



7th October 2020

Steve Hartley  
Executive Director  
NSW Department of Planning, Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

**RE: Submission to the Draft Cumberland Plain Conservation Plan (CPCP)**

Dear Sir,

NSW Wildlife Information Rescue and Education Service Inc. (WIRES) welcomes the opportunity to make a submission on the Draft Cumberland Plain Conservation Plan (CPCP) and its potential impacts on our native wildlife and their habitat.

WIRES is Australia's largest wildlife rescue organisation and was formed in 1985. Almost 35 years later, WIRES has 28 branches, more than 3,000 members and assists hundreds of thousands of community members annually. WIRES mission is to actively rehabilitate and preserve Australian wildlife and inspire others to do the same.

WIRES dedicated Rescue Office operates 365 days a year, acting as the first point of contact for the community to provide wildlife information and education and emergency rescue advice and assistance for sick, injured and orphaned native animals. We receive around 170,000 calls to our 1300 number annually, including thousands of interstate calls. On average, WIRES assists tens of thousands of native animals each year, provides up to 80% of all wildlife rescue and care in NSW and plays an important role in national community wildlife education.

In addition, WIRES trains hundreds of new volunteers in wildlife rescue and care annually. Over 1,800 people have registered for introductory training in 2020 alone and we are dedicated to the ongoing recruitment of new volunteers and the continued training of existing volunteers. This growing network of volunteer rescuers and carers is critical for the rescue and rehabilitation of our unique native wildlife.

After the catastrophic bushfires of last summer, where an estimated three billion animals perished, we recognise that we are no longer operating under a 'business as usual' approach. In New South Wales alone, approximately 7% (5.37 million hectares) of land was burnt. This included 37% of the national park estate, 42% of state forests and 4% of freehold land<sup>1</sup>. In addition, a new report commissioned by the World Wide Fund for Nature-Australia found the 2019-20 bushfires resulted in the loss of about 71% of koala populations in fire affected areas at six locations on the north coast of New South Wales<sup>2</sup>. With this new reality and so much of our natural bushland lost, it is crucial that we reconsider projects resulting in habitat destruction and landscape modification, in order to protect and improve the outcomes for our remaining native species.

---

<sup>1</sup> State of New South Wales and Department of Planning, Industry and Environment. 2020. NSW Fire and the Environment 2019–20 Summary. Environment, Energy and Science Department of Planning, Industry and Environment.

<sup>2</sup> Biolink Ecological Consultants. 2020. Quantifying the impacts of bushfire on populations of wild (Phascolarctos cinereus): insights from the 2019/20 fire season. Prepared for WWF Australia





The independent reviewer of the national *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) has recently stated that “Australia’s natural environment and iconic places are in an overall state of decline and are under increasing threat. The pressures on the environment are significant—including land-use change, habitat loss and degradation, and feral animal and invasive plant species. The impact of climate change on the environment is building, and will exacerbate pressures, contributing to further decline. Given its current state, the environment is not sufficiently resilient to withstand these threats. The current environmental trajectory is unsustainable”<sup>3</sup>. WIRES is concerned that the proposed Cumberland Plain Conservation Plan (CPCP) will negatively impact native wildlife, including threatened species, and the habitats they rely on for food, safety, and shelter. It is likely that these impacts will be observed both during the proposed construction period and ongoing, well into the future.

### Impact on Threatened Species and Ecosystems

If the Plan is approved in its current form, the recovering and chlamydia-free South West Sydney Koala population, a thriving and expanding population of 600 to 1,000 individuals, will eventually lose most of its habitat and likely become extinct. The Plan will also have a significant impact on eight threatened ecological communities, 25 flora species and 24 fauna species, including the Swift Parrot, Powerful Owl, Regent Honeyeater, Squirrel Glider, Yellow Bellied Glider and East Coast Free-tail Bat.

The 2019-20 fires burned 80 percent of the Blue Mountains World Heritage Area, adjacent to the Plan area, and a report released June 30 by the New South Wales parliament estimates that the bushfires killed at least 5,000 koalas—as much as a third of the state population<sup>4</sup>. In addition, the federal environment minister is on the record as saying that this iconic species is among a number that are likely to have their threat status upgraded, following the summer’s bushfire disaster and ongoing habitat destruction<sup>5</sup>. With these considerations, it is alarming that the NSW government is proposing new developments that would decimate koalas and their habitat.

