

From: Anthony Tavella on behalf of DPE PS ePlanning Exhibitions Mailbox
Sent: Friday, 9 October 2020 12:23 PM
To: DPE PS Biodiversity Mailbox
Subject: FW: Webform submission from: Draft Cumberland Plain Conservation Plan
Attachments: greens-nsw-draft-cumberland-plain-conservation-plan-submission.pdf

From: noreply@feedback.planningportal.nsw.gov.au <noreply@feedback.planningportal.nsw.gov.au>
Sent: Friday, 9 October 2020 12:20 PM
To: DPE PS ePlanning Exhibitions Mailbox <eplanning.exhibitions@planning.nsw.gov.au>
Subject: Webform submission from: Draft Cumberland Plain Conservation Plan

Submitted on Fri, 09/10/2020 - 12:18
Submitted by: Anonymous
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[greens-nsw-draft-cumberland-plain-conservation-plan-submission.pdf](#)

Submission: 25 September 2020 Department of Planning, Industry and Environment, Green and Resilient Places Division. Locked Bag 5022 NSW, our members and supporters are concerned that the Plan will not adequately protect threatened species and critically endangered ecological communities and chlamydia-free populations in NSW. This unique region also contains more than 100 threatened or migratory animal and plant species, 680 koalas, and 100 km² of koala habitat. The Cumberland Plain is home to a large koala population in Camden; Campbelltown; Liverpool; Fairfield; Penrith; Blacktown and Hawkesbury. It is being developed to meet requirements for strategic biodiversity offsets required to deliver four nominated areas for development in Western Sydney including: • Greater Macarthur Growth Area • Greater Penrith to the West Growth Area • Greater Sydney Growth Area • Greater Western Sydney Growth Area. We note that the Minister for Planning and Public Spaces, the Hon Rob Stokes MP, describes the Plan as “one of the largest conservation areas in NSW”. In addition, “Energy and Environment Minister, Matt Kean, has set a goal of doubling the number of koalas by 2050 in a bid to defy projections that koalas will be headed for extinction in NSW before 2050”. The Greens NSW, however, are concerned about the level of new development proposed in an area that is listed under the EPBC Act as threatened ecological communities or classified as over-cleared vegetation types (that is, greater than 70% cleared compared to original vegetation). Areas of remaining native vegetation are often of high conservation value as they may contain the only remaining habitat for species at risk of extinction. Processes and trading mechanisms such as biodiversity banking and offsets being used to trade off high conservation areas for development are of concern. The Report of the Independent Review of the EPBC Act found that: “Offsets do not offset the impact of development, and overall there is a net loss of native vegetation”. The Cumberland Plain already provide offsets for two other major Growth Centres, the North West Growth Centre and the South West Growth Centre. The designation was in recognition of its severely impacted native vegetation within new conservation lands, but notes that “the Plan lacks a firm commitment to the total amount of land which will be protected and incorporated into the reserve by 2040. has concerns with the developer contribution model. Funding for the program will be allocated annually to meet the bowl capacity. are concerned that the Plan acknowledges that the urban heat island effect in Western Sydney “will increase as urbanisation increases”. The largest chlamydia-free koala population in NSW. are dismayed at the Plan’s lack of emphasis on adequately protecting koala habitat for a reserve. We consider that the Plan has not adopted a holistic planning approach to protecting the South West Sydney koalas. consider that the Plan’s approach to biodiversity offsets is flawed. Chief Scientist Koala Report. consider that the Plan includes insufficient measures to mitigate the effects of climate change on wildlife. In determining the Plan as a “first priority” biodiversity offset area by the Australian Government in 2012 for two other major Growth Centres, the North West Growth Centre and the South West Growth Centre. 2036. Many of these new homes are likely to be in the four new growth centres located within the Cumberland Plain area. The Greens NSW are concerned that the EPBC Act. Thus, development in these areas will not require further site by site biodiversity assessment, so long as the approved conservation program is followed for development. Development will occur within specified urban capable lands within each nominated area (shaded light brown in Figure 1-1). Threatened Ecological Community in the nominated areas (without excluded lands). The direct impacts of the development are mainly associated with the loss of impacted native vegetation within new conservation lands, “the Plan lacks a firm commitment to the total amount of land which will be protected and incorporated into the reserve by 2040. This will offset native vegetation that is cleared for urban development and transport initiatives. We note that the Plan has identified 28,300 hectares of native vegetation. Act and/or BC Act-listed threatened ecological communities impacted by development facilitated through the Plan. The remaining areas included in the Stage 2 of this reserve will only be incorporated into the reserve by 2040. The Greens NSW welcomes the Government’s commitment to protect the Koala Reserve, announced as part of the Plan, and two additional public reserves under investigation for feasibility: • the Gulguer Reserve in the Georges River Koala Reserve, establishing biodiversity stewardship sites on private land. We note that “other areas within the reserve are currently publicly held. The Office of Strategic Reserves, for example, currently owns around 60% of the 1,130 hectares of land to be initially protected. ecological communities for up to 25% of the Plan’s target to secure 5,475 hectares of impacted native vegetation i.e up to 1370 hectares. Agreed in the Growth Centres, instead of being secured upfront. Significant funding is required to implement the conservation program over the life of the development in the four Western Sydney nominated areas. A Special Infrastructure Contribution for biodiversity of \$4,500 per dwelling was proposed. determination on the biodiversity component of the Special Infrastructure Contribution before the Plan is approved”. Beyond the initial Government

