

The Director General  
Department of Planning Industry and Environment

Submitted online

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9 October 2020

## Draft Cumberland Plain Conservation Plan

The National Parks Association Macarthur Branch (NPA Macarthur) is the longest established environment group in the Macarthur region. Since the Branch formation in 1975 our members have worked to protect and conserve bushland areas in the Campbelltown, Camden, Liverpool and Wollondilly local government areas and further afield.

In 1988 Macarthur Branch proposed the creation of the Dharawal Nature Reserve and the Upper Georges River State Conservation Area. . This campaign aim was partially realised by the creation of the Dharawal National Park in 2012. More recently the Branch has proposed a national park on the western side of the upper Georges River and also a Bargo-Nepean National Park. The Branch has also supported calls for the protection of the Upper Nepean and Cumberland Plain vegetation throughout the area. Since the Branch's beginnings our members have bush walked throughout the area; fought bush fires; conducted biodiversity surveys, koala tracking, platypus surveys; advocated for the protection of cultural, biodiversity and landscape values of the area; staffed information displays at fetes and agricultural shows; given talks to schools and service clubs; introduced hundreds of people to the area through community college courses and walks; run a Nature Talk program and lobbied local councils and successive State Governments to protect these areas.

## The Draft Plan

NPA Macarthur opposes the draft Cumberland Plain Conservation Plan as it will facilitate development in a streamlined fashion allowing developers to destroy 10% of the remaining critically endangered ecological community – Cumberland Plain Woodland while effectively receiving discounts on requirements of the existing planning process. The document is not so much a conservation plan, rather it provides a pathway to destruction of important habitat and the facilitation of development through a streamlined development approval pathway. The approval of developments such as the M9 Motorway and railway line are not intended to be developed within the next decade. A 2020 environmental approval for a 2030 development is an inappropriate planning measure. The development should be assessed within the environmental and social context of the time that it is commenced.

The draft plan demonstrates the failure of the offsetting system. Areas previously conserved as offsets will be destroyed under the draft plan.

We object to the use of lands already acquired by the State Government for conservation/passive recreation being nominated as biodiversity offsets for development. The draft plan proposes the destruction of bushland within parts of two existing NPWS reserves. This is a deplorable situation. The National Parks estate should be protected and enhanced for future generations

### **Proposed Koala Reserve**

NPA Macarthur has campaigned for the protection of the Georges River Regional Open Space (GRROS) through dedication as part of the national parks estate. We are alarmed that the Government has failed to identify what form the proposed Koala Reserve will take and look back to 1993 when a Liberal/National State Government made a commitment to conserve the O'Hares Creek catchment and delivered a Crown Reserve. The most appropriate land manager for the new reserve is the National Parks and Wildlife Service and the most appropriate reservation is as a national park.

#### A history of poor management

NPA Macarthur has been alarmed over the lack of management that has been afforded to acquired lands in the decades since the GRROS lands were identified. We have seen instances of Campbelltown Council illegally dumping fill in parts of the reserve and discharging waste water from street sweep trucks in other areas. We have alerted Council and the Dept of Planning, Industry and Environment (and its predecessors) to breaches in gates, fences/barriers that have been made to allow individuals to dump rubbish, collect bush rock, fell koala trees for firewood, extend their back yards and access bushland areas for illegal vehicle activity. Stormwater runoff from encroaching development and inappropriate land use in scenic protection areas has increased weeds and reduced water quality. There has been little to no control of feral animals in the area. The values of the GRROS have been and remain under threat because there is no management regime in place. Councils are to be commended for the enforcement work they have done however it is an insufficient level of management to adequately protect the area.

#### Why the delay in dedication of the Koala Reserve?

Acquisition of the GRROS commenced in the 1970's. Councils from across Sydney contributed to the funds put in place to acquire the GRROS and by 1990 around 90 percent of the earmarked land was within government hands.<sup>1</sup>

NPA Macarthur questions why most of the GRROS cannot be dedicated as a reserve within the National Parks estate now. We understand that some areas outside of the identified GRROS have been identified for inclusion within the new reserve, however we argue that the majority of the best conservation lands are already within public ownership. We understand that as of January 2019, 78 hectares of land identified for acquisition by DPIE remained in private hands. We ask the State Government to abandon owner initiated acquisition for an

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<sup>1</sup> Purdon Associates, 'Summary Report For Discussion with Campbelltown, Liverpool and Wollondilly Councils Georges River Regional Open Space Study' (1989)

active buy back to complete the GRROS acquisition process. We note also that northern areas of the proposed koala reserve include areas of core koala habitat that should be under active conservation management.

