

Susan Thomson

From: Anthony Tavella on behalf of DPE PS ePlanning Exhibitions Mailbox
Sent: Monday, 12 October 2020 9:36 AM
To: DPE PS Biodiversity Mailbox
Subject: FW: Webform submission from: Draft Cumberland Plain Conservation Plan

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From: noreply@feedback.planningportal.nsw.gov.au <noreply@feedback.planningportal.nsw.gov.au>
Sent: Friday, 9 October 2020 4:58 PM
To: DPE PS ePlanning Exhibitions Mailbox <eplanning.exhibitions@planning.nsw.gov.au>
Subject: Webform submission from: Draft Cumberland Plain Conservation Plan

Submitted on Fri, 09/10/2020 - 16:58

Submitted by: Anonymous

Submitted values are:

Submission Type: I am making a personal submission

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Submission file: [webform_submission:values:submission_file]

Submission: Draft Cumberland Plain Conservation Plan – Submission 9/10/20 (part 1) This plan aims to protect Western Sydney's "threatened plants and animals and support the needs of the community through the creation of new conservation lands and green spaces close to homes". I'm sure most people understand there is a need to balance the huge amount of development coming to Western Sydney with all of the amazing grasslands and other open spaces, bushlands, Cumberland Plain Woodland and other EEC's that occur in the area covered by the plan. The areas specified in the Plan to receive funding first are three new public reserves which will help "protect at least 5,475 hectares of impacted native vegetation within new conservation lands", containing threatened ecological communities, and threatened flora and fauna. Such a commitment is commendable and I am grateful to live near the proposed Georges River Koala Reserve in Campbelltown. But when looking at the maps of the area involved, these areas (the Koala Reserve, plus the Gulguer Reserve Investigation Area, the Confluence Reserve Investigation Area, and "other areas identified for further investigation as future reserves such as Bargo") do not add up to nearly as much land as I would have hoped could be set aside for protection at this early stage. The huge list of "commitments" in Appendix C gives me some hope, but I also hope there is a way to implement and enforce them all. Back in 2016 I attended a talk given by a local ecologist about the Cumberland Plain Woodland. We have only been here just over 200 years and the CPW had already been reduced by 2016 to cover only around 6% of the Sydney basin, and was mostly found only in fragmented areas within the outer suburbs of Sydney. Whether it is 6% still or whether it is indeed 9% as noted on the Office of Environment & Heritage webpage (<https://www.environment.nsw.gov.au/threatenedSpeciesApp/profile.aspx?id=10191>), most stands of CPW are mown under whether on private land or council land. This has always ensured that no matter how large the area of tree canopy, unless there is a significant middle and understorey the land can be too easily bulldozed for development. I have seen significant areas of CPW destroyed in Campbelltown and Camden over the past 10 years so it is frustrating to see that biodiversity offsets are allowed. I am not an expert on the subject of offsets but I know that bulldozing stands of EEC's destroys more than tree canopy, and that a bunch of volunteers planting hundreds of saplings elsewhere cannot make up for what has been destroyed. It is better than nothing, but for the 30 years it takes to reach some kind of maturity the fauna displacement and death is heartbreaking. I would like to see more areas set aside as large Reserves in the Plan at this early stage to ensure better east-west and north-south environmental connections throughout western Sydney, including along the spine of the Scenic Hills which stretches from the Mount Annan Botanic Gardens across to the Western Sydney Parklands. I would also like to see stands of CPW trees that lack understoreys better protected and rehabilitated whether on public or private property, so that the fragmentation of CPW across western Sydney does not continue to speed up. Information for landholders about the value of not mowing under CPW trees could go a long way. I feel the Plan does not go far enough in ensuring protection of the important environmental biodiversity of plants and animals in western Sydney. It really needs to because the plan proposes 10,014 hectares of new development in Western Sydney and the destruction of over 10% of the entire Cumberland Plain Woodland ecosystem. For such a diminishing ecosystem to lose 10% shows me that while the intention of this plan sounds amazing, that it may end up being nothing more than mere lip service to the CPW that our state government wants to protect. I