taken to protect the integrity of the strategic conservation area before the additional land can be set aside or protected in other ways. Consequent funding for the program to be allocated annually at the same rate at which development is expected to occur in the Growth Centres. Funding for the recent Annual Report acknowledges that cost and suitability constraints may impede its ability to secure high-value biodiversity offsets on the Infrastructure Contributions levied on developers, they are staged to coincide with the rate of development instead of being secured upfront". 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 Food Futures, "6% of demand. "The Plan acknowledges that the urban heat island effect in Western Sydney "will increase as urbanisation increases," but mentions that 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 can often absorb and store heat, increasing the urban heat island effect. The Plan fails to set aside enough land to properly protect the koala population. The proposed Georges River Koala Reserve will eventually be established. The report, Conserving Koalas in the Wollondilly and Campbelltown Local Government Areas estimated 8,292.46 hectares would need to be set aside. Last year's season's horrific bushfires killed thousands of koalas and destroyed over 3.5 million hectares, or 25%, of the most suitable koala habitat in eastern Australia. from south of Port Macquarie on NSW's mid-north coast to near Ballina in the state's north. The recent Upper House Inquiry into Koala populations found that the koala will become extinct in New South Wales before 2050. Shortly after the fires the Minister for Environment and Energy, the Hon Matt Keay, announced he would accept the Chief Scientist's recommendation to secure all of the east-west habitat corridors for the koalas. The Plan acknowledges "east-west habitat corridors for the protection of the Campbelltown Koala population (Chief Scientist's Koala Report), to protect the habitat of the six east-west corridors. Instead of all six, only the Ousedale Creek to Appin North east-west corridor will be protected. The Plan has not adopted a holistic planning approach to protect the catchment rivers. Mount Gilead and Menangle Park are not part of the land subject to biodiversity certification in the Plan because they are covered by agricultural tenures and landscapes, connect internally and with each other," and that "koalas, in using these corridors, do not recognise lines on maps." The Plan also mentions "shale transition forest... it is essential that this habitat supports the movement of koalas such that dispersing koalas can move through the landscape." The Chief Scientist's Koala Report also recommends koala fencing to keep wildlife away from roads and residential areas, the Plan does not include this. 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 a Road. If the proposal to build 120 km of koala fencing is implemented without an adequate number of appropriately sized movement corridors, "if 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 will become a functional 'dead-end'. The Plan includes insufficient measures to mitigate the effects of climate change on wildlife. The report acknowledges the need for communities, and identifying priority locations, such as climate refugia, to support the persistence and adaptation of at-risk species and ecosystems. biocertification of 10,470 hectares of the Cumberland Plain as 'urban capable' land available for development. Such development will have urban form and function. government's commitment to save koalas in NSW from extinction. Cate Faehrmann MLC Greens NSW environment spokesperson and Chair of the NSW Environment and Heritage Committee.

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

DRAFT CUMBERLAND PLAIN CONSERVATION PLAN

SUBMISSION - NSW GREENS

25 September 2020

Department of Planning, Industry and Environment,
Green and Resilient Places Division.
Locked Bag 5022,
Parramatta NSW 2124

Submitted via
planningportal.nsw.gov.au/draftplans/exhibition/draft-cumberland-plain-conservation-plan

Thank you for the opportunity to make a submission to the [Draft Cumberland Plain Conservation Plan](#) (the Plan). The Greens NSW, our members and supporters are concerned that the Plan will not adequately protect threatened species and critically endangered ecological communities within the Cumberland Plain area.

