

Draft Cumberland Plain Conservation Plan Submission to the NSW DPIE

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Standing – relevance to conservation of the Cumberland Plain Woodland

I have a long-term commitment to environment protection of the Cumberland Plain, apparent from my education, professional and practical experience.

- Formerly, worked as Program Manager for the Outer Sydney Region the Hawkesbury-Nepean River catchment, governed by covering 14 LGAs in the Operations Division of the NSW EPA – reviewing development plans, inspecting, and witnessing the effects... subsequently taught at Institute of Environmental Studies (UNSW) on human health aspects of climate change, and worked as an environmental lawyer assessing EISs...
- Currently, a member of National Parks Association NSW and Cumberland Land Conservancy (CLC)¹. With CLC, participated in educational activities

¹ For an understanding of this group and the four parcels of lands it manages, see an annual report: https://cumberlandlc.org.au/wp-content/uploads/2019/01/CLC-annual-report-2017_18-_4_web_final.pdf

(talks/walks, and 'citizen science'), undertaken bushcare to enable regeneration on lands adjacent to native vegetated land, including the hand removal of African Love-Grass, sometimes working alongside people paid as part of a social support program;

- Education - Undertook fieldwork in Rickaby's Creek while studying *Aquatic Ecology* at University of Western Sydney and completed a Master of Environmental Studies electing specialist subjects with considerable fieldwork: *Biogeography* and *Conservation Biology & Biodiversity* (distinctions awarded for both).

Through these experiences (and using 'program logic'!), I learnt that **to protect land² with existing native vegetation needs to inform and be the absolute priority of any conservation program.**

Protection measures for any land with existing native vegetation can be many and varied, depending on the site and opportunities. For example, adjoining lands, and on-site bush regeneration by weed and feral animal control.

The DPIE's proposals and basis for conserving biodiverse land

- read the October 2019 DPIE Powerpoint (30 pages) presentation (Steerbeke) to a workshop for the Community Reference Group
- consulted 2020 DPIE's documents on public exhibition, especially the Draft Plan and Sub-Plan A.

The starting point of the 2019 Powerpoint presentation is an existing legal framework and the operating premise of using land offsets as the major policy, directed to an ambiguous goal for "landscape conservation outcomes". Page 6 refers and presumes restoration would and can be for "securing biodiversity outcomes". The remainder is about "delivery" - ripping up lands and planting etc.

This gives clear indication that revegetation is strongly in play. It was also mentioned that revegetation will occur in the land which is in the area of Bent's Basin.

The later 2020 Draft CPCP mentions the Community Reference Group but not their endorsement or objection to the operating premises that an 'offset policy' and 'revegetation' would contribute to conserving the Cumberland Plain. Both these notions have fallen into disrepute following evaluation in practice.

The Draft CPCP (p.10) declares using 'program logic' setting out its

vision: support Western Sydney's biodiversity and growth [that's urban growth] - essentially it is a Plan to change the uses of land to further urban development while seeking to conserve some land for ecological communities of this unique

² the physicality of land risks being obscured in discussions about landscapes and biodiversity.

geological/alluvial sub-region, for which the touchstone is biodiversity. Will it work?

objective: to deliver biodiversity outcomes and support the ecological function of the Cumberland Plain, improve ... urban development...

A good objective, so let's check the program logic!

DFAT states that Program logic requires "Having a **sound evidence base is critical** for a good program logic."³

Program logic requires sound evidence - ecology of the Cumberland Plain

It is not apparent that the DPIE team have 'problematized' the challenge of conserving biodiversity of the Cumberland Plain – the state of the ecology and declines in the face of planning mechanisms and legislation, and whether proposed mechanisms (offset policy and land restoration) is fit for purpose.

Although the Draft Plan articulates the **principle to conserve lands with existing native vegetation (highest ecological value of biodiversity) as a priority**, it proposes to adopt and invest in discredited methods:

- Proposing to acquire cleared land, even land subject to flooding, for "restoration" by re-vegetation, E.g. The Confluence. This method is discredited – see the research literature, for example, cited below.

