

## Sarah Ng

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**From:** Anthony Tavella on behalf of DPE PS ePlanning Exhibitions Mailbox  
**Sent:** Thursday, 8 October 2020 10:09 AM  
**To:** DPE PS Biodiversity Mailbox  
**Subject:** FW: Webform submission from: Draft Cumberland Plain Conservation Plan  
**Attachments:** cumberland-plain-conservation-plan.docx

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**From:** noreply@feedback.planningportal.nsw.gov.au <noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Thursday, 8 October 2020 7:41 AM  
**To:** DPE PS ePlanning Exhibitions Mailbox <eplanning.exhibitions@planning.nsw.gov.au>  
**Subject:** Webform submission from: Draft Cumberland Plain Conservation Plan

Submitted on Thu, 08/10/2020 - 07:39  
Submitted by: Anonymous  
Submitted values are:  
Submission Type: I am making a personal submission  
First Name: Martin  
Last Name: Derby  
Name Withheld: No  
Email: [REDACTED]  
Suburb/Town & Postcode: Belrose 2085  
Submission file:  
[cumberland-plain-conservation-plan.docx](#)

Submission: Dear Committee Koalas exist presently in a thriving, healthy colony in a forest just south of Campbelltown. These koalas are some of the healthiest in NSW, and they are on our doorstep in Sydney. My concern is the success of this koala colony to survive in its present state. The government's plan would clear 1,780 hectares of endangered ecosystems and isolate about 60% of remaining wildlife areas by surrounding them with roads and houses. Under the guise of a so-called "conservation plan", the NSW Government is planning to allow Sydney koala forests to be destroyed for housing and infrastructure. This is a flawed plan and property developers who continually influence the NSW Planning Department and of course have a vested interest for this development to proceed, have had some influence in drawing up this draft plan. Developers are intent on making money and judging from past experiences will take shortcuts to increase their profits, which will undermine protecting our wildlife and decrease their prospects for survival. The government must amend its flawed "conservation plan" and go back to the drawing board and come up with proposals that really do protect this critical bushland. This colony and many others like it will be gobbled up by urban sprawl if the NSW Government adopts the draft Cumberland Plain Conservation Plan that is now open for public feedback. Like minded- environmentalists and the public are conscious of saving koalas with a genuine concern for the survival of this species recommend and list critical improvements to the plan. There are nine key changes that must be implemented for the NSW government to be honestly committed to the survival of all wildlife in this area and particularly the koala. They are:- 1. The draft plan should be withdrawn and redeveloped using the framework of ecological sustainable development. 2. Protecting a 500m-wide koala corridor at Mount Gilead in the city's southwest, 3. Saving Wianamatta Regional Park in the northwest 4. Extend the Camden Tunnel 4km south and 6km north to save the wildlife corridor between the Elizabeth Macarthur Agricultural Institute and Razorback, Cobbitty Hills as well as existing homes. 5. Do not clear critically endangered Cumberland Plain Woodland because no type of revegetation offset can compensate for clearing the critically endangered landscape of which 94% has already been lost to urban development. 6. Protect the Cumberland Conservation Corridor. 7. Lock in a sufficient budget upfront to ensure offsets are delivered and do not permit taxpayer subsidies for developer offsets. 8. Stage development and require the satisfactory delivery of offsets from each stage before further development proceeds (as per the Western Sydney Growth Centres). 9. Do not create offsets on existing public reserves of any kind. These changes must be included in the plan especially regarding offsets and budgets and the assessment of each developmental stage, to ascertain that each stage is delivering the desired outcomes before proceeding to the next stage. All too often the interests of developers are considered ahead of environmental consequences to get the job done quickly and with taxpayer financial support. The Cumberland Plain Conservation Plan fails the wildlife and particularly the koalas in that area and we strongly urge the government to rewrite it using the framework of ecologically sustainable development. Currently, the plan would result in fragmentation and clearing of vast areas of habitat and threatened ecosystems, with devastating consequences for the wildlife that call this area home. It would allow clearing of over 10% (or 1000 hectares) of Cumberland Plain Woodland, a critically endangered ecosystem. These animals are sensitive to changes around them, excessive noise and air pollution, and ongoing intrusions into their quiet peaceful environment will be disturbed. This could have major effects on their health and their ability to breed successfully. Has this been considered? Admittedly the Plan mentions monitoring and research of the species, but all these actions will be useless if this population is compromised and they are on a downward spiral to extinction- it will be too late for them then. All the commissioned reports, strategies are meaningless, if you are not sincerely committed to protect our koalas properly and protect high quality habitats with increased funding and this applies to this area in particular. This draft Cumberland Plain Conservation Plan must not proceed in its' present form unless the above key changes are

