

Sarah Ng

From: Anthony Tavella on behalf of DPE PS ePlanning Exhibitions Mailbox
Sent: Thursday, 8 October 2020 10:07 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: Wednesday, 7 October 2020 9:48 PM
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 - 21:47

Submitted by: Anonymous

Submitted values are:

Submission Type: I am making a personal submission

First Name: private

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Submission file: [webform_submission:values:submission_file]

Submission: 1. The 'Cumberland Plain Conservation Plan' does not reflect Australia's commitments as a signatory under the United Nations Convention on Biological Diversity as it results in a significant loss of many hectares of existing native vegetation habitat, and degrades much of the 'conserved' vegetation through increased fragmentation and edge effects with the likelihood that it will have little biodiversity value in the long-term. 2. In 2019, a global assessment of biodiversity concluded that "the world needs transformative change if life on Earth is to be safeguarded and people are to continue to receive the services and benefits that nature provides" (Global Assessment on Biodiversity and Ecosystem Services report released in 2019 by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services). The report lists land use changes, climate change, pollution and invasive species among the main drivers of nature degradation. Rather than proposing a 'transformative change' that will actually enable a halt and perhaps a reversal to the tragic loss of biodiversity occurring in western Sydney, the so-called conservation plan formalises and facilitates further destruction and loss, and very minimal conservation. Based on figures contained in the report, approximately 53,000 hectares of existing habitat, of which approximately 18,000 hectares is vegetation in good condition, will be destroyed by enactment of this so-called 'Conservation Plan', and only about 4% of the Plan Area will be protected in existing and future conservation reserves. Data taken from the 'Conservation Plan' to make these calculations is: a) Plan Area covers 200,000 hectares, with 61,000 hectares containing native vegetation, much of this being ecological communities or habitats for species listed under the BC Act and/or EPBC Act b) 13% of pre-1750 extent of native vegetation remains in good condition (ie 26,000 hectares of the Plan Area), with 10% of the existing vegetation protected in a reserve or biodiversity agreement (ie 2,600 hectares of the Plan Area) c) The Plan commits to protect at least 5,475 hectares of impacted native vegetation within new conservation lands d) Land currently within reserves plus new conservation lands total approximately 8,000 hectares, based on the above figures 3. Furthermore, the diagram showing 'strategic conservation areas' (figure 12) shows these are highly fragmented, with very high edge to area ratio, which is not conducive to good conservation outcomes. Given these areas will be divided by roads, and edged by residential areas with the pressures of roaming pets, informal BMX tracks, artificial night lighting, weed incursion and demands for hazard reduction burning to protect homes, their conservation values following development of the land surrounding them is highly questionable 4. This Plan affects the survival of many threatened species and endangered ecological communities as identified in the document. They will never get off the endangered list, and will likely be at greater risk of extinction, without a transformative change that results in existing habitats being conserved and degraded habitats and 'missing links' restored on an appropriate scale, not evident in the current draft of the Plan. The 'conservation plan' does not consider what the minimum viable population size (or indeed the desired population size) is for each of these species, and what habitat area and habitat features and threat abatements are necessary to support this target population – as would be expected in a real 'conservation plan' – rather, lines are drawn on a map and the flora and fauna are expected to fit in and adapt. 5. Holistic land-use planning for conservation as envisaged by this plan has the potential to be a powerful tool for conservation, but it needs a bold approach where landscape-scale conservation needs are prioritised, and future threats that will be caused by development of adjoining lands fully accounted for. This 'conservation plan' needs to go back to the drawing board and start again, putting conservation needs ahead of development goals, to have any long-term impact on the status of western Sydney's native flora and fauna.

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