#### Georges River Parkway

Parts of the Georges River Parkway road reservation are shown in mapping to be located within the proposed Koala Reserve while other parts of the Georges River Parkway are located outside the reserve. We call on the Government to publically state that this planned road will not go ahead and to include it within the boundaries of the proposed Koala Reserve.

#### Large Areas of GRROS/Koala Habitat Not Protected

Large areas of GRROS bushland in public ownership and comprising significant Koala habitat in Myrtle Creek (Minto Heights) and Peter Meadows Creek (Minto Heights/Kentlyn) has been left outside the proposed Reserve area. These areas have demonstrated very high levels of use by Koalas in recent years. The areas also contain significant sites of Aboriginal cultural value. For example, the upper reaches of Peter Meadows Creek contain the important 'Bull Cave' and 'Birthing Cave'. They form an important component of the GRROS and we believe that they should be included within the Koala Reserve. It is important for the State Government to state what the future management of these significant bushland areas will look like if they are left out of the new reserve. These areas should be conserved within the National Parks Estate.

#### Cooperative Management of bushlands on the western side of the Upper Georges River

Irrespective of the timeline for dedication of portions of the Reserve we urge the State Government to seek to develop a Cooperative management model for the Reserve and any future additions, H Range (defence), Local Aboriginal Land Council land (including former Wedderburn State Forest and former Crown Reserves now owned by Land Councils). This model/plan should involve Campbelltown and Wollondilly Councils and include a regional approach to the management of access/recreation points including Simmos Beach, Ingleburn Reserve, The Basin/Keith Longhurst Reserve, The Woolwash and any other planned visitor access points in the southern portion of the Reserve.

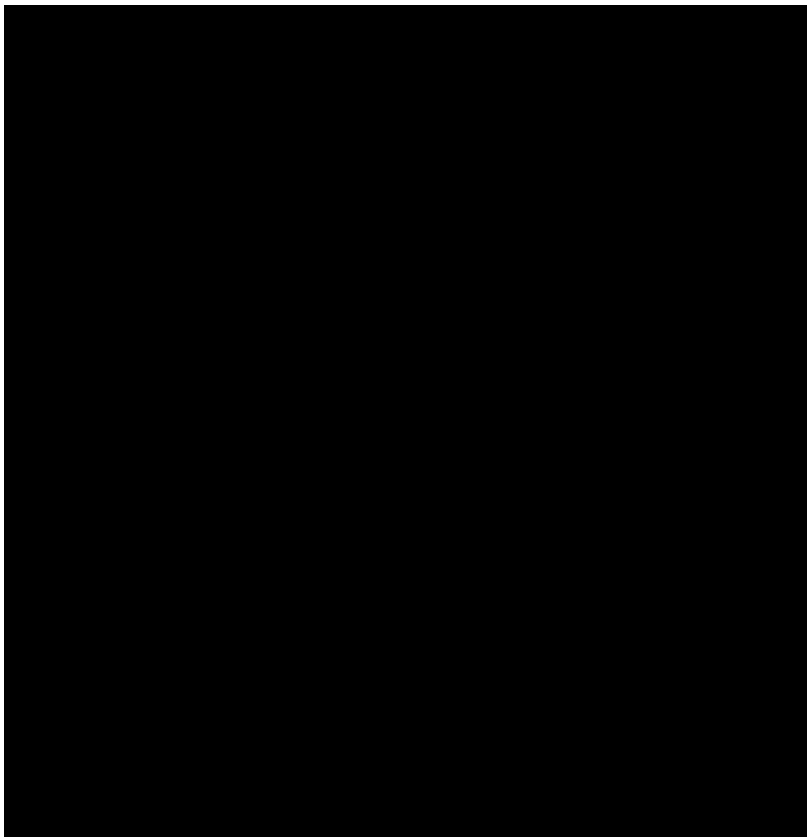


Fig 1. Reserve boundary (Purple) Important Koala Habitat (Green). Peter Meadows and Myrtle Creek areas (Minto Heights, Kentlyn) outside boundary of reserve but largely owned by the Dept.

