

Sarah Ng

From: Christine Chalker
Sent: Thursday, 8 October 2020 10:35 AM
To: Chantelle George
Subject: FW: Mulgoa Landcare Submission to the Draft Cumberland Plain Conservation Plan
Attachments: MVLG Submission to the Draft CPCP.docx

For the diary process

From: Hugh Harrold
Sent: Thursday, 8 October 2020 10:23 AM
To: Christine Chalker ; Office@team.minister.nsw.gov.au
Subject: Mulgoa Landcare Submission to the Draft Cumberland Plain Conservation Plan

Attention: Mr Peter Poulos, Senior Adviser to Minister Kean.

Dear Mr. Poulos,

I appreciated the opportunity to meet with you via teleconference some weeks ago now. It is an important time as the NSW Government considers how to manage the future of what little remains of the natural environment of Western Sydney. The release of the Draft Cumberland Plain Conservation Plan exposes concerning limitations to the Plan's vision of preserving the unique vegetation communities of Western Sydney.

Specifically, the Draft Plan permits the offsetting of land clearing to occur OFF the Cumberland Plain. A significant proportion of offsets (20%) will be delivered 'anywhere in NSW'. This conflicts with the intention of the Plan to reverse the current trajectory of Cumberland Plain Woodland toward imminent extinction.

The Mulgoa Valley Landcare Group have identified 5 key issues that need to be addressed within the final version of the Plan. We have made recommendations that will vastly improve the success of the Plan and we hope that such recommendations will be adopted by DPIE.

It had been my hope to deliver these recommendations to Minister Kean in a meeting. Unfortunately this was not possible during the exhibition phase of the Draft Cumberland Plain Conservation Plan. However, it would be of great value to meet with Minister Kean in the coming months and we extend that offer to include a site tour of conservation opportunities in Western Sydney. Planning mistakes also need to be understood and we are happy to identify these as well.

I attach for your information (and for the information of Minister Kean), a copy of the submission prepared on behalf of the Mulgoa Valley Landcare Group. We hope that you might find some time to understand our concerns and specifically we urge you to ensure that five important conservation corridors that have been overlooked in the Draft Plan are included in the final version of the CPCP.

Thank you for briefing the Minister on the content of our submission and we look forward to hearing from you regarding the proposed meeting.

Sincerely
Lisa Harrold
President
Mulgoa Valley Landcare Group Inc




Submission to the Draft Cumberland Plain Conservation Plan October 2020

Mulgoa Valley Landcare Group Inc.
[REDACTED] **Mulgoa 2745**

“The Draft Cumberland Plain Conservation Plan (CPCP) identifies how biodiversity impacts from projected growth in Western Sydney will be addressed. It aims to help protect the area’s important biodiversity on a landscape scale for the long term, by establishing new reserves and biodiversity stewardship sites, driving ecological restoration and delivering threat management programs”. (Draft CPCP)

Previous ‘plans’ have failed to reverse the decline of biodiversity on the Cumberland Plain. In fact, since the implementation of ‘Biodiversity Stewardship Agreement’ legislation, the decline of our native vegetation communities has continued. (2018 State of the Cumberland Plain Report, Cumberland Conservation Network).

Unprecedented population growth anticipated in the next four decades will add exponential pressure to our Critically Endangered Ecological Community (‘CEEC’), Cumberland Plain Woodland which is already ‘functionally extinct’ on the Cumberland Plain. This Plan must address not only the protection of native vegetation on the Cumberland Plain, but migratory and nomadic species that will also be impacted by reduced foraging in this region (including Swift Parrots, Regent Honeyeaters, Grey Headed Flying Foxes and woodlands birds).

The Draft Cumberland Plain Conservation Plan essentially maps the native vegetation that will be retained and the native vegetation that will be removed on the Cumberland Plain. It is literally ‘the eleventh hour’ for our vanishing flora and fauna. We must be confident that the CPCP will prevent the extinction of species and reverse the fragmentation and decline of our native vegetation communities. There is no doubt that this is our final opportunity to ‘get it right’.

The Mulgoa Valley Landcare Group proposes 5 key amendments to the current Draft Cumberland Plain Conservation Plan which seek to improve the outcomes of this Plan:

1. **ALL offsetting (direct and indirect) must occur on the Cumberland Plain.** DPIE acknowledges that our Ecological Communities are critically endangered, but under the Draft CPCP they allow the biodiversity offsets to be secured 'anywhere in NSW'.
2. **Small lots are included in the conservation opportunities of this plan.** The BCT will only consider properties of at least [REDACTED] in size for Biodiversity Stewardship Agreements. However, there is much biodiversity and opportunity to connect land on smaller sized lots. If a BSA is too difficult to achieve on smaller lots (due to expenses involved in setting up the agreement, compliance etc), then another vehicle for biodiversity conservation on small lots must be considered.
3. **Specific and important corridors are included in this Plan :** The Kingshill Corridor (Mulgoa), Blaxland Creek (Orchard Hills), completion of the Cumberland Conservation Corridor (various small connections have not been included as SCA's), The Mount Gilead 'Georges River to Nepean River' Corridor (Appin), and the extension to Crossman Reserve (Jerry's Creek, Wallacia).
4. **Resolve conflict between the Plan's basic principles and proposed priorities**
5. **Offsetting is avoided on public land.** Offset funding must acquire land or establish BSA agreements to protect biodiversity on additional (or 'new') land as opposed to paying for the management of existing reserves and parklands.

Finally, the Community Reference Group brings to the table broad 'grass-roots knowledge' and passion for the Cumberland Plain. We encourage DPIE to retain this group as a way of ensuring transparency, engagement, feedback to members of representative groups and updates on progress and opportunities as this Plan is delivered over the coming decades.

Thank you for the opportunity to comment. We encourage the Department to contact us to discuss any of the issues we have raised in this submission. We are eager to see this Plan successfully deliver the vision of preserving the precious and unique ecological communities of the Cumberland Plain.

