

## Susan Thomson

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**From:** [REDACTED]  
**Sent:** Monday, 12 October 2020 9:31 AM  
**To:** DPE PS Biodiversity Mailbox  
**Cc:** [REDACTED]  
**Subject:** RE: Cumberland Plain Conservation Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good morning all,

I received a submission on one of the State significant development (SSD) modifications I'm currently handling which actually relates to the draft Cumberland Plain Conservation Plan. The submission was received on 9 October 2020 and is reproduced below for your consideration/reference:

Title

Mr

First name

John

Last name / Surname

Boyle

Email

[REDACTED]  
Street Number/PO Box Number

[REDACTED]  
Street Name

[REDACTED]  
Suburb

WEST RYDE

State

New South Wales

Post Code

2114

Classification

Object

Political Donations?

No

Name Withheld?

No

Submission

Dear Minister Kean, Minister for the Environment & Energy and  
Minister Stokes, Minister for Planning & Public Spaces

Re: Objection to the Draft Cumberland Plain Conservation Plan

I urge you to please reconsider the draft Cumberland Plain Conservation Plan (CPCP) that will accelerate the destruction of Sydney's remaining green belt and which appears, to me, to be designed to clear the way for state and federal governments biodiversity certification. Seemingly, it has the potential to destroy the established conservation and offset rules required of developers with an all-in-one 'strategic' approval process that may become a template for biodiversity offset schemes across NSW. I strongly oppose this plan because it will remove the remnant remaining open land, not prevent further loss of biodiversity. If the Conservation Plan were to be approved, then, perhaps thousands of hectares of 'urban capable' rural land will be released for development without the need for any further environmental impact assessments. It will accelerate the dismantling of Sydney's remaining green belt and rapidly destroy the essential ability to produce fresh produce, close to major markets/consumers.

Moreover, the Plan, as drafted, will threaten the existence of the chlamydia-free koala population and have a significant impact on threatened ecological communities, and important habitat flora and fauna species. The Plan will impact over 1,000 hectares of the critically endangered Cumberland Plain Woodland, unique to this region. It is of much concern that only a small area of the original 107,000 hectares remains. This plan will impact a further 1,014.6 hectares or almost 16% of the critically endangered Cumberland Plain Woodland, leaving less than 5,400 hectares. Surely, no reasonable person would want to be responsible for such destruction of our existing essential open space and its struggling biodiversity species that depend on it, including koalas, squirrel gliders, swift parrot, glossy black cockatoo and spotted-tailed quolls?

It should be a priority to create the proposed Upper Georges River National Park from Glenfield to Appin and include the Georges River Parkway Road into the park. Additionally, Cumberland Plain Woodland or other 'grassy woodland communities' in the 4,795 hectares of 'avoided land' should be zoned E2 (environmental conservation). The Plan does not comply with the Chief Scientist's recommendation to secure all of the east-west habitat corridors for the koalas. It acknowledges that "east-west connectivity between the Georges and Nepean rivers is important for the resilience of the Southern Sydney koala population," but it dismisses the recommendation made in a recent report prepared by the Chief Scientist's expert panel, Advice on the protection of the Campbelltown Koala population (Chief Scientist Koala Report), to protect the habitat of the six east-west corridors.

Instead, the Plan argues unspecified "scientific advice from the department and the research community ... that the existing six east-west corridors in the Greater Macarthur Growth Area are too fragmented and not wide enough to support koalas over the long term." There is no justification nor evidence provided for this erroneous conclusion. Only the Ousedale Creek to Appin North east-west corridor will be protected. This issue has wider implications for other flora and fauna species, not just for koalas.

Furthermore, the proposed construction of koala exclusion fencing will isolate and fragment an expanding and thriving population. While the Chief Scientist Koala Report also recommends fencing to keep wildlife away from roads and residential areas, the Plan does not incorporate the Report's recommendation for habitat corridors with a recommended width of 390-450 metres, to be enhanced by 'Asset Protection Zones' and 30 metre wide buffers on either side of the corridor to "reduce the impact of threats, light and noise on koalas."

And, the Chief Scientist Koala Report notes that the Ousedale Creek to Appin North corridor, the Plan's preferred east-west corridor, is impeded by "numerous suburban and rural properties between the habitat edge and road surface, on both the east and west sides." The Plan also does not specify an adequate number of koala underpasses or suitable crossings across busy Appin Road, where unfortunately, many koalas have been killed.

If the proposal to build 120 km of koala fencing is implemented without an adequate number of appropriately sized movement corridors, the koalas will be trapped. The Chief Scientist Koala Report confirms the need to maintain connectivity, noting that it helps to "avoid the creation of dead ends where koalas face threats without routes of escape, and once housing development occurs along the western flank of the Mount Gilead site the route for koalas to move east or west will be through a narrow strip of habitat at the confluence of the Nepean River and Menangle Creek, and conceptual plans illustrate this habitat being potentially surrounded by three roads." This wildlife corridor will become a functional dead-end.

Clearly, the Plan lacks any commitment to the necessary amount of land to be protected. Nor, does not

indicate whether any necessary measures will be taken to protect the integrity of the strategic conservation area before the additional land can be set aside or protected in other ways.

Paradise lost: Have we learnt nothing? Did the person(s) responsible for this misguided plan not notice the unprecedented recent wildfires that ravaged so much of our land, killed 75 people, just in Victoria and South Australia, and destroyed countless millions of flora and wildlife, not understand the existential crisis due to climate change now facing the world?

As recently as last January, the western Sydney suburb of Penrith was the hottest place on Earth, reaching a high of 48.9 degrees Celsius. This was the highest-ever temperature for the area, recorded by the Bureau of Meteorology smashed a record that had stood for 80 years.

It is not hard to envisage that this inappropriate, in time and place, plan is surely designed to replace the Cumberland Plain open space left, with densely built black-roofed houses, huddled cheek by jowl, on the smallest possible blocks-marginally bigger than the house footprint, with no room for a shade giving tree, nor place for children to play, or habitat for wildlife, and no room on the front verge for a tree, occupied by utility conduits. Thus, any future unfortunate occupiers of such proposed housing could look forward to possibly living in the hottest place on earth, with aircraft flying overhead 24 hours per day 7 days per week, and, the attendant aircraft noise and engine pollution.

Whilst the Plan does acknowledge that the urban heat island effect in Western Sydney "will increase as urbanisation increases," measures to mitigate its impact are minimal. Western Sydney University research has identified that in Sydney's treeless urban areas morning summer surface temperatures are nearly 13 degrees celsius higher than in vegetated areas. Summer temperatures can rise to over 50 degrees celsius in Western Sydney; a temperature now deemed too hot to be safe for hot water systems! The proposed 'Greening our city' program that was announced in 2019 and designed to ensure one million trees be planted by 2022, is flawed. It makes better sense to preserve existing trees than to remove and replant, particularly as building block sizes are now typically too small to accommodate significant trees.

In closing, do the proponents of this misguided plan know that projected future population growth will be nothing like that of recent years, with considerably lower growth and commensurate greatly reduced demand for housing?

I urge you to reject the draft Cumberland Plain Conservation Plan as it will result in an ecological disaster for Greater Sydney


Sincerely,  
John Boyle

Should you have any questions regarding this email, please do not hesitate to contact me.

Kind regards,  
Patrick

  
**A/Senior Environmental Assessment Officer**

Industry Assessments | Department of Planning, Industry and Environment

  
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[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)



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Industry &  
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