

Dear Dr Gangemi,

Re: Request to protect critically endangered bushland in Fred Caterson Reserve from development impacts.

The Australian Plants Society NSW Limited (APS NSW) is a community organisation with over 1500 members across New South Wales, including a well-established Parramatta and Hills District Group which recently celebrated its 50th anniversary. We are part of an Australia-wide organisation with over 5,000 passionate members.

We strongly advocate 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.

Very recently, members of our Board (and the author of this letter) met with senior NSW Government Environment and Planning representatives to have our voice heard on major environmental and biodiversity issues affecting NSW.

We are highly concerned and distressed about the proposal to redevelop sporting facilities at Fred Caterson Bushland Reserve at Castle Hill.

Our reasons against the development are:

1. The proposed development will have adverse impacts on threatened ecological communities

The Fred Caterson Reserve Masterplan (Moir Landscape Architecture dated 10.12.20) states there are five vegetation communities proposed to be impacted at Fred Caterson. Three of these communities, stated as: 'Sandstone Transition Forest', 'Shale Transition Forest' and 'Sydney Turpentine Ironbark Forest' comprise two threatened ecological communities, namely Sydney Turpentine Ironbark Forest and Shale-Sandstone Transition Forest, listed under both the NSW *Biodiversity Conservation Act 2016* and the Commonwealth *Environment Protection and Conservation Act 1999*, and categorised as **critically endangered under both laws**.

The stated vegetation losses for these five communities, in the masterplan, tally to approximately 52,900 m² or 5.29 hectares of native vegetation.

2. The proposed development will have adverse impacts on two threatened flora species

Fred Caterson Reserve is a site for many records of the listed threatened flora species, under the NSW *Biodiversity Conservation Act 2016*. These include *Epacris purpurascens* var. *purpurascens* and *Acacia pubescens*, with other threatened species occurring nearby. It is likely *Epacris purpurascens* occurs close to tracks and bushland edges, close to the current sporting fields.

3. The proposed development is contrary to the responsibility and requirement of the Hills Shire to protect biodiversity

The Hills Shire legislates to protect biodiversity under its Local Environmental Plan 2019 and applies the NSW Biodiversity Conservation Act, as required by State law on all development affecting biodiversity in the Shire. It is of great concern to us, that a Council proposal is to have such detrimental impacts given the requirements of these laws.

The Hills Shire has a Bushland Conservation Committee, which aims to: *protect, connect and improve the integrity and diversity of the natural environment in the Shire through advice to Council*.

The proposed impacts to vegetation from this proposed development is a very poor example for the community in Australian flora and fauna conservation, especially when Council considers the unique bushland-biodiversity of the Hills Shire and the community volunteers who participate in programs, such as Bushcare, to protect and nurture it.

4. The proposed development is contrary to Commonwealth Biodiversity Goals

The Commonwealth Government 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. This project opposes this goal.

One of the overriding principles of *Australia's Biodiversity Conservation Strategy 2010-2030* (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.

https://www.planning.vic.gov.au/_data/assets/pdf_file/0021/213717/Background-Documents-Commonwealth-Biodiversity-Conservation-Strategy-2010.pdf

The precautionary principle should be applied to the impacts and potential threats of the proposal, such as habitat loss, vegetation clearing, soil degradation and adding to the impacts of climate change by removing vegetation.

5. The impacts to native vegetation cannot be sufficiently offset or mitigated

It is unclear how The Hills Shire Council would offset the proposed vegetation losses even close to adequately. We do not accept biodiversity offsetting as an acceptable mitigation measure, as it usually results in protecting bushland that was already protected in practice.

In addition, proposing bushland regeneration works as part of the redevelopment is also not an acceptable mitigation measure. Bushland regeneration could be undertaken and coordinated by Council in any event, for the sole purpose of protecting local bushland.

6. The proposed development has ongoing impacts on remaining native vegetation

We are extremely concerned about ongoing impacts to Fred Caterson Reserve from this proposed development. Increased traffic, visitation and associated human activity are likely to further degrade the natural values through edge effects, rubbish introduction, soil compaction and erosion, and noise pollution.

We ask you to preserve the 5 hectares of native vegetation threatened by this proposed development. We ask you to seek more suitable sites with less biodiversity and environmental value, for sporting facilities. The loss of over 5 hectares of vegetation (arguably 7 soccer fields) in Sydney's urban environment is simply too great a quantity and a terrible example for Council to set for the community, given our world biodiversity crisis.

Yours sincerely,

Dan Clarke (BSc - Hons)

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

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