



Attention:

Department of Planning, Industry and Environment, Green and Resilient Places
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Greening Australia feedback on the Draft Cumberland Plain Conservation Plan

Greening Australia is broadly supportive of The Plan as a scientifically founded response to the challenge of biodiversity offsetting for the urban development and major infrastructure corridors described in the Plan. We feel it lays a good foundation for a process for larger conservation planning for all of Western Sydney. It also seeks to secure long term protection and enhancement of bushland that also generates social benefits from having high amounts of highly biodiverse, natural green spaces in the places that people live, work and recreate. International research and case studies suggest that this is one of the best ways to build cities using a resilience approach.

While it is disappointing that this Plan has only come about because that the urban development and major infrastructure corridors described in the Plan will result in the loss of 1,777.8 hectares of native vegetation, DPIE is to be commended on the process, science and innovation presented in the Plan in response to this loss.

Use of the Conservation Priorities Method does represent a commitment to scientifically rigorous and defensible planning for best environmental outcomes. It is heartening to see the subsequent commitment to acquisition for lands to be included in the public conservation estate as well as extending additional protection to private lands. We also acknowledge the importance that has been placed on well planned, risk managed and maintained restoration as an important component of delivering total offset obligations.

While DPIE is to be commended on the above, there are some areas that Greening Australia feel could be improved in the Plan. These are outlined below.

Avoided Land Clearing

In line with the Offset Hierarchy of 'Avoid, Minimise, Mitigate', a greater emphasis could be placed on avoided land-clearing both in small developments bordering the biocertification lands as well as areas zoned for environmental protection. This would avoid the 'death by a thousand cuts' scenario, especially when considering small blocks that are currently excluded from The Plan.

Timeframes

The timeframes for assessment and acquisition of lands are excessively long and out of sync with the rate of land acquisition and conversion to urban development and infrastructure. We would expect the acquisition, restoration and conversion of lands for the public estate to happen within the initial 5 year investment window. These sites will have the greatest long-term protection, be public assets and will require restoration works to occur as soon as possible so as to accrue the maximum offset credit generation within a reasonable timeframe.





Enable connectivity

While Corridor establishment, protection and maintenance are acknowledged, specifications in the Plan do not align with the latest scientific advice on what functional connectivity, especially for Koalas, requires. We would expect the Plan to explicitly require Corridors to be;

- a) Of 390m width in mapped and validated Koala Habitat and Corridor areas
- b) Supported through engineered solutions such as under and overpasses on major roads where DPIE and independent science has identified priority landscape linkages
- c) Protected in line with the latest science on functional riparian zones, and at a minimum, enforced in line with the Water Act.

Conservation Planning for all of Western Sydney

The Conservation Priorities Method has generated a solid and defensible framework on which both ecological and investment decisions can be made objectively. Greening Australia feel it would be a missed opportunity to not extend this same process to the areas of Western Sydney and the Cumberland Plain outside of the Scope of the Cumberland Plain Conservation Plan. This would further support the efforts to reduce red-tape on one hand and improve conservation outcomes through taking a landscape view on the other. It would give developers and infrastructure planners greater certainty for planning expansion of Sydney post 2056 and secure Nature's future despite of our rapidly growing city's hunger for land.

Seed Supply for restoration

We note that 1,365ha of restoration will occur over the life of the plan. For this restoration to generate credits and deliver a sufficient outcome to meet the Offset Obligations of the biocertification, high species diversity and large volumes of appropriate provenance seed will be required. Greening Australia recommends that the Plan also include a Seed Supply and Provenance strategy to ensure that seed is available as the proposed works come online. This would be best done through a participatory process for the local Seed and Nursery industry and informed through national frameworks and seed collection and supply standards.

