

Submission - Draft Cumberland Plain Conservation Plan

Thank you for the opportunity to comment on the Draft Cumberland Plain Conservation Plan.

I'm writing to express my concern with the so-called Cumberland Plain Conservation Plan and to request that the government rewrite it using the framework of ecologically-sustainable development.

I agree to publication on the department's website of my submission, name and postcode.

My experience living on the Cumberland Plain Woodlands (CPW)

I have lived on the CPW for most of my life including at my present location for the past 40 years. I daily observe the amazing and precious variety of flora and fauna present on my 28 acres of CPW. As I write this submission I look out over bushland which includes a giant Forest Red Gum (E. **tereticornis**) which provides Koala food habitat and is at least 150 years old. On my property I have seen the critically endangered Regent Honeyeater. Kangaroos, wallabies and wombats are seen almost nightly even though I am within one kilometre of Mulgoa Village. My property and others around me demonstrates the importance and effectiveness of biodiversity corridor connectivity allowing terrestrial animals to 'pass through' on their journey.

Critically Endangered Cumberland Plain Woodland

The Cumberland Plain Woodlands is listed as 'critically endangered', one step away from extinction.

Any plan to lessen protective laws/measures in conserving the Cumberland Plain Woodland would be an act of 'environmental vandalism' – not only a failure to protect but in fact 'legalising' actions to remove existing protective measures. Perhaps it would be an 'environmental crime' as defined on the Australian Federal Police site where it is defined as 'actions that have a significant impact on national environmental significance' with one of the points listed under this action being 'threatened species and ecological communities'?

INTERGENERATIONAL EQUITY

We are the 'caretakers' of our environment, a role aimed at conserving as much as we can for our children and the future generations.

Intergenerational equity must be maintained for future generations and this can only be achieved by planning for ecologically sustainable development. The draft CPCP fails to address and deliver intergenerational equity as it does not provide planning for ecologically sustainable development.

Draft Cumberland Plan Conservation Plan - Major Shortcomings

Currently, the plan would result in fragmentation and clearing of vast areas of habitat and threatened ecosystems and destroying many existing essential biodiversity corridors. This would have devastating consequences for the wildlife and would undoubtedly lead to more

extinctions. It would allow clearing of over 10% (or 1000 hectares) of Cumberland Plain Woodland, a critically endangered ecosystem.

KEY FACTS & FIGURES

On reading the draft CPCP I concur with the findings by the Greater Sydney Landcare which states:

Total land to be cleared/developed = 10,470 hectares
Total endangered ecosystems destroyed = 1,780 ha
Total Cumberland Plain Woodland destroyed = 1,014 hectares
Proportion of Cumberland Plain Woodland ecosystem destroyed = >10%
Area of wildlife habitat to be isolated by roads/development = 12,807 ha
Proportion of the Cumberland Plain region to be isolated = 59%
Endangered species impacted = Unknown*little/no survey
Total funding offered (developer contributions) = \$84 M instalment *total unknown
Total offsets required = 5,475 hectares
Cumberland Plain Woodland offsets required = 3,170 hectares
Aboriginal sites destroyed (total) = Unknown *little/no survey
Aboriginal burial grounds destroyed = At least 2
Homes to be evicted for development = At least 20
Homes to be evicted for reserves(developers offsets) = At least 30
Existing National Park land destroyed = >84 hectares
Existing Conservation/Restoration areas destroyed = At least 8

Effects on Rural land.

Furthermore current rural land and the current uses would be lost. As stated by the Action Network Group, **'If the Plan is granted biodiversity certification by the state and federal governments, the 10,014 hectares of rural land reclassified as 'urban capable' can be released for development without the need for further environmental impact assessments.** Future opportunities to secure koala habitat or mitigate environmental damage on the 'urban capable' rural land will be lost'.

Koala habitat/corridors not fully identified and protected

Penrith LGA has not been identified as koala habitat/corridor regardless of the area being part of the Department of Environment's map, the Greater Southern Sydney Koala Corridor.

In fact 2 koalas were found on Mulgoa Road, rescued and relocated on the 25th June, 2018 (female) and on the 30th August, 2018 (male). How many others have passed through adjacent bushland without being seen?

We know that Penrith adjoins the Greater Blue Mountains World Heritage Area and that koalas are there. Why would a 'geographical' border be indicative of koala habitation while the actual sightings and relocation of koala's be ignored or not included in the draft CPCP?

KEY CHANGES REQUESTED TO THE DRAFT CPCP

The CPCP has major key shortcomings especially as it will replace the developer's legal requirements to compensate for ('offset') this damage.

I agree that the following key changes, as stated by Greater Sydney Landcare, need to occur to the draft CPCP:

• KEY CHANGES TO PROPOSED DEVELOPMENTS

- o Protect a 500 m wide koala corridor at Mount Gilead
- o Tunnel 2 km to save Wianamatta Regional Park
- o Extend the Camden Tunnel 4 km south and 6 km north – saving EMAI-to-Razorback Wildlife Corridor, Cobbitty Hills & homes
- o Clearing 10% of the entire Cumberland Plain Woodland ecosystem is unacceptable

• KEY CHANGES TO PROPOSED OFFSETS

- o Protect the Cumberland Conservation Corridor within the Strategic Conservation Area (SCA)
- o Allow smaller lots to be eligible for offsetting (SCA) and improve offset funding accordingly
- o Demand new, large public reserves of Cumberland Plain Woodland (CPW) to offset loss of CPW in three National Parks
- o Restore the focus of offsets to Cumberland Plain Woodland – the ecosystem most impacted by these developments
- o Protest landowner-specific exclusions in the SCA

• SCRAP THE FAILED 'AVOIDED LAND' model (E2 ZONING & CREEKS)

- o CPCP riparian corridors and small bushland parcels are left in no-man's-land, neither developed nor conserved as offsets
- o 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
- o 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'

Aboriginal heritage

The draft CPCP fails dismally to identify Aboriginal cultural sites and places. The combination of the lack of consultation with Traditional Owners and other significant Aboriginal people, the paucity of culturally inclusive surveys and documentation continues. Aboriginal culture has existed in Australia for 80-120,000 years.

The draft CPCP must include Aboriginal Cultural Heritage identification and conservation if it claims to be an 'inclusive' planning and conservation plan.

Yours sincerely

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