

By email: biodiversity@planning.nsw.gov.au

SUBMISSION ON THE DRAFT CUMBERLAND PLAIN CONSERVATION PLAN

I wish to object to the Draft Cumberland Plain Conservation Plan (“the Plan”). Its name is a misnomer as it permits wide scale destruction of endangered ecological communities and the habitat of threatened animal and plant species. For example, the Plan would permit destruction of approximately 16% of the remaining critically endangered Cumberland Plain woodland.

The Plan’s actual purpose is to facilitate strategic biodiversity certification from the state and federal governments to allow further development to occur. Biodiversity certification enables offsetting to occur. Offsetting results in a net loss of threatened habitats and/or endangered ecological communities. Further, offsets are not protected in perpetuity and can still be developed in the future or used as an offset for a subsequent development.

The Plan also reduces what remains of Sydney's green belt. In doing so, destroying the ability of the Sydney Basin to meet 20% of the Sydney’s fresh food needs. The Plan would allow the release of 10,000 ha of ‘urban capable’ rural land for development without requiring further environmental impact assessments.

Other major concerns about the Plan are:

1. Inadequate and inappropriate measures to protect koalas

One area, the Georges River Koala Reserve, is proposed for koala conservation but it is inadequate to support a viable population of koalas. Further, this reserve may not be established until 2040. Two other areas, the Gulguer and the Confluence are identified for further assessment of their feasibility as future koala reserves. There is no guarantee that the two additional areas will be protected from development.

The Plan's proposed construction of 120 km of koala exclusion fencing will isolate and fragment koala colonies. The Plan protects only one of the six east-west movement corridors recommended in the Chief Scientist and Engineer’s Koala Report.

2. The Plan will lead to fragmentation and loss of ecological resilience

The extent and nature of developments proposed will further fragment endangered ecological communities and the habitats of threatened species. This fragmentation will reduce the ecological resilience of the fragmented areas making it less likely that communities will adapt to climate change.

3. Pre-approval for major projects


The Plan purports to give approval to major infrastructure projects such as the Western Sydney Orbital motorway at least a decade before the proposed construction date. This is outrageous given the uncertainty about when land will be acquired for conservation. The differing approach to achieving conservation aims and development goals again highlights that the Plan promotes development and not environmental conservation.

4. Inadequate funding for Conservation

Funding for infrastructure is in the order of billions of dollars whereas \$84 million is available for conservation. The conservation funding is inadequate to achieve even the very limited conservation outcomes under the Plan.

5. Offsets not in perpetuity.

It is concerning that land that was set aside as an offset is now proposed for development including land in Wianamatta Regional Park and land proposed to be reserved as Colebee Nature Reserve. Unless offsets are protected in perpetuity, the conservation benefit from offsetting can be negligible or non-existent if subsequent development is allowed on the offset.


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