We are particularly concerned about the Southern Sydney koala population. This Cumberland Plain koala population is home to the largest koala population in Greater Sydney and one of the only chlamydia-free populations in NSW. This unique region also contains more than 100 threatened or migratory animal and plant species, 680 kilometres of waterways including three water catchment areas and 68 hectares of wetlands of national importance.

The Plan covers an area of around 200,000 hectares in Western Sydney and spans across eight local government areas: Wollondilly; Camden; Campbelltown; Liverpool; Fairfield; Penrith; Blacktown and Hawkesbury. It is being developed to meet requirements for strategic biodiversity certification under the [Biodiversity Conservation Act 2016 \(NSW\)](#) (BC Act) and strategic assessment under the [Environment Protection and Biodiversity Conservation Act 1999 \(Cth\)](#) (EPBC Act).

The Plan will facilitate the biodiversity approvals required to deliver four nominated areas for development in Western Sydney including:

- Greater Macarthur Growth Area
- Greater Penrith to Eastern Creek Investigation Area
- Western Sydney Aerotropolis
- Wilton Growth Area.

Existing land uses comprise mainly freehold land zoned rural and residential, with more than 76% of the remaining native vegetation in the Cumberland subregion in private ownership.

We note that the Minister for Planning and Public Spaces, the Hon Rob Stokes MP, describes the Plan as

“one of the largest strategic conservation planning exercises ever... and a once-in-a-generation commitment to protect south-west Sydney’s rich environmental assets and important koala population while providing certainty for investment in a growing part of Sydney”¹.

In addition, “Energy and Environment Minister, Matt Kean, has set a goal of doubling the number of koalas by 2050 in a bid to defy projections the marsupial could become extinct in the wild in NSW by mid-century. The koala goal is the government’s first response to... the release of an [Upper House parliamentary report](#) that found numbers (in NSW) were down to 15,000-20,000 and the animal was headed for extinction in NSW before 2050”.

The Greens NSW, however, are concerned about the level of new development proposed in an area that is home to more than 100 threatened or migratory fauna and flora species that are listed under either NSW or Commonwealth legislation or both. Of the 40 plant community types (PCTs) in the area, approximately 30 are associated with BC Act or EPBC Act listed threatened ecological communities or classified as over-cleared vegetation types (that is, greater than 70% cleared compared with the notional original extent)².

In 2010, the NSW Government’s [Cumberland Plain Recovery Plan](#) found that only 13% of the pre-1750 extent of native vegetation remains in good condition, with an additional 12% occurring as

¹ New Plan to deliver conservation legacy for Western Sydney available at: <https://www.dpie.nsw.gov.au/news-and-events/new-plan-to-deliver-conservation-legacy-for-western-sydney#:~:text=%E2%80%9CThe%20Cumberland%20Plain%20Conservation%20Plan,Sydney%2C%E2%80%9D%20Mr%20Stokes%20said.>

² Sub-Plan A: Conservation Program and Implementation available at: https://shared-drupal-s3fs.s3-ap-southeast-2.amazonaws.com/master-test/fapub_pdf/00+-+CPCP/Draft+Sub-Plan+A.pdf

scattered trees in disturbed areas. Areas of remaining native vegetation are often of high conservation value as they may contain the only remaining habitat for species and ecological communities that occur only in the Cumberland subregion. Approximately 10% of the existing native vegetation communities in the Plan Area are protected in a reserve or a biodiversity agreement.

The Greens NSW oppose market based processes and trading mechanisms such as biodiversity banking and offsets being used to trade off high conservation areas for development. Offsets should not be used to justify clearing of endangered or threatened remnant and high value regrowth vegetation. We support a prohibition on clearing of core koala habitat across all land tenures.

We note that Professor Graeme Samuel AC's Interim Report of the Independent Review of the EPBC Act found that:

*"Offsets do not offset the impact of development, and overall there is a net loss of habitat. Proponents are permitted to clear habitat in return for protecting other areas of the same habitat from future development. It is generally not clear if the area set aside for the offset is at risk from future development"*³.

We note that parts of the Cumberland Plain already provide offsets for two other major Growth Centres, the North West Growth Centre and the South West Growth Centre.

In brief, the Greens NSW:

- are concerned that the Plan proposes further significant urban development on the Cumberland Plain, a region that was designated as a "first priority" biodiversity offset area by the Australian Government in 2012 for two other major Growth Centres, the North West Growth Centre and the South West Growth Centre⁴. The designation was in recognition of its severely degraded environmental state.
- are concerned that the Plan will certify 10,470 hectares of the Cumberland Plain as urban capable land available for development.

³ Ibid. p. 13.

⁴ Approval Decision for the Taking of Actions in Accordance with an Endorsed Program under the EPBC Act - Program for the Development of the South West and North West Growth Centres in Western Sydney, NSW available at: <https://www.environment.gov.au/system/files/pages/f8ab91b2-7295-4ee3-af0d-7771bfc6dabd/files/approval-sydney-growth-centres-strategic-assessment.pdf>

- welcomes the Government's commitment to offset 5,475 hectares of impacted native vegetation within new conservation lands, but notes that "the Plan lacks a firm commitment to the total amount of land which will be protected"... to 2056... and "acknowledges that conservation land will be secured slowly over time".
- welcomes the newly announced conservation reserves, but notes that only one of the reserves has been firmly committed to and that Stage 2 of this reserve will only be incorporated into the reserve by 2040.
- has concerns with the developer contribution model. Funding for the program will be allocated annually at the same rate at which development is expected to occur in the Growth Centres, instead of being secured upfront.
- are concerned that the Plan provides no assessment about how the loss of so much rural land will impact the Sydney region's food bowl capacity.
- are concerned that the Plan acknowledges that the urban heat island effect in Western Sydney "will increase as urbanisation increases" but proposes only minimal measures to mitigate its effect. This area regularly experiences record summer temperatures.
- considers that the Plan fails to set aside enough land to properly protect a thriving population of 600 to 1,000 koalas, the largest chlamydia-free koala population in NSW.
- are dismayed at the Plan's lack of emphasis on adequately protecting koala habitat for a recovering and healthy population given the recent fires which have decimated the state's koala population.
- are very concerned that the Plan does not accept the Chief Scientist's recommendation to secure all of the east-west habitat corridors for the koalas.
- consider that the Plan has not adopted a holistic planning approach to protecting the South West Sydney koalas.
- consider that the Plan's proposed construction of 120 km of Koala exclusion fencing, without adequate overpasses and underpasses, will isolate and fragment Koala colonies, especially

because the Plan protects only one of the six east-west movement corridors recommended in the Chief Scientist Koala Report.

- consider that the Plan includes insufficient measures to mitigate the effects of climate change on wildlife.

In detail

Further significant urban development is being proposed in a subregion that has been previously designated as a “first priority” biodiversity offset area.

The Plan proposes massive urban development on the Cumberland Plain, a region that was designated as a “first priority” biodiversity offset area by the Australian Government in 2012 for two other major Growth Centres, the North West Growth Centre and the South West Growth Centre. The designation was in recognition of its severely degraded environmental state.

The Government’s Greater Sydney Region Plan states that an additional 184,500 homes will be required in the Western District by 2036. Many of these new homes are likely to be in the four new growth centres located within the Cumberland Plain area.

The Greens NSW are concerned that 10,470 hectares of the Cumberland Plain will be certified as urban capable land available for development. The land will be subject to strategic biodiversity certification for development under the BC Act and strategic assessment under the EPBC Act. Thus, development in these areas will not require further site by site biodiversity assessment, so long as the approved conservation program detailed in the Plan is implemented by the department. A map of nominated areas under the Plan is shown in Figure 1-1 from the [Draft Cumberland Plain Assessment Report](#) below.



We note that not all parts of the nominated areas are proposed for development. Development will occur within specified urban capable lands within each nominated area (shaded light brown in Figure 1-1 above).

The Plan will certify 10,470 hectares of the Cumberland Plain as urban capable land available for development.

A total of 1,015 ha of Cumberland Plain Woodland will be directly impacted by the development. This is approximately 68% of the Threatened Ecological Community in the nominated areas (without excluded lands). The direct impacts of the development are mainly associated with urban development.

The development will result in a loss of 4.4% of the remaining 23,221.9 hectares of Cumberland Plain Woodland in the broader Cumberland subregion.

