelltown Local Planning Panel* (16 Dec 2020) too, recognized the corridor's importance stopping Lendlease’s Gilead earthworks DA from encroaching within 250m of Menangle Creek. It is because of its unique position being the shortest link between the Georges and Nepean Rivers, in the image to the left, the pink is Gilead Stage 1, the green dashes represent the Koala corridors (CPKoM).

Lendlease's proposal however, dismisses all these reports, planning instruments, conditions and indeed their own Chairman Michael Ullmer's promise at the 2020 AGM ..*"will be meeting or exceeding all substantive areas of that Chief Scientist's Report."* The only substantive area on Gilead stage 1 is the Menangle Creek corridor, instead Lendlease proposes a width of less than 60m (a width needed primarily for infrastructure).

Below is an image showing what the Koala sees after these new rezonings. The dark red areas are those lost to Koala movement (and the pink developable areas), and the dark green areas are those gained. It still blocks East - West koala movements across Gilead.



Campbelltown Council must insist that the proposal meets the requirements of its own Campbelltown Koala Plan of Management and/or the Local Planning Panels conditions. **Councils Proposed Amendment of the CLEP** on p19 however, appears to make the corridor requirement conditional on whether a Koala underpass at Noorumba is built, this is baseless, the Noorumba - Menangle Creek corridor is a functioning corridor now with or without an underpass.

Indeed this implied Council/NSW Planning condition is absurd as it incentives any developer that is required to upgrade Appin road, which at Gilead is Lendlease of course, (via an RMS SVPA) to not build a Koala underpass, as to do so would be an extra expense and would see them lose developable area along

the Menangle Creek Koala corridor, this faux condition gives them an effective veto over all the corridor Koala Strategies in South West Sydney, a veto they are wielding ***'the Secondary east-west corridor identified within the draft Campbelltown Koala Plan of Management for the study area is unlikely to be of vital importance to the local Koala population.'***¹ (2018 Lendlease & RMS Appin Road Upgrade Report), NSW Planning is now executing this plan instead of their legislated ones, see [Conserving Koalas in the Wollondilly and Campbelltown Local Government Area](#) *'Koalas could continue to move through the landscape via primary movement corridors, rather than via the east-west secondary corridors. ... Allowing koalas access to the secondary corridors would expose them to threats associated with residential areas'*². This report comes with an exclusion fencing proposal all down Appin Road to stop Koalas moving east-west to keep the land west of Appin road clear of Koalas. A localized extinction plan, obviously for developer interests not Koalas.

It goes without saying that the use of that report for the Gilead Stage 1 - Biodiversity Certification (Anthony Lean 23rd June 2019) approval, and to retire Koala species on Biobanks west of Appin Road (which is all of them), if your strategy is to then stop Koalas trying to cross Appin Road, is a complete joke, if the consequences were not so dire.

At a time when koala populations are crashing in numbers not seen since the 1930s, and when they face a real threat of extinction by 2050. This Koala Colony, genetically unique, Chlamydia free, and now likely the only 'recovering' Koala colony left in NSW (McAlpine 2015) after being spared the devastation of the 2019/20 bushfires, is of national significance, and must be protected at all costs. This proposal falls well short of that, Campbelltown Council must enforce their own Koala protections, and if they cannot, they must withdraw this amendment and decline the proposal and stop all future DAs on this land.

This Planning Proposal was not on public exhibition for 28 days, as required under section 3.34(2)(c) of the EP&A act. Nor was TEC notified of this proposal despite our obvious and continued interest.

Your Sincerelyly



Saul Deane

Urban Sustainability Campaigner

This Statement is endorsed by:



National Parks Association



Nature Conservation Council



International Fund for Animal Welfare



Wilderness Society - Sydney North

¹ Lend Lease Communities (Roads And Maritime). Appin Road Upgrade, Mt Gilead, Nsw Biodiversity Assessment. October 2018 WSP, p59

² Conserving Koalas in the Wollondilly and Campbelltown Local Government Areas 2018 (OEH) 2019 (DPIE).