

Your details

Submission details

I am making this submission as

An academic/researcher

Submission type

I am submitting on behalf of my organisation

Organisation making the submission (if applicable)

Total Environment Centre

Your position in the organisation (if applicable)

Urban Sustainability Campaigner

Consent to make submission public

I would like this submission to remain anonymous

Share your experience or tell your story

Your story

Working to protect Koalas from extinction over the last 3 years, meant watching the bushfires this season devastate Koala habitat across the state, has been gutting, and has definitely put Koalas on trajectory of being extinct in the wild in NSW by around mid century.

Watching the Department of Planning mouth concern, but work to clear Koala corridors and habitat for major developer interests in the face of these fires, is the antipathy of the welling of community spirit we saw rise from the Australian community.

Terms of Reference (optional)

The Inquiry welcomes submissions that address the particular matters identified in its [Terms of Reference](#).

1.1 Causes and contributing factors

see attached file

1.2 Preparation and planning

see attached file

1.3 Response to bushfires

see attached file

1.4 Any other matters

see attached file

Supporting documents or images

Attach files

- 200417 - Bushfire submission - Koalas.pdf

17th April 2020

Submission: inquiries@bushfireinquiry.nsw.gov.au

Dear NSW Independent Bushfire Inquiry,

RE: Submission - NSW Independent Bushfire Inquiry - need for enforcement of Koala corridors. This submission is similar to the one provided to the Koala Habitat Protection SEPP, and addresses Term of Reference - 7 of this inquiry.

The early face of this fire season was that of the Koala, facing the devastation of their colonies across NSW. So of the utmost importance to our ecosystem, is that wide and numerous wildlife corridors across the landscape, must allow Koalas to escape fire and then after the fire allow them to repopulate those burnt areas. This is a generally accepted principle of wildlife management, and state policy backs it. However, the lack of implementation of this policy when it is inconvenient is deeply concerning and unfortunately would lead one to believe that Koalas facing a stochastic fire threat around fragmented landscapes are doomed, this will certainly be the case if a large fire occurs east of Appin road in Campbelltown.

The failing with SEPP 44 (and this will be the case with the Koala Habitat Protection SEPP) is not the policy, but its lack of bureaucratic enforcement in the face of large developers /landholder interests, which due to the large areas so often involved is when it's enforcement is most needed. This has been the case at Gilead, with the Campbelltown Koala Plan of Management (CKPoM) - a SEPP 44 requirement - being sidelined.

At Gilead, NSW Planning has effectively worked hand in glove with Lendlease to see that the CKPoM has *not been applied* to Gilead. If SEPP 44 can not be applied to the strategically important wildlife corridor junctions of Gilead, to a Koala colony that is of critical importance to the survival of Koalas in NSW, then no Koala SEPP will be anything more than window dressing to hide a lack of robustness, in face of vested interests. There is no doubt, Campbelltown Koalas and Gilead's position are exceptional.