Lisa Harrold
President
Mulgoa Valley Landcare Group Inc.
[REDACTED]

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Response to the Draft Plan to conserve the ecology of the Cumberland Plain and recommendations for change

1. The Mulgoa Valley Landcare Group supports the concept of a strategic, long-term plan to conserve what little remains of the biodiversity of the Cumberland Plain. We acknowledge the extensive assessment process undertaken by this Plan and we support the proposal for new reserves, for acquisition of key areas, for creating corridors and for entertaining the prospect of compulsory acquisition when required. This has been proposed by our group for more than two decades. Transport Corridors require compulsory acquisition of private lands so they can be achievable. However, until now, the compulsory acquisition of private land to create Biodiversity Corridors has never before been considered. Like transport corridors, biodiversity corridors are also essential. We are pleased that recognition of this has resulted in this pivotal inclusion for compulsory acquisitions of important areas where required.
2. We agree with a long-term plan will provide certainty for conservation as well as for development. It will reduce the practice of land banking and speculation amongst property owners/developers which ultimately leads to political lobbying to achieve development rezoning. However, the Plan does not go far enough to reassure landowners who now have conservation zonings that their property still has value – conservation value. The broadly accepted view is that a conservation zoning will dramatically reduce property value. This has led to immense criticism and anger regarding this Plan. Appropriate compensation for lost development opportunity must be addressed in the community education process. This message must be much stronger in the final version of the CPCP. Landholders must be willing participants within this plan to conserve biodiversity. The only viable incentive is genuine financial reward, and this must be clearly identified in the Plan.
3. Mulgoa Valley Landcare Group also supports strategic or targeted offsetting. Previous BioBank sites/BSA sites have been randomly located across the Cumberland – due to the voluntary nature of participation in the scheme. This has resulted in isolated patches of conservation surrounded by uncertainty regarding adjoining areas. Targeting ‘Strategic Conservation Areas’ and encouraging ‘clustered’ participation is welcomed. This could be extended to incorporate the offsetting needs of other developments on the Cumberland Plain which are outside the four new growth areas and corridor infrastructure which is the focus of this plan.

Five key issues require amendment

Whilst the above benefits are recognised, there are *five key issues* that must be amended in the final version of the Cumberland Plain Conservation Plan.

1. All offsets must occur on the Cumberland Plain

The vision of the Draft CPCP is to conserve biodiversity of the Cumberland Plain which is gravely threatened by land clearing.

Permitting offsetting to occur 'elsewhere in NSW' fails to conserve the ecosystems of the Cumberland Plain. Owing to its special geology and alluvial systems giving rise to unique vegetation communities, it is not possible to conserve the Cumberland Plain 'elsewhere in NSW'. The most important recommendation of this submission is to ensure that all investment in land (whether it be direct or in direct offsetting) must occur only on the Cumberland Plain.

Below are some quotations from the Plan that illustrate the intention to deliver 20% of the offsets outside the Cumberland Plain. Therefore it is a fallacy to consider that this is a plan to conserve the Cumberland Plain if the lands to be protected are in a different place with a different geology and alluvial systems.

*"The Plan's vision is ambitious, so a robust and **flexible process** for securing biodiversity offsets over time will be established to endure for the life of the Plan to 2056. This will ensure the conservation program stays on track to meet its strategic commitments and outcomes."* Page 13 of Sub Plan A.

*"The department acknowledges that it may be **challenging to meet some of the offset targets in the Plan Area** as many of the targeted communities and species have limited extent or habitat remaining in the Cumberland subregion. Rather than committing to a reduced offset target, the Plan allows flexibility in reaching those targets through the conservation lands selection steps."* Page 71 Draft CPCP

*"The conservation land selection steps will guide effective and flexible implementation of the conservation program to 2056 by **allowing offsets to be secured outside the Plan Area** when they can't be secured from within; and allowing for offset substitutes in cases where like-for-like species and threatened ecological community offsets are unlikely to be secured."* Page 71 Draft CPCP

*Alternate offsets can only be used once **appropriate steps** have been taken to obtain target TECs (including all like-for-like credits that make up the relevant TEC).*Page 74 Draft CPCP

***A maximum of 20%** of the Plan's cumulative offset targets for TECs can be secured outside of the Cumberland subregion over the life of the Plan (including either like-for-like credits or alternate offsets). Page 74, Draft CPCP*

*If at Year 5, offset targets for critically endangered or endangered species have not been met, the direct purchase of offsets for the same species **can be secured from anywhere in NSW**.* Page 74 Draft CPCP

RECOMMENDATION:

The proposal to locate offsets elsewhere in NSW would defeat the declared aim of conserving the Cumberland Plain ecological communities to protect diversity.

Biodiversity offsetting is an economic concept that fails to understand that unique vegetation arises because of unique soil structures – and offsets are not readily substitutable from one place to another.

The process of procuring the offsets is vague in this Draft Plan and one fifth of the offsets are proposed to be located outside the Cumberland Sub region.

In order to protect the ecological communities of the Cumberland Plain, it is imperative that ALL land investments and offsets are to be made on the Cumberland Plain.

2. Biodiversity on smaller parcels of lands should be acknowledged and included under the Plan.

Valuable biodiversity occurs on all sizes of properties across the Cumberland Plain. Moreover, smaller parcels of land can provide significant contributions as corridors and links to the proposed extensions of existing reserves and new reserves.

However, this plan fails to identify a mechanism that can encourage private property owners to participate in biodiversity conservation on lots which are less than 20Ha in size. Creating corridors across highly fragmented landscapes cannot be achieved by the mechanisms available in the draft CPCP. We acknowledge that Biodiversity Stewardship Agreements are not cost effective or administratively viable on properties that are less than 20Ha in size.

Additional mechanisms for conserving land on smaller lots must be included. These smaller, private land parcels are generally located in the Metropolitan Rural Lands area of the Cumberland Plain. They exist in areas such as Mulgoa Valley, Camden and Cobbitty and are typically 5 – 10 Ha in size.

The Draft CPCP quote below refers to the available mechanisms for securing connectivity – but the plan fails to acknowledge the value of biodiversity on smaller lots which cannot be protected by those mechanisms identified.

“This can be reduced and reversed by enhancing connections. Extending existing reserves and biodiversity stewardship sites and establishing new protected areas will build these connections. Active management and maintenance of the protected areas and their surroundings reduces threats such as pests and weeds”.

Page 13, Sub Plan A

We also acknowledge that an alternate mechanism for protecting biodiversity on smaller lot private land should be 'reward based' rather than 'compliance based'. This will contribute to connectivity and the 'Green web' – a concept promoted in the 1980's but overlooked since then in all aspects of 'Planning'.

Example: There are many properties in Mulgoa Valley that are 10Ha in size (ie too small to be eligible for a BSA). Any efforts to engage property owners in conserving native bushland must offer a financial incentive. However, most people are suspicious of a permanent conservation area appearing on their property title. We propose that a local government 'rates rebate' be offered proportionately for the amount of land 'voluntarily protected for biodiversity' each year. So, if a property owner had 10 hectares and implemented a program to exclude stock and remove weeds on 5 Ha (ie actions to protect biodiversity)– then they would receive a 50% reduction in the annual rates bill. This can be a significant saving and hence a significant incentive. A simple annual compliance inspection would allow for the rates reduction to continue the following year – and so on. We propose that this scheme could be 'piloted' for 5 years in Mulgoa and that the reduction in rates received by Penrith Council as a consequence could be partly absorbed by council, and partly funded by the CPCP.

RECOMMENDATION:

We propose the investigation/inclusion of a mechanism for smaller properties to participate in biodiversity conservation. A 5 year 'pilot program' of rates-relief incentivised biodiversity conservation in a suitable location (eg the Mulgoa Valley) is suggested. This utilises the 'carrot' approach to conservation as opposed to the 'stick' approach imposed for the illegal clearing of native vegetation on private land. This will contribute to connectivity on small but important parcels of land.

3. Include the FIVE priority corridors

The Draft Plan speaks about fragmentation of vegetation communities, '*enhancing connections*', and securing corridors in perpetuity (see quotation below) yet it fails to map and secure the relevant land that connects habitat.

*The Draft CPCP states “**Landscape connectivity is important for biodiversity as it allows the linkage of habitats, species, communities and ecological processes. For example, connectivity supports species movement including to escape predators but also to reduce inbreeding; it enables the movement of pollen and seeds as well as maintaining diversity to enable resilience to adverse climatic or fire conditions. Once a landscape is fragmented, it is more prone to additional degradation. As such, as development increases, remnant vegetation becomes more fragmented and the risk of local extinctions increases. Connectivity in the Cumberland subregion is already compromised. Once clearing levels exceed 70% of the landscape, biodiversity loss from fragmentation increases (DECCW 2010). This threshold has been surpassed in the Cumberland subregion**”.*

Commitment 12: Secure priority habitat corridors in the Cumberland subregion in perpetuity, to support connectivity for ecological communities and species. Page 62 Draft CPCP

We accept that land connections are complex to achieve because they often involve remnant vegetation on smaller parcels of privately-owned land (The difficulties of conserving biodiversity on smaller lots are discussed in point 2). To deliver a Plan to preserve biodiversity without committing to connectivity by mapping vital corridors instantly devalues this Plan.

RECOMMENDATION:

To achieve Commitment 12, therefore, we recommend that the following five corridors be mapped and prioritised in the 'Strategic Conservation Areas' identified in the final CPCP. These FIVE CORRIDORS are Mulgoa Valley Landcare group's priority inclusions for the final Cumberland Plain Conservation Plan.

1. **Kingshill Corridor** – will permanently connect the Blue Mountains WHA eastward through Mulgoa (via Fernhill) to the largest (1370Ha) Cumberland Plain Woodland remnant at Defence Establishment Orchard Hills. This involves three landholders only. All land identified is UNDEVELOPED. Target species are present (*Pultenaea parviflora* and *Marsdenia viridiflora*).
2. **The Blaxland Creek Corridor** – identified as the 'most pristine Creek on the Cumberland Plain' (DPIE website), this corridor will link the largest remnant of Cumberland Plain Woodland (1370Ha on Defence Establishment Orchard Hills) eastwards to the South Creek Green Spine (as identified by the Greater Sydney Commission). Despite being impacted by the Outer Sydney Orbital Freeway as well as passenger and freight rail corridors, sympathetic design can ensure this important biodiversity connection is maintained and improved.

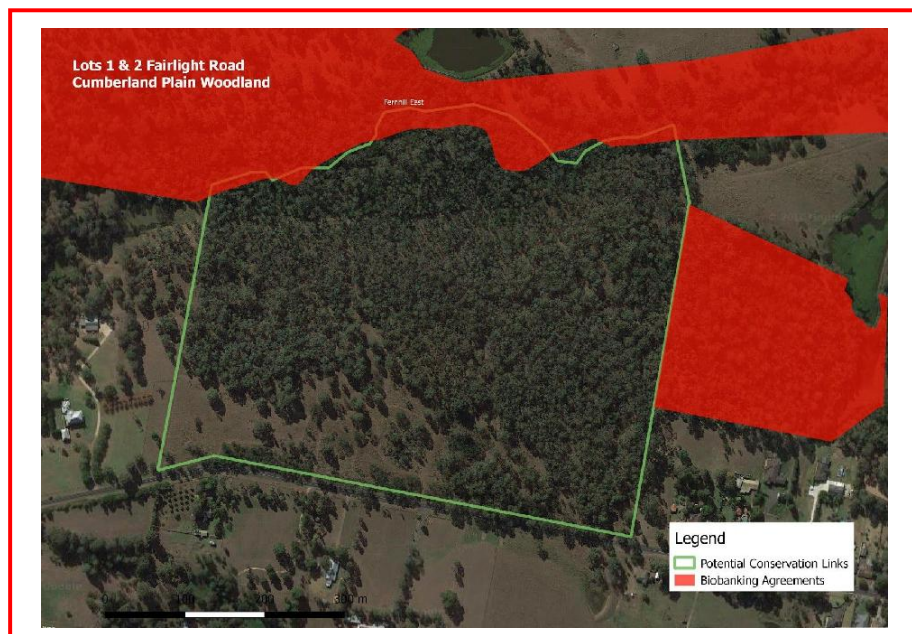
It is imperative that the largest remaining remnant of Cumberland Plain Woodland (1370Ha at Defence Establishment Orchard Hills) is afforded permanent biodiversity connectivity under this plan. Mulgoa Valley Landcare Group Inc. has been advocating for the implementation of the Kingshill and the Blaxland Creek corridors for over a decade. To overlook the necessity of these connections would make a mockery of the intentions of this plan.

