

Sarah Ng

From: Anthony Tavella on behalf of DPE PS ePlanning Exhibitions Mailbox
Sent: Friday, 9 October 2020 11:20 AM
To: DPE PS Biodiversity Mailbox
Subject: FW: Webform submission from: Draft Cumberland Plain Conservation Plan

From: noreply@feedback.planningportal.nsw.gov.au <noreply@feedback.planningportal.nsw.gov.au>
Sent: Thursday, 8 October 2020 10:52 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 - 22:51

Submitted by: Anonymous

Submitted values are:

Submission Type: I am submitting on behalf of my organisation

First Name: Keep Sydney

Last Name: Beautiful

Name Withheld: No

Email: [REDACTED]

Suburb/Town & Postcode: 2034

Submission file: [webform_submission:values:submission_file]

Submission: Submission: Draft Cumberland Plain Conservation Plan OBJECTION Background When the Growth Centres SEPP received federal government biodiversity certification in 2012, it was on the condition that the Cumberland Plain would be the first preference for biodiversity offsetting. This was in recognition of its very degraded environmental state. The Biodiversity Offset Program for the Growth Centres SEPP was introduced in 2006 as a compromise solution after a promise to codify a green belt around Sydney never eventuated. Greater Macarthur and Wilton were never development opportunities but rather intended to be the green lungs and agricultural security for a growing city. Professor Graeme Samuels in his Interim Report on the Review of the EPBC Act was scathing about the misuse of biodiversity offset programs. He said that they often fail to deliver on their promised environmental outcomes and that too often areas designated as biodiversity offsets are later released for development. That's exactly what's happening here. To date, the Biodiversity Offset Program has only protected 368 hectares of Cumberland Plain Woodland. The target is 2,400 hectares and the Cumberland Plain Conservation Plan acknowledges that the proposed development will impact over 1,000 hectares of this critically endangered species. If realised, the Cumberland Plain Conservation Plan will fragment and destroy the already critically endangered ecological woodland but also put the viability of the healthy and expanding Koala population at risk. . The Key Objections to the Draft CPCP are as follows . A failure to acknowledge and act on expert scientific findings on the Macarthur (also known as the Campbelltown) Koala population, including but not limited to - Campbelltown Council's Koala Plan of Management - <file:///Users/peterbradley/Downloads/Attachment-3-Item-8.2-Outcome-of-the-Public-Exhibition-of-the-draft-Campbelltown-Comprehensive-Koala-Plan-of-Management.pdf> - -The Chief Scientist Report (March 2016 Independent review into the Decline of Koala Populations in Key Areas of NSW) - <https://www.chiefscientist.nsw.gov.au/independent-reports/koala-report> - The Chief Scientist's Campbelltown Koala Report - https://www.chiefscientist.nsw.gov.au/data/assets/pdf_file/0005/318830/Koalas-Advice-Final.pdf - -Recommendations from the Upper House Inquiry Koala Populations and Habitat in New South Wales - <https://koala.nsw.gov.au/2019/07/02/inquiry-into-koala-populations-and-habitat-in-nsw/> • The Cumberland Plain is critically endangered and was designated as a "first priority" biodiversity offset area. The Cumberland Plain was designated as a "first priority" offset area when the federal government granted strategic biodiversity certification to the North West and South West Growth Centres in 2012 (Growth Centres Biodiversity Offset Program). Now four more growth centres have now been added in or near the subregion, representing a 50% increase in land in the area classified as 'urban capable'. More intensive development than originally planned has also been proposed for both the North West and South West Growth Centres. The population of Menangle Park, Mount Gilead and Appin, an area that is home to the Campbelltown koalas, will grow from approximately 3,000 to 109,00 people over the next 36 years. • The Draft CPCP favours developers as 10,014 hectares of rural land for urban redevelopment while setting aside only 5,475 hectares of native vegetation in new conservation lands. The conservation program will include the likely addition of three new reserves but some of this land is already publicly held. The Office of Strategic Reserves, for example, currently owns 60% of the 1,130 hectares of land to be initially set aside for the proposed Georges River Koala Reserve. At least 25% of the targeted 5,475 hectares of native vegetation will be delivered through the ecological restoration of threatened native vegetation. Agreements will also be entered for biodiversity stewardships on private lands. • The Draft CPCP will impact between 10- 16% of the critically endangered Cumberland Plain Woodland. Only 6,400 hectares or 6% of the original 107,00 hectares of Cumberland Plain Woodland still exists. The Growth Centres Biodiversity Offset Program is meant to protect at least 2,400 hectares of Cumberland Plain Woodland or other 'grassy woodland' communities. Its most recent Annual Report acknowledges that cost and suitability constraints may impede its ability to secure high-value biodiversity offsets on the Cumberland Plain. To date, this Program has only protected 715 hectares of native vegetation, of which 369 hectares is Cumberland Plain Woodland. Because land purchases and biodiversity stewardship agreements are primarily funded by Special Infrastructure Contributions (SICs) levied on developers, they are staged to coincide