#### Additional Lands/Corridors

We urge the State Government to plan for and protect biodiversity corridors between the proposed Koala Reserve and the Nepean River Gorge. The six existing corridors should be enlarged to better protect koalas and other species. The corridors should be provided with over/underpasses where they are cut by Appin Road. We support the provision of koala fencing along Appin Road. We seek the inclusion of Noorumba Reserve (Campbelltown City Council) and Beulah (Historic Houses Trust) together with riparian corridors west of these parcels to protect these east/west corridors.

#### Anomalies in mapping

Several areas of draft plan mapping do not accord with the current Local Environment Plan<sup>2</sup> acquisition map. For example, Fig 2 shows a section the LEP acquisition map to the left of a portion of the draft plan mapping for the area in the vicinity of Ingleburn Reserve. Portions of the GRROS that have dwellings are excluded from the Reserve. Fig 3 shows a portion of the Campbelltown LEP Acquisition map on the left and the draft plan map for a portion of the proposed Koala Reserve at Howard Street, Minto Heights. Portions of land identified for acquisition that have structures have been excluded from the proposed koala reserve. These areas include the *Minto Bush Camp* and *Vijayaloka Buddhist Retreat Centre*. The practice of DPIE and its predecessors has been to demolish structures within the GRROS. We believe that these areas should be included within the Koala Reserve. In the case of Howard Street in

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<sup>2</sup>Campbelltown Local Environment Plan 2015 (NSW).

particular, removing the inclusion of the areas currently outside the reserve would provide a hard edge which would improve management outcomes.

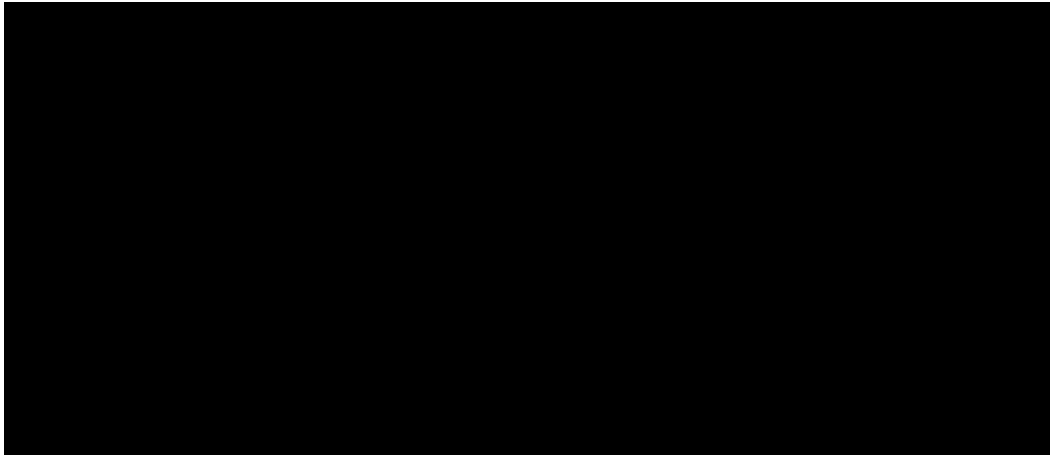


Fig 2. Campbelltown LEP map and draft Cumberland Plain Conservation Plan area for Ingleburn Reserve vicinity.