will annex here the Greater Sydney Landcare Network ideas for making some helpful changes to the plan, because they make sense to me and because it may help with the fine-tuning of this plan: **KEY CHANGES TO PROPOSED DEVELOPMENTS** Protect a 500 m wide koala corridor at Mount Gilead 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 & homes Clearing 10% of the entire Cumberland Plain Woodland ecosystem is unacceptable **KEY CHANGES TO PROPOSED OFFSETS** Protect the Cumberland Conservation Corridor within the Strategic Conservation Area (SCA) Allow smaller lots to be eligible for offsetting (SCA) and improve offset funding accordingly Demand new, large public reserves of Cumberland Plain Woodland (CPW) to offset loss of CPW in three National Parks Restore the focus of offsets to Cumberland Plain Woodland – the ecosystem most impacted by these developments Protest landowner-specific exclusions in the SCA **SCRAP THE FAILED 'AVOIDED LAND' model (E2 ZONING & CREEKS)** CPCP riparian corridors and small bushland parcels are left in nomans-land, neither developed nor conserved as offsets The Western Sydney Growth Centres program shows that this model fails – no agency wants to own or manage the unfunded creek corridors, and landowners on E2 zoned lands (left ineligible as offsets) illegally clear bushland **Scrap the 'avoided' category – land in development precincts should either be developed or fully funded as an offset.** **ADEQUATE BUDGET LOCKED IN UP-FRONT:** The CPCP must lock in a sufficient budget up-front to ensure offsets are actually delivered, as per the \$540 M Western Sydney Growth Centres offset program **STAGING DEVELOPMENT to MATCH DELIVERY OF OFFSETS:** The CPCP must stage development and require the satisfactory delivery of offsets from each stage before further development proceeds (as per the Western Sydney Growth Centres) **NO PUBLIC LAND FOR DEVELOPER OFFSETS:** Stop the CPCP using loopholes in NSW law to relabel existing public reserves as offsets for developers. This denies us new green spaces and denies farmers funding to conserve bushland on their land. Demand that no offsets are created on existing public reserves of any kind. **NEW CONSERVATION RESERVES, NOT PLANTING:** The CPCP tries to cut developers costs by replacing the requirement for new conservation areas with tree planting on waste land (The Confluence). Research demonstrates that neither traditional nor scalp-and-seed revegetation compensates for clearing Cumberland Plain Woodland. We need to save the woodlands that remain, not plant seedlings. **NO TAXPAYER SUBSIDY OF DEVELOPER OFFSETS** Thank you for the opportunity to have my say in a confidential way without my name being published. Please note that the second part of my submission will be emailed to you early next week, as per the short extension of time which has kindly been granted to me. Regards, Nea Makowski

URL: <https://pp.planningportal.nsw.gov.au/draftplans/exhibition/draft-cumberland-plain-conservation-plan>

Draft Cumberland Plain Conservation Plan – Submission 14/10/20 (part 2)

Regarding Sub-Plan B: Koalas.

Please annex this to the first part of my submission which was sent in on the closing date for submissions. Thank you so much for the extension of the second part of my submission.

I am pleased to see the minister describing Western Sydney in this Plan as a “biologically diverse landscape with a rich variety of unique plants and animals, some of which are found nowhere else in the world”, and acknowledging that “It is also home to the largest koala population in the Sydney region and one of the healthiest in NSW.”

Campbelltown contains unique soil types and therefore fauna containing unique nutrients – which Koalas thrive on. Ecologists and Campbelltown Council are well aware of this, and I hope the State Government is too. Koalas certainly live and thrive in the sandstone areas of the Georges River, and have for a long time now, but as their numbers are increasing they are now, more than ever, pushing out into the urban areas where the nutrients are higher. These local Koalas are indeed unique, with their almost-disease-free status probably due to more than their genetic status, because genes themselves are nothing without a healthy environment (physical and emotional), as per epigenetics. A healthy bushland and no stress are essential components of continuing the SW Sydney Koala colony’s healthy status.

And this brings me to my next point: Without habitat Koalas simply cannot survive.

If they are cut off from the rich soils that lie throughout the area of Campbelltown and Appin and the edge of the sandstone soils of the Georges River bushland, then they will suffer.

All because developers have bought up nearly all the land between Campbelltown and Appin on a promise and a prayer.

The Plan’s vision to ‘support Western Sydney’s biodiversity and growth’ will need to be balanced extra carefully because of continuing developer pressure. I am of course grateful the government is committing time and resources to finding a better balance between the two, especially regarding the South West (or Southern and South-West?) Sydney koala population. And the Georges River Koala Reserve is an enormous step in the right direction, for which I feel incredibly grateful!

But there are some “buts” or cautions:

On page 42 of draft Cumberland conservation plan, case study 1 regarding the Georges River Koala Reserve talks about this corridor being “the most important”. How do we know, when developers who own land on the western side of Appin road refuse to allow anybody on their land to check for evidence of wildlife, and Koalas in particular? And will blocking most wildlife routes across Appin Road in an east-west direction channel more of our healthy colony towards the unhealthy southern highlands? These are questions that I am not satisfied the bureaucrats have been prepared to answer, and the only conclusion I can draw is that they are either not fully informed by landowners of their actions, or they figure the best outcome is to placate both those who advocate for environment/koalas and those who advocate for development by drawing a line in the sand

between the two (for example seeking to separate koalas from either side of Appin Road between Campbelltown and Appin without adequate number of overpasses/underpasses? This would be incredibly cruel, given that Koalas are already living to the west of Appin Road as far over as the Mt Annan Botanic Gardens. They actually need proper wildlife crossings, whether over or underpasses, so they can continue to cross Appin Road around Noorumba Reserve and the Biobanking site, Beulah. This is a well-known Koala hot-spot acknowledged by RMS. Surely something can be done even if there are trees removed in order for this to be created, because for the short term loss there will be long term gains, and it is the long-term gains that all of us should be thinking about when it comes to the future of a Koala colony.