The image below shows the strategic links that are necessary and achievable. The pink outlined properties are UNDEVELOPED and are required to achieve a viable corridor of land and create lasting connectivity for the largest remaining remnant of CPW at Orchard Hills . The broader Kingshill and Blaxland Creek corridors are identified as orange and the 'already conserved' areas are green.



The **Kingshill Corridor** (see above) comprises **three undeveloped parcels** (outlined in pink) of land that will create suitable framework for permanent connectivity. **These three parcels are (from West to East)**

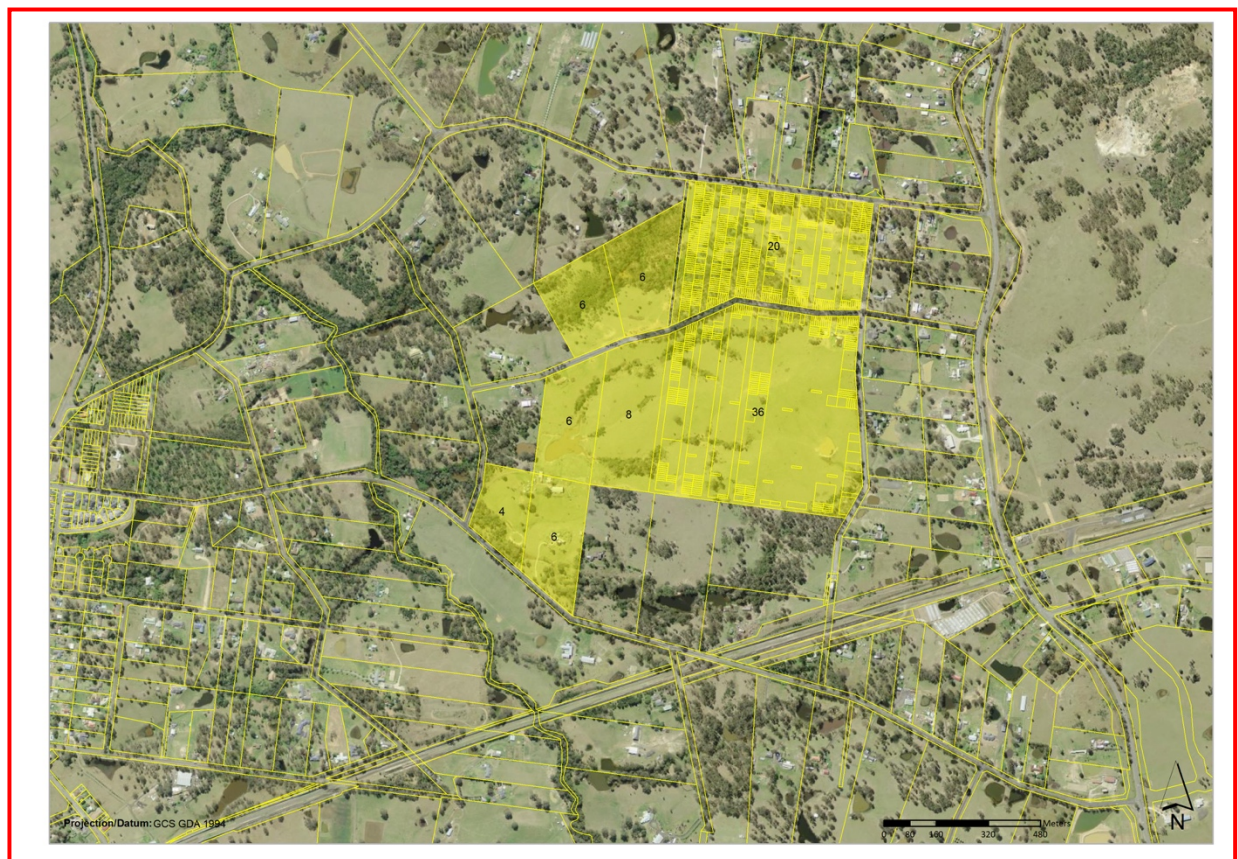
- 26 Hectares of undeveloped land on Fairlight Rd, Mulgoa (adjoined by BioBanks and within 100m of Regent Honeyeater breeding location)



- 10 Ha of undeveloped CPW at 1 Tilba Rd, Mulgoa



- 32 Ha of undeveloped land between Kingshill Rd and Longview Roads, Mulgoa (containing *Marsdenia viridiflora* and *Pultenaea parviflora*) (ie lands shaded yellow to the NORTH of Longview Road)

