



Friday, 09 October 2020

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

Dear Sir / Madam

Submission to exhibition of Draft Cumberland Plain Conservation Plan ([REDACTED]

Thank you for the opportunity to make submissions on the draft CPCP exhibition documents. As owners of Stonequarry, Bradcorp provides the following for the Department's consideration in finalising the draft plan.

Before discussing the draft plan and Stonequarry specifically, we congratulate the NSW Government and the Department in their efforts thus far in preparing the CPCP. The finalised plan will be a much-needed, critical piece of environmental policy and legislation that supports both the long-term growth of Western Sydney while protecting important biodiversity in the region. Bradcorp appreciates the resourcing required for the preparation of a plan of this scale. We trust that our submissions here will add to the 'knowledge base' and assist the Department in producing a robust, well-informed final plan.

Stonequarry

[REDACTED] parcel located on the western edge of the Picton township.

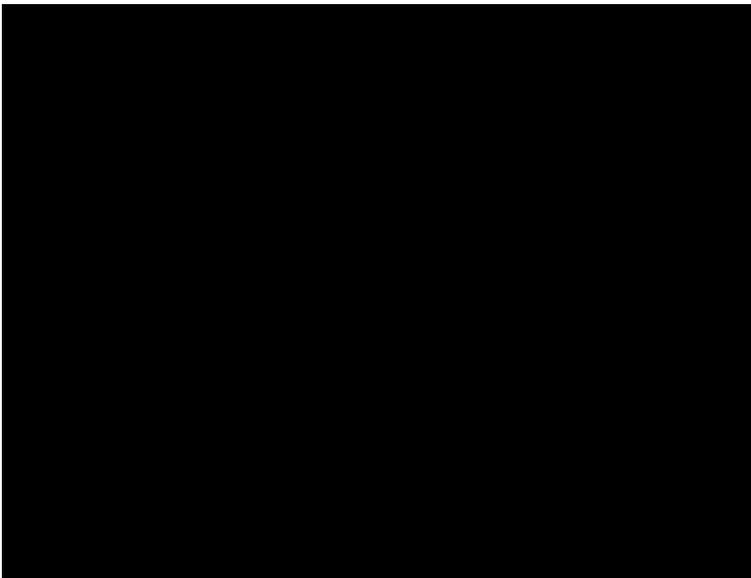


Figure 1: Stonequarry Location (Source: Google Earth Pro)

██████████ benefits from a series of development approvals issued by Wollondilly Shire Council relating to its development as an urban resort, comprising a hotel, accommodation, golf course and various associated facilities. The approvals also allow construction and individual property titles for 120 resort units, 174 tourist units and 108 condominiums for over residents aged over 55 years (i.e. a seniors housing complex).

The 'substantial commencement' of these approvals has been accepted by Council. Part of Stonequarry is already used for rural-residential living (54 lots have been developed and sold), full construction plans for the golf course have been approved and road and drainage works for the approved resort are in place. Major infrastructure sufficient to service the full extent of the existing approvals has been constructed by Bradcorp including potable water supply from Thirlmere, extension of high voltage electric supply from Barkers Lodge Road and Thirlmere way, construction of a sewerage treatment plant on site together with an irrigation disposal area and creation of a community scheme and subdivision of the site. Vegetation clearance in accordance with approvals granted has also been undertaken.

The property, comprising Lots ██████████ in DP ██████████ is within a registered community title subdivision development. The community title subdivision was created as part of procedural planning for the approved development of the land.

An overall master plan of the approved development is provided at **Attachment A**. On request, Bradcorp can further particulars of the approved development and its commencement.

Completion of the development has been delayed due to economic climate considerations however it is Bradcorp's intention to proceed.

The draft CPCP and Stonequarry

The spatial viewer forming part of the draft CPCP exhibition package identