



NSW Farmers Association
Cumberland Branch
c-/ Aaron Vumbaca
Honorary Secretary

9 October 2020

Department of Planning, Industry and Environment
Green and Resilient Places Division
Locked Bag 5022
Parramatta NSW 2124

Email: biodiversity@planning.nsw.gov.au

Attention: Elizabeth Irwin

From: THE NSW Farmers Association- Cumberland Branch

RE: SUBMISSION TO DRAFT CUMBERLAND PLAIN CONSERVATION PLAN ("DCPCP")

Dear Ms Irwin,

In 2017, The NSW Farmers Association called for a "fresh food precinct" at the proposed Western Sydney Airport (WSA), describing it as a "game-changer for the farming sector" in NSW.

At that time, the NSW Premier Gladys Berejiklian confirmed that fresh produce trade will be a key part of the new Aerotropolis with an export hub for fresh and premium regional value added products providing a once in a generation opportunity to transform NSW agriculture into a high value high tech industry.

The NSW Farmers released a special report with KPMG in "*Think big, think fresh: A fresh food precinct at the heart of Western Sydney*", released in November 2017 that recommended a Fresh Food Precinct for WSA including, export orientated food processing, high tech agriculture, and a fresh food market collocated within the airport precinct.

This report also highlighted the significant opportunities an agri-business precinct would provide for Western Sydney.

The NSW Farmers' Association Chief Executive Officer Matt Brand at the time said "This will create thousands of jobs in Western Sydney, including much needed knowledge jobs for the region, and establish high value, modern and technologically driven agricultural operations within the region. The only way to achieve this is an integrated supply chain linking food production to the air freight facilities at Western Sydney Airport." This sentiment has not changed, and our Current Board and CEO support this proposal wholeheartedly.

A copy of the Association and KPMG Green Paper can be found at:

<https://assets.kpmg.com/content/dam/kpmg/au/pdf/2017/western-sydney-fresh-food-precinct.pdf>

Therefore, whilst we do not object to the DCPCP in principle, and we appreciate the Department is trying to preserve genuine and valuable native vegetation for future generations, we are concerned that some of the inaccurate and unjustified limitations of the DCPCP will impede the ability for the true vision of the agribusiness precinct to be realized.

This not only includes land within the Aerotropolis SEPP but also the broader Western Badgerys Creek lands which connect into the agribusiness precinct.

We list our reasons as follows with a longer report to follow next week as per the discussion with Amelia from your office on 8 October 2020:

1. A primary concern of the Government and regulators should be the safety of airline passengers. Any Conservation Zoning is not allowed under the Airport Safety Guidelines



which specifically prohibits conservation areas within close proximity of an airport. We do not understand how the government has such inconsistencies across Departments?

2. There are significant inconsistencies between the Department's Aerotropolis SEPP and the DCPCP. Specifically, page 74 of the Finalization Plan outlines the government objectives for the Agribusiness Precinct. These objectives cannot be achieved if the area is deemed conservation / avoid for development / strategic conservation zone.
 - *Encourage fresh food markets in appropriate locations with direct access to the Airport and associated tourism opportunities. (Planning Partnership and Western Parkland City Authority).*
 - *Address the interface between the proposed Outer Sydney Orbital and The Northern Road through precinct planning to ensure the Agribusiness Precinct retains connection with the rural land and Biostrategic Agricultural Land to the west (Planning Partnership and Transport for NSW).*

"Enable an interconnected relationship between the Agribusiness Precinct and MRA and their planning requirements (Planning Partnership, Western Parkland City Authority and Department of Planning, Industry and Environment)."

The DCPCP needs to be reconsidered and reviewed so these objectives can be achieved.

3. Most of the land in the Agribusiness Precinct and MRA zone has been historically changed through agricultural land uses. Whatever conservation value limited areas of that zone has, will be impacted significantly by the development of major infrastructure projects including Western Sydney Aerotropolis, Outer Sydney Orbital, The Northern Road Upgrade and the Western Sydney Freight Line and Intermodal Terminal. The combined impacts to biodiversity of the Area from the infrastructure can never be adequately mitigated to maintain that particular land as conservation.
4. If the Area was ever designated as 'Conservation Land' it would inhibit the ability of government to construct the Outer Sydney Orbital (and its related infrastructure).
5. The zoning of any part of the Study Area as 'Conservation Zone' will not contribute to suitable environmental restoration or biodiversity conservation gain, but rather, lead to misguided use of limited resources and supporting infrastructure, which would be better spent on targeted conservation actions to restore and enhance native vegetation, threatened species habitat and overall habitat connectivity in one or more other locations in the Cumberland Plain that are not spatially constrained by the direct and indirect impacts of a major Aerotropolis.
6. We also do not understand why the Department has created a new classification of "Strategic Conservation Zone" (SCA). From a legal standpoint, landholders in the SCA who want to develop their land will still be required to submit development applications through the relevant development assessment pathway. Any impacts on ecology associated with these development applications will need to be assessed in accordance with the requirements of the BC Act and/or the EPBC Act, which include requirements to avoid and minimise impacts. The DCPCP proposes to introduce new planning controls for the SCAs that will minimise impacts on areas with high biodiversity value that can deliver regional biodiversity outcomes. As part of this assessment process the consent authority will need to consider the region's biodiversity values when assessing development applications. As assessments under the BC Act already require assessments at landscape levels as well as measures to avoid and minimise impacts on areas with high biodiversity value, the introduction of additional planning controls are redundant.

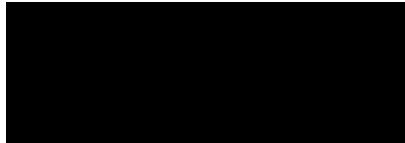


NSW Farmers Association
Cumberland Branch
c-/ Aaron Vumbaca
Honorary Secretary

7. Whilst we acknowledge that the Plan states that not all of the mapped strategic conservation area will in the future be established as conservation land, we do not believe it is fair for the Department to burden land with that classification now without undertaking a proper analysis or inspection.

We formally request the an extension to the submission until 14th October which will allow us more time to consult with our members, and we look forward to submitting additional supporting information next week once we have done so.

Yours faithfully,



Salvatore Russo,
Chair
Cumberland Branch
NSW Farmers Association