

Please find below my submission to the Draft Cumberland Plain Conservation Plan.

You can include my name and submission on your website.

I **object** to the proposed Plan.

Climate Change and Excessive heat

Although the Plan acknowledges the expected increase in temperatures in Western Sydney due to Climate Change and that this will be exacerbated by the *urban heat island effect*, the measures outlined in the Plan to address this, are inadequate. The 5 Million Trees for Greater Sydney Program would not make up for the potential loss of 1,014.6 hectares of critically endangered Cumberland Plain Woodland with its mature trees. Apart from the fact that the loss of the CPW trees would also mean the destruction of whole ecological communities and could not be replaced by a tree planting program which would be staged over many years and thus take many more years to reach maturity. Meanwhile the impact on the whole ecology of the CPW would be catastrophic resulting in the death of countless animals including koalas and the decimation of this unique woodland.

In an article in the SMH on October 5 [The Sydney suburbs that hit 50C last summer](#) it states that:

Sydney's hottest area reached temperatures above 50 degrees across several locations on three separate days last summer, according to Western Sydney University researchers urging authorities to put in place new heatwave measures for the upcoming season.

According to a study conducted by Pfautsch, & Rouillard from Western Sydney University entitled [Benchmarking Heat Across Cumberland Council, New South Wales](#) (2019) communities living in Cumberland Council LGA are experiencing extreme heat more frequently than previously known.

If the Western Parkland City meets its projected population growth of 1.5 million by 2056, temperatures will be even hotter from tree clearing and the “large amounts of hard and dark-coloured surfaces such as roads and roofs” (The Draft Cumberland Plain Conservation Plan p68).

Any increase in temperatures in South Western Sydney is going to make it unliveable for humans and wildlife alike. People with compromised health are already vulnerable during heatwaves as are animals.

The AMA has joined other health organisations around the world – including the American Medical Association, the British Medical Association, and Doctors for the Environment Australia – in recognising climate change as a health emergency. [AMA Sept 2019](#) It warns that there are serious impacts on human health and human wellbeing such as higher mortality and morbidity from heat stress; higher incidence of mental ill-health and increases in the transmission of vector-borne diseases.

This is not only a serious issue for humans but will be devastating for our wildlife. Koalas are going to really suffer as their body temperatures are between 35 and 36 degrees (while humans 36 and 37 degrees). This is an animal welfare issue and should not be dismissed.

Ignoring the advice of the Chief Scientist

The Plan has not adhered to the advice of the Chief Scientist and the **Independent Expert Panel** (see "Advice on the protection of the Campbelltown Koala population" 30 April 2020). It has not protected all six of the east-west movement corridors and dismisses the importance of these corridors in favour of unspecified "scientific advice from the department and the research community". The Chief Scientist has indicated that **six koala bushland corridors** between the George's and Nepean Rivers

bushland are necessary to ensure the survival of the koalas by enabling them to re-populate good habitat on the Cumberland Plain, and reach beyond to the Blue Mountains. The CPCP only guarantees one.

The plan does not reflect scientific advice that koala corridors need to be at least 425m wide. The priority koala corridors of this width should be at Noorumba Reserve and Beulah-Woodhouse Creek, at Mt Gilead. The Koala Reserve must include the important Peter Meadows Ck koala habitat, and abandon the road named as the 'Georges River Parkway' as it will threaten the koala population.

I support the establishment of the **Georges River Koala Reserve**, however, it must be a priority to extend this and create the proposed [Upper Georges River National Park](#) from Glenfield to Appin and include the Georges River Parkway Road as part of the park.

Habitat Fragmentation

The Plan's proposed construction of 120 km of Koala exclusion fencing will isolate and fragment Koala colonies. Measures must be in place to allow safe movements of koalas and other wildlife across their natural range.

The CPCP will permanently isolate three of the four National Parks which currently protect significant areas of Cumberland Plain Woodland; the Wianamatta Regional Park, Shanes Park, and Colebee Nature Reserve. The CPCP M7 motorway and M7-Ropes Crossing Link Road proposals would completely isolate these three reserves from each other. Instead:

- Tunnel 2 km to save Wianamatta Regional Park
- Extend the Camden Tunnel 4 km south and 6 km north - saving EMAI-to-Razorback Wildlife Corridor, Cobbitty Hills

Failure to guarantee new protection measures

I am extremely concerned that there are no firm commitments about how much land will eventually be protected. No development (staged or otherwise) should occur until adequate protection of native vegetation is assured.