Whilst welcoming the Government’s commitment to offset 5,475 hectares of impacted native vegetation within new conservation lands, “the Plan lacks a firm commitment to the total amount of land which will be protected”... to 2056... and “acknowledges that conservation land will be secured slowly over time”.

The Greens NSW welcomes the commitment within the Plan to protect in perpetuity a minimum of 5,475 hectares of native vegetation in new conservation lands. This will offset native vegetation that is cleared for urban development and transport initiatives.

We note that the Plan has identified 28,300 hectares of strategic conservation area within the Plan Area. This area contains approximately 18,300 hectares of native vegetation, classified into plant community types (PCTs), including potential habitat for 49 threatened flora and fauna species and 8 EPBC Act and/or BC Act-listed threatened ecological communities impacted by development facilitated through the Plan. The remaining areas include cleared land but with the potential for restoration of the Plan’s targeted threatened ecological communities.

Greens NSW welcomes the newly announced conservation reserves, but notes that only one of the reserves has been firmly committed to and that Stage 2 of this reserve will only be incorporated into the reserve by 2040.

The Greens NSW welcomes the Government’s commitment to prioritise the establishment of new public reserves within the first five years of the Plan’s implementation to deliver an upfront strategic offset for the area’s threatened ecological communities, species and their habitats. The priority reserves are the Georges River Koala Reserve, announced as part of the Plan, and two additional public reserves under investigation for feasibility:

- the Gulguer Reserve Investigation Area and
- the Confluence Reserve Investigation Area.

We also welcome the Government’s commitment of \$84 million to spend on implementing the Plan within its first five years. “This includes funding to plant 100,000 trees planned for restoring koala habitat in the Georges River Koala Reserve, establishing biodiversity stewardship sites on private land. We note that “other areas within the strategic conservation area have also been identified for further investigation as future reserves to provide greater landscape connectivity such as Bargo”.

The permanent reservation of this land is welcome. We recognise that some of this land is currently publicly held. The Office of Strategic Reserves, for example, currently owns around 60% of the 1,130 hectares of land to be initially set aside for the proposed Georges River Koala Reserve. We note that “the Plan’s conservation program will prioritise and fund on-ground actions to actively restore the vegetation communities in the Plan Area. Activities will include restoration of threatened ecological communities for up to 25% of the Plan’s target to secure 5,475 hectares of impacted native vegetation i.e up to 1370 hectares. Agreements will also be entered for biodiversity stewardships on private lands.

The Greens NSW has concerns with the developer contribution model. Funding for the program will be allocated annually at the same rate at which development is expected to occur in the Growth Centres, instead of being secured upfront.

Significant funding is required to implement the conservation program over the life of the Plan to 2056. We note that “the Plan proposes to fund the conservation program through developer contributions. The funding model proposes to recover costs from industry through a biodiversity component of a Special Infrastructure Contribution on development in the four Western Sydney nominated areas.

A Special Infrastructure Contribution for biodiversity of \$4,500 per dwelling was proposed in the Wilton and Greater Macarthur Growth Areas draft Land Use and Infrastructure Implementation Plans. The NSW Minister for Planning will consider a range of developer contribution levels, including full cost recovery, prior to making a final determination on the biodiversity component of the Special Infrastructure Contribution before the Plan is approved”.

Beyond the initial Government commitment to offset 5,475 hectares of impacted native vegetation within new conservation lands, Greens NSW shares the concerns of other stakeholders including the [Better Planning Network](#) that “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 or protected in other ways. Consequently, the Plan could face similar suitability and cost constraints to those already identified in the [Growth Centres Biodiversity Offset Program’s most recent annual report](#)”⁵. Specifically, “the biodiversity certification of the Growth Centres SEPP requires funding for the program to be allocated annually at the same rate at which development is expected to occur in the

⁵ Better Planning Networks submission to DPIE, The Draft Cumberland Plain Conservation Plan: An extinction plan for the South West Sydney Koalas and other Wildlife p.3. available at: https://d3n8a8pro7vhmx.cloudfront.net/betterplanningnetwork/pages/72/attachments/original/1601513593/Cumberland_Plain_Conservation_Plan.pdf?1601513593

Growth Centres. Funding projections are therefore calculated annually. These will vary from year to year”⁶.

“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 levied on developers, they are staged to coincide with the rate of development instead of being secured upfront”⁷.

The Plan provides no assessment about how the loss of so much rural land will impact the Sydney region’s food bowl capacity. 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 could 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 6% of demand⁸.