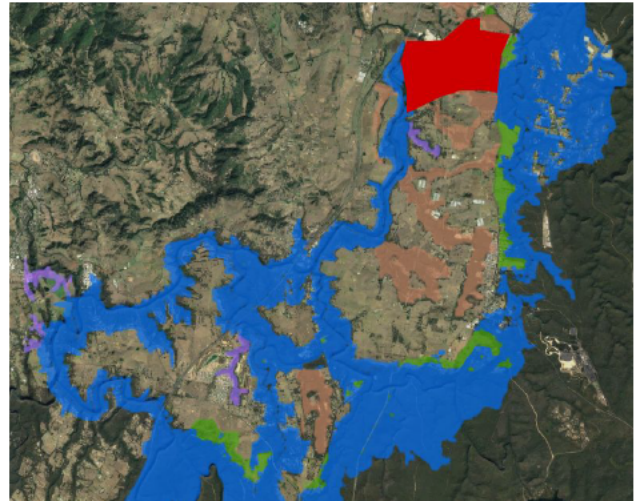
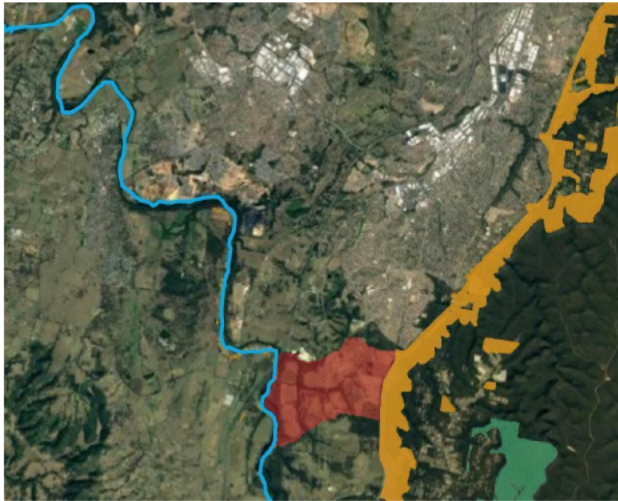
The Campbelltown colony is exceptional: After the unprecedented bushfires of the summer of 2019/2020 koala habitats (and likely populations too) of the Blue Mountains (80% burnt)¹, the North Coast (30% burnt)² and the South Coast (unquantified) have been devastated. The

¹<https://www.sbs.com.au/news/it-s-huge-fears-80-per-cent-of-nsw-s-iconic-blue-mountains-lost-to-bushfires>

²<https://www.theguardian.com/australia-news/2019/dec/27/australias-environment-minister-says-up-to-30-of-koalas-killed-in-nsw-mid-north-coast-fires>

health of the Campbelltown colony untouched thankfully by the fires has become 'critical'³ to NSW Koala populations survival.

Wildlife corridors are vital: Gilead is important to the Campbelltown colony not so much for its habitat (which is important) but for its position. Gilead sits exactly at the crossroads of the vital north-south and east-west links between and along the Georges and Nepean Rivers. The fires have highlighted how crucial corridors are to wildlife survival as both an escape from fire and a path back to recolonise habitat. Lendlease's development will fragment this colony, for a residential project that is not in a particularly amenable spot (its attraction is its size).



The red area above - Gilead - is of great strategic value, because of the near confluence of Sydney's two major rivers, the Georges (yellow west bank shown) and the Nepean (in blue). Gilead is the shortest, northernmost bridge between these two extensive riparian zones - natural wildlife corridors.

The red area above again is Lendlease's Gilead development. All the coloured areas indicate roughly the different widths of treed Koala habitats; purple (narrow), orange (wider), and blue (widest). They nearly all follow riparian zones. We can see how Gilead completes the loop for Macarthur Koala movements.

Koala corridors are vital and are recognized as such in the new Koala SEPP. This is a well established principle in Koala management.

'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.' NSW Chief Scientist 2016.

The function of these corridors within Gilead was, and has been long recognized as being vital to Koala long term survival (Ward 2002).

³ Mid november Cheyne Flanagan, director of the Port Macquarie Koala Hospital on ABC702 radio stated, following the North Coast fires, that the Campbelltown colony had now become 'critical' to Koala survival in NSW.

There is a need to build resilience into these recovering koala populations so that they are capable of better withstanding the impacts of future development and stochastic impacts such as fire. ... In order to do this, viable linkages and associated habitat patches need to be secured across the landscape.⁴

Biolink 2018. Koala Corridor Project: Campbelltown & Wollondilly LGAs.

The Campbelltown Koala Plan of Management a collaboration between Campbelltown City Council, the **NSW Office of the Environment and Heritage (OEH)**, and Biolink (an independent expert), it clearly identified koala corridors in the 2016 CKPoM. In the image below, taken from Page 31 of the CKPoM. Gilead in the extreme bottom left corner, has identified 2 east-west Habitat Linkage Areas (HLAs) connecting the Georges to the Nepean river, and 1 north-south HLA following the Georges River. This is logical, as to the immediate north is suburbia.

