

## Sarah Ng

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**From:** Anthony Tavella on behalf of DPE PS ePlanning Exhibitions Mailbox  
**Sent:** Tuesday, 6 October 2020 10:55 AM  
**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:** Monday, 5 October 2020 9:17 PM  
**To:** DPE PS ePlanning Exhibitions Mailbox <eplanning.exhibitions@planning.nsw.gov.au>  
**Subject:** Webform submission from: Draft Cumberland Plain Conservation Plan

Submitted on Mon, 05/10/2020 - 21:16  
Submitted by: Anonymous  
Submitted values are:  
Submission Type: I am submitting on behalf of my organisation  
First Name: Sharyn  
Last Name: Cullis on behalf of 'Georges River Environmental Alliance'  
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Submission file: [webform\_submission:values:submission\_file]

Submission: Objection to the Cumberland Plain Conservation Plan Whilst the Georges River Environmental Alliance supports the establishment of the 'Campbelltown' Koala Reserve, we 'Object' to the draft Cumberland Plain Conservation Plan, (CPCP), within which it is framed, because it is not a genuine commitment to 'conservation', but is instead a developer off-set framework. It will deliver greater developer certainty and streamlined processes up front to enable the destruction of endangered ecological forest communities and further threaten iconic fauna species, including koalas. It sets dangerous precedents for the management of conservation bushland around the state. Furthermore, it will have grave negative impacts on the human communities who live, and will live, in Western Sydney. See below both specific grounds for objections and our recommendations for a better Plan. Our specific grounds for the objection: • It is unacceptable that the CPCP will approve the loss of more than 1000 ha of Cumberland Plain woodlands for urban development and infrastructure projects. These woodlands are already critically endangered with only 6% of the original forests still in existence. The extra amount to be removed is approximately 16% of the 6% that remains. That further risks 25 endangered plant species and 24 endangered fauna species including koalas, squirrel gliders, spotted-tailed quolls, swift parrots and glossy black cockatoos, found within this ecosystem. The CPCP also admits vegetation removal will exacerbate the health risks associated with heat waves in Western Sydney. • The plan does not lock in time-specific targets or guarantees that land of conservation significance will be protected, but instead indicates this will be secured over time, much through developer contributions and offsets. Whilst developers will be given the certain right to destroy vegetation up-front, the degree and nature of their commitments to make conservation offsets is unclear. • The Plan commits to create only one Conservation Reserve of 1885 ha for koalas at the extreme southern edge of the Cumberland Plain. However, 60% of that is not threatened land, it is currently safe as Crown Land. The remainder will not be dedicated now when it is needed, but will be gradually added over time. The Chief Scientist has indicated that six koala bushland corridors between the George's and Nepean Rivers bushland are necessary to ensure the survival of the koalas by enabling them to re-populate good habitat on the Cumberland Plain, and reach beyond to the Blue Mountains. The CPCP only guarantees one. The plan does not reflect scientific advice that koala corridors need to be at least 425m wide. • The Plan does not declare, name or quantify the extent of much needed other conservation reserves, throughout the rest of the vast area of the Cumberland Plain to be buried under tiles, concrete and bitumen. Only 2 other reserve possibilities are 'under investigation'. This is pathetically inadequate. The further flaws of this approach are revealed by the proposal for the 'Confluence Reserve', which is currently cleared flood-prone paddocks. Developer costs will be cut by replacing the requirement to save quality bushland, by inviting developers to fund tree planting on this waste land. This will be no 'replacement' for the loss of old growth, hollow bearing ancient trees. • The Plan accommodates the appalling routes of the M9 and M12 that deliberately carve through previously identified bushland, community parkland, green creek corridors and even dedicated NPWS nature reserves. One third of the NPWS Colbee Nature Reserve will be lost to major roadworks. The proposed M9 (Outer Sydney Orbital) will cut through the middle of Wianamatta Regional Park, creating a wildlife roadkill zone, through the green corridor along South Creek, and then continue south to decimate the bushland of the Cobbitty Hills. The Plan does not demonstrate a coherent vision for corridors of green space along the corridors of blue (streams) In fact it fails to realise every stream and creekline as a soft, cooling, visually pleasing green opportunity. • The Plan does not articulate or value the need and opportunity to extend the Western Sydney Parkland, as a contiguous green corridor, south to reach and link Mt Annan Botanical Gardens, Sugarloaf and Camden Park Estate, to Mt Gilead, Woodhouse and Menangle Ck corridors. • The firm budget allocation to achieve Conservation outcomes of \$84M, is inadequate, and any future allocations totally unquantified. Prior estimates of what is needed is \$530M. So bushland is being undervalued to developer advantage. Our specific Recommendations' for the revision of the Plan are: 1. The Plan must establish multiple new Conservation Reserves, to off-set any Cumberland Plain vegetation loss. Any off-sets must be 'like for like', and create additionality. The 3 proposals, (the Koala Reserve, Gulguer and The Confluence), are not sufficient. This plan will

partially destroy two reserves that were specifically set aside as offsets for the M7. Offsets are meant to be in perpetuity, so this must never happen. 2. The need is to 'save' woodlands that remain, not do 'replacement' plantings, which will take generations to yield any cool canopy and biodiversity protection and enhancement. 3. Six E-W koala corridors should be established to link the Georges River koalas to bushland of the Nepean, to that of the Cumberland Plain, and beyond to the Blue Mountains. The priority koala corridors of more than 425m in width should be at Noorumba Reserve and Beulah-Woodhouse Creek, (at Mt Gilead), and they must extend even beyond the Nepean to reach Mt Annan and the Western Sydney Parklands. The Koala Reserve must include the important Peter Meadows Creek koala habitat, and abandon the road named as the 'Georges River Parkway' as it will threaten the koala population. 4. The main roads should be re-aligned or tunnel to avoid high value bushland and open space. For example, the Camden tunnel needs to be extended 6kms northwards and 4kms southwards to save the Camden Park to Razorback wildlife corridor and Cobbitty Hills bushland. The South Creek corridor and Colbee NR should be untouched by road development. A tunnel of 2kms is required to save Wianamatta Park. 5. The CPCP must lock in a budget of at least \$540M up-front (as per Western Sydney Growth centres offset program), stage developments so that no new development happens until past offset commitments have been delivered and not use loopholes in NSW law to re-label existing public reserves as offsets for developers. Public land should not be used for offsets under any circumstances because this does not achieve additionality. Dr Sharyn Cullis PhD-Science and Technology Studies-UNSW Secretary, Georges River Environmental Alliance. [REDACTED]

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