

## Sarah Ng

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**From:** Anthony Tavella on behalf of DPE PS ePlanning Exhibitions Mailbox  
**Sent:** Friday, 9 October 2020 11:05 AM  
**To:** DPE PS Biodiversity Mailbox  
**Subject:** FW: Webform submission from: Draft Cumberland Plain Conservation Plan  
**Attachments:** submission.docx

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**From:** noreply@feedback.planningportal.nsw.gov.au <noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Thursday, 8 October 2020 6:57 PM  
**To:** DPE PS ePlanning Exhibitions Mailbox <eplanning.exhibitions@planning.nsw.gov.au>  
**Subject:** Webform submission from: Draft Cumberland Plain Conservation Plan

Submitted on Thu, 08/10/2020 - 18:54  
Submitted by: Anonymous  
Submitted values are:  
Submission Type: I am making a personal submission  
First Name: Judith  
Last Name: Christie  
Name Withheld: No  
Email: [REDACTED]  
Suburb/Town & Postcode: Forest Lodge , 2037.  
Submission file:  
[submission.docx](#)

Submission: To whom it may concern, I wish to make a submission regarding the Cumberland Plain Conservation Plan (CPCP) and to highlight some of the deficiencies of the Plan that are of particular concern to me. I worked in environmental education and restoration projects in western Sydney for a number of years from 1998. Watching the incremental loss of the now critically endangered Cumberland Plain Woodland (CPW) ecological community has been distressing for me and more so for the local communities that have invested so heavily in working to protect these landscapes over decades. This woodland supports unique plant species and is so critical for a number of our woodland birds – in particular the Swift Parrot which is found in Western Sydney most years and the Regent Honeyeater which miraculously bred successfully in western Sydney last season. To quote Mick Roderick, Birdlife Australia's NSW Manager Woodland Birds: "Quite simply, the woodlands of the Cumberland Plain are an integral part of a limited network of high quality woodlands on fertile soils that remain in south-eastern temperate Australia. All wooded remnants on the Cumberland Plain need to be retained to provide breeding habitat for Regent Honeyeaters, as well as all other birds (and flora and fauna generally) that rely on these habitats for survival. That the CPCP proposes clearing 10% of the entire remaining Cumberland Plain Woodland ecosystem is shocking. Unfortunately, I know from my experience and the research I helped facilitate, that our revegetation projects using traditional planting and direct seeding techniques did not restore to a sustainable level the complex ecosystem that is CPW. Revegetation is a poor substitute for remnant so it is imperative to retain as much as possible of the remnant vegetation and to enhance connectivity wherever opportunities exist. The current CPCP does not do that but rather threatens connectivity in existing reserves, does not enhance opportunities to save small remnants and does not ensure riparian corridors will be managed. If the CPCP is to improve current developer requirements to compensate damage and conserve and manage biodiversity to the greatest extent possible then I urge the Minister for Planning to urgently consider addressing some key shortcomings of the plan. • Funding: Fund the CPCP adequately and lock in budget to enable suitable offsets – not just existing public reserves and ensure developers pay for offsets – not the taxpayer • Offsetting: Restore the focus of offsets to CPW – and allow smaller lots (that is less than 20 ha) to be eligible in the Strategic Conservation Area, as well as protecting the Cumberland Conservation Corridor. Create new large public reserves of CPW rather than relabelling existing public reserves as developer offsets. Stage development to match delivery of offsets. • Connectivity: This plan proposes to destroy and fragment existing reserves such as Wianamatta Regional Park. Build a 2km tunnel to save this Regional Park – a fragmented remnant itself following the development of the ADI site in the 1990s. Likewise extend the Camden tunnel 4 km south and 6 km north to save wildlife corridors and protect a 500m koala corridor at Mount Gilead. • E2 zoned lands: The CPCP leaves riparian corridors and small bushland patches without guaranteed management and protection. Weed management in those areas is challenging and if unfunded or not allowed as offsets, land can become wasteland or be illegally cleared, according to evidence from experts in land management in western Sydney who are familiar with the Western Sydney Growth Centre model. These areas are also important for connectivity and threatened species. As I said above, planting trees and shrubs into degraded land has been shown not to be able to achieve 'high value biodiversity outcomes' as is the intention of the SEPP. Conserving intact bushland must be the priority action of the CPCP to conserve the woodland vegetation, the wildlife species and the historic landscapes of the Cumberland Plain. Please review the CPCP to maximize this outcome. Yours sincerely Judith Christie

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

The Hon Rob Stokes,  
Minister for Planning and Public Spaces  
Parliament House  
Sydney

Dear Minister

I am writing to ask you to review issues regarding the Cumberland Plain Conservation Plan (CPCP) and to highlight for you some of the deficiencies of the Plan that are of particular concern to me.