Similarly, while apparently recognising the contribution of bushland strips as corridors and buffer zones, the *Draft Plan* has omitted to map and nominate **significant corridors** – this **needs to be remedied in the final Plan**.

Sub-Plan A lists generic "guiding principles", particularly Principles 1 to 6 (p.21) and a diagram on page 25 illustrates a conservation program – a risk management framework – with five component actions (here as "commitments" in Draft CPCP language). Conserving biodiversity relies upon the continued existence of Cumberland Plain ecological communities. It is the geological history and alluvial river systems, albeit modified by recent human intervention, that have created these communities and only found here. The Cumberland Plain formed by the river systems and alluvial soils which has changed with urban development by land clearing and sealing surfaces. The soils of the Cumberland Plain, differ from the sandstone country to the east and west, created ecological communities of plants and animals, only found in this region – they are not found anywhere else in the world.

³ <https://www.dfat.gov.au/sites/default/files/explanatory-note-on-program-logic.pdf>

Therefore, the application of the economic idea of land offsets, substituting one parcel of land for another as if the parcels are equivalent (in place and in time), bears a high risk for ecological integrity and conservation of the habitats.

Some research literature and Cumberland Plain assessments

Reports on the status of the environment on the Cumberland Plain for future conservation purposes identify lands that could be conserved and a rationale for doing so, for example:

- Cumberland Conservation Network ... *State of the Cumberland Plain 2017-18*⁴. This report identifies lands which are obtainable that is parcels which the owner may be willing to sell or to enable ecological conservation. This pragmatic approach could enable conserving some of the more precious/species-rich parcels and/or parcels that are situated in relation to other parcels and thereby function as corridors, buffers, and seeding places. Such locations have been developed by ground-truthing and provide a more robust source than areas marked in the DPIE's CPCP Strategic Conservation Areas (from aerial mapping).

Two scientific papers bear upon the program outlined by the DPIE's proposals:

- 1) A September 2020 paper in *Nature* recognised that "...limiting further loss will remain challenging in several biodiversity-rich regions".⁵ The title declares what's needed: ***Bending the curve of terrestrial biodiversity needs an integrated strategy*** [emphasis added]. They point out Increased efforts are required to prevent further losses to terrestrial biodiversity and the ecosystem services that it provides.
- 2) 2014 paper by Curran, Hellweg and Beck,⁶ ***Is there any empirical support for biodiversity offset policy?***

This paper presents research investigating the assumption that habitat restoration works! Its conclusion: "Restoration offset policy therefore leads to a net loss of biodiversity ..." referring to loss of species richness and time lags associated with restoration.

With regard to our concerns for Cumberland Plain ecology, Curran's paper demonstrates that the conservation of intact bushland exceeds the results achieved by revegetation.

⁴ <https://greatersydneylandcare.org/wp-content/uploads/2018/10/GSLN-CCN-State-of-the-Cumberland-2018-GSLN.pdf>

⁵ Leclere D., Obesrsteiner M., Young L. "Bending the curve of terrestrial biodiversity needs an integrated strategy", *Nature* Volume 585, PP 551-556., 10 September 2020. <https://www.nature.com/articles/s41586-020-2705-y>

⁶ Curran et Al. (2014) "Is there any empirical support for biodiversity offset policy? *Biological Applications* 24(4) pp.617-632 - <https://www.jstor.org/stable/24432178?seq=1>

It is well known now that Cumberland Plain Woodland is not restored by the “scalp and seeding” techniques. Olling’s (2019)⁷ paper provides “an [longitudinal] analysis of four of the several plots on the Cumberland Plain where ground scalping and direct seeding has been undertaken”. While the scalping and direct seeding does have some applications, for conserving Cumberland Plain ecology, Olling concludes: “Not for a moment should scalping and direct seeding be contemplated as an alternative to preserving intact or reasonably intact stands of threatened ecological communities.”

