

Antony Lewis

18 Butia Way, Stanhope Gardens NSW 2768

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The Executive Director, Biodiversity and Sustainability Branch
Department of Planning and Environment
GPO Box 39
Sydney NSW 2000

To whom it may concern,

This new significant conservation plan comes after some very poor plans have just been delivered by the Greater Sydney Commission for Marsden Park North and Schofields West. Review of those plans has shown the deficient processes and numerous concerns for existing residents of western Sydney who are passionate for our local flora & fauna and wish to continue living in the area. As residents, we know the local environment and also see that the reviews conducted have been limited, constrained or outright manipulated to under estimate the actual existing ecosystems and their worth. It is under this context that I make the following comments to the Terms of Reference for the Cumberland Plain Conservation Plan:

1. Existing Parks and Reserves must NOT be reused for offsets
Section 3.1.5 does not include existing public bushland reserves in the definition of already protected bushland. Many of these reserves have already been fought for protection by the local community and need to remain protected and cannot be used as equity for further construction/destruction.
This should also include reserves egresses under major power lines and for underground services (eg. Gas lines) which are already achieving offset for the existing development in the region.
2. Old growth trees need to be mapped and maintained
Trees of age greater than 100 years provide a developed ecosystem including the hollows that develop in older trees and the need for space around them to ensure human safety. They have deep roots and are generally clustered as development has not occurred around them. These trees provide significant support for avian and terrestrial fauna as well as the flora that lives below the leaf canopy. Their local climate also provides significant shelter and shade against harsh weather conditions.
The terms of reference needs to make mapping of these trees mandatory and any effects of development to the trees' local ecosystem quantified and justified.
3. Terrestrial and avian fauna migratory paths need to be mapped.
Sections 3.2.3 and 4.6.4 make comment to this but does not make it a requirement and the wording of this requirement should include documenting all effects, both beneficial and detrimental, that the plan and development will have on these paths.
It is my expectation that land acquisition will be required to redevelop these corridors in western Sydney and the previous impact assessment reports and developments for other growth areas have not achieved this in anyway.
The environment is an ecosystem of multiple flora and fauna and to achieve genetic diversity as resilience against human development, corridors need to be deliberately developed, ensured they are active and maintained.

4. Effects of Climate Change, refuse dumping and air quality loss due to higher human activity
Human activity has effect wherever it occurs; on a global scale (climate change) as well as the local scale (refuse dumping in reserves, poorer air quality)
The assessment must quantify and report on both the detrimental and beneficial effects of the plan.
With respect to climate change, the report must consider both rainfall and temperature volatility, particular with respect to the exacerbation caused by the urban heat island effect and temperature inversions that are common to western Sydney.
Currently ad hoc rural dams in western Sydney are providing the stop gap water source for much habitat. The poor natural water retention is due to the removed of wetlands and water stagnation in riparian corridors from previous development. Action to include how water will be available to fauna and flora during significant dry spells needs to be considered and documented.
5. Aboriginal heritage:
Section 4.5.1(e) refers to heritage but does not specifically call out documenting aboriginal heritage. The terms of reference should specifically refer to the documenting of aboriginal heritage, as well as ensuring multiple groups are consulted.
As a specific example, recently the Aboriginal Burial grounds were inappropriately located in the original Marsden Park North plan and such occurrences represent poor research and consultation.
6. Local Consultation:
Much reference material in earlier studies have been done by paid consultants with limited understanding of the local conditions and often only book audits.
It needs to be mandatory for ground-truthing to occur with respect to auditing the existing environmental conditions of western Sydney. The Cumberland Conservation Network have developed a significant study showing the Cumberland Plain is already below 8% of its pre-colonization state and that more natural lands need preservation all rewilding.
The Cumberland Bird Observers have significant avian history of the area.
Along with this on ground auditing, community consultation MUST occur and deliberate, specific engagement with the environment groups who know the area intimately.
As part of the terms of reference, the final assessment must include a summary of conservation priorities defined by the local communities from these face to face consultations.

I hope this assessment/plan will set best practice for what is the last of western Sydney peri-urban lands. Due to the significant land size of this area of focus it is expected there will be much interest and I hope that the natural beauty of Cumberland Plain can be maintained and the residents of the future can still see koalas, kangaroos, migratory shore birds and native frogs in western Sydney.

**Sincerely,
Antony Lewis**