“The Plan acknowledges that the urban heat island effect in Western Sydney ”will increase as urbanisation increases,” but measures to mitigate its impact are minimal. 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”⁹.

⁶ Conserving western Sydney’s threatened bushland: Growth Centres Biodiversity Offset Program Annual Report 2018–19 p. 3. available at:

<https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Animals-and-plants/Biodiversity/growth-centres-biodiversity-offsets-program-annual-report-2018-19-200155.pdf>

⁷ Better Planning Networks submission to DPIE, The Draft Cumberland Plain Conservation Plan: An extinction plan for the Suth West Sydney Koalas and other Wildlife p.2. available at: https://d3n8a8pro7vhmx.cloudfront.net/betterplanningnetwork/pages/72/attachments/original/1601513593/Cumberland_Plain_Conservation_Plan.pdf?1601513593

⁸ Ibid. p. 3.

⁹ Ibid. p. 3.

The Plan 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. 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 8,292.46 hectares would need to be set aside for this purpose¹⁰.

The Plan does not emphasise adequately protecting koala habitat to achieve a recovering and healthy population. This is both shocking and surprising given that the recent fires have decimated the state's koala population¹¹. Last season's horrific bushfires killed thousands of koalas and destroyed over 3.5 million hectares, or 25%, of the most suitable koala habitat in eastern New South Wales¹². This includes moderate, high and very high suitability habitat. In fact, a recent study by Biolink, commissioned by the World Wide Fund for Nature Australia, reported an overall 71% 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 north¹³. The recent Upper House Inquiry into *Koala populations and habitat in New South Wales* found that, "given the scale of loss to koala populations across New South Wales as a result of the 2019- 2020 bushfires and without urgent government intervention to protect habitat and address all other threats, the koala will become extinct in New South Wales before 2050¹⁴.

Shortly after the fires the Minister for Environment and Energy, the Hon Matt Kean MP commented that "This season's significant bushfires have resulted in devastating losses to koala numbers across NSW, so it is imperative that remaining populations and habitat are protected"¹⁵. NSW Greens could not agree more.

The Plan does not accept the Chief Scientist's recommendation to secure all of the east-west habitat corridors for the koalas. The Plan acknowledges "east-west connectivity between the

¹⁰ Ibid. p.3.

¹¹ Ibid. p. 3-4.

¹² NSW Fire and the Environment 2019–20 Summary p. 17. available at: <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Parks-reserves-and-protected-areas/Fire/fire-and-the-environment-2019-20-summary-200108.pdf>

¹³ New WWF report: koalas suffer 71% decline across fire grounds. p. 3. available at: <https://www.wwf.org.au/news/news/2020/new-wwf-report-koalas-suffer-decline-across-fire-grounds#gs.i2hoys>

¹⁴ Legislative Council Inquiry into Koala populations and habitat in New South Wales p. xii. available at: <https://www.parliament.nsw.gov.au/lcdocs/inquiries/2536/Koala%20populations%20and%20habitat%20in%20New%20South%20Wales%20-%20Report%203.pdf>

¹⁵ Koala losses 'spectacularly huge' after NSW drought, bushfires. available at: <https://www.smh.com.au/environment/conservation/koala-losses-spectacularly-huge-after-nsw-drought-bushfires-20200218-p5420h.html>

Georges and Nepean rivers is important for the resilience of the Southern Sydney koala population,”¹⁶ but it discounts the recommendation made in a recent report prepared by the Chief Scientist’s expert panel, [Advice on the protection of the Campbelltown Koala population](#) (Chief Scientist’s Koala Report), to protect the habitat of the six east-west corridors. 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.”¹⁷ Only the Ousedale Creek to Appin North east-west corridor will be protected¹⁸.

The Plan has not adopted a holistic planning approach to protecting the South West Sydney koalas¹⁹. The Plan does not address the importance of maintaining the Woodhouse Creek to Beulah (east-west corridor) at Mount Gilead, which is 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. Nevertheless, 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... 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”²⁰.