The Plan’s proposed construction of 120 km of Koala exclusion fencing will isolate and fragment koala colonies, especially because it protects only one of the six east-west movement corridors recommended in the Chief Scientist’s Koala Report<sup>6</sup>. This report states that koala survival depended on 6 corridors with each needing to be more than 425m wide, and this Plan ignores this. These corridors provide the koalas with important and easy passage between the Georges and Nepean rivers, allowing them to access refuge areas in times of stress and also interbreed with different colonies. Even with these factors taken into account, the report found that “*The proposed high densities for residential and urban development that are proposed makes it unlikely that koalas*

---

<sup>3</sup> Samuel, G. 2020. Interim Report of the Independent Review of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).

<sup>4</sup> New South Wales. Parliament. Legislative Council. Portfolio Committee No. 7 – Planning and Environment. *Koala populations and habitat in New South Wales* / Portfolio Committee No. 7 – Planning and Environment [Sydney, N.S.W.]: the Committee, 2020. [xviii, 291 pages; 30 cm. (Report no. 3 / Portfolio Committee No. 7 – Planning and Environment)

<sup>5</sup> Cox, L. 2020. 'Sliding towards extinction': koala may be given endangered listing as numbers plummet. The Guardian Australia. <https://www.theguardian.com/environment/2020/sep/25/sliding-towards-extinction-koala-may-be-given-endangered-listing-as-numbers-plummet> accessed 7/10/2020.

<sup>6</sup> NSW Chief Scientist & Engineer. 2020. *Advice on the protection of the Campbelltown Koala Population*. Koala Independent Expert Panel. NSW Government.





could persist in the long-term in the urban matrix". It is disappointing that more is not being done within the Plan to safeguard koalas and other threatened species.

As far as wildlife habitat is concerned, this proposal seeks to clear a total of 10,470 hectares of land and destroy more than 10% of the entire Cumberland Plain Woodland ecosystem. Only 6,400 hectares, or 6%, of this unique ecosystem still exists after more than a century of clearing. It is listed as critically endangered at both a state and federal level, but despite this, the rate of clearing of Cumberland Plain Woodland has continued to increase since this ecosystem was listed as critically endangered and is now amongst the highest rates of land clearing globally<sup>7</sup>. It is worth noting at this stage that the fauna components are also explicitly included in the listing of the Cumberland Plain Woodland ecosystem both at State and Federal levels.

To date, the Plan only promises to set aside 5,475 hectares of native vegetation to compensate for the loss of 10,014 hectares of rural land. WIRES believes that offsetting is not appropriate in this instance, given the unique nature of the vegetation and the presence of a number of threatened species.

### **Impact on Connectivity**

WIRES is concerned that the CPCP talks considerably about the importance of connectivity, but it fails completely in adequately assessing the vast scale of connectivity loss proposed, and in providing proportional improvements to regional connectivity. In total, 12,807 hectares of habitat will be permanently isolated by the proposals contained in the CPCP. Much of this is open woodland which is not mapped as native vegetation in the CPCP, which focuses on trees not wildlife. This represents 59% of the Cumberland Plain region.

The CPCP will permanently isolate three of the four National Parks lands which currently protect significant areas of Cumberland Plain Woodland. These are Wianamatta Regional Park, Shanes Park, and Colebee Nature Reserve.

The proposed isolation will result in the loss of most or all native mammal species from Colebee Nature Reserve, which is of insufficient size to maintain its populations of Echidnas, Kangaroos and Sugar Gliders in isolation.

This loss of connectivity is likely to result in catastrophic decline of wildlife at a regional scale including the direct decline of fauna species – especially terrestrially-moving mammals e.g. Koalas, Echidna and Wombat

Eastern Grey Kangaroos, which are vital for maintaining the grassy structure of healthy Cumberland Plain Woodland, will be particularly impacted by the loss of connectivity, with cascading impacts to many other grassy woodland plant and animal species which rely on these grazers to maintain suitable habitat.

