

## Nicholas Gonsalves

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**From:** Anthony Tavella on behalf of DPE PS ePlanning Exhibitions Mailbox  
**Sent:** Tuesday, 8 September 2020 6:48 PM  
**To:** DPE PS Biodiversity Mailbox  
**Subject:** FW: Webform submission from: Draft Cumberland Plain Conservation Plan

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**From:** noreply@feedback.planningportal.nsw.gov.au <noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 8 September 2020 5:23 PM  
**To:** DPE PS ePlanning Exhibitions Mailbox <eplanning.exhibitions@planning.nsw.gov.au>  
**Subject:** Webform submission from: Draft Cumberland Plain Conservation Plan

Submitted on Tue, 08/09/2020 - 17:23

Submitted by: Anonymous

Submitted values are:

Submission Type: I am submitting on behalf of my organisation

First Name: Max

Last Name: Downes

Name Withheld: No

Email: [REDACTED]

Suburb/Town & Postcode: Brownlow Hill

Submission file: [webform\_submission:values:submission\_file]

Submission: Hi Brownlow Hill has committed approx 100 ha to biobanking since we were the pilot program and we intend on committing an additional 300ha. What is unclear to me is what the strategic conservation area means, if it means the opportunity to subdivide the land is a lot harder now, because of the strategic conservation area, then our land value will dramatically decrease and we will be left with an asset that we can't do anything with? This is particularly worrying as biobanking BAM credit prices are set based on the opportunity cost of the land? Seems like we are being punished for wanting to preserve the biodiversity of the land which is the opposite of the intention of this plan? Secondly, it does not state anywhere how many BAM credits are to be purchased? Finally it states a preference for land that has a lot of room for potential improvement or as it is phrased on page 73 "highest percentage cleared status". when the BCT assesses a biobank site they give a low amount of credits to this sort of countryside as it is deemed 'risky' that the biodiversity outcomes may never be achieved. It again seems that what you are targeting here land that has low biodiversity credits per hectare, this incentivizes poor land management practices. This amounts to a situation where we have [REDACTED] of very high-quality Cumberland plain woodland that we are better off letting deteriorate unless there is a commitment to actually buy the credits at a price, rather than an intention possibly commit some acres to Biodiversity stewardship agreements. Regards Max Downes

URL: <https://pp.planningportal.nsw.gov.au/draftplans/exhibition/draft-cumberland-plain-conservation-plan>