The proposed construction of 120 km of Koala exclusion fencing will isolate and fragment an expanding and thriving koala population. While the [Chief Scientist’s 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

¹⁶ Draft Cumberland Plain Conservation Plan Sub-Plan B: Koalas. p.29
[https://shared-drupal-s3fs.s3-ap-southeast-2.amazonaws.com/master-test/fapub_pdf/00+-+CPCP/edited_5.+Draft+Sub-Plan+B+Koalas+\(in+template\).pdf](https://shared-drupal-s3fs.s3-ap-southeast-2.amazonaws.com/master-test/fapub_pdf/00+-+CPCP/edited_5.+Draft+Sub-Plan+B+Koalas+(in+template).pdf)

¹⁷ Ibid. p. 29.

¹⁸ Better Planning Networks submission to DPIE, The Draft Cumberland Plain Conservation Plan: An extinction plan for the South West Sydney Koalas and other Wildlife p.4. available at:
https://d3n8a8pro7vhmx.cloudfront.net/betterplanningnetwork/pages/72/attachments/original/1601513593/Cumberland_Plain_Conservation_Plan.pdf?1601513593

¹⁹ Ibid. p. 4.

²⁰ Advice on the Protection of the Campbelltown Koala population. p. Vi. available at:
https://www.chiefscientist.nsw.gov.au/___data/assets/pdf_file/0005/318830/Koalas-Advice-Final.pdf

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"²¹. The Plan also doesn't specify an adequate number of koala underpasses or suitable crossings across busy Appin Road²².

If the proposal to build 120 km of koala fencing is implemented without an adequate number of appropriately sized movement corridors, koalas may become trapped. The Chief Scientist's 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"²³. 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"²⁴. Effectively this habitat corridor will become a functional 'dead-end'²⁵.

The Plan includes insufficient measures to mitigate the effects of climate change on wildlife.

The report acknowledges that "climate change is likely to introduce additional threats and exacerbate ecosystem stressors such as fire, disease, pests and weeds. Government commitments include funding research to identify the most at-risk species and ecological communities, and identifying priority locations, such as climate refugia, to support the persistence and adaptation of at-risk species and ecological communities"²⁶. Given the ferocity of last summer's fires Greens NSW believes more is required in terms of action from the State Government on climate change.

Summary

²¹ Ibid. p. xi.

²² Better Planning Networks submission to DPIE, The Draft Cumberland Plain Conservation Plan: An extinction plan for the South West Sydney Koalas and other Wildlife p.4. available at: https://d3n8a8pro7vhmx.cloudfront.net/betterplanningnetwork/pages/72/attachments/original/1601513593/Cumberland_Plain_Conservation_Plan.pdf?1601513593

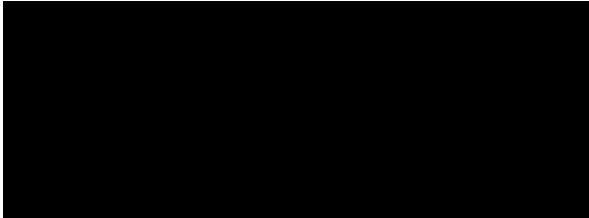
²³ Advice on the Protection of the Cambelltown Koala population. p. 32. available at: https://www.chiefscientist.nsw.gov.au/_data/assets/pdf_file/0005/318830/Koalas-Advice-Final.pdf

²⁴ Ibid. p. x.

²⁵ Better Planning Networks submission to DPIE, The Draft Cumberland Plain Conservation Plan: An extinction plan for the South West Sydney Koalas and other Wildlife p.4. available at: https://d3n8a8pro7vhmx.cloudfront.net/betterplanningnetwork/pages/72/attachments/original/1601513593/Cumberland_Plain_Conservation_Plan.pdf?1601513593

²⁶ The Draft Cumberland Plain Conservation Plan p. 41. available at: [https://shared-drupal-s3fs.s3-ap-southeast-2.amazonaws.com/master-test/fapub_pdf/00+-+CPCP/edited_2.+Draft+Cumberland+Plain+Conservation+Plan+\(in+template\).pdf](https://shared-drupal-s3fs.s3-ap-southeast-2.amazonaws.com/master-test/fapub_pdf/00+-+CPCP/edited_2.+Draft+Cumberland+Plain+Conservation+Plan+(in+template).pdf)

In summary, the Greens NSW do not believe this Plan is sufficient to facilitate the biocertification of 10,470 hectares of the Cumberland Plain as ‘urban capable’ land available for development. Such development will have unacceptable risks on the Southern Sydney koala population and goes against the Chief Scientist’s recommendations. We urge the Government to reassess the need to develop in this area due to its unacceptable impact on the local environment and the government’s commitment to save koalas in NSW from extinction.



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