### **Impact on Wildlife Carers**

There is currently no staging confirmed in the Plan. It is therefore assumed that all development would be approved up-front, meaning that much of the area may be cleared in the first few months after approval. This will potentially put our volunteer wildlife carers under immense pressure to rescue and rehabilitate displaced, injured and orphaned native animals as a direct result of this proposal.

---

<sup>7</sup> Cumberland Conservation Network. 2018. *State of the Cumberland Plain 2017-18*. The Greater Sydney Landcare Network (GSLN)





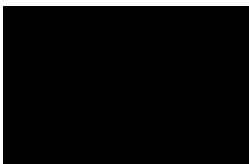
At an absolute minimum WIRES urges that consideration be made in the budget to have qualified wildlife veterinarians, ecologists and carers on hand during clearing and construction works in order to mitigate impacts to native animals.

### Recommendations

1. The draft plan should be withdrawn and redeveloped using the framework of ecological sustainable development.
2. Protect a 500m-wide koala corridor at Mount Gilead.
3. Save Wianamatta Regional Park
4. Extend the Camden Tunnel 4km south and 6km north to save the wildlife corridor between the Elizabeth Macarthur Agricultural Institute and Razorback, Cobbitty Hills as well as existing homes.
5. Refrain from clearing critically endangered Cumberland Plain Woodland, because no type of revegetation offset can compensate for clearing the critically endangered landscape.
6. Create new conservation reserves of Cumberland Plain Woodland, rather than tree planting on waste land. 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.
7. Protect the Cumberland Conservation Corridor within the Strategic Conservation Area (SCA), a Federal Government-Community partnership which has already made significant improvements to connectivity.
8. Lock in a sufficient budget upfront to ensure offsets are actually delivered and do not permit taxpayer subsidies for developer offsets.
9. Stage development and require the satisfactory delivery of offsets from each stage before further development proceeds (as per the Western Sydney Growth Centres). This staged process will also allow for the movement of wildlife from areas being cleared and prevent wildlife carers being inundated with rescues all at once.
10. Ensure budgetary allowances for wildlife veterinarians, ecologists and WIRES staff on site during any works to minimise the acute loss of wildlife related to development.
11. Do not create offsets on existing public reserves of any kind.

Taking into account the above information, WIRES encourages the use of the precautionary principle, as referenced in the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), in this instance and to consider our recommendations, as we cannot support the proposed Cumberland Plain Conservation Plan (CPCP) in its current format. I hope you will take these matters into consideration and plan for longevity of threatened ecosystems the wildlife dependent on them.

Yours sincerely,



Leanne Taylor, WIRES CEO



## Sarah Ng

---

**From:** Anthony Tavella on behalf of DPE PS ePlanning Exhibitions Mailbox  
**Sent:** Monday, 12 October 2020 9:37 AM  
**To:** DPE PS Biodiversity Mailbox  
**Subject:** FW: Webform submission from: Draft Cumberland Plain Conservation Plan  
**Attachments:** wires-cpcp-submission-october-2020.pdf

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

---

**From:** noreply@feedback.planningportal.nsw.gov.au <noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Friday, 9 October 2020 4:54 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 - 16:51  
Submitted by: Anonymous  
Submitted values are:  
Submission Type: I am submitting on behalf of my organisation  
First Name: [REDACTED]  
Last Name: [REDACTED]  
Name Withheld: Yes  
Email: [REDACTED]  
Suburb/Town & Postcode: Brookvale 2100  
Submission file:  
[wires-cpcp-submission-october-2020.pdf](#)