I worked in environmental education and restoration projects in western Sydney for a number of years from 1998. Watching the incremental loss of the now critically endangered Cumberland Plain Woodland (CPW) ecological community has been distressing for me and more so for the local communities, with whom I worked, who have invested so heavily in trying to protect these landscapes over decades.

This woodland supports unique plant species and is so critical for a number of our critically endangered woodland birds – in particular the Swift Parrot which is found in Western Sydney most years and the Regent Honeyeater which miraculously bred successfully in western Sydney last season. To quote Mick Roderick, Birdlife Australia's NSW Manager Woodland Birds: *"Quite simply, the woodlands of the Cumberland Plain are an integral part of a limited network of high quality woodlands on fertile soils that remain in south-eastern temperate Australia. All wooded remnants on the Cumberland Plain need to be retained to provide breeding habitat for Regent Honeyeaters, as well as all other birds (and flora and fauna generally) that rely on these habitats for survival."*

That the CPCP proposes clearing 10% of the entire remaining Cumberland Plain Woodland ecosystem is shocking. Unfortunately, I know from my experience and the research I helped facilitate, that our revegetation projects using traditional planting and direct seeding techniques did not restore to a sustainable level the complex ecosystem that is CPW. Revegetation is a poor substitute for remnant so it is imperative to retain as much as possible of the remnant vegetation and to enhance connectivity wherever opportunities exist. The current CPCP does not do that but rather threatens connectivity in existing reserves and for threatened species like Koala, does not enhance opportunities to save small remnants and does not ensure riparian corridors will be managed.

If the CPCP is to improve current developer requirements to compensate damage and conserve and manage biodiversity to the greatest extent possible, then I urge the Minister to urgently consider addressing some key shortcomings of the plan.

- **Funding:**  
Fund the CPCP adequately and lock in budget to enable suitable offsets – not just existing public reserves and ensure developers pay for offsets – not the taxpayer
- **Offsetting:**  
Restore the focus of offsets to CPW – and allow smaller lots (that is less than 20 ha) to be eligible in the Strategic Conservation Area (SCA), as well as protecting the Cumberland Conservation Corridor in the SCA. Small private landholders in the SCA who are often faced with difficult decisions (eg sell for development; sell for offset – if sufficient market value; clear vegetation for possible productive outcomes, ignore/neglect – wait for better offer) will benefit. Create new large public reserves of CPW rather than relabel existing public reserves as developer offsets. Stage development to match delivery of offsets.
- **Connectivity:**  
This plan proposes to destroy and fragment existing reserves such as Wianamatta Regional Park. Build a 2km tunnel to save this Regional Park – the Reserve is a fragmented remnant itself following the much protested development of the ADI site in the 1990s. Likewise extend the Camden tunnel 4 km south and 6 km north to save wildlife corridors and protect a 500m koala corridor at Mount Gilead.
- **E2 zoned lands:**  
The CPCP leaves riparian corridors and small bushland patches without guaranteed management and protection. I know from experience, weed management in those areas is challenging and if unfunded or not allowed as offsets, land can become wasteland or be illegally cleared, according to evidence from experts in land management in western Sydney who are familiar with the Western Sydney Growth Centre model that introduced this zoning. These areas are also important for connectivity and threatened species.

As I said above, planting trees and shrubs into degraded land has been shown not to be able to achieve 'high value biodiversity outcomes' as is the intention of the SEPP. (For example as proposed for one the new 'conservation' reserves – 'The Confluence') Conserving intact bushland must be the priority action of the CPCP to conserve the woodland vegetation, the wildlife, the endangered and possibly yet to identified unique species, and the historic landscapes of the Cumberland Plain.

I ask you as Minister, to please listen to the community who care about this landscape and review the CPCP to maximize biodiversity outcomes.

Yours sincerely

Judith Christie

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As I said above, planting trees and shrubs into degraded land has been shown not to be able to achieve 'high value biodiversity outcomes' as is the intention of the SEPP. Conserving intact bushland must be the priority action of the CPCP to conserve the woodland vegetation, the wildlife species and the historic landscapes of the Cumberland Plain. Please review the CPCP to maximize this outcome.

Yours sincerely

Judith Christie