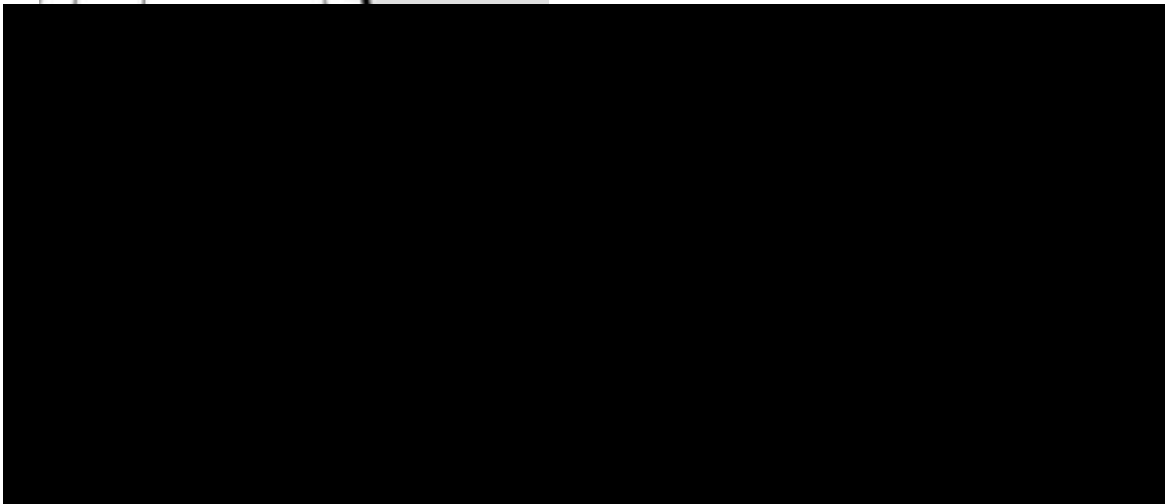


Fig 3. LEP Acquisition map next to reserve area map. Howard Road Minto Heights - Minto Bush Camp and Vijayaloka Buddhist Retreat Centre are shown on Campbelltown LEP land acquisition map as regional open space (acquisition by Dept Planning but sections at the front of these properties appear to be outside the boundary of the reserve

See also Fig 4, Hamilton/Harrison Roads, Kentlyn.

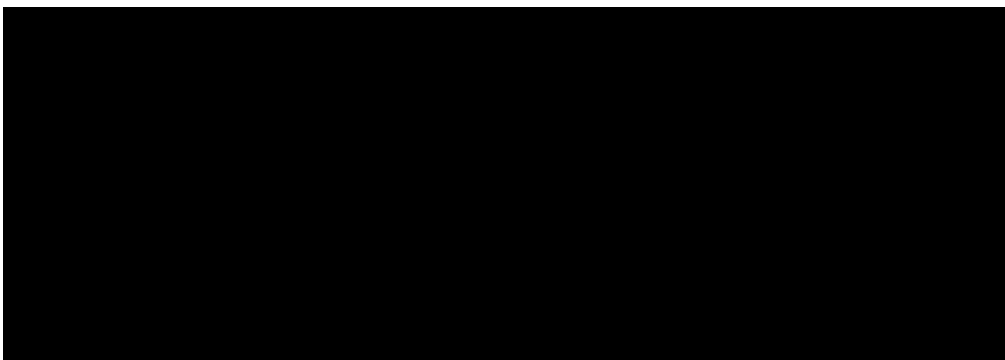


Fig 4. Reserve boundary map/Zoning map Hamilton/Harrison Road, Kentlyn.

At Long Point we think that there is an opportunity to include include parts of the GRP within the Reserve south and north of Oakley Road (Fig 5).

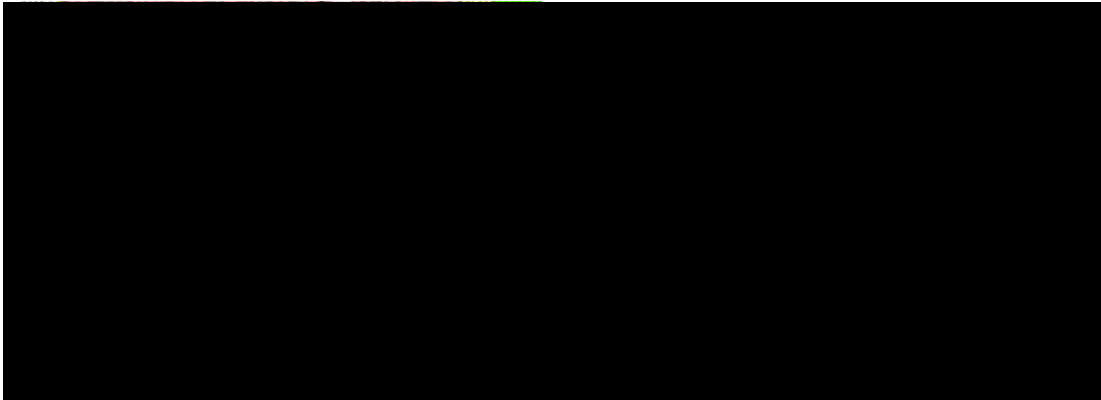


Fig 5. Long Point Regional Open space lands and Parkway land that could be included.

Roads providing access to the proposed Koala Reserve (for example Fig 5) should be included within the boundaries of the Reserve in order to allow for better management of the Reserve and easier enforcement of access rules.