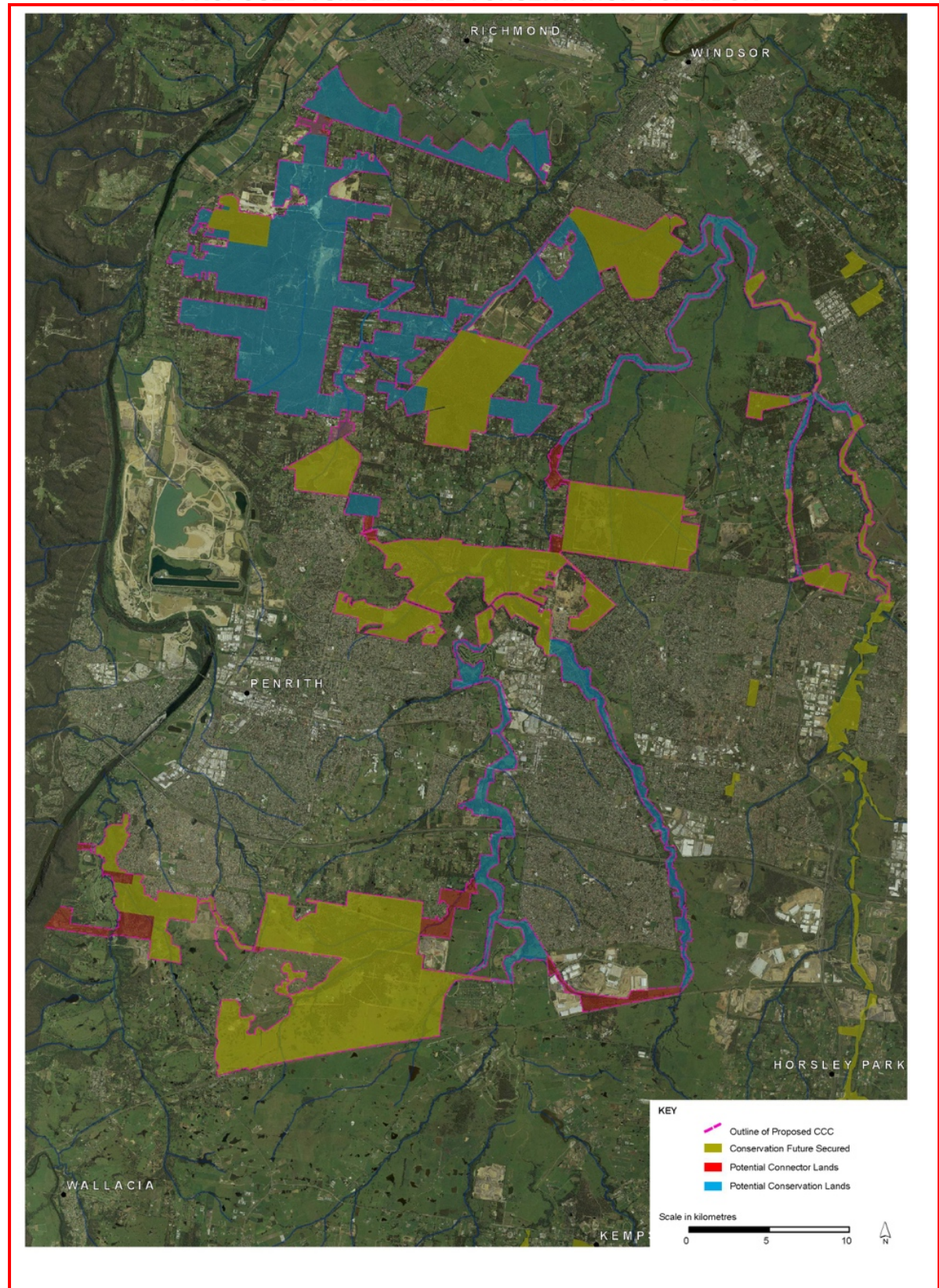


3. **Extension to Crossman Reserve** – the two large ‘green shaded’ rectangular parcels in the map below are high quality RFEF vegetation along Jerry’s Creek in Wallacia. They are undeveloped and will effectively link the mapped Strategic Conservation Areas of Greendale to the Nepean River via the existing 15Ha Crossman Reserve (shaded ‘aqua’, which has an active Bushcare group and an investment of > \$25,000 this year). These two parcels are UNDEVELOPED land – but have been overlooked by the Draft CPCP. The Mulgoa valley Landcare Group urges DPIE to include these two properties in the ‘Strategic Conservation Areas map with a vision to create a connected corridor between the Nepean River and Greendale SCA’s.



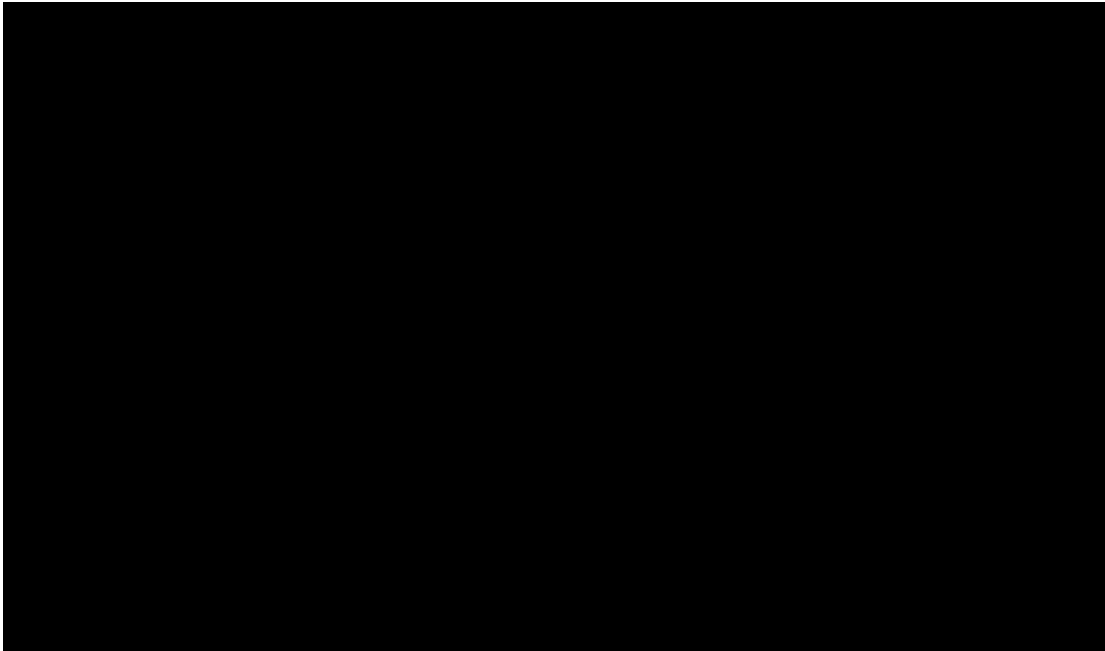
4. **Completion of the Cumberland Conservation Corridor:**

The Cumberland Conservation Corridor (see below) has received over \$50 Million of Federal Funding over four election cycles since 2007. This has been achieved as a result of community vision and lobbying over 15 years. The Cumberland Conservation Corridor (CCC) is intended to create permanent biodiversity connectivity between the core biodiversity remnants, largely in the Penrith LGA. Acquisition of a few small parcels of (undeveloped) land are still required to complete the CCC. The Draft CPCP has overlooked the CCC by failing to recognise and include these important links as Strategic Conservation Areas. This oversight is inconsistent with the recognition of the CCC's ecological value by the Federal Government, Penrith City Council and collective community conservation groups of Western Sydney (Cumberland Conservation Network).

