

16 October 2022

Strategic Planning Team
Sutherland Shire Council
spu@ssc.nsw.gov.au

ATTN: Robert Mckinlay

Re: Objection to the Planning Proposal for 147 Garnet Road, Kareela.

The Australian Plants Society, Sutherland Group (APS Sutherland) is a community organisation with a strong member base in Sutherland Shire. APS Sutherland strongly advocates for the protection and conservation of our unique natural areas including bushland, waterways and marine areas, and the incredibly diverse flora and fauna that inhabit these areas. We will celebrate our 60th anniversary next year.

We strongly object to the planning proposal on 147 Garnet Road, Kareela. We are concerned about the impacts of the planning proposal on the native vegetation of this site. Some of our members have volunteered for many years at the adjoining Joseph Banks Native Plants Reserve, including being involved with its establishment and maintenance (until Council accepted responsibility), and which celebrated its 50th anniversary in 2020.

Specific Concerns

We object to the proposal due to the potential biodiversity loss onsite, detailed as follows:

The reports accompanying the proposal clearly identify that the site is of high environmental significance and is environmentally sensitive land for several reasons, including:

- Impact to the Grey-Headed Flying-fox on the adjoining lot, a listed threatened species under both State and Commonwealth legislation (Eco Planning, dated 17 August 2022);
- Impact of up to 0.50 ha of a total of 0.55 ha of the native plant community type Coastal Enriched Sandstone Dry Forest.

We would remind Council that a large amount of environmental expertise and effort was committed to establishing and protecting this Flying-fox colony, over the last 15 years. We are concerned about the long-term protection of this camp, were its numbers to increase, once any proposed development had taken place on the site.

We consider it non-sensical and environmentally irresponsible, to propose to include the site on the Sutherland Terrestrial Biodiversity Map, after approximately 5,000 m² of native vegetation is cleared from the site. It is also unlikely that any significant and equivalent biodiversity (i.e. native canopy, midstorey and groundlayer) can be re-established on the site through planting or other regeneration methods, once buildings and associated infrastructure have been installed over most of the site.

We disagree with the wording in the Eco Planning report that: *the size of the impacted area is small (0.48 ha)*. This is of a size equivalent to around 60% of a standard soccer field of native vegetation. From a review of available historic aerial photographs, the trees onsite appear to be several decades in age. The vegetation to be cleared is remnant native vegetation and not “non-native” vegetation.

The planning proposal for a rezoning does not protect the environmental qualities of the site at all and does not ensure they are maintained.

The proposed asset protection zones on the site adjoin Joseph Banks Native Plants Reserve, and important public reserve, and extensive clearing would affect the health of the plant and animal communities in the adjoining reserve.

We support the arguments of concerned residents as reported in *The Leader (Sylvanvale Rezoning Angst*, Murray Trembath, dated 12 October 2022) such as allocating the site for a green corridor linking the Kareela soccer fields, the Kareela Creek greenspace development, The Joseph Banks Native Plants Reserve and Kareela Golf Course, with current buildings put towards community use.

Biodiversity Responsibilities and Commitments

We would remind Sutherland Council of the following governmental goals and commitments established to protect biodiversity:

1. The United Nations Goals for Sustainable Development.

Goal 15 states specifically:

Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss.

(United Nations – Department of Economic and Social Affairs – Sustainable Development accessed 29 Sep 2022 <https://sdgs.un.org/goals/goal15>)

2. Australia's Commonwealth Commitment to Biodiversity Protection

The Commonwealth has committed to increase the proportion of our nation managed for biodiversity protection to no less than 30% of all land and seas by 2030 (The Conversation <https://theconversation.com/protecting-30-of-australias-land-and-sea-by-2030-sounds-great-but-its-not-what-it-seems-187435> accessed 22 Sep 2022).

The planning proposal should also address how the project aligns and meets the objectives of *Australia's Biodiversity Conservation Strategy 2010-2030* https://www.planning.vic.gov.au/_data/assets/pdf_file/0021/213717/Background-Documents-Commonwealth-Biodiversity-Conservation-Strategy-2010.pdf

One of the overriding principles of the Strategy (page 18) states:

Knowing that our knowledge is limited, we should apply the precautionary principle while employing adaptive management approaches using new science and practical experience. The precautionary principle is that lack of full scientific certainty should not be used as a reason for postponing a measure to prevent degradation of the environment where there are threats of serious or irreversible environmental damage.

We believe this applies to the impacts and potential threats the project will cause, such as habitat loss, vegetation clearing, soil degradation and adding to the impacts of climate change by removing vegetation, especially old remnant trees.

Actions

We urge Sutherland Shire Council to reject this inappropriate planning proposal, which will result in more vegetation removal in our unique “bushland” and biodiverse Shire.

Yours Sincerely,

Dan Clarke (B.Sc – Hons)

Conservation Officer, on behalf of the Board of Australian Plants Society – NSW.

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