

Sarah Ng

From: Anthony Tavella on behalf of DPE PS ePlanning Exhibitions Mailbox
Sent: Tuesday, 6 October 2020 10:52 AM
To: DPE PS Biodiversity Mailbox
Subject: FW: Webform submission from: Draft Cumberland Plain Conservation Plan

From: noreply@feedback.planningportal.nsw.gov.au <noreply@feedback.planningportal.nsw.gov.au>
Sent: Sunday, 4 October 2020 10:11 AM
To: DPE PS ePlanning Exhibitions Mailbox <eplanning.exhibitions@planning.nsw.gov.au>
Subject: Webform submission from: Draft Cumberland Plain Conservation Plan

Submitted on Sun, 04/10/2020 - 10:10

Submitted by: Anonymous

Submitted values are:

Submission Type: I am making a personal submission

First Name: Trevor Phillip

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Name Withheld: No

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Submission file: [webform_submission:values:submission_file]

Submission: I am a resident in the Sydney metropolitan area for over 60 years and interested in urban development and natural environments, having completed an environmental science degree in the mid-1970s. I would like the concerns below to be addressed when the Cumberland Plain Conservation Plan is finalised and implemented: 1. Only 6,400 hectares or 6% of the original 107,000 hectares of Cumberland Plain Woodland still exists. This plan will impact a further 1,014.6 hectares or almost 16% of the critically endangered Cumberland Plain Woodland, leaving less than 5,400 hectares, so less than 20% of the original woodland will remain. 2. Plan commits to the creation of only one reserve - the Georges River Koala Reserve. There is insufficient clarity about the representation of Cumberland Plain Woodland or other 'grassy woodland communities' in the 4,795 hectares of 'avoided land' to be zoned E2 (environmental conservation). 3. Vestiges of the original woodland are not necessarily interconnected with wildlife corridors. Plan does not accept the Chief Scientist's recommendation to secure all of the east-west habitat corridors for the koalas. The Plan acknowledges "east-west connectivity between the Georges and Nepean rivers is important for the resilience of the Southern Sydney koala population," but it discounts the recommendation made in a recent report prepared by the Chief Scientist's expert panel, Advice on the protection of the Campbelltown Koala population (Chief Scientist Koala Report), to protect the habitat of the six east-west corridors. 4. Instead, the Plan cites unspecified "scientific advice from the department and the research community...that the existing six east-west corridors in the Greater Macarthur Growth Area are too fragmented and not wide enough to support koalas over the long term." There is no justification or evidence provided for this conclusion. Only the Ousedale Creek to Appin North east-west corridor will be protected. And this issue has wider implications for other flora and fauna, not just koalas. 5. Proposed construction of 120 km of Koala exclusion fencing will isolate and fragment an expanding and thriving koala population. While the Chief Scientist Koala Report also recommends koala fencing to keep wildlife away from roads and residential areas, the Plan does not incorporate the Report's recommendation for habitat corridors with a recommended width of 390-450 metres, to be enhanced by 'Asset Protection Zones' and 30 metre wide buffers on either side of the corridor to "reduce the impact of threats, light and noise on koalas." Further, the Chief Scientist Koala Report notes that the Ousedale Creek to Appin North corridor, the Plan's preferred east-west corridor, is impeded by "numerous suburban and rural properties between the habitat edge and road surface, on both the east and west sides." The Plan also doesn't specify an adequate number of koala underpasses or suitable crossings across busy Appin Road. 6. Plan lacks a firm commitment to the amount of land to be protected. It does not indicate whether any steps will be taken to protect the integrity of the strategic conservation area before the additional land can be set aside or protected in other ways. 7. Plan acknowledges that the urban heat island effect in Western Sydney "will increase as urbanisation increases," but measures to mitigate its impact are minimal. Western Sydney University research has identified that in Sydney's treeless urban areas, morning summer surface temperatures are nearly 13 degrees celsius higher than in vegetated areas. Summer temperatures can rise to over 50 degrees celsius in Western Sydney; a temperature now deemed too hot to be safe for hot water systems! 8. The suggested solution of 'Greening our city' - a Premier's Priority program that was announced in 2019 and designed to ensure one million trees are planted by 2022, is inherently flawed; it makes far better sense to preserve existing trees than to remove and replant. And new building block sizes are typically too small to accommodate significant trees. 9. The proposed Georges River Koala Reserve falls far short of securing all of the primary, secondary and tertiary koala habitat corridors. The Department of Planning, Industry and Environment (DPIE) 2018 report, Conserving Koalas in the Wollondilly and Campbelltown Local Government Areas estimated that 8,293.46 hectares would need to be set aside for this purpose. The state's koala population is now predicted to become functionally extinct in the wild before 2050, according to a report released in June by the Upper House Inquiry into Koala populations and habitat in NSW. 10. If the proposal to build 120 km of koala fencing is implemented without an adequate number of appropriately sized movement corridors, the koalas will be trapped. The Chief Scientist Koala Report confirms the need to maintain connectivity, noting that it helps to "avoid the

creation of dead ends where koalas face threats without routes of escape... once housing development occurs along the western flank of the Mount Gilead site the route for koalas to move east or west will be through a narrow strip of habitat at the confluence of the Nepean River and Menangle Creek...and conceptual plans illustrate this habitat being potentially surrounded by three roads.” Effectively this wildlife corridor will become a functional dead-end. 11. Plan does not address the significant adverse impact on the scenic, historic and physical qualities of this unique landscape. The protection of the undeveloped, rural character of the landscape of the Scenic Hills around Campbelltown has been a priority since the earliest planning schemes of the Post-WW2 period. This Plan will completely undo a visionary planning process that attempted to constrain the footprint of the urban areas and encourage only development that would be sympathetic to the scenic and cultural values of one the most picturesque and historic rural landscapes in NSW. In particular, it abandons the “linear city” concept in which natural areas would be readily accessible to the city’s population, and economies are achieved in the provision of service and transport corridors.

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