with the rate of development instead of being secured upfront. • The Draft CPCP only commits to the creation of one reserve - the Georges River Koala Reserve- The Upper House Inquiry into Koalas recommended the Upper Georges River Koala national Park. Two other reserves, the Gulguer and the Confluence are still under investigation for feasibility. The Plan also acknowledges that the 755 hectares of land to be incorporated into the Georges River Koala Reserve will only be secured by 2040. Sufficient clarity is also lacking about the representation of Cumberland Plain Woodland or other 'grassy woodland communities' in the 4,795 hectares of 'avoided land' to be zoned E2 (environmental conservation). • The Draft CPCP does not provide a firm commitment to the amount of land to be protected and acknowledges that conservation land will be secured slowly over time. The Plan says "it expects that around 11,000 hectares, or approximately double the Plan's offset commitment of 5,475 hectares of impacted native vegetation, will be protected within new conservation lands." Through a peer-review process, a "strategic conservation area" of 28,300 hectares, which includes 18,300 hectares of native vegetation, has been identified. It apparently "represents the areas in the Cumberland subregion that are considered most likely to be viable in the long-term and to maximise ecological function and connectivity across the landscape." But the Plan does not indicate whether any steps will be taken to protect the integrity of the strategic conservation area before the additional land can be set aside. Consequently, the Plan could face suitability and cost constraints, like those identified in the Growth Centres Biodiversity Offset Program's most recent annual report. • The Draft CPCP is putting at risk Sydney's food bowl. A recent article in The Australian quoted research that shows that agricultural production in the Greater Sydney region accounts for a \$1 billion of the state's \$16 billion annual total. According to the recently published Sydney's Food Futures Report, produced by UTS's Institute for Sustainable Futures, if current trends in urbanisation continue, the Sydney region will lose 60% of its total food production by 2031. Instead of meeting 20% of the city's fresh food needs, in just over a decade, the Sydney basin will provide just 5% of demand. • The Draft CPCP has not adequately addressed the health impacts of urban heat for potential residents Western Sydney University research has identified that in Sydney's treeless urban areas, morning summer surface temperatures are nearly 13 degrees celsius higher than in vegetated areas. Summer temperatures can often soar to over 50 degrees celsius in Western Sydney. While the Plan notes that "large amounts of hard and dark-coloured surfaces such as roads and roofs cause localised warming," the main solution put forward to address the heat island effect is 'Greening our city' - a Premier's Priority program that was announced in 2019 and designed to ensure one million trees are planted by 2022. In the meantime, developers have already been granted permission to remove even small clusters of mature trees and dams on rural properties for new housing estates. New block sizes are typically too small to accommodate trees or even significant greenery. • The Draft CPCP fails to set aside enough land to properly protect the koala population. The proposed Georges River Koala Reserve will eventually set aside 1,885 hectares to protect the koalas' important north-south primary habitat corridor and the Plan commits to protecting an additional 610 hectares of important koala habitat. But it falls far short of securing all of the primary, secondary and tertiary koala habitat corridors. The Department of Planning, Industry and Environment (DPIE) 2018 report, Conserving Koalas in the Wollondilly and Campbelltown Local Government Areas estimated that 8,293.46 hectares would need to be set aside for this purpose. • The Draft CPCPP fails to acknowledge the catastrophic impact bushfires have had on the states Koala population. Last season's horrific bushfires killed thousands of koalas and destroyed as much as a fifth of their habitat in NSW. In fact, a recent study by Biolink, commissioned by the World Wide Fund for Nature Australia, reported an overall 71 per cent fall in the koala population across six firegrounds, from south of Port Macquarie on NSW's mid-north coast to near Ballina in the state's north. The state's koala population is now predicted to become functionally extinct in the wild before 2050, according to a report released in June by the Upper House