



Ryde - Hunter's Hill Flora and Fauna Preservation Society

Member of Nature Conservation Council of N.S.W.

**P.O. Box 2127
Boronia Park 2111**

Department of Planning and Environment
Draft Cumberland Plain Conservation Plan - Terms of Reference
28 January 2019

Dear Sir/Madam,

We write to object to the above draft Cumberland Plain Conservation Plan - Terms of Reference (CPCP ToR).

We are appalled that the Department would advertise such a significant document over the festive season. We became aware of the exhibition in the latest Planning newsletter which we received 28 January. The newsletter informed us that the CPCP - ToR was open for comment until 25 January 2019.

We find this a cynical and poor approach to community engagement by an agency which should be promoting best practice in regard to community engagement. We understand that the Department has committed to improved transparency and genuine commitment in how environmental planning documents are exhibited.

Further, whilst we appreciate that the agreement reached with the Commonwealth Government is most likely outside the scope of community comment for the CPCP - ToR we express serious concerns as to why the process of Commonwealth delegation to the State government was not open for community comment.

The Commonwealth legislation provides a significant layer of environmental protection for critically endangered ecological communities such as on the Cumberland Plain which should not be delegated to the weaker State layer of protection. We are disturbed by statements in the agreement that the as yet untested State driven "landscape approach to planning may benefit the environment".

Overall we express disappointment in the unbalanced intent of the CPCP - ToR. It has clear statements of intent to facilitate development over the next 38 years but provides no clear statement of intent to protect or enhance biodiversity recognised as critically endangered nationally. This is inconsistent with the principles of ecologically sustainable development which should be underpinning growth and development in western Sydney.

There needs to be a clear statement that public bushland reserves are fully protected within the CPCP - ToR and not open to private developers as future offset opportunities. Often the

protection of such reserves have been due to community efforts to protect their natural areas from destruction and private developers should not “reap” the rewards of these protected areas to facilitate further destruction of natural areas.

The final adoption of the Cumberland Plain Conservation Plan will remove opportunity for future community input into the protection of natural areas valued by local residents. The adoption of the CPCP over such a large area removes this historic process of community engagement in the protection of highly valued local natural areas. There is a major failure within the CPCP - ToR to ensure genuine community engagement at the level of the local community.

We understood that the Greater Sydney Commission strategic planning processes were to include the protection of biodiversity and ensure an effective urban tree canopy to mitigate the heat island effect and improve air quality. The protection of remnant natural bushland contributes significantly to this urban tree canopy and its benefits for western Sydney residents but the CPCP - ToR seem solely development drive and demonstrates a lack of integration within any sensible strategic environmental planning process.

Thankyou for an opportunity to comment as we hope you will accept our late submission.

Yours sincerely
Cathy Merchant
RHHFFPS Committee Member