

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
Attachments: submission-cpcp.docx

From: noreply@feedback.planningportal.nsw.gov.au <noreply@feedback.planningportal.nsw.gov.au>
Sent: Wednesday, 7 October 2020 10:57 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 - 22:52
Submitted by: Anonymous
Submitted values are:
Submission Type: I am making a personal submission
First Name: Bruce and Pamela
Last Name: French
Name Withheld: No
Email: [REDACTED]
Suburb/Town & Postcode: Cobbitty 2570
Submission file:
[submission-cpcp.docx](#)

Submission: Submission on the draft Cumberland Plain Conservation Plan We have several meritorious concerns with the draft CPCP. 1. Clearing TEC's: The plan proposes to clear 1777.8 ha of threatened ecological communities. The plan recognises that the proposed clearing of native vegetation will affect 8 threatened ecological communities, 25 threatened flora species and 24 threatened fauna species. 1777.8 ha represents 5.3% of the existing remnant vegetation on the Cumberland Plain. The 5.3% figure is based on a 2018 publication of 33124 ha of remaining remnant vegetation on the Cumberland Plain (1). Clearing of this amount of a threatened ecological community would be contrary to our legislated responsibility to protect Matters of National Environmental Significance under the EPBC Act. The clearing of 5.3% of the threatened ecological communities of the Cumberland Plain is not an acceptable compromise. 2. Inadequate offsets: The proposed offsets are not robust. The Confluence Reserve Investigation area is almost devoid of native vegetation and yet is being put forward as a biodiversity offset site where ecological community tree planting is proposed. There are numerous scientific studies showing the inferiority of building biodiversity by tree planting (2, 3). The conclusions of a study of replanting in the Cumberland Plain in the journal Restoration Ecology Wilkins, S et al 2003 state the "...a much higher premium needs to be placed on ecosystems that recognises both the difficulty and cost of their replacement, or arguably, recognises their irreplaceability...". The Confluence Reserve Investigation area cannot be regarded as a valid biodiversity site. 3. Connectivity loss: There are several areas where connectivity between threatened ecological communities will be severed, if not decimated under the proposed plan, particularly the Cobbitty Hills (the Cobbitty Hills area is the largest area of intact Bushland in the Cumberland Plain, representing 2200ha) and the Elizabeth MacArthur Agricultural Institute-Razorback in the southern part of the Plain. Such loss of connectivity in these areas appears to be contrary to the stated aims of the draft CPCP which include Support western Sydney's biodiversity and growth. Deliver biodiversity outcomes and support the ecological function of the Cumberland Plain. The importance of connectivity on biodiversity cannot be overstated. Healthy biodiversity is a recognised positive influence for the survival and resilience of species within a plant community. We also encourage the DPIE to look at the submission made by Camden Council including the importance of the connectivity of the Cobbitty Hills area when the Outer Sydney Orbital was first open to public submissions in 2018. This submission states "...The Cobbitty Hills corridor is identified in the Local Biodiversity Strategy (Camden LGA 2013) as a significant (high priority) corridor, as it contains critically endangered Cumberland Plain Woodland. The proposed preservation zone for the orbital would result in vegetation clearance and fragmentation of this ecologically significant and biodiversity corridor within Cobbitty." (4) Both the Cobbitty Hills area and the EMAI-Razorback area could (should) be identified as being potential biodiversity offset areas of high value. These key connectivity corridors could be preserved by extending the OSO tunnel to preserve both the Cobbitty Hills and the EMAI-Razorback areas. We believe the length of the tunnel could be significantly shortened by constructing it in a straight line rather than in the current serpiginous underground curve around the western perimeter of Camden only to then sweep to encompass the eastern perimeter of the township of Cobbitty. 4. Strategic Conservation Area (SCA): The draft CPCP supposes that biodiversity conservation will occur within the Strategic Conservation Area. There is no stated plan to enable this to occur other than encouraging Biodiversity Stewardship Agreements to be taken up by landowners. Whilst we are supportive of Biodiversity Stewardship Agreements we consider their uptake in the SCA to be a major risk given that in the years between 2008 and 2018 Biobanking and Biodiversity Stewardship Agreements were introduced and yet there was a net decline of most of the threatened ecological communities of the Cumberland Plain (1). Biodiversity Stewardship Agreements in their current format are not generally affordable to landowners and would not appear to be the answer for the SCA. Biodiversity Stewardship Agreements could be an