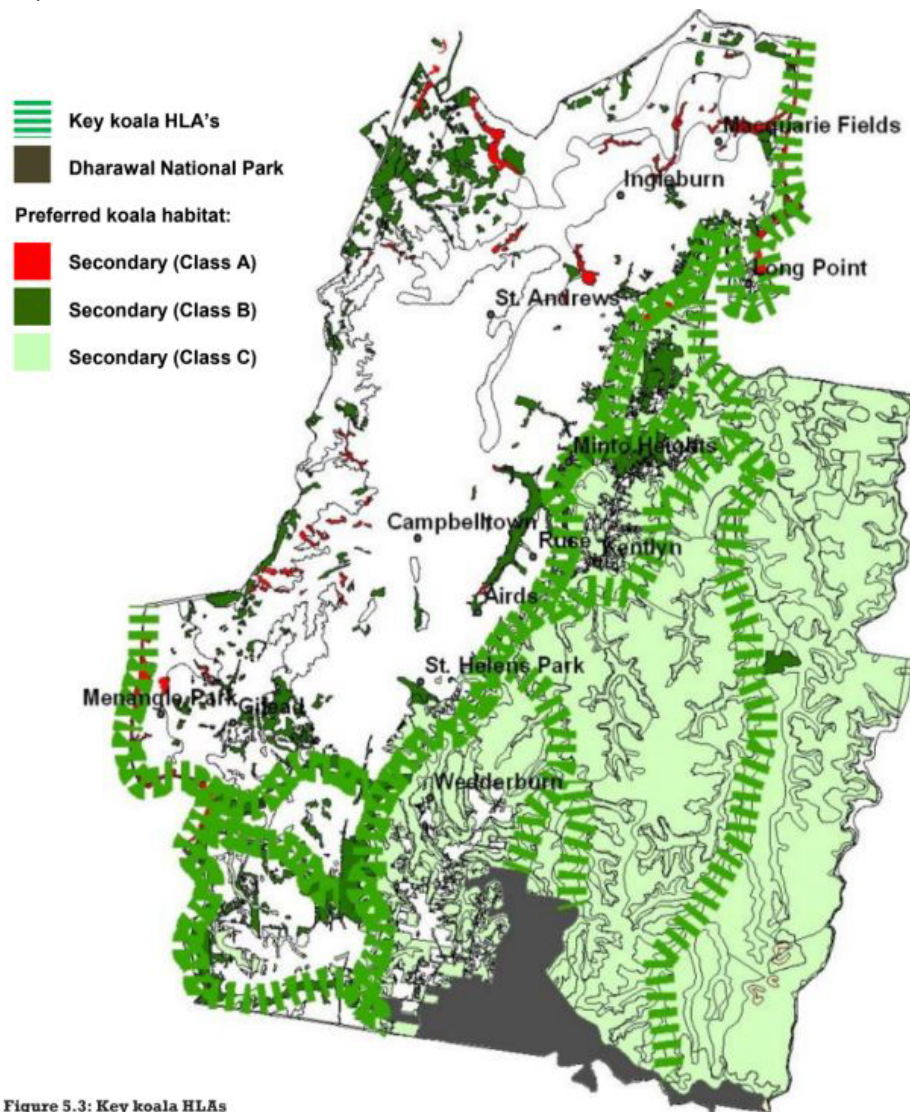


Figure 5.3: Key koala HLAs

Yet despite this, Lendlease and RMS in one paragraph in a 2018 co-authored report dismissed these corridors out of hand, and thus this 2016 CKPoM.


⁴ Biolink. 2018. Koala Corridor Project: Campbelltown & Wollondilly Local Government Areas. Biolink Ecological Consultants, Uki, NSW. Report to NSW Office of Environment & Heritage.