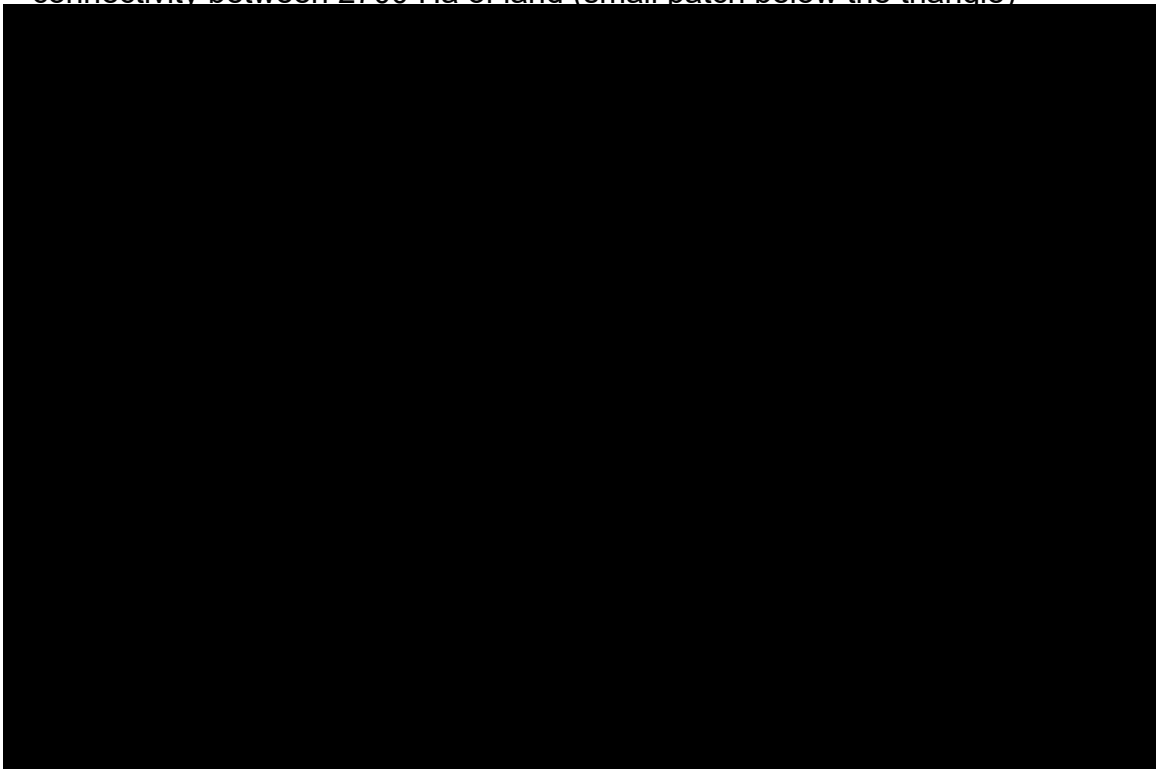
PROPOSED CUMBERLAND CONSERVATION CORRIDOR

The following links are required to complete the Cumberland Conservation Corridor:

- Ninth Avenue: Only 3Ha separates the Wianamatta Regional Park and the Wianamatta Nature Reserve from permanent connectivity. Shaded red on the map below, this 3Ha is UNDEVELOPED land and we urge DPIE to include this site within the Draft CPCP as a 'Strategic Conservation Area'.



- [REDACTED] in size and the last piece of land required to secure connectivity between 2700 Ha of land (small patch below the triangle)



- Erskine Park Corridor (already breached multiple times by poor planning – including the controversial Jacfin warehouse and the Goodman access Rd

and now the new freight rail line in blue). Rescue measures must be implemented – including wildlife land bridges and underpasses.



5. **The Mount Gilead Koala Corridor.** The NSW Chief Scientist recommended a package of measures to mitigate development impacts on the population of Koalas in Campbelltown. DPIE cannot 'pick and choose' whatever suits from this 'package' of recommendations. The Mulgoa Landcare Group supports ALL recommendations of the Chief Scientist and this includes a viable corridor (500m) between the Georges and Nepean Rivers.

The Mulgoa Valley Landcare Group urges the inclusion of the five corridors as indicated above and recommends that the Department gives them priority in the final CPCP.

Also, riparian corridors often present the only remaining land with continuity of tree canopy across the Cumberland Plain – quite simply because they are difficult to develop. To improve the ecological function of these riparian corridors we also propose the increase of Riparian E2 zoning from 40m to 100m under this Plan—thereby instantly creating greater opportunity for revegetation and for improved fauna movement.

4. Conflict between the Plan's basic conservation principle and its proposed priorities.

The Draft Plan states the following principle ***"Conservation lands protect the large patches of vegetation that are in better or the best available condition"***. Draft CPCP, page 71.

This is a good idea.

The Draft CPCP recognises the principle of protecting 'the best available vegetation'. Yet the Plan contradicts this principle, for example, by recommending the revegetation of 'The Confluence'. This land parcel is 600Ha of improved pasture and open paddocks. With only 60 Ha of extant CPW, this is NOT a large patch, nor is it in the best available condition. Given the conservation principle, this selection seems misguided and wasteful. This shows the Plan is contradicting its own intention. It would be far better to expend the funds on acquisition of existing native vegetation and traditional bush regeneration.

