



Green and Resilient Places Division
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Draft Cumberland Plain Conservation Plan

The National Trust of Australia (NSW) take the opportunity to comment on the Draft Cumberland Plain Conservation Plan (The Plan). The National Trust included the *Cumberland Plain Remnant Communities* on the National Trust Register in 1986. These remnants including Long Neck Lagoon, Agnes Banks, Riverstone, Castlereagh State Forest, Marsden Park, Mulgoa, Prospect, Kemps Creek, Nortons Basin, Hawkesbury, Marayong and Carysfield Park, were listed as they are representative of the remaining major stands of vegetation naturally occurring in the drier part of the Cumberland Plain. The remnants were identified as having high conservation status because they:

- Contain rare and endangered plants;
- Are important habitats; and
- Are an important educational and scientific resource.

The preparation of the Plan has included many assessments, studies and consultations, which are thorough and comprehensive. The planning controls proposed to be set in place under the *Environmental Planning and Assessment Act* to protect the biodiversity and ecological values within the area covered by the Plan are comprehensive.

The detailed consultation undertaken with the community throughout the process, especially the involvement of Aboriginal communities from the pre-planning stage through to the preparation of the drafts is to be commended. The plan is comprehensive in addressing many challenges faced by the Cumberland Plain including climate change, and provides an explanation of how these problems will be addressed and issues resolved.

The Trust has several concerns with the Plan being:

1. Offsets

The Plan states that when selecting conservation lands as offsets they should as a first option be secured in priority areas within the Plan's strategic conservation area and secondly, from elsewhere within the Plan's strategic conservation area. The Biodiversity Stewardship Site program however, provides contingencies for lands to be selected from subregions adjacent to the Cumberland Plain or as a last option, anywhere else in NSW.¹ The Trust believes that any offsets should be secured from

¹ Department of Planning, Industry and Environment (NSW) 2020. *Draft Cumberland Plain Conservation Plan*, [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), p.73-74.



within the area of the Plan's strategic conservation area. Offsets should result in equal or greater biodiversity outcomes or the development should not go ahead.

2. Aboriginal fire management strategies

Fire management in the Plan aligns with NPWS and RFS fire strategies. Aboriginal fire strategies should also be acknowledged and we suggest that Aboriginal communities could be consulted regarding the development of fire management plans within the Cumberland Plain.

3. 5 year review

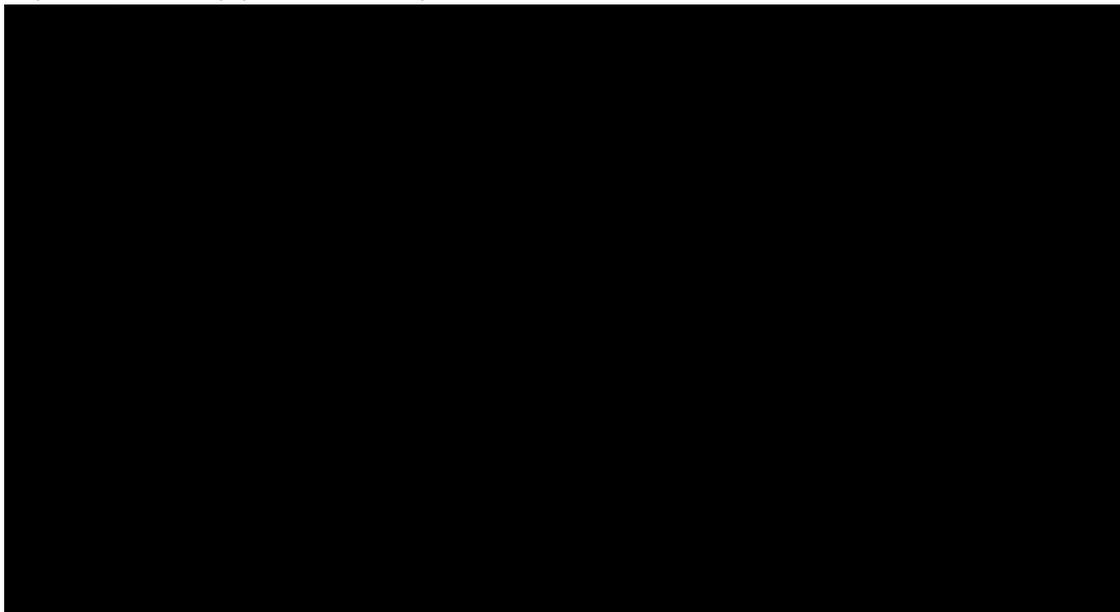
The Plan will require significant resourcing, both in finances and staff, in its ongoing implementation. Over such a long time frame and with so many authorities involved, the implementation of the Plan will need careful and ongoing oversight to achieve the desired conservation outcomes. Independent reviews commissioned by the Department are proposed to be undertaken every 5 years.² The requirement for these reviews should be required by legislation.

4. Review of the EPBC Act

The Plan has been prepared to facilitate the biodiversity approvals under the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999*. This Act has recently been reviewed and a revised draft has been submitted to Parliament for consideration. The final provisions of the Draft EPBC Act should be known before the Plan is finalised to ensure that it will provide the necessary safeguards for the implementation of the Plan.

5. Meaningful site planning

The National Trust has serious and warranted concerns about the eventual form that the development of the Cumberland Plain will take. The following screenshot, from a public webinar on the proposal, represents the very worst aspects of proposed development. Houses jam-packed into new subdivisions with no space for any effective planting for future habitat, and a sad monument on the hill to the one tree which has survived – itself now surrounded by a concrete pathway. This is not “avoiding impacts to biodiversity on a landscape scale”. Biodiversity occurs throughout the entire Cumberland Plain and needs to continue to do so in the future, not just in designated areas. Any true commitment to supporting biodiversity and growth needs to include those areas proposed for development, not simply the leftover spaces which surround them.



² Ibid, p.3.



The National Trust will be happy to engage with you further on this matter should you wish.

Kind regards,



Conservation Director