Inquiry into Koala populations and habitat in NSW, and reiterated in the recent WWF report. • The Draft CPCP fails to adopt the Chief Scientist's recommendation to secure ALL of the east-west habitat corridors for the koalas. While the Plan acknowledges "east-west connectivity between the Georges and Nepean rivers is important for the resilience of the Southern Sydney koala population," it discounts the recommendation made in a recent report prepared by the Chief Scientist's expert panel, (Chief Scientist Koala Report 2020), to protect the habitat of the six east-west corridors, as it had also rejected similar findings from the Campbelltown Koala Plan of management. Instead, the Plan sites unspecified "scientific advice from the department and the research community...that the existing six east-west corridors in the Greater Macarthur Growth Area are too fragmented and not wide enough to support koalas over the long term." Only the Ousedale Creek to Appin North east-west corridor will be protected. . The Draft CPCP does not provide connecting corridors and habitat for the Koala who is a landscape or roaming animal East-west corridors such as Woodhouse Creek to Beulah and Menangle Creek to Noorumba Reserve at Mount Gilead, are the fastest and easiest route for the koalas between the Georges and Nepean rivers. Mount Gilead and Menangle Park are not part of the land subject to biodiversity certification in the Plan because they are covered by an alternative development assessment process. The Chief Scientist Koala Report highlights "the importance of a holistic planning approach," arguing that "by their very nature, the habitat corridors within the two study areas cross multiple tenures and landscapes, connect internally and with each other," and that "koalas, in using these corridors, do not recognise lines on maps." With respect to the benefit of maintaining east-west connectivity between the Georges River and Nepean River, the Chief Scientist Koala Report underscores its importance: The habitat in this region contains high quality feed trees due to the sandstone shale transition forest. The Campbelltown koala population is expanding and therefore it is essential that this habitat supports the movement of koalas such that dispersing koalas can move through the landscape, can breed to ensure genetic diversity, and can access refugia in times of stress, drought or other threats. • The Draft CPCP fails to provide the recommended 390-450 mete wide corridors While the Chief Scientist Koala Report also recommends koala fencing to keep wildlife away from roads and residential areas, the Plan does not incorporate the Report's recommendation for habitat corridors with a recommended width of 390-450 metres, to be enhanced by 'Asset Protection Zones' and 30 metre wide buffers on either side of the corridor to "reduce the impact of threats, light and noise on koalas." Further, the Chief Scientist Koala Report notes that the Ousedale Creek to Appin North corridor, the Plan's preferred east-west corridor, is impeded by "numerous suburban and rural properties between the habitat edge and road surface, on both the east and west sides." The Plan also doesn't specify an adequate number of koala underpasses or suitable crossings across busy Appin Road. • The Draft CPCP fails to adequately address the impact of Climate Change on both humans and wildlife. The Plan acknowledges that "koala habitat in river and creek valleys provides important refuge and resilience to warming and drying climates, a characteristic that is likely to become increasingly important with climate change." But if the proposal to build 120 km of koala fencing is implemented without an adequate number of appropriately sized movement corridors, the koalas will be trapped. The Chief Scientist Koala Report confirms the need to maintain connectivity, noting that it helps to "avoid the creation of dead ends where koalas face threats without routes of escape." The Report notes that "once housing development occurs along the western flank of the Mount Gilead site" (Stage 2 of the Lendlease Mount Gilead development), "the route for koalas to move east or west will be through a narrow strip of habitat at the confluence of the Nepean River and Menangle Creek...and conceptual plans illustrate this habitat being potentially surrounded by three roads." Effectively this habitat corridor will become a functional 'dead-end', and thus more ominously a 'population sink'. • The Draft CPCP fails to address the significant Indigenous and Colonial heritage The protection of the undeveloped, rural character of the landscape of the Scenic Hills around