answer if they were made more financially attractive to landowners. 5. Indigenous heritage: Previous biocertifications (e.g. Western Sydney Growth Areas) have incorporated Aboriginal cultural heritage surveys, ensuring that the planning approvals locked in on biodiversity grounds are also appropriate on other grounds. The CPCP has failed to do so. It proposes certifying development over key areas of cultural concern including McGees Hill (associated with the Appin Massacre) and two Dharug Burial Grounds on South Creek. We would like to see at least the same emphasis on preserving and recognising indigenous heritage sites as is placed on post European heritage sites. 6. Old Growth Forests (OGF): The need to protect OGF is conspicuously missing from the draft CPCP. OGF maps are available. OGF's have ecological, historical and indigenous cultural significance and deserve a prime place within the CPCP. 1 "State of the Cumberland Plain 2017-18" Greater Sydney Landcare Network page 13 for analysis of remnant bushland, page 19-24 for effect of Biodiversity Offsets Program on TEC's) <chrome://offline/5bc25018c800b924724b981ab30190e4/file.pdf?entryURL=https%3A%2F%2Fgreatersydneylandcare.org%2Fwp-content%2Fuploads%2F2018%2F10%2FGSLN-CCN-State-of-the-Cumberland-2018-GSLN.pdf&virtualURL=https%3A%2F%2Fgreatersydneylandcare.org%2Fwp-content%2Fuploads%2F2018%2F10%2FGSLN-CCN-State-of-the-Cumberland-2018-GSLN.pdf> 2 Wilkins, S et al Measuring Success: Evaluating the restoration of a grassy eucalypt woodland on the Cumberland Plain, Sydney, Australia. Restoration Ecology Vol 11; No 4, pp 489-503, Dec 2003 3 <https://greatersydneylandcare.org/wp-content/uploads/2020/09/Revegetation-CPW-is-not-restored-by-ScalpSeed-techniques-BDEG-2019.pdf> 4 Submission to the Outer Sydney Orbital Transport Corridor Camden Council May 2018 p31 section 7 Biodiversity and Air Quality <https://www.camden.nsw.gov.au/assets/pdfs/Council/Plans-and-Strategies/Submissions-and-Position-Papers/Final-Camden-Council-Submission-Outer-Sydney-Orbital-Transport-Corridor-May-2018.pdf>

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

Submission on the draft Cumberland Plain Conservation Plan

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1. Clearing TEC's: The plan proposes to clear 1777.8 ha of threatened ecological communities. The plan recognises that the proposed clearing of native vegetation will affect 8 threatened ecological communities, 25 threatened flora species and 24 threatened fauna species. 1777.8 ha represents 5.3% of the existing remnant vegetation on the Cumberland Plain. The 5.3% figure is based on a 2018 publication of 33124 ha of remaining remnant vegetation on the Cumberland Plain (1). Clearing of this amount of a threatened ecological community would be contrary to our legislated responsibility to protect Matters of National Environmental Significance under the EPBC Act.

The clearing of 5.3% of the threatened ecological communities of the Cumberland Plain is not an acceptable compromise.

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Support western Sydney's biodiversity and growth.

Deliver biodiversity outcomes and support the ecological function of the Cumberland Plain.

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These key connectivity corridors could be preserved by extending the OSO tunnel to preserve both the Cobbitty Hills and the EMAI-Razorback areas. We believe the length of the tunnel could be significantly shortened by constructing it in a straight line rather than in the current serpiginous underground curve around the western perimeter of Camden only to then sweep to encompass the eastern perimeter of the township of Cobbitty.

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Biodiversity Stewardship Agreements could be an answer if they were made more financially attractive to landowners.

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We would like to see at least the same emphasis on preserving and recognising indigenous heritage sites as is placed on post European heritage sites.

6. Old Growth Forests (OGF): The need to protect OGF is conspicuously missing from the draft CPCP. OGF maps are available. OGF's have ecological, historical and indigenous cultural significance and deserve a prime place within the CPCP.

1 "State of the Cumberland Plain 2017-18" Greater Sydney Landcare Network
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2 Wilkins, S et al Measuring Success: Evaluating the restoration of a grassy eucalypt woodland on the Cumberland Plain, Sydney, Australia. Restoration Ecology Vol 11; No 4, pp 489-503, Dec 2003

3 <https://greatersydneylandcare.org/wp-content/uploads/2020/09/Revegetation-CPW-is-not-restored-by-ScalpSeed-techniques-BDEG-2019.pdf>

4 Submission to the Outer Sydney Orbital Transport Corridor Camden Council May 2018 p31 section 7 Biodiversity and Air Quality
<https://www.camden.nsw.gov.au/assets/pdfs/Council/Plans-and-Strategies/Submissions-and-Position-Papers/Final-Camden-Council-Submission-Outer-Sydney-Orbital-Transport-Corridor-May-2018.pdf>