The restoration of 'The Confluence' can never reproduce Cumberland Plain Woodland and will not even resemble such habitat for at least 80 years - until natural hollows form. Essentially, we are removing quality habitat for development and replacing with seedlings. In the intervening 80 years, where does the fauna go? This is contradictory and discredits this Plan.

We are very concerned that one quarter (25%) of all offset actions is permitted to be revegetation as opposed to conserving existing vegetation. This is not genuine offsetting and it is unacceptable that a priority under this Draft CPCP should target revegetation instead of conserving existing vegetation. We support the Community Reference Group's proposal that revegetation component of this plan be no more than **10%** of the offset investment.

RECOMMENDATION:

Investment and priority actions must be in accordance with the principles of the Plan.

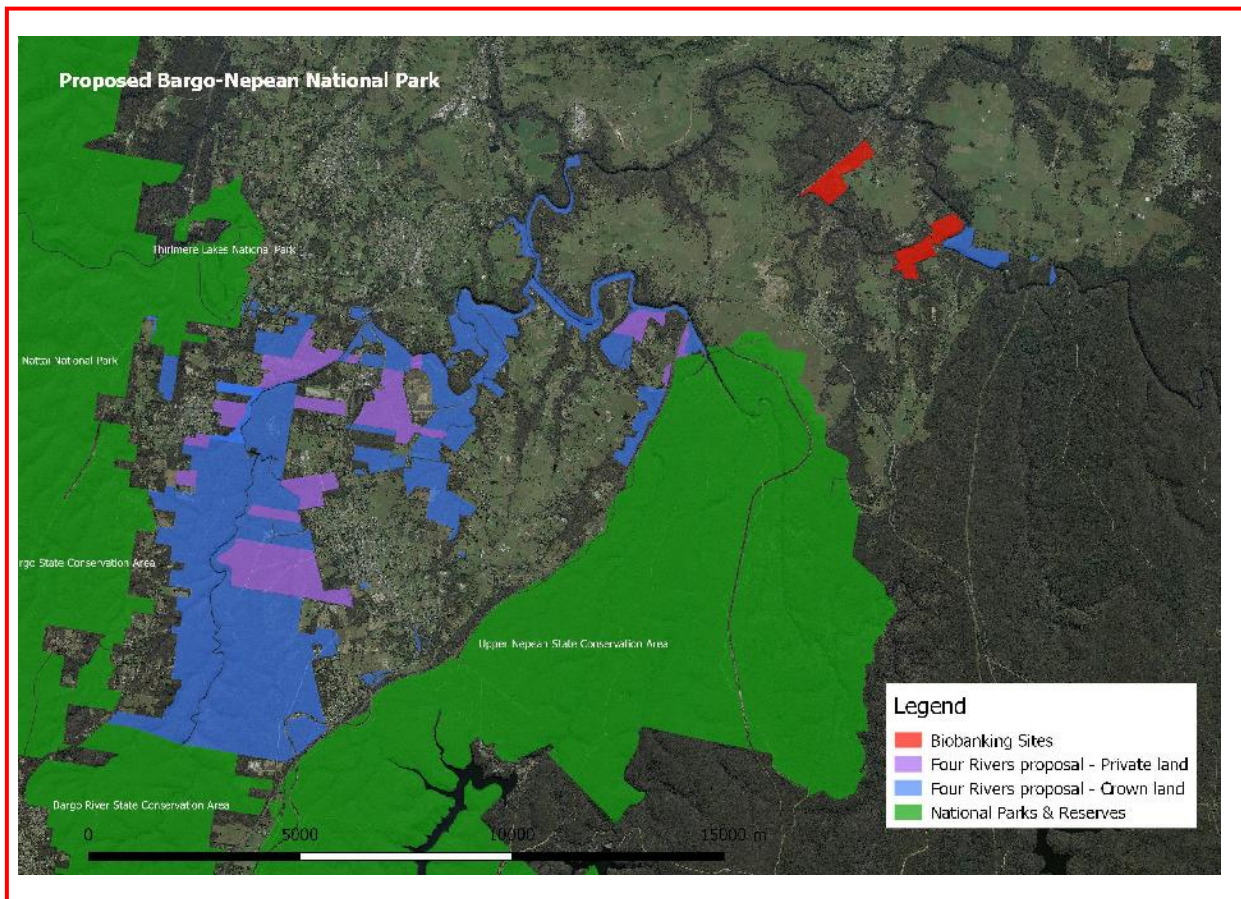
As such, a priority of the Draft Plan, identified as 'the Confluence', must be replaced in favour of other options,

(a) the Bargo-Nepean Conservation Area or

(b) the Cobbitty Hills Conservation Area.

These preferred and more effective land options would be consistent with the 'Principle' of the Plan to conserve the best vegetation available.