Submission: 7th October 2020 Steve Hartley Executive Director NSW Department of Planning, Industry and Environment Locked Bag 5022 Parramatta NSW 2124 RE: Submission to the Draft Cumberland Plain Conservation Plan (CPCP) Dear Sir, NSW Wildlife Information Rescue and Education Service Inc. (WIRES) welcomes the opportunity to make a submission on the Draft Cumberland Plain Conservation Plan (CPCP) and its potential impacts on our native wildlife and their habitat. WIRES is Australia's largest wildlife rescue organisation and was formed in 1985. Almost 35 years later, WIRES has 28 branches, more than 3,000 members and assists hundreds of thousands of community members annually. WIRES mission is to actively rehabilitate and preserve Australian wildlife and inspire others to do the same. WIRES dedicated Rescue Office operates 365 days a year, acting as the first point of contact for the community to provide wildlife information and education and emergency rescue advice and assistance for sick, injured and orphaned native animals. We receive around 170,000 calls to our 1300 number annually, including thousands of interstate calls. On average, WIRES assists tens of thousands of native animals each year, provides up to 80% of all wildlife rescue and care in NSW and plays an important role in national community wildlife education. In addition, WIRES trains hundreds of new volunteers in wildlife rescue and care annually. Over 1,800 people have registered for introductory training in 2020 alone and we are dedicated to the ongoing recruitment of new volunteers and the continued training of existing volunteers. This growing network of volunteer rescuers and carers is critical for the rescue and rehabilitation of our unique native wildlife. After the catastrophic bushfires of last summer, where an estimated three billion animals perished, we recognise that we are no longer operating under a 'business as usual' approach. In New South Wales alone, approximately 7% (5.37 million hectares) of land was burnt. This included 37% of the national park estate, 42% of state forests and 4% of freehold land. In addition, a new report commissioned by the World Wide Fund for Nature-Australia found the 2019-20 bushfires resulted in the loss of about 71% of koala populations in fire affected areas at six locations on the north coast of New South Wales. With this new reality and so much of our natural bushland lost, it is crucial that we reconsider projects resulting in habitat destruction and landscape modification, in order to protect and improve the outcomes for our remaining native species. The independent reviewer of the national Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) has recently stated that "Australia's natural environment and iconic places are in an overall state of decline and are under increasing threat. The pressures on the environment are significant—including land-use change, habitat loss and degradation, and feral animal and invasive plant species. The impact of climate change on the environment is building, and will exacerbate pressures, contributing to further decline. Given its current state, the environment is not sufficiently resilient to withstand these threats. The current environmental trajectory is unsustainable". WIRES is concerned that the proposed Cumberland Plain Conservation Plan (CPCP) will negatively impact native wildlife, including threatened species, and the habitats they rely on for food, safety, and shelter. It is likely that these impacts will be observed both during the proposed construction period and ongoing, well into the future. Impact on Threatened Species and Ecosystems If the Plan is approved in its current form, the recovering and chlamydia-free South West Sydney Koala population, a thriving and expanding population of 600 to 1,000 individuals, will eventually lose most of its habitat and likely become extinct. The Plan will also have a significant impact on eight threatened ecological communities, 25 flora species and 24 fauna species, including the