*Due to the fragmented and relatively small extent of Koala habitat, limited existing records, the proposed significant increase in future residential development to the west of Appin Road and the associated increase in edge effects detrimental to the Koala, the Secondary east- west corridor identified within the draft Campbelltown Koala Plan of Management (CKPoM) (Biolink Ecological Consultants 2016) for the study area is unlikely to be of vital importance to the local Koala population.*⁵

This expedient paragraph to avoid having to consider building wildlife bridges or tunnels, was then used to abolish the need to establish the need for any accommodation of Koalas in Gilead, this is effectively a 'localized Koala extinction plan' to expedite residential development. The green dotted fence as seen in the adjacent image is exclusion fencing, used to keep Koalas from the 'pink areas' (Lendlease's possible developable areas). The collateral damage to existing Koala biobanks (Beulah & Noorumba) also identified in the CKPoM as important HLAs - the mid-blue Koala corridors - would be to sterilize them of Koalas.



Koala/development separation fence

 Koala road kill mitigation fence

 Future koala road kill mitigation fence

Corridors

 Primary

 Secondary

 Tertiary



Perhaps most concerning is that OEH (now part of DPIE) put aside their own co-authored CKPoM of 2016 that highlighted HLAs, and protected these existing Biobanks. OEH then writes an internal unauthored document of no scientific value, that is diametrically opposed to their original CKPoM, this is then used internally to justify Lendlease's Gilead development. Again the last paragraph of this obsequious report 'Conserving Koalas in the Wollondilly and Campbelltown Local Government Areas' mimics Lendlease's previous paragraph.

*Exclusion fencing progressively built along Appin Road would prevent east–west koala movements across the Greater Macarthur GA. Underpass structures would need to be built to provide east–west access to koalas. However, **we do not consider the east–west corridors essential for the long-term survival of the regional koala population.** Koalas could continue to move through the landscape via primary movement corridors, rather than via the east–west secondary corridors. The distance from the top of the Georges corridor to the Cataract corridor is approximately 15 kilometres and is within the distance that koalas can disperse. **Allowing koalas access to the secondary corridors would expose them to threats associated with residential areas and would be inconsistent with the second key principle of our strategy to conserve these koala populations (to separate koalas from residential areas).**⁶*

The final paragraph is a non-sequitur conclusion to the report itself. Both experts quoted as references in the report (Dr. Matthew Crowther and Dr. Steve Phillips) saw exclusion fencing as only a temporary

⁵ Lend Lease Communities (Roads And Maritime). Appin Road Upgrade, Mt Gilead, Nsw Biodiversity Assessment. October 2018 WSP, p 59.

⁶ Conserving Koalas in the Wollondilly and Campbelltown Local Government Areas 2018 (OEH) and then in 2019 (DPIE).

measure, and emphasized the importance of east-west connectivity. Neither of the referenced papers quoted support the report's final conclusion.

Thus at Gilead, we are left with weak narrow Koala corridors that are only there because the Water Management Act with its mandatory riparian setbacks are stronger statutory conditions than anything established for Koalas. The HLA widths of 425m established by the CKPoM 2016 and the Biolink 2018 report have been ignored. Lendlease has now written its own KPoM which not unsurprisingly believes Water Management Act setbacks are exactly the same as koala corridor requirements, this has been biocertified by the Department of Planning. Can all developers now write their own KPoM, and ignore Koala SEPP ones ?

This is of great concern, it shows Lendlease's ability to get the NSW planning department to clear inconvenient regulatory hurdles for Lendlease at the cost of the Koala and a coherent Koala policy. This report's conclusion opposes the Koala SEPP's aims, which does see co-habitation of Koala and People as a possible outcome. After the fires, we know backyards and suburbia can be where Koalas can seek refuge. If this exclusion fencing is built before the next fire without exits for 15km, and only leftover corridors for Koalas to use, the next fire event east of Appin road will devastate one of the few colonies unaffected by the recent fires.

This reports disingenuous bureaucratic duplicity condemns the Koala in NSW, whatever name the Koala SEPP is given. Without a public service with courage and integrity the Koala has no protection. If the CKPoM is not upheld to protect the Koalas within the Gilead development, then this Koala SEPP like SEPP 44 will have no credibility, and instead the obligatory setbacks like those of the Water Management Act that have forced Lendlease to do something should be beefed up and applied to give Koala habitat protection as well.

This enquiry must mandate a required wildlife setback along riparian zones of between 200m to 425m, so that wildlife too, has a route of escape and return.

