

## Sarah Ng

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**From:** DPE PS ePlanning Mailbox  
**Sent:** Monday, 28 September 2020 8:27 AM  
**To:** DPE PS Biodiversity Mailbox  
**Subject:** FW: Webform submission from: Draft Cumberland Plain Conservation Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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**From:** noreply@feedback.planningportal.nsw.gov.au <noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Saturday, 26 September 2020 9:48 AM  
**To:** DPE PS ePlanning Mailbox <ePlanning@planning.nsw.gov.au>  
**Subject:** Webform submission from: Draft Cumberland Plain Conservation Plan

Submitted on Sat, 26/09/2020 - 09:48

Submitted by: Anonymous

Submitted values are:

Submission Type: I am making a personal submission

First Name: [REDACTED]

Last Name: [REDACTED]

Name Withheld: Yes

Email: [REDACTED]

Suburb/Town & Postcode: 2101

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

Submission: I am an Ecologist and Ornithologist with 18 years experience in survey and assessment of biodiversity in Western Sydney. I was one of the first wave of Accredited Biodiversity Assessors. The report produced by Biosis and Open Lines grossly underestimates the potential for impacts from the Cumberland Plain Plan to international migratory waders, in particular the EPBC Act JAMBA listed Migratory Gallinago hardwickii (Latham's Snipe). All of the dams and watercourses throughout the study area support foraging by Latham's Snipe. A significant proportion of this species' total population forages in the western Sydney area during the Austral summer. Biosis and Open Lines have made no real attempt to quantify the distribution and abundance of Latham's Snipe in the study area. Expert organisations such as Cumberland Bird Observers Club and BirdLife Australia have not been invited to provide insight or quantify the impacts from the Cumberland Plain Conservation Plan upon these species. An adequate study must be undertaken in accordance with Commonwealth guidelines. A complete and thorough investigation into usage of all creeks, floodplains and dams by Latham's Snipe and Sharp-tailed Sandpiper (*Calidris acuminata*) must be undertaken. Experts must be consulted. Other species that have been overlooked include the EPBC Act Endangered Australasian Bittern (*Botaurus poiciloptilus*). The reports by BIOSIS and Open Lines make no reference to this species which occurs in reed beds in dams and creek lines in Western Sydney. The total number of biodiversity offset credits that are required to implement the Conservation Plan must be sought from the market and no discounting undertaken. It is fraudulent to claim that a plan such as the proposed will lead to conservation and protection of Threatened species and Ecological communities in Western Sydney if you cannot commit to sourcing the precise number and type of credits required to meet like-for-like demands. A lack of credits available 'in the market' is not a legitimate excuse to discount your credit obligations. By changing the rules and discounting your credit obligations, you are lowering the bar for biodiversity credit trading schemes, damaging public confidence and respect for credit trading schemes and placing the NSW Biodiversity Offset Scheme in disrepute. As an Accredited Assessor and Biodiversity expert, I encourage the NSW Government to 'practice what you preach' in regards to implementation of the Biodiversity Offset Scheme by ensuring that the precise type and number of species credits and ecosystem credits are retired to ensure a like-for-like offset. Otherwise you are damaging the validity of the Biodiversity Offset Scheme. In order to generate more credits to meet the true demands, you should increase staffing of the BCT and streamline BSA approval processes and most importantly, actively encourage private landholders across the Cumberland Plain IBRA region to establish Biodiversity Stewardship Agreement (BSA) sites. This may be (in part) achieved by reducing the 'minimum permitted area' for a BSA from 1 hectare down to 0.5 hectares so as to allow smaller patches of species/habitat rich Cumberland Plain, Riverflat Forest, Shale-gravel Forest etc to be protected in perpetuity and to help generate the high volume of biodiversity offset credits you require to see this scheme through. Protecting and managing if small, but diverse patches may allow protection of entire local populations of some threatened plants and also provide 'habitat stepping stones' or linkages between larger patches. At present there is no long-term incentive or benefit to landholders to maintain and protect small patches of Cumberland Plain Woodland on landholdings as to the average landholder, the vegetation currently serves nothing more than a fire hazard and hindrance to development.

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