The Confluence would not be a good investment. Revegetating this land at expense of securing good bushland elsewhere would be a bad mistake, especially since this is a major flood plain which will keep bringing in weeds from upstream in flood events.

In practice, this means that the proposed “revegetation” of The Confluence (degraded, compacted, flood-prone land) should be withdrawn. It has no support, to my knowledge, from any environmental experts.

Replace DPIE’s proposal for The Confluence with investments in land that have superior ecological contributions!

Some proposals of the Draft Plan conflict with its own vision “support Western Sydney’s biodiversity”

- the proposed destruction of Cumberland Plain Woodland and isolation of patches of existing native vegetation > clearing of 10% of the entire (remaining) Cumberland Plain Woodland ecosystem
- the proposed destruction of native vegetated lands in existing National Parks and on lands gazetted Conservation Areas
- the proposal to relabel and assign public reserves as offsets for developers – thereby removing the better option to fund farmers and landholders to conserve bushland on their lands.

Exhibited documents describe proposals, over the next 35 years, for future uses of lands covering 200, 000 hectares in eight local government areas of Western Sydney.

The Minister for Planning and Public Spaces, Rob Stokes referred to this planning exercise as “a 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”. How can this Plan be modified to have a less harmful result for Cumberland Plain ecology and koala habitat?

⁷ <https://greatersydneylandcare.org/wp-content/uploads/2020/09/Revegetation-CPW-is-not-restored-by-ScalpSeed-techniques-BDEG-2019.pdf>

Koala habitat protection

The *Draft CPCP* proposals for koala protection **fails to adopt the integrated package of measures recommended for the healthy Campbelltown koala population** by the NSW Chief Scientist and Engineer, in April 2020.⁸ The *Draft CPCP* chooses fencing without the associated buffer zones, for example, exposing these (and other) animals to unnecessary risk

For Koala conservation, environmental groups stress:

- Timing – The need to expedite completion of the Georges River Koala National Park within the next five years, not by 2040 as proposed in *Draft CPCP*.
- Giving priority to the proposed Nepean-Bargo National Park since it would serve not only as habitat for iconic koalas but other species, under even greater threat of extinction, such as the Squirrel Glider. Only part of the requisite lands is shown in the Draft CPCP strategic conservation area.

The greater value of these lands over lands proffered in the Draft CPCP: The Confluence and Gulguer additions (not on Cumberland shale soils, anyway).

For koala protection I support suggestions made by other groups that DPIE revise its Plan to:

- a) protect a 500 m wide koala corridor at Mount Gilead
- b) tunnel 2 km to save Wianamatta Regional Park
- c) extend the Camden Tunnel 4 km south and 6 km north – saving EMAI-to-Razorback Wildlife Corridor, Cobbitty Hills & home.

Requested changes

These are made throughout this document – my apologies for running out of time to list them all here!

- A switch from “restoration” to acquisition and protection of existing native vegetation – specifically replacing The Confluence proposal with superior land parcels.

I am concerned to have read of the apparent omission of a survey of Aboriginal sites and the proposed destruction of at least two burial grounds. Can DPIE remedy this oversight?

⁸ NSW Chief Scientist and Engineer (30 April 2020) *Advice on the protection of the Campbelltown Koala population* Koala Independent Expert Panel:
https://www.chiefscientist.nsw.gov.au/__data/assets/pdf_file/0005/318830/Koalas-Advice-Final.pdf

Further remedies would be to

- Continue the Community Reference Group and develop an implementation strategy with appropriate staging to ensure delivery of offsets being contingent for further development of the Western Sydney Growth centres
- Ensure budget priorities are to acquire parcels of land with existing native vegetation and to assign Crown lands for conservation.

In general, I support the proposals from Greater Sydney Landcare.

Thank you for this opportunity to contribute to the development of a more effective program to conserve the Cumberland Plain Woodland, in particular, as habitat for native flora and fauna and retain this unique environmental landscape.