



FRIENDS OF FERNHILL AND MULGOA VALLEY INC.

We understand that the Cumberland Plain Conservation Plan (CPCP) is a plan to replace the standard rules which require developers to set aside land for conservation and instead to replace these rules with a new 'strategic' approval. If this is allowed, the developments included in the CPCP will clear 10,470 hectares of land and destroy more than 10% of the entire Cumberland Plain Woodland (CPW) ecosystem.

The CPCP will replace developer's legal requirements to compensate for ('offset') this.

Whether the CPCP will be an improvement depends on whether

- sufficient funding is locked in
- staging of development is matched to the satisfactory completion of offsets
- wildlife corridors are conserved
- intact bushland is conserved instead of planting trees
- offsets are new – not existing public reserves
- developers pay for offsets – not the taxpayer
- all direct offsetting, restoration and indirect offsetting will occur on the Cumberland Plain, or whether other areas of NSW will be protected at the expense of CPW

FFMV Inc asks that key changes are made to the proposed offsets:

- the Cumberland Conservation Corridor within the Strategic Conservation Area (SCA) is protected – particularly small connections that are currently not protected.
- smaller acreages are eligible for offsetting (SCA) and offset funding is increased to better incentive conservation, thereby improving private property owner participation.
- more new public reserves of Cumberland Plain Woodland (CPW) are declared to offset 84ha loss of CPW in National Parks including the Bargo-Nepean Proposal, Cobbitty Hills Proposal and the Greendale Proposal (recommendations made by the Cumberland Conservation Network's State of the Cumberland Plain Report, 2018)
- the focus of offsets is restored to Cumberland Plain Woodland (the ecosystem most impacted by developments). Offsetting elsewhere in NSW is not acceptable.
- landowner-specific exclusions in the SCA should be dropped. To truly conserve the ecosystem of the Cumberland Plain, the best diversity must be protected regardless of tenure.
- CPCP riparian corridors and E2 zonings must be conserved in perpetuity as offsets.

Specifically for the Mulgoa Valley, FFMV Inc is concerned that

- excluding 'small' (less than 20 ha) lots to reduce cost of offsets to developers and reduce administrative requirements by the BCT, will exclude most CPW. If Biodiversity Stewardship Agreements were to include smaller lots, this would negate the need for offsets to be located outside the Cumberland Plain (after 5 years of the program) and ensure that this was a genuine Conservation Plan for the Cumberland Plain.
- there is a need to increase, not reduce, the incentive of offsetting on private land given the current trajectory of loss in CPW. This incentive for private landholders has been undermined due to the 'Bio-credit marketplace' being swamped when Local Government was permitted to place BSA's on Council Reserves.
- basing CPCP mapping on lots rather than properties is flawed, as multi-lot single holdings are erroneously excluded. The classic example is the Kingsview (Kingshill Road) corridor at Mulgoa where an extinguished paper subdivision has resulted in numerous small lots within a single property holding.
- basing maps on desktop aerial mapping with limited/no expert input has excluded Derived Native Grassland forms of CPW, which are often more (not less) intact than canopied forms viz. ground truthing of aerial mapping is essential!

Some key additions to the SCA are needed in the Mulgoa Valley:

- The Kingsview (Kingshill) Corridor (land between Longview & Kingshill Rd) - a known threatened flora hotspot especially for *Pultenaea parviflora* and *Marsdenia viridiflora* subsp. *Viridiflora*. This corridor will provide rare connectivity between the Blue Mountains World Heritage Area (via conserved lands on Fernhill) through to the largest remnant of CPW at the Defence Establishment Orchard Hills. This presents the best opportunity for migratory woodlands birds to remain on the Cumberland Plain.
- Small-lot CPW along Mulgoa Creek around Farm and Littlefields Roads
- Open habitat including Derived Native Grasslands south of Fairlight Rd and west of Mulgoa Road
- Crossman Reserve (15Ha) is an existing Penrith Council reserve along Jerrys' Creek at the southern boundary of Mulgoa Valley. Two parcels of undeveloped land southwards of Crossman Reserve should be included in the Strategic Conservation Areas mapping. The vegetation is in excellent condition, they are large (20Ha) and provide connection from the Nepean River through to the SCA's in the Greendale Area via Jerry's Creek.

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