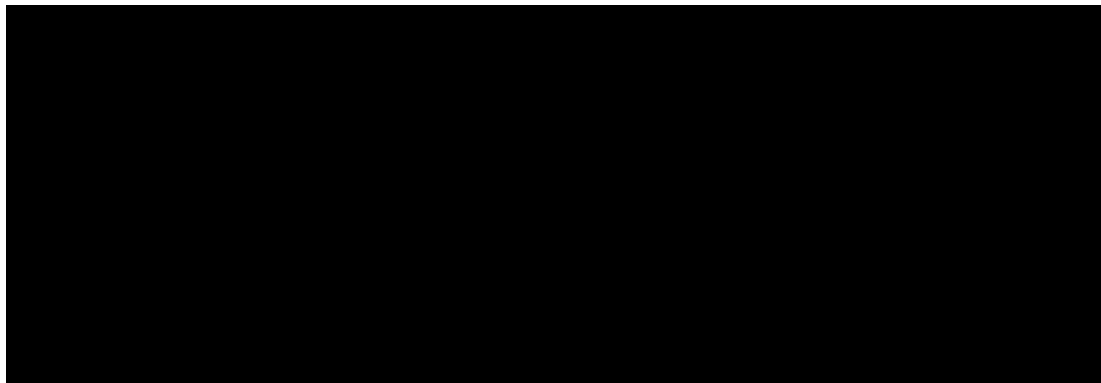


Fig 5. Bensley Av x Mercedes, include the road inside the reserve.

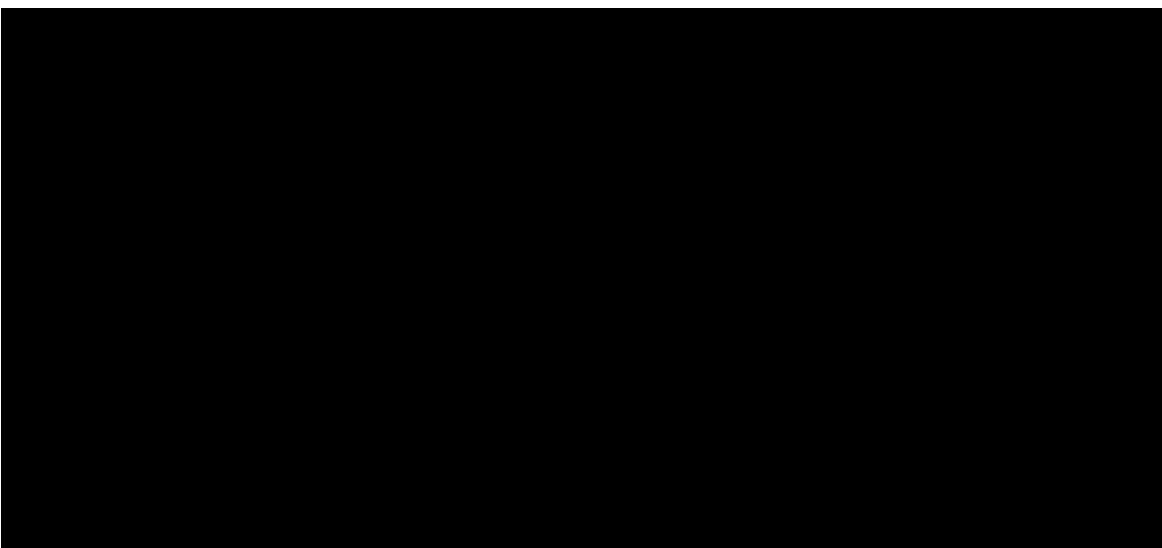


Fig 6. LEP Acquisition map next to reserve area map. Former area of the gut scraper factory (Kentlyn) excluded from the Reserve. Funding should be provided to rehabilitate gut scraper waste water treatment facility.

The Georges River Regional Open Space is an outstanding area of bushland that contains significant biodiversity, cultural and visual values. We are grateful for the foresight of past governments to plan for the area and to progressively acquire it. The area is almost entirely within Government hands now. The values of the area are however under threat because of a lack of management. The remaining private property should be actively acquired by the State and the entire area should be dedicated as a national park as a matter of urgency.

Yours sincerely

Tim Carroll  
On behalf of the National Parks Association of NSW  
(Macarthur Branch)