The Plan says "it expects that around 11,000 hectares, or approximately double the Plan's offset commitment of 5,475 hectares of impacted native vegetation, will be protected within new conservation lands" – but has no assurance this will be achieved. The three new reserves proposed (Georges River Koala; and Gulguer and Congluence still to be subject to feasibility study) will only be completed over the life of the Plan. They should be preserved within the next 3 years, otherwise the Plan can be watered down over time in the face of development pressure.

Funding should be increased by five-fold with the priority for purchase of bushland for permanent protection. Monies for revegetation programs should be reallocated to conservation and the programs deferred until existing habitat is conserved.

Offsets hasten local extinction

The use of offsets on existing conservation land should be prohibited. Offsets in general are fraught with problems such as lack of action on compliance and enforcement and the cumulative impact of loss of native vegetation. Biodiversity Offsets Policy for Major Projects (Major Projects Offset Policy) introduced in 2014 has weakened the offset standards and made it easier for State significant development and infrastructure. Despite being inconsistent with national biodiversity offset standards, including the EPBC Act Environmental Offsets Policy the scheme was accredited under the NSW Bilateral Assessment Agreement.

The Environmental Defenders Office has highlighted the problems with biodiversity offsets in a recently published document, [Devolving Extinction](#) 2020 where it states:

The NSW scheme does not actually offset biodiversity impacts and instead facilitates net loss of biodiversity and local extinctions. Accreditation of this scheme would clearly be inconsistent with the objects of the EPBC Act and the EPBC Act offset standards.

Sydney's Food Bowl

The Plan does not consider how the Sydney region's agricultural output, which accounts for about 20% of the City's fresh food supplies, will cope with the further loss of rural land even though the Plan mentions that "the Plan area in the Cumberland basin in Western Sydney contains some of the most fertile country in the Sydney basin." Recent research suggests that the Covid-19 pandemic's impact on international and local transportation networks highlights that rural land within 150 kilometres of the city is essential for human survival. (see CSIRO publication, The Future of the Fringe)

I am in agreement with the **Recommendations of the Georges River Environmental Alliance** for revision of the Plan. See below:

1. The Plan must establish **multiple new Conservation Reserves**, to off-set any Cumberland Plain vegetation loss. Any off-sets must be 'like for like', and create additionality. The 3 proposals, (the Koala Reserve, Gulguer and The Confluence), are not sufficient. This plan will partially destroy two reserves that were specifically set aside as offsets for the M7. **Offsets are meant to be in perpetuity, so this must never happen.**
2. The need is to **'save' woodlands** that remain, not do 'replacement' plantings, which will take generations to yield any cool canopy and biodiversity protection and enhancement.
3. **Six E-W koala corridors** should be established to link the Georges River koalas to bushland of the Nepean, to that of the Cumberland Plain, and beyond to the Blue Mountains. The priority koala corridors of more than 425m in width should be at Noorumba Reserve and Beulah-Woodhouse Creek, (at Mt Gilead), and they must extend even beyond the Nepean to reach Mt Annan and the Western Sydney Parklands. **The Koala Reserve** must include the important Peter Meadows Creek koala habitat, and abandon the road named as the 'Georges River Parkway' as it will threaten the koala population.
4. The **main roads should be re-aligned or tunnel** to avoid high value bushland and open space. For example, the Camden tunnel needs to be extended 6kms northwards and 4kms southwards to save the Camden Park to Razorback wildlife corridor and Cobbitty Hills bushland. The South Creek corridor and Colbee NR should be untouched by road development. A tunnel of 2kms is required to save Wianamatta Park.
5. The CPCP must **lock in a budget** of at least \$540M up-front (as per Western Sydney Growth centres offset program), stage developments so that **no new development** happens until past offset commitments have been delivered and not use loopholes in NSW law to re-label existing public reserves as offsets for developers. **Public land should not be used for offsets** under any circumstances because this does not achieve **additionality**.

Thank you for your consideration of my submission, if you wish to contact me about the contents of my submission I can be reached at [REDACTED] or by mail at:

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