**Jennifer Street**

Sydney has a rich botanical heritage. It has some of the highest levels of species diversity in Australia. But it feels like no one knows about it. There’s a sort of cultural blind spot in our society about this richness.

The area we’re in was called Botany Bay. And I keep coming back to this name, Botany Bay, Botany Bay. They called it Botany Bay; they didn’t call it nice-spot-for-apartments Bay.

**Bushland under threat**

This piece of Eastern Suburbs Banksia Scrub at Jennifer Street is part of that botanical heritage. And is under threat.

What I really wanted to highlight is that every piece of government assessment and literature about Eastern Suburbs Banksia Scrub highlights that further clearance and fragmentation is the number one threat to its continued survival. The number one threat. Something that struck me was, how can there possibly be protection for this ecological community at three levels of government. But it still be threatened with development?

**The development application process**

It seems to me the Development Application (DA) and Land and Environment Court (LEC) process (to allow development) is about compromise and reaching a solution that is the best possible for both parties. This is definitely positive. But when it comes to this development and this ecological community, it doesn’t take into account the larger picture across Sydney. Eastern Suburbs Banksia Scrub only exists in the Sydney region. And there’s now only 3% of this ecological community remaining. We have to take into account that a huge amount of clearing and development has happened historically, without any compromise. This is why there’s only 3% remaining. Surely this cumulative reduction of the community over time has to be taken into account.

**Ecology and edge effects**

Development on this site also poses a threat to adjoining patches in the national park. The DCCEEW consultation guide (August 2021) mentions this:

“As ecological communities are reduced in area, they are become more likely to become extinct. For an ecological community to be considered extinct does not necessarily mean that all patches have been removed, but that they no longer have sufficient ecological function or their character is substantially changed.”

“These fragmented and isolated areas with more exposed edges are more vulnerable to pests and diseases.”

“…with lost connections across the landscape there’s also less chance of recovery of any patches after they are disturbed. The damage from threats to an ecological community may continue long after the action, such as, land clearing, has finished. With the action of many threats that degrade remnants these may change substantially in character, even if the entire area has not been lost.”

There was a 2018 submission made by the developer and Cumberland Ecology as part of the ecological community being deemed of national significance. The submission makes several mentions of the ‘low quality’ ESBS in the area they proposed to clear. But the fact that the area is degraded and of ‘low quality’ is surely evidence of those ‘edge effects’ of wind, water and weed infiltration. The submission doesn’t give attention to this aspect of the argument. Also, the fact that further development such as this will likely exacerbate these conditions for adjoining patched is not mentioned.

Does the court’s decision also take into account the edge effects exacerbated by future residents in the development? What about domestic animals? Domestic and feral cats are a huge problem for native wildlife. And if you know anything about ecology, any impacts on one part of the system, impact the system as a whole.

**Is this development in the public good?**

The whole development application and court process seems to be skewed towards ways in which the development can ultimately go ahead.

In the conclusion to the previous LEC decision that gave in principle approval to the development, one of the reasons given as justification was that more housing is deemed to be in the public good.

While this is certainly true, the question before the court is framed in such a way that the value of housing becomes a deciding factor in whether or not to allow development to go ahead. If you ask that question, it’s easy to then go on to say, “Yes, it is in the public good”. But if the process were to be truly equal it’s almost as if a separate question should be put before the court, completely independent of any development application. Is preserving this piece of bushland in the public good? Because if the court sought to answer that same question, the answer would surely be yes.

**Unknowns about Australian biodiversity**

In Australia we only have 200 years’ worth of western scientific knowledge about the continent’s biodiversity. If you read any research about our plants and animals, there’s always a mention at the end that we need more research, we need more research.

I read about the advisory group’s meeting in 2019 about the up listing of the community from endangered to critically endangered. As I was reading, I noticed there were several mentions of what the most effective use of the group’s resources in terms of the many communities that needed assessment. There were many hints that the process had limited resources to assess everything that needed assessment.

On the Maroubra Woodland Snail, I’ll just read this one passage from the Australian Museum’s website on the conservation status of our snails:

“Of the more than two thousand land snail species known in Australia, only a fraction has been listed to date. This, importantly, reflects the number of conservation assessments done so far and by no means the actual number of threatened species.”

So, this site, the ecological community’s ability to regenerate/ survive transplantation and information about the Maroubra Woodland Snail is not necessarily the whole picture needed to make an effective judgement. How can decisions like this be made when we don’t have a full picture?