



Shire of  
**Gunnedah**  
Land of Opportunity

Koala Strategy Submissions  
PO Box A290  
SOUTH SYDNEY NSW 1232

23 February 2017

Dear Sir/Madam,

**Re: Proposed Koala Strategy**

I refer to your community information session with Council on 16 February 2017 and the abovementioned.

In response to the proposed Koala Strategy, the following comments are provided:

*Consistency with other Koala Habitat legislation*

Council assesses development applications under the provisions of the State Environmental Planning Policy No. 44 - Koala Habitat Protection (SEPP44). The Department of Planning and Environment are currently undertaking a review of the SEPP44. Any proposed strategy should review the existing legislation and ensure that there is a level of consistency with the proposed strategy.

*Ability to implement Strategy outcomes*

Council supports the development of a whole-of-government NSW Koala Strategy. However, if there is no legislative requirement associated with the Strategy, the ability to enforce any Strategy outcomes can be limited.

*Ability to enforce legislation with no suitably qualified people in rural/regional areas*

It is highlighted that within rural and regional areas, there is limited and in some cases, no suitably qualified consultants to undertake koala habitat investigations. To undertake development, developers may be required to engage consultants from larger regional or metropolitan areas, which could result in significant costs. To comply with the legislative requirements, the cost of engaging suitably qualified consultants that are not located within an area, can impact on whether development occurs, which can be at a significant cost to smaller communities. It is acknowledged that developments should assess environmental impacts. However, it is recommended that Strategy Outcomes should consider alternative or a range of methods for achieving required outcomes.

*Mapping of Koala Habitat*

Council would like to question the mapping for the Strategy. Council engaged a consultant to undertake a Koala Plan of Management (KPoM) for part of the local government area. As the mapping in Council's KPoM did not meet the SEPP44 definitions for 'core koala habitat', Council resolved to not proceed the KPoM. It was advised in the information session, that the Strategy will use existing mapping (where available) and model vegetation in other areas of no mapping, to determine whether or not the land contains 'koala habitat'. It is requested that any mapping be ground-truthed as the implications of modelled 'koala habitat' can be quite costly for a developer.

If you have any questions regarding this matter, please contact Council's Manager Development & Planning, Carolyn Hunt on 6740 2100.

Yours faithfully

Carolyn Hunt  
MANAGER DEVELOPMENT & PLANNING

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