

Sarah Ng

From: Anthony Tavella on behalf of DPE PS ePlanning Exhibitions Mailbox
Sent: Wednesday, 7 October 2020 3:55 PM
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: Wednesday, 7 October 2020 11:17 AM
To: DPE PS ePlanning Exhibitions Mailbox <eplanning.exhibitions@planning.nsw.gov.au>
Subject: Webform submission from: Draft Cumberland Plain Conservation Plan

Submitted on Wed, 07/10/2020 - 11:16

Submitted by: Anonymous

Submitted values are:

Submission Type: I am making a personal submission

First Name: Nicholas

Last Name: Harrop

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Submission file: [webform_submission:values:submission_file]

Submission: To whom it may concern, I am writing to provide an outsider's perspective on the Draft Cumberland Plain Conservation Plan. I am not a local resident but I feel I have a stake in the issue of koala survival as all people do. I am a heritage professional who works for an environmental consultancy and have had significant exposure to environmental approvals. I would like to present this submission as a question rather than a criticism of the Plan. Can you claim with confidence that should the Plan be extrapolated to all koala habitat within Australia, the survival of the species would be likely? This may sound like an irrelevant question as there are conditions specific to the Cumberland area and all koala habitat is not planned to be developed. However, I think this is the question that all developments need to ask of themselves with respect to environmental impacts. If a level of impact is justifiable in one area, it must be justifiable in all areas. Australia's environmental degradation and decimation of species such as the koala have arisen from a mentality that individual developments are taken in isolation. The mentality behind the approvals process is generally flawed. It takes the state-wide health of a biodiversity value in considering its impacts but does not take into account the cumulative impact of all developments past and present to that value. In my opinion the only way to gain a fair assessment of impacts is to treat a development area as a microcosm for the broader environment. Therefore, in relation to Sub-Plan B (and perhaps other listed species and populations) the question is 'if the Cumberland Plain Conservation Area was the only place that koalas survived in the world, would they continue to survive in the long term?'. It seems that the Plan does strive to take into account a broad area by its very nature and as a result the conservation considerations are more holistic than typical developments. I understand that the authors of the Plan are not responsible for the pressures of unsustainable urban growth or the inadequacies of the NSW Koala Strategy. However, I am concerned about the 240 hectares of important koala habitat under threat. I would hope that should the answer to the question I pose here be 'no, koalas would not survive should this area be typical of all koala habitat', then some adjustments would be made. Higher density living is a reality of our future and we need to build up, not out as much as possible. I understand that the Plan strives to meet the requirements of the BC and EPBC Acts. However, having worked in environmental approvals for most of my professional life I know how easy these boxes are ticked. There is an opportunity here to set an example on how to grow sustainably, and it does seem there is a genuine attempt to exceed the legislated requirements. I can only ask that the authors of the Plan are confident that they have exhausted all possibilities in reducing environmental impact. Yours Faithfully, Nick Haarrop

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