Swift Parrot, Powerful Owl, Regent Honeyeater, Squirrel Glider, Yellow Bellied Glider and East Coast Free-tail Bat. The 2019-20 fires burned 80 percent of the Blue Mountains World Heritage Area, adjacent to the Plan area, and a report released June 30 by the New South Wales parliament estimates that the bushfires killed at least 5,000 koalas—as much as a third of the state population . In addition, the federal environment minister is on the record as saying that this iconic species is among a number that are likely to have their threat status upgraded, following the summer's bushfire disaster and ongoing habitat destruction . With these considerations, it is alarming that the NSW government is proposing new developments that would decimate koalas and their habitat. The Plan's proposed construction of 120 km of Koala exclusion fencing will isolate and fragment koala colonies, especially because it protects only one of the six east-west movement corridors recommended in the Chief Scientist's Koala Report . This report states that koala survival depended on 6 corridors with each needing to be more than 425m wide, and this Plan ignores this. These corridors provide the koalas with important and easy passage between the Georges and Nepean rivers, allowing them to access refuge areas in times of stress and also interbreed with different colonies. Even with these factors taken into account, the report found that "The proposed high densities for residential and urban development that are proposed makes it unlikely that koalas could persist in the long-term in the urban matrix". It is disappointing that more is not being done within the Plan to safeguard koalas and other threatened species. As far as wildlife habitat is concerned, this proposal seeks to clear a total of 10,470 hectares of land and destroy more than 10% of the entire Cumberland Plain Woodland ecosystem. Only 6,400 hectares, or 6%, of this unique ecosystem still exists after more than a century of clearing. It is listed as critically endangered at both a state and federal level, but despite this, the rate of clearing of Cumberland Plain Woodland has continued to increase since this ecosystem was listed as critically endangered and is now amongst the highest rates of land clearing globally . It is worth noting at this stage that the fauna components are also explicitly included in the listing of the Cumberland Plain Woodland ecosystem both at State and Federal levels. To date, the Plan only promises to set aside 5,475 hectares of native vegetation to compensate for the loss of 10,014 hectares of rural land. WIRES believes that offsetting is not appropriate in this instance, given the unique nature of the vegetation and the presence of a number of threatened species. Impact on Connectivity WIRES is concerned that the CPCP talks considerably about the importance of connectivity, but it fails completely in adequately assessing the vast scale of connectivity loss proposed, and in providing proportional improvements to regional connectivity. In total, 12,807 hectares of habitat will be permanently isolated by the proposals contained in the CPCP. Much of this is open woodland which is not mapped as native vegetation in the CPCP, which focuses on trees not wildlife. This represents 59% of the Cumberland Plain region. The CPCP will permanently isolate three of the four National Parks lands which currently protect significant areas of Cumberland Plain Woodland. These are Wianamatta Regional Park, Shanes Park, and Colebee Nature Reserve. The proposed isolation will result in the loss of most or all native mammal species from Colebee Nature Reserve, which is of insufficient size to maintain its populations of Echidnas, Kangaroos and Sugar Gliders in isolation. This loss of connectivity is likely to result in catastrophic decline of wildlife at a regional scale including the direct decline of fauna species – especially terrestrially-moving mammals e.g. Koalas, Echidna and Wombat Eastern Grey Kangaroos, which are vital for maintaining the grassy structure of healthy Cumberland Plain Woodland, will be particularly impacted by the loss of connectivity, with cascading impacts to many other grassy woodland plant and animal species which rely on these grazers to maintain suitable habitat. Impact on Wildlife Carers There is currently no staging confirmed in the Plan. It is therefore assumed that all development would be approved up-front, meaning that much of the area may be cleared in the first few months after approval. This will potentially put our volunteer wildlife carers under immense pressure to rescue and rehabilitate displaced, injured and orphaned native animals as a direct result of this proposal. At an absolute minimum WIRES urges that consideration be made in the budget to have qualified wildlife veterinarians, ecologists and carers on hand during clearing and construction works in order to mitigate impacts to native animals. Recommendations 1. The draft plan should be withdrawn and redeveloped using the framework of ecological sustainable development. 2. Protect a 500m-wide koala corridor at Mount Gilead. 3. Save Wianamatta Regional Park 4. Extend the Camden Tunnel 4km south and 6km north to save the wildlife corridor between the Elizabeth Macarthur Agricultural Institute and Razorback, Cobbitty Hills as well as existing homes. 5. Refrain from clearing critically endangered Cumberland Plain Woodland, because no type of revegetation offset can compensate for clearing the critically endangered landscape. 6. Create new conservation reserves of Cumberland Plain Woodland, rather than tree planting on waste land. 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. 7. Protect the Cumberland Conservation Corridor within the Strategic Conservation Area (SCA), a Federal Government-Community partnership which has already made significant improvements to connectivity. 8. Lock in a sufficient budget upfront to ensure offsets are actually delivered and do not permit taxpayer subsidies for developer offsets. 9. Stage development and require the satisfactory delivery of offsets from each stage before further development proceeds (as per the Western Sydney Growth Centres). This staged process will also allow for the movement of wildlife from areas being cleared and prevent wildlife carers being inundated with rescues all at once. 10. Ensure budgetary allowances for wildlife veterinarians, ecologists and WIRES staff on site during any works to minimise the acute loss of wildlife related to development. 11. Do not create offsets on existing public reserves of any kind. Taking into account the above information, WIRES encourages the use of the precautionary principle, as referenced in the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), in this instance and to consider our recommendations, as we cannot support the proposed Cumberland Plain Conservation Plan (CPCP) in its current format. I hope you will take these matters into consideration and plan for longevity of threatened ecosystems the wildlife dependent on them. Yours sincerely, Leanne Taylor, WIRES CEO

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