Time has shown me that when large acreages separate bushland from urban areas there are still issues for koalas from dogs and roads, but there are nowhere near as many as those found in areas where suburbia backs onto bushland, and when a major road filled with heavy fast traffic (such as Appin and Picton Roads) passes through thick bushland. So surely government mandating multiple wildlife corridors over and/or under Appin Road both in the Campbelltown end and the Appin End of Appin Road, and in between, around where Belltrees Kennels are, is a better outcome than a vague stipulation for “at least one” corridor crossing Appin Road. This matter is too important to be kicked down the road for up to 10 years from now.

Barrier fencing on both sides of major roads is certainly important and has been shown to work, but only when there is proper construction (unlike what has been built along Picton Road where wildlife has been able to dig underneath, and where fencing ends suddenly without being redirected far into bushland away from the road) and proper regular checks/upkeep. Proper and regular wildlife corridors over or under such areas are essential for the survival of wildlife.

In regard to the list of Commitments in Sub Plan B: Koalas:

Commitment 12 no. 4 & 5 – I have discussed issues I have with these, above.

Commitment 13 no. 3 – why not include sandstone transition forest (SSTF). Campbelltown lost a large swathe of it in recent years in the Airds/Bradbury renewal in the area now referred to as Newbrook, next to Smith's Creek which is Core Koala Habitat. SSTF is made up of some species of trees which are Koala feed trees.

Commitment 21 – why not sooner than year 6 onwards?

Commitment 25 – why not co-fund a local wildlife hospital in Campbelltown with specialist vets to treat the unique disease-free koalas of Campbelltown and surrounding areas (I believe Wilton has a disease-free colony as well), as they need to be quarantined away from koalas from other areas which are infected with chlamydia etc; and local vets are under a primary obligation to treat people's pets first, leaving wildlife to wait longer than fair or necessary.

And in regard to the Recommendations:

Recommendation 1 – I would like to see the proposed Georges River Parkway is finally removed from all planning instruments, in order to ensure protection of the Georges River Koala Reserve.

And I also would like to see improved signage at all entrances into bushland walking tracks and firetrails in the Koala Reserve that strongly and clearly prohibit motorbike riding in bushland areas and dog walking off-leash. While I understand some people in the local area are keen for council to create a mountainbike track from Glenfield to Appin, if this were to eventuate there would be a probability (rather than a possibility) of antisocial behaviour including dirt bikes through areas of previously unspoilt bushland, and such a track would fragment the environment and could foreseeably place flora and fauna in the Koala Reserve at risk.

Campbelltown Council is already implementing Native Nursery at Home training for volunteers who are interested in growing local native plants from seed for revegetation purposes, so I'm sure you would have a whole bunch of happy helpers with this task if help is needed with revegetation.

Koala exclusion fencing along both sides of Appin Road from Campbelltown to Appin would be an amazing outcome, but it would need more than one corridor structure crossing (over or under) Appin Road between Campbelltown and Appin to ensure stress levels for local wildlife are kept low. Dr Steve Phillips who is familiar with the local environment and Koalas here in Campbelltown and Wollondilly clearly has recommended more than one of such crossing structures (<https://www.macarthuradvertiser.com.au/story/5286942/plan-to-protect-campbelltowns-koalas/>).

Recommendation 4 – I may not be a koala vaccine scientist or vet, but if/when there is a koala chlamydia and/or koala retrovirus vaccination I would like to suggest that because the koalas of Campbelltown are so unique there should be some testing done first on a handful of local koalas, then re-test them 6 months and 12 months later, before vaccinating every single local koala that comes into care, to make sure that the vaccine does not cause adverse reactions which are not noted in other populations – if this has not already been done. It would be a travesty for human intervention to actually cause a problem with this unusually disease-free and expanding population.

So far the plans seem to focus on channelling Koalas in mostly a north-south and east direction, but this increases the probability of more encounters with the comparatively unhealthy southern highlands populations. Over-urbanising rich farmland does not mean we should act impulsively to overcompensate in other ways without proper testing first.

Multiple overpasses between Campbelltown and Appin, proper planning of urban areas that are laced with wildlife corridor networks (for example both east-west and north-south), and ensuring developments are as low density as possible to minimise the number of cars will be just some ways to balance the natural environment with the planned urban environments. This land has been mainly used for rural purposes and Macquarie Street needs to understand that this land cannot be subjected to the same planning rules as everywhere else, the line in the sand needs to be more on the side of the environment, especially where Koalas are concerned. Lip service is not enough and putting into action this plan to protect and nurture the flora and fauna of Western Sydney will be closely scrutinised.

Thank you for the opportunity to submit my thoughts regarding this massive plan.