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19 April 2016

**Submission regarding Amended Development Proposals DA14/1238 & DA14/1239
subject to Land and Environment Court Proceedings 15/10467 & 15/10468.**

I am writing to you on behalf of the Australian Plants Society - Sutherland Group, to express our opposition and concern to the amended development proposal on the land known as Spring Gully in Bundeena.

The Australian Plants Society is an active community organisation that supports and promotes the preservation and conservation of Australian native plants. Sutherland Group is a long-established, active community group with members committed to conserving and studying Australian native plants in the Sutherland Shire. I am the Conservation Officer for Sutherland Group, and am a professional botanical consultant, with expertise in vegetation assessment and ecological significance of vegetation.

This submission follows up active participation by our group in the defence of the ecological values of Spring Gully. I, along with other Sutherland group members, provided evidence for the Land and Environment Court Section 34 conference in November last year and addressed the court directly, stating our concerns for the impacts to endangered ecological communities and fauna which will occur if the development is approved.

We are extremely concerned about the following proposed ecological impacts on the land

- Loss of 366 protected trees including at least 55 hollow bearing habitat trees;
- Removal of up to 75% canopy from 39 trees, mainly larger, mature *Angophora costata*, including 16 identified as hollow bearing, resulting in removal of the forest canopy to a maximum 15% cover over the 7,500 m² inner asset protection zone;
- Clearing of all shrubs, many hundreds of small trees and the undergrowth from within inner protection zone and substantial removal and modification of the vegetation over a proposed area of more than 3 hectares;
- Loss of biodiversity, threatened species habitat and wildlife corridors and buffers on land zoned for Environmental Conservation;
- Increased human visitation including the regular, intensive manual maintenance of the landscape over 3 hectares of steep gully vegetation on highly erodible soils landscapes.

The opinion of the consulting ecologists that most of the onsite trees are semi-mature is, to us, irrelevant as such trees can still provide valuable habitat in terms of density and flowering/nectar resources for birdlife and threatened marsupial species. Furthermore, to remove remnant canopy trees and then propose replanting in other areas of the Site in vegetation that is exhibiting very good resilience is also flawed and constitutes bad ecological restoration practice. In such cases, trees to be planted are simply sourced from any available nursery and are often not of local provenance. Planting will also likely exacerbate soil erosion.

In addition, the land adjoining the access road has recently being reported as containing the listed State and Commonwealth endangered ecological community *Eastern Suburbs Banksia Scrub* by Professor David Keith of the University of NSW. This EEC was previously thought to occur only north of Botany Bay. In addition, a second endangered ecological community, *Coastal Upland Swamp*, also adjoins the current access road. This EEC is protected at both the State and Commonwealth level and will also be impacted by any proposed road widening. This particular EEC lies on soils which provide data on historic landscape formation. These soils are also sensitive to perturbation and altered drainage regimes. The significance of both of these EECs is virtually ignored by the updated ecological reports.

We implore Council to refuse the amended development application and make every effort to get this land added to the Royal National Park estate.

Yours Sincerely,

Dan Clarke B.Sc (Hons – Botany)
Conservation Officer
Australian Plants Society, Sutherland Group