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Your ref Our ref File ref



Department of Planning, Industry and Environment, Green and Resilient Places Division,

Locked Bag 5022,

Parramatta NSW 2124

8th October 2020

Dear Sir/Madam,



Arup response to the Draft Cumberland Plain Conservation Plan

Arup welcomes the opportunity to respond to the *Draft Cumberland Plain Conservation Plan*. We strongly support the NSW Government's recognition of the importance of landscape-scale strategic conservation planning to assess and protect biodiversity up front in planning for large-scale development.

The scale of the plan is commendable and as one of the largest strategic conservation plans to be undertaken in Australia we agree that it has huge potential to deliver new conservation lands, connections to existing habitat and help restore degraded landscapes across Western Sydney.

We have prepared this response to support and encourage the NSW Government to push forward with this Conservation Plan and would welcome the opportunity to explore the following two key themes with you in more detail as you refine the Plan.

Green Grid network

We understand that around 11,000 hectares will be protected within newly created conservation lands, which approximately double the Plan's offset commitment of 5,475 hectares of impacted native vegetation. This will deliver increased habitats as well as build ecological connectivity across the 200,000-hectare Conservation Plan boundary.

However, we believe The Plan could be more ambitious in addressing green grid opportunities and illustrating how proposed conservation lands will link with new and existing recreational and infrastructure corridors to strengthen the wider blue and green grid network.

The blue and green grid network, or green infrastructure, provides us with the environmental, economic and social benefits that help us mitigate and adapt to climate change, improve

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recreation, health and wellbeing, decrease soil erosion, manage water resources and enhance biodiversity.

The success of the proposed Georges River Koala reserve and the other proposed reserves will largely depend on the quality and connectivity of these ecological areas to this wider green infrastructure network of open spaces, rivers, parks and habitats.

The conservation of Georges River and the numerous creeks and tributaries that make up the blue grid in Western Sydney needs to be acknowledged as part of the Conservation Plan. The Western Sydney water systems are an interconnected and integral component of the ecological communities of the Cumberland Plain and will play a key role in the recreational and infrastructure networks of future development.

A green grid network also provides opportunities to connect people and communities with The Conservation Plan. The commitments within The Plan aim to enhance conservation outcomes by increasing the capacity of the community to participate in biodiversity conservation or through enhancing the scientific knowledge base. However, by connecting communities, organisations and businesses to the wider benefits of green infrastructure, as well as education and conservation, this will facilitate broader partnerships in the implementation of the Conservation Plan Program.

Several State documents exist on the importance of green infrastructure across Greater Sydney¹ and this plan should align more closely to these to illustrate the networks between ecological conservation areas and recreational open spaces, including woodlands, wetlands, rivers and parks. The attached plan has been mocked up using these existing strategy documents to show how easily these networks could be conveyed.

Embracing a clearer green grid framework within The Plan will enable integrated environmental, social and economic outcomes as part of the delivery of The Plan's 28 commitments.

Document Layout and Plans

The layout of the document and maps emphasises that urban development and infrastructure are prioritised ahead of environmental conservation. By re-ordering the 'Development', 'Description of Action' and 'Conservation Program' chapters the vision of the plan to support Western Sydney's biodiversity and growth is more balanced.

The maps within the Development chapter are also primarily categorised as 'certified – urban capable land' or 'excluded land' with very little of the existing conservation area context shown.

Our understanding is that 'excluded land' refers to land that is excluded from NSW strategic biodiversity certification and strategic assessment under the EPBC Act as it already has specific urban zoning (already developed or to be developed), or is land that is environmentally protected or Commonwealth land sites. Could these areas of environmentally protected or Commonwealth land sites be highlighted as has been done with the 'non-certified land' (avoided land for biodiversity or other environmental purposes)?

¹ https://www.greater.sydney/metropolis-of-three-cities/sustainability/city-its-landscape/green-grid-links-parks-open-spaces and https://www.governmentarchitect.nsw.gov.au/projects/sydney-green-grid

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Generally, there is also limited green infrastructure information (conservation areas, hydrological mapping and recreational areas) shown on the mapping within The Plan. For example, there are four World/and or National Heritage Places identified within 10km of The Plan boundary but these are not illustrated graphically anywhere?

Conclusion

We advocate strongly for putting bio-diversity at the centre of all built-environment planning and engineering to combat and reverse fragmentation, and ensure the restoration and preservation of the precious Cumberland Plain natural environment for future generations to enjoy and cherish.

Indigenous land management knowledge and involvement is critical in the conservation story. We absolutely agree that engaging and partnering with Western Sydney's Aboriginal community and LALCs is a critical component of implementing the Plan and collaboration with these groups should be at the forefront of all project planning strategies.

We look forward to starting a dialogue with you around the Draft Cumberland Plain Conservation Plan and support this exciting way forward for building and fostering better conservation outcomes across Western Sydney.

Kind regards



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