Campbelltown has been a priority since the earliest planning schemes of the Post-WW2 period. This Plan will completely undo a visionary planning process that attempted to constrain the footprint of the urban areas and encourage only development that would be sympathetic to the scenic and cultural values of one the most picturesque and historic rural landscapes in NSW. This would be Australia's only remaining frontier landscape from the Macquarie era, where fortified granaries still give testament to the frontier wars of that time. Conclusion The Draft CPCP is a green light for developers and a failure for the critically endangered Cumberland Plain and the Koala population that depends on it. In light of the koala crisis facing NSW, the plan must be rejected until a holistic and scientific approach is adopted

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Submitted on Thu, 08/10/2020 - 22:51
Submitted by: Anonymous
Submitted values are:
Submission Type: I am submitting on behalf of my organisation
First Name: Keep Sydney
Last Name: Beautiful
Name Withheld: No
Email: [REDACTED]
Suburb/Town & Postcode: 2034
Submission file: [webform_submission:values:submission_file]

Submission: Draft Cumberland Plain Conservation Plan OBJECTION

Background

When the Growth Centres SEPP received federal government biodiversity certification in 2012, it was on the condition that the Cumberland Plain would be the first preference for biodiversity offsetting. This was in recognition of its very degraded environmental state. The Biodiversity Offset Program for the Growth Centres SEPP was introduced in 2006 as a compromise solution after a promise to codify a green belt around Sydney never eventuated. Greater Macarthur and Wilton were never development opportunities but rather intended to be the green lungs and agricultural security for a growing city.

Professor Graeme Samuels in his Interim Report on the Review of the EPBC Act was scathing about the misuse of biodiversity offset programs. He said that they often fail to deliver on their promised environmental outcomes and that too often areas designated as biodiversity offsets are later released for development. That's exactly what's happening here. To date, the Biodiversity Offset Program has only protected 368 hectares of Cumberland Plain Woodland. The target is 2,400 hectares and the Cumberland Plain Conservation Plan acknowledges that the proposed development will impact over 1,000 hectares of this critically endangered species. If realised, the Cumberland Plain Conservation Plan will fragment and destroy the already critically endangered ecological woodland but also put the viability of the healthy and expanding Koala population at risk. .

The Key Objections to the Draft CPCP are as follows:

A failure to acknowledge and act on expert scientific findings on the Macarthur (also known as the Campbelltown) Koala population, including but not limited to - Campbelltown Council's Koala Plan of Management - <file:///Users/peterbradley/Downloads/Attachment-3-Item-8.2-Outcome-of-the-Public-Exhibition-of-the-draft-Campbelltown-Comprehensive-Koala-Plan-of-Management.pdf> - -The Chief Scientist Report (March 2016 Independent review into the Decline of Koala Populations in Key Areas of NSW) - <https://www.chiefscientist.nsw.gov.au/independent-reports/koala-report> - The Chief Scientist's Campbelltown Koala Report - [https://www.chiefscientist.nsw.gov.au/ data/assets/pdf file/0005/318830/Koalas-Advice-Final.pdf](https://www.chiefscientist.nsw.gov.au/data/assets/pdf_file/0005/318830/Koalas-Advice-Final.pdf) - - Recommendations from the Upper House Inquiry Koala Populations and Habitat in New South Wales - <https://koala.nsw.gov.au/2019/07/02/inquiry-into-koala-populations-and-habitat-in-nsw/>

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The Draft CPCP favours developers as 10,014 hectares of rural land for urban redevelopment while setting aside only 5,475 hectares of native vegetation in new conservation lands. The conservation program will include the likely addition of three new reserves but some of this land is already publicly held. The Office of Strategic Reserves, for example, currently owns 60% of the 1,130 hectares of land to be initially set aside for the proposed Georges River Koala Reserve. At least 25% of the targeted 5,475 hectares of native vegetation will be delivered through the ecological restoration of threatened native vegetation. Agreements will also be entered for biodiversity stewardships on private lands.

The Draft CPCP will impact between 10- 16% of the critically endangered Cumberland Plain Woodland. Only 6,400 hectares or 6% of the original 107,00 hectares of Cumberland Plain Woodland still exists. The Growth Centres Biodiversity Offset Program is meant to protect at least 2,400 hectares of Cumberland Plain Woodland or other 'grassy woodland' communities. Its most recent Annual Report acknowledges that cost and suitability constraints may impede its ability to secure high-value biodiversity offsets on the Cumberland Plain. To date, this Program has only protected 715 hectares of native vegetation, of which 369 hectares is Cumberland Plain Woodland. Because land purchases and biodiversity stewardship agreements are primarily funded by Special Infrastructure Contributions (SICs) levied on developers, they are staged to coincidewith the rate of development instead of being secured upfront.

