



## WEPA Submission on Draft Cumberland Plain Conservation Plan (CPCP)

### **INTRODUCTION**

I am writing on behalf of the Willoughby Environmental Protection Association (WEPA) to comment on the Draft Cumberland Plain Conservation Plan (CPCP).

The Cumberland Plains is a major growth centre and WEPA commends Planning NSW for developing the Cumberland Plains Conservation Plan to protect the highly endangered Cumberland Plains Woodlands and associated ecosystems on the Cumberland Plains. Please see our report below which recommends adjustments to the plan (CPCP) that we feel will ensure the long term protection and viability of the Cumberland Plain ecological communities and aboriginal sites of significance.

### **BACKGROUND**

The current Cumberland Plain Conservation Plan (CPCP) is a plan to preserve the highly endangered Cumberland Plains ecological communities by replacing the standard rules that require developers to set aside land for conservation and instead replace these rules with a new 'strategic' approval process.

This strategy will lead to the approval of all the largest development proposals in Sydney's west including the Gilead-to-Appin housing estates, M9 Orbital freeway and the corporate agriculture precinct surrounding Western Sydney Airport.

Under the current proposal the developments included in the CPCP will clear 10,470 hectares of land and destroy more than 10% of the remaining highly endangered Cumberland Plain Woodland ecosystem. It will also permanently isolate koalas from much of South-West Sydney destroy Aboriginal burial grounds, and force more than 50 residents from their homes.

### **KEY FACTS**

The following facts Impact The Efficacy Of The Current Plan To Conserve The Highly Endangered Cumberland Plains Woodlands:

- Total land to be cleared/developed = 10,470 hectares
- Total endangered ecosystems destroyed = 1,780 ha
- Total Cumberland Plain Woodland destroyed = 1,014 hectares
- Proportion of Cumberland Plain Woodland ecosystem destroyed = >10%
- Area of wildlife habitat to be isolated by roads/development = 12,807 ha
- Fragmentation & isolation of healthy koala populations located on the Cumberland Plain
- Proportion of the Cumberland Plain region to be isolated = 59%
- The number of endangered species impacted by the developments is unknown because there has been little/no surveys done to identify species present or their location.



- Total funding offered (developer contributions) = only \$84 M instalment \*total unknown
- Total offsets required = 5,475 hectares
- Cumberland Plain Woodland offsets required = 3,170 hectares
- Including revegetation of highly degraded land in plan, while excluding existing intact endangered Cumberland Plains ecosystems from protection.
- Existing National Park land destroyed = >84 hectares.
- Existing native reserves cut in half by proposed roads
- Existing Conservation/Restoration areas destroyed = At least 8

## **RECOMMENDATIONS**

### ***Recommendation 1 • Key Changes To Proposed Developments***

- Clearing 10% of the remaining endangered Cumberland Plain Woodland ecosystem is unacceptable, as it will guarantee the extinction of many endangered species. Protection of existing native bushland is far more effective in protecting endangered species than revegetation of degraded land.
- Conduct a comprehensive survey and develop a holistic strategy that prioritises and incorporates existing Cumberland Plain native vegetation communities & waterways. The aim should be to preserve what remains of the endangered Cumberland Plains ecosystems and connect the fragmented ecological communities through wildlife corridors. That is: The strategy should be to preserve what remains, before planting on degraded land.
- Protect a 500 m wide koala corridor at Mount Gilead housing development to allow for the free movement of koalas between Georges River koala reserve and Nepean River.
- Construct a 2km tunnel under Wianamatta Regional Park to prevent the destruction of the park by the proposed M9 orbital motorway.
- Extend the Camden Tunnel 4 km south and 6 km north – saving EMAI-to-Razorback Wildlife Corridor, Cobbitty Hills & homes



### ***Recommendation 2: Key Changes To Proposed Offsets***

- Use offsets to protect the Cumberland Conservation Corridor within the Strategic Conservation Area (SCA)
- Make smaller lots with remnant native Cumberland plains vegetation communities eligible for offsetting (SCA) and improve offset funding accordingly. (Design wildlife corridors to connect these remnant native ecosystems)
- Create new, large public reserves of Cumberland Plain Woodland (CPW) to offset loss of CPW in three National Parks
- Restore the focus of offsets to Cumberland Plain Woodland – the ecosystem most impacted by these developments.
- All offsets should be new green spaces & native bushland, including funding farmers who wish to conserve bushland on their land. Landholders should be adequately compensated for the protection of native bushland on their land.
- Do not allow the use of existing public reserves as offsets for developers.

### **Recommendation 3: Scrap The Failed ‘Avoided Land’ Model (E2 Zoning & Creeks)**

- The current application of this policy has led to preservation of isolated pockets of vegetation.
- CPCP riparian corridors and small bushland parcels are left in no-mans land, neither developed nor conserved as offsets. As previously noted, these isolated parcels should be included and corridors designed to connect them.
- The Western Sydney Growth Centres program shows that this model fails – no agency wants to own or manage the unfunded creek corridors, and landowners on E2 zoned lands (left ineligible as offsets) illegally clear bushland
- Scrap the ‘avoided’ category – land in development precincts should either be developed or fully funded as an offset.
- Revise map to include existing Cumberland Plains Woodlands and exclude highly degraded land designated for revegetation where these areas are not identified as necessary for wildlife movement, riparian corridors or for ecosystem viability of existing native bushland.

NB: Existing complex ecosystems are of higher conservation value and are more effective in protecting endangered species than degraded land that is re-vegetated with a few species. The re-vegetated areas take decades to establish and don’t support the complex interactions of multiple species in an ecosystem in the here and now.



## **Recommendation 3: Adequate Budget Locked In Up-Front**

- The CPCP must lock in a sufficient budget up-front to ensure offsets are actually delivered, as per the \$540 M Western Sydney Growth Centres offset program.
- Not properly resourcing the Cumberland Plains Conservation Plan up front will result in the failure to protect and preserve these highly endangered ecosystems.
- Provide adequate financial support to landowners who wish to protect existing Cumberland Plains ecosystem communities on their properties.
- Developers should be charged the full cost of providing offsets.

## **Recommendation 4: Staging Development To Match Delivery Of Offsets:**

- The CPCP must stage development and require the satisfactory delivery of offsets from each stage before further development proceeds (as per the Western Sydney Growth Centres)

## **Recommendation 5: New Conservation Reserves, Not Planting:**

The CPCP tries to cut developers costs by replacing the requirement for new conservation areas with tree planting on very highly degraded land (The Confluence). As previously mentioned, research demonstrates that neither traditional (nor scalp-and-seed) revegetation compensates for clearing Cumberland Plain Woodland. To effectively protect the highly endangered Cumberland Plains Woodland ecosystems we need to save the woodlands that remain, not plant seedlings.

Sue-Ellen Smith  
WEPA Secretary

[wepa@wepa.org.au](mailto:wepa@wepa.org.au)

Website: [www.wepa.org.au](http://www.wepa.org.au)

Facebook: [www.facebook.com/wepa.org.au](http://www.facebook.com/wepa.org.au)