adopted. The 42 Recommendations as reported in NSW Parliament Legislative Council Committee Inquiry also must be adopted across all of NSW and finally the NSW Koala Protection Policy has implications in the broader sense in NSW and in the Cumberland Plain Conservation Plan. Four SEPP guidelines need to be implemented to protect koalas which means simply if it is core koala habitat it must not be cleared. 1. End the practice of developers 'offsetting' the destruction of core koala habitat (currently the Draft Guidelines allow koala habitat to be cleared if the developer can demonstrate they have met the 'aims of the SEPP'. The aim of the SEPP should be for core koala habitat NOT to be cleared). 2. Prohibit the clearing of core koala habitat for all developments (currently state significant developments, like mines, are exempt). 3. Protect koala habitat on land less than 1 hectare in size (currently the SEPP only applies to larger parcels of land, meaning it's death by a thousand cuts for koala habitat, particularly in coastal areas and on urban fringes). 4. Strengthen the SEPP so that core koala habitat cannot be cleared on private land for the purposes of private native forestry and intensive agricultural activities (as 99% of land identified as koala habitat on private land can still be cleared). Please make the recommended changes to the draft Cumberland Plain Conservation Plan and do not let this iconic species go extinct on your watch. Their future is in your hands. Yours sincerely, Martin Derby

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

Dear Committee

Koalas exist presently in a thriving, healthy colony in a forest just south of Campbelltown. These koalas are some of the healthiest in NSW, and they are on our doorstep in Sydney.

My concern is the success of this koala colony to survive in its present state. The catastrophic bushfires took an immense toll on koalas and the NSW Koala Strategy has failed them because of continued logging of prime habitats. The Koala Strategy whilst it has set up forests for relocating koalas to, this often is not successful initially to the population. Relocation causes stress for the animal which can affect successful breeding of the species. The koala populations already established in existing habitats need to be left there undisturbed for this animal to survive. Koalas have dealt with fires, numbers plummeting and local extinctions occurring due to excessive land-clearing, drought, stress-related disease, climate change, feral and domestic animals, vehicle strikes and Chlamydia. The one causing continual damage however, is logging of their habitat and this will still occur due to the proposed residential development in the Campbelltown area.

In the NSW Parliament Legislative Council Committee 'Koala Populations and Habitat in New South Wales' states Recommendation 42 "That the NSW Government ensure that the NSW Koala Strategy: Bushfire Recovery Plan contains as its key focus, the protection of koala habitat."

Existing koala habitat must be protected. Prime habitats must not be logged. Out of the 48 koala populations in NSW we appear to have only 2 stable ones left, all the rest in decline or unclear. On Page 104 of the NSW Legislative Council Committee Report Ms Cerin Loane, Senior Policy and Law Reform Solicitor of the Environmental Defenders Office contended that the Koala Strategy and SOS Koala Project are 'falling short of providing real and tangible protections for koalas and their habitat', arguing that actual reform of NSW legislation was needed to ensure 'real protections' for koalas. One of these healthy stable koala populations is located in the Campbelltown area.

**This bushland is under threat to urban sprawl and the encroachment of man if the NSW Government adopts the draft Cumberland Plain Conservation Plan.**

**The government's plan would clear 1,780 hectares of endangered ecosystems and isolate about 60% of remaining wildlife areas by surrounding them with roads and houses. These other wildlife also must be considered in their survival regarding the impact of this development.**

Under the guise of a so-called "conservation plan", the NSW Government is planning to allow Sydney koala forests to be destroyed for housing and infrastructure. This is a flawed plan and property developers who continually influence the NSW Planning Department and of course have a vested interest for this development to proceed, have had some influence in drawing up this draft plan. Developers are intent on making money and judging from past experiences will take shortcuts to increase their profits, which will undermine protecting our wildlife and decrease their prospects for survival. The government must amend its flawed "conservation plan" and go back to the drawing board and come up with proposals that really do protect this critical bushland.

In the NSW Parliament Legislative Council Committee 'Koala Populations and Habitat in New South Wales', on page 28-29 "The health of the colony near Campbelltown has become critical to the population's survival in the state. Lendlease's development will impede the retention of a resilient colony if certain points are not adhered to in the development. The Total Environment Centre (TEC) claims Walker Corporation has not set aside sufficient land for koala habitat in the important Allen's Creek corridor by dramatically constricting this corridor that has been identified as a primary corridor." In other words, they are cutting costs to increase profits and the koalas will suffer. In the report, Campbelltown City Council agreed with expert evidence that 450 metres was the width for a koala corridor, but in the absence of an approved Koala Plan of Management, the council said that it could not mandate developers to uphold their advice. It is the responsibility of the State Government to insist on at least this minimum width.

Should the current development proposal proceed, in the absence of an approved Koala Plan of Management, Dr Steve Phillips of Biolink predicted that the South Western Sydney koala population would be the poorer for it as it will further fragment their habitat. The NSW government must do more and if they do not our Campbelltown koalas will move to a possible extinction. If the development is approved the NSW state government needs to approve the Koala Plan with an ideal width of 500 metres to create a successful koala corridor for the species to survive.

But this colony and many others like it will be gobbled up by urban sprawl if the NSW Government adopts the draft Cumberland Plain Conservation Plan that is now open for public feedback.

Like minded- environmentalists and the public are conscious of saving koalas with a genuine concern for the survival of this species recommend and list critical improvements to the plan.

There are nine key changes that must be implemented for the NSW government to be honestly committed to the survival of all wildlife in this area and particularly the koala. They are:-

1. **The draft plan should be withdrawn and redeveloped using the framework of ecological sustainable development.**
2. **Protecting a 500m-wide koala corridor at Mount Gilead in the city's southwest,**
3. **Saving Wianamatta Regional Park in the northwest**
4. **Extend the Camden Tunnel 4km south and 6km north to save the wildlife corridor between the Elizabeth Macarthur Agricultural Institute and Razorback, Cobbitty Hills as well as existing homes.**
5. **Do not clear critically endangered Cumberland Plain Woodland because no type of revegetation offset can compensate for clearing the critically endangered landscape of which 94% has already been lost to urban development.**
6. **Protect the Cumberland Conservation Corridor.**
7. **Lock in a sufficient budget upfront to ensure offsets are delivered and do not permit taxpayer subsidies for developer offsets.**
8. **Stage development and require the satisfactory delivery of offsets from each stage before further development proceeds (as per the Western Sydney Growth Centres).**
9. **Do not create offsets on existing public reserves of any kind.**

These changes must be included in the plan especially regarding offsets and budgets and the assessment of each developmental stage, to ascertain that each stage is delivering the desired outcomes before proceeding to the next stage. All too often the interests of developers are considered ahead of environmental consequences to get the job done quickly and with taxpayer financial support.

The 42 recommendations contained in the June 2020 of the NSW Legislative Council 'Koala Populations and Habitat in NSW' emphasizes protecting urban koala habitats and corridors, protecting old growth forests, urgently prioritising the restoration and replenishment of koala habitat lost to bushfire in national parks, reducing logging quotas and the utilisation of core koala habitat on private land.

The Hon Matt Kean MP, Minister for Energy and Environment, said in February 2020, 'This season's significant bushfires have resulted in devastating losses to koala numbers across NSW, so it is imperative that remaining populations and habitat are protected.' This includes this healthy colony in south western Sydney.

**The government MUST come up with a plan that actually protects this critical bushland and the koala.**

The Cumberland Plain Conservation Plan fails the wildlife and particularly the koalas in that area and we strongly urge the government to rewrite it using the framework of ecologically sustainable development.

Currently, the plan would result in fragmentation and clearing of vast areas of habitat and threatened ecosystems, with devastating consequences for the wildlife that call this area home. It would allow clearing of over 10% (or 1000 hectares) of Cumberland Plain Woodland, a critically endangered ecosystem.

The Government recognises in its Plan that South Western Sydney has the largest koala population in the Sydney metropolitan area and is home to one of the healthiest koala populations in NSW. The NSW Government also recognises as stated in the Plan the importance of koalas to the local community in Western Sydney and their plan to accommodate koalas in and around their proposed massive residential housing developments and proposed major infrastructures which are still a cause of concern for all wildlife.

These animals are sensitive to changes around them, excessive noise and air pollution, and ongoing intrusions into their quiet peaceful environment will be disturbed. This could have major effects on their health and their ability to breed successfully. Has this been considered? Admittedly the Plan mentions monitoring and research of the species,

but all these actions will be useless if this population is compromised and they are on a downward spiral to extinction- it will be too late for them then.

All the commissioned reports, strategies are meaningless, if you are not sincerely committed to protect our koalas **properly and protect high quality habitats with increased funding and this applies to this area in particular.**

This ***draft Cumberland Plain Conservation Plan*** must not proceed in its' present form unless the above key changes are adopted. This issue concerning the plight of koalas in NSW is a concern for all Australians. The government must change their course of action in saving our koalas, listen to the evidence and the professionals, the public concerns and act in a decisive way to genuinely save our koalas.

The 42 Recommendations as reported in NSW Parliament Legislative Council Committee Inquiry also must be adopted across all of NSW and finally the NSW Koala Protection Policy has implications in the broader sense in NSW and in the ***Cumberland Plain Conservation Plan***.

Four SEPP guidelines need to be implemented to protect koalas which means simply **if it is core koala habitat it must not be cleared.**

1. End the practice of developers 'offsetting' the destruction of core koala habitat (currently the Draft Guidelines allow koala habitat to be cleared if the developer can demonstrate they have met the 'aims of the SEPP'. The aim of the SEPP should be for core koala habitat NOT to be cleared).
2. Prohibit the clearing of core koala habitat for all developments (currently state significant developments, like mines, are exempt).
3. Protect koala habitat on land less than 1 hectare in size (currently the SEPP only applies to larger parcels of land, meaning it's death by a thousand cuts for koala habitat, particularly in coastal areas and on urban fringes).
4. Strengthen the SEPP so that core koala habitat cannot be cleared on private land for the purposes of private native forestry and intensive agricultural activities (as 99% of land identified as koala habitat on private land can still be cleared).

Please make the recommended changes to the ***draft Cumberland Plain Conservation Plan*** and do not let this iconic species go extinct on your watch. Their future is in your hands.

Yours sincerely,  
Martin Derby  
Belrose NSW 2085