The Draft CPCP only commits to the creation of one reserve - the Georges River Koala Reserve- The Upper House Inquiry into Koalas recommended the Upper Georges River Koala national Park. Two other reserves, the Gulguer and the Confluence are still under investigation for feasibility. The Plan also acknowledges that the 755 hectares of land to be incorporated into the Georges River Koala Reserve will only be secured by 2040. Sufficient clarity is also lacking about the representation of Cumberland Plain Woodland or other 'grassy woodland communities' in the 4,795 hectares of 'avoided land' to be zoned E2 (environmental conservation).

The Draft CPCP does not provide a firm commitment to the amount of land to be protected and acknowledges that conservation land will be secured slowly over time. The Plan says “it expects that around 11,000 hectares, or approximately double the Plan’s offset commitment of 5,475 hectares of impacted native vegetation, will be protected within new conservation lands.” Through a peer-review process, a “strategic conservation area” of 28,300 hectares, which includes 18,300 hectares of native vegetation, has been identified. It apparently “represents the areas in the Cumberland subregion that are considered most likely to be viable in the long-term and to maximise ecological function and connectivity across the landscape.” But the Plan does not indicate whether any steps will be taken to protect the integrity of the strategic conservation area before the additional land can be set aside. Consequently, the Plan could face suitability and cost constraints, like those identified in the Growth Centres Biodiversity Offset Program’s most recent annual report.

The Draft CPCP is putting at risk Sydney’s food bowl. A recent article in The Australian quoted research that shows that agricultural production in the Greater Sydney region accounts for a \$1 billion of the state’s \$16 billion annual total. According to the recently published Sydney’s Food Futures Report, produced by UTS's Institute for Sustainable Futures, if current trends in urbanisation continue, the Sydney region will lose 60% of its total food production by 2031. Instead of meeting 20% of the city’s fresh food needs, in just over a decade, the Sydney basin will provide just 5% of demand.

The Draft CPCP has not adequately addressed the health impacts of urban heat for potential residents Western Sydney University research has identified that in Sydney’s treeless urban areas, morning summer surface temperatures are nearly 13 degrees celsius higher than in vegetated areas. Summer temperatures can often soar to over 50 degrees celsius in Western Sydney. While the Plan notes that "large amounts of hard and dark-coloured surfaces such as roads and roofs cause localised warming," the main solution put forward to address the heat island effect is 'Greening our city' - a Premier’s Priority program that was announced in 2019 and designed to ensure one million trees are planted by 2022. In the meantime, developers have already been granted permission to remove even small clusters of mature trees and dams on rural properties for new housing estates. New block sizes are typically too small to accommodate trees or even significant greenery.

The Draft CPCP fails to set aside enough land to properly protect the koala population. The proposed Georges River Koala Reserve will eventually set aside 1,885 hectares to protect the koalas' important north-south primary habitat corridor and the Plan commits to protecting an additional 610 hectares of important koala habitat. But it falls far short of securing all of the primary, secondary and tertiary koala habitat corridors. The Department of Planning, Industry and Environment (DPIE) 2018 report, *Conserving Koalas in the Wollondilly and Campbelltown Local Government Areas* estimated that 8,293.46 hectares would need to be set aside for this purpose.

The Draft CPCPP fails to acknowledge the catastrophic impact bushfires have had on the states Koala population. Last season's horrific bushfires killed thousands of koalas and destroyed as much as a fifth of their habitat in NSW. In fact, a recent study by Biolink, commissioned by the World Wide Fund for Nature Australia, reported an overall 71 per cent fall in the koala population across six firegrounds, from south of Port Macquarie on NSW's mid-north coast to near Ballina in the state's north. The state's koala population is now predicted to become functionally extinct in the wild before 2050, according to a report released in June by the Upper House Inquiry into Koala populations and habitat in NSW, and reiterated in the recent WWF report.