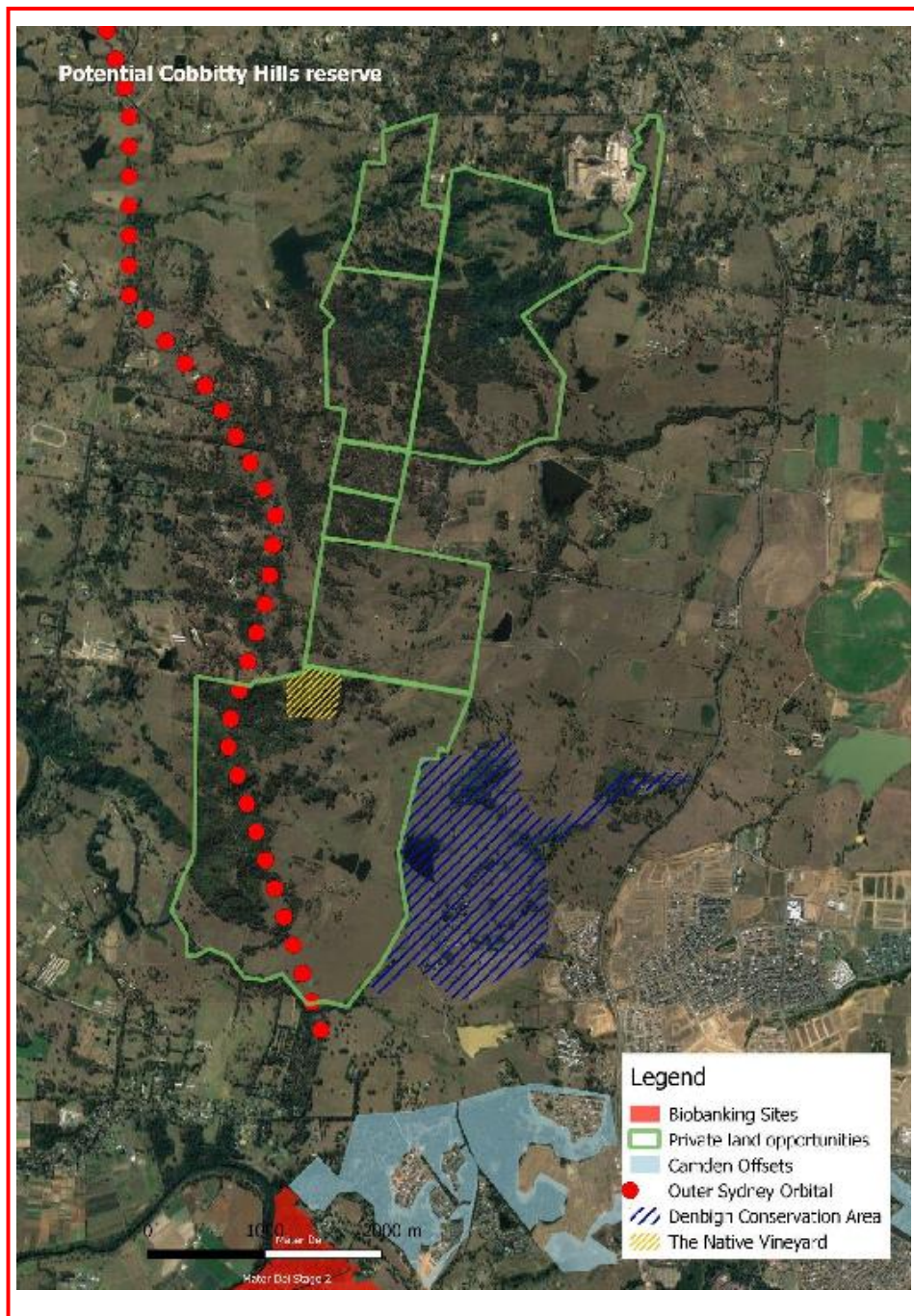
The Bargo-Nepean proposal is well supported, being put forward under the 2018 'State of the Cumberland Plain' report. It would secure important habitat in the Bargo River Gorge and the Upper Nepean.



Another option would be to secure the Cobbitty Hills Reserve proposal – a far superior land selection to ‘The Confluence’. This area has been previously identified by the Cumberland Conservation Network’s ‘State of the Cumberland Plain Report’, 2018, to DPIE but overlooked.

The Cobbitty Hills Reserve comprises 1,200 hectares of unoccupied corporate lands representing the largest unreserved patch of Cumberland Plain Woodland (see below). The land includes the Aboriginal quarry of Cubbitch Barta (after which ‘Cobbitty’ and ‘Cut Hill’ are named) sacred to the Dharug and Gundungurra peoples and the heritage ‘Native Vineyard’ of Western Sydney Dry Rainforest.

Both these two alternatives – Bargo-Nepean and Cobbitty Hills Reserve would offer a far better ecological contribution than the Confluence. Further, there is wide support from the Cumberland Conservation Network to replace the investment in the Confluence with superior alternatives.



5. Offsetting must be avoided on public land

Mulgoa Valley Landcare Group will continue to highlight the injustice of permitting offset funding to be provided to Local Government for the management of existing reserves. This fails to expand the amount of conservation land available to protect biodiversity. DPIE have consistently encouraged this practice which has led to local councils receiving offsets funds to manage existing reserves.

At present, native vegetation is being cleared and the offsets funding is being used to manage existing reserves. No new areas are being protected from future development. Further, allowing Council reserves to become BSA sites allows many more bio credits into the marketplace thereby devaluing credits and dis-incentivising participation by private landholders.

Example: Noorumba Reserve near Campbelltown: a State Biobank, a Council reserve and an active Bushcare site which then was permitted to become an offset to the Lend Lease 'Gilead' development. CPW? was destroyed by the Gilead development, but no new areas were protected as a result. Instead, we were promised 'better management' on an existing reserve.

RECOMMENDATION:

We support new reserves and we support additions to existing reserves - but there is no ecological benefit in providing funds derived from the destruction of critically endangered native vegetation communities to **manage existing public land**. We recommend that offsets funding is not spent establishing BSA's on public land.

Furthermore, the BSA program relies on untrained land managers (ie the property owner) to care for our best areas of Biodiversity. More often, land managers have purchased a BSA site with a view to a large acreage 'lifestyle' rather than being cognisant of their role in biodiversity conservation. As such, on-going education will play a key role in improving outcomes on BSA sites.

Funding

Finally, the upfront funding package is disproportionate to the task at hand.

The \$84 Million offered to deliver the first five years of this Plan cannot be considered sufficient to deliver the thousands of hectares of conservation lands required to achieve the outcomes proposed under this this plan.

Many decades of poor planning has resulted in the native vegetation communities of Western Sydney being cleared to the brink of extinction.

A much higher 'upfront loan' (\$300 million) must be secured via the Treasury Department and refunded by developer levies into the future. We believe that earliest acquisition of land and BSA sites will be key to the success of this Plan. Waiting for developer levies to be paid into an offset fund will give greater opportunity to the 'clearing by stealth' of the identified Strategic Conservation Areas of this Plan.

