

**Submission  
No 33**

**INQUIRY INTO INTEGRITY OF THE NSW  
BIODIVERSITY OFFSETS SCHEME**

**Name:** Mrs Patricia Durman

**Date Received:** 30 August 2021

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## SUBMISSION: GENERAL COMMENT ON THE BIO CERTIFICATION PROCESS

At present, it appears that no Threatened Species is fully protected under the latest legislation, whether the species is Critically Endangered, Threatened or Vulnerable it may be destroyed as long as credits are allotted to another area that does not necessarily need to be on the land to be cleared or nearby.

From memory over the past 30 years no area within the Georges River Catchment at Campbelltown has been awarded bio-certification credits to protect the river, Shale Sandstone Transition Forest, Koalas or any other threatened species but these credits have been sent to areas outside the Campbelltown Council region from mining and other developments for homes.

This process was previously only used for mining and in the instance of the Emplacement Area east of Appin was implemented to allow Illawarra Coal (now South 32) to clear an area of approximately 4km by 1.5km for the storage of coal waste but allowed an area in the Illawarra to be protected which was a different woodland and river catchment than what is continuing to be destroyed within the Georges River catchment at Brennans Creek, the main source of water into the Georges River at this point

In the case of Mount, Gilead credits were allotted to Fern Hill at Mulgoa and a somewhat rugged area between Appin and Wilton (Wollondilly) which would not be suitable for housing. Noorumba Reserve which has been a reserve for many years was also allotted funding this will lead to the destruction of Cumberland Plain Woodland, Tree Hollows, Koala and bird habitat, and the loss of water in dams in a heritage area that has been classified as high fire danger and a koala corridor.

Schedule 2 Shale Transition Woodland was only found in the Campbelltown and Cumberland Council areas but once Mount Gilead has been cleared the woodland will be lost at Campbelltown as it is only on this property this type of woodland is still in existence, which will leave the woodland at Cumberland vulnerable to insect or pathogen attack with no other woodland population where seed could be collected. (NPWS)

The development will also deliver pollution into Menangle Creek which already has a problem with salinity and runs into the Nepean River, litter and chemicals from gardens and vehicles will also add to this problem as will all development within the Nepean and Hawkesbury river catchments.

The proposed areas to be reserved within the Macarthur Priority Growth Plan and the Cumberland Plain Conservation Plan do not link to form a wildlife corridor between the Georges River, Mount Gilead, Sugarloaf Mountain, and the lower Blue Mountains but rather are disjointed and appear to be more like islands of hard to manage areas that will be expensive to create Plans of Management, to protect or manage.

The State Government has stated they will create a Georges River Koala Park which will if implemented protect a small part of the already in place Georges River Open Space (Glenfield through to Appin and Water Catchment Areas, which has been protected since the 1970s but a 42-acre parcel of land within the Wedderburn Gorge was not purchased by the government despite Bio Certification credits being available and two separate members of the public writing to the government to inform them of the sale.

The amount of development in areas that contain threatened species within the Campbelltown Macarthur region will far outweigh areas the government intends protecting and in this case, credits will be awarded out of area or funds will be donated to a fund that will probably be spent in other regions.

The Biocertification process is leading to a gross loss of habitat rather than protecting threatened species on the property to be developed and until the government of all levels including Campbelltown City Council

recognises the importance of the Campbelltown Koala Population and local threatened species the loss will continue.

Koalas are being displaced or killed at both Airds and Appin and there have been cases of kidney dysfunction in koalas at Smiths Creek which is recognised as the first signs of stress in a koala population possibly caused by the loss of wildlife corridors between the Creek the Georges River and St Helens Park by the Landcom Airds/Bradbury development.

Further subdivision will take place at Glenfield and Ingleburn which will once more see the destruction of koala habitat.

The Bio Certification process is being used to ensure the quick and efficient loss of threatened species and being replaced by overcrowded suburbs which will only increase heat into an area that is already experiencing approximately 50 degree days during summer. Temperatures have already increased and with a locked-in and irreversible extra 1.5 degrees of heat expected due to Climate Change which will bring heat to the region to the mid 50 degrees (55-56 degrees) and a danger to human life, native animals and bushland and this without the urban heat sink caused by the destruction of green space which is at present absorbing much of the heat being produced.

Proposed reserves within the Macarthur Priority Growth Area Plan and Cumberland Plain Conservation Plan do not appear to include any wildlife corridors which will retain a continuous chain from the Georges River to the Lower Blue Mountains but instead propose to create several koala bottlenecks at St Helens Park, Sugarloaf Mountain, Mount Gilead, east Appin, and the Blue Mountains

Will the Panel ensure the protection of these animals by ensuring that a workable corridor of at least 390 to 425 metres plus a 30-metre buffer zone and 30-metre fire Asset Protection Area is included as standard within both plans as per the recommendations of the Chief Scientist, rather than the proposed disjointed reserves shown on the Cumberland Plain Conservation Plan.

Unless the panel take the future of Cumberland Plain Woodland, Shale Sandstone Transition Forest, Campbelltown koala population and the human population in the Campbelltown Council area seriously they will be lost, Bio certification has not worked and a new sustainable plan should be implemented.