The Draft CPCP fails to adopt the Chief Scientist's recommendation to secure ALL of the east-west habitat corridors for the koalas. While the Plan acknowledges "east-west connectivity between the Georges and Nepean rivers is important for the resilience of the Southern Sydney koala population," it discounts the recommendation made in a recent report prepared by the Chief Scientist's expert panel, (Chief Scientist Koala Report 2020), to protect the habitat of the six east-west corridors, as it had also rejected similar findings from the Campbelltown Koala Plan of management. Instead, the Plan sites unspecified "scientific advice from the department and the research community...that the existing six east-west corridors in the Greater Macarthur Growth Area are too fragmented and not wide enough to support koalas over the long term." Only the Ousedale Creek to Appin North east-west corridor will be protected. The Draft CPCP does not provide connecting corridors and habitat for the Koala who is a landscape or roaming animal East-west corridors such as Woodhouse Creek to Beulah and Menangle Creek to Noorumba Reserve at Mount Gilead, are the fastest and easiest route for the koalas between the Georges and Nepean rivers.

Mount Gilead and Menangle Park are not part of the land subject to biodiversity certification in the Plan because they are covered by an alternative development assessment process. The Chief Scientist Koala Report highlights "the importance of a holistic planning approach," arguing that "by their very nature, the habitat corridors within the two study areas cross multiple tenures and landscapes, connect internally and with each other," and that "koalas, in using these corridors, do not recognise lines on maps." With respect to the benefit of maintaining east-west connectivity between the Georges River and Nepean River, the Chief Scientist Koala Report underscores its importance: The habitat in this region contains high quality feed trees due to the sandstone shale transition forest. The Campbelltown koala population is expanding and therefore it is essential that this habitat supports the movement of koalas such that dispersing koalas can move through the landscape, can breed to ensure genetic diversity, and can access refugia in times of stress, drought or other threats.

The Draft CPCP fails to provide the recommended 390-450 metre wide corridors While the Chief Scientist Koala Report also recommends koala fencing to keep wildlife away from roads and residential areas, the Plan does not incorporate the Report's recommendation for habitat corridors with a recommended width of 390-450 metres, to be enhanced by 'Asset Protection Zones' and 30 metre wide buffers on either side of the corridor to "reduce the impact of threats, light and noise on koalas." Further, the Chief Scientist Koala Report notes that the Ousedale Creek to Appin North corridor, the Plan's preferred east-west corridor, is impeded by "numerous suburban and rural properties between the habitat edge and road surface, on both the east and west sides." The Plan also doesn't specify an adequate number of koala underpasses or suitable crossings across busy Appin Road.

The Draft CPCP fails to adequately address the impact of Climate Change on both humans and wildlife. The Plan acknowledges that "koala habitat in river and creek valleys provides important refuge and resilience to warming and drying climates, a characteristic that is likely to become increasingly important with climate change." But if the proposal to build 120 km of koala fencing is implemented without an adequate number of appropriately sized movement corridors, the koalas will be trapped. The Chief Scientist Koala Report confirms the need to maintain connectivity, noting that it helps to "avoid the creation of dead ends where koalas face threats without routes of escape." The Report notes that "once housing development occurs along the western flank of the Mount Gilead site" (Stage 2 of the Lendlease Mount Gilead development), "the route for koalas to move east or west will be through a narrow strip of habitat at the confluence of the Nepean River and Menangle Creek...and conceptual plans illustrate this habitat being potentially surrounded by three roads." Effectively this habitat corridor will become a functional 'dead-end', and thus more ominously a 'population sink'.

The Draft CPCP fails to address the significant Indigenous and Colonial heritage. The protection of the undeveloped, rural character of the landscape of the Scenic Hills around Campbelltown has been a priority since the earliest planning schemes of the Post-WW2 period. This Plan will completely undo a visionary planning process that attempted to constrain the footprint of the urban areas and encourage only development that would be sympathetic to the scenic and cultural values of one of the most picturesque and historic rural landscapes in NSW. This would be Australia's only remaining frontier landscape from the Macquarie era, where fortified granaries still give testament to the frontier wars of that time.

Conclusion The Draft CPCP is a green light for developers and a failure for the critically endangered Cumberland Plain and the Koala population that depends on it. In light of the koala crisis facing NSW, the plan must be rejected until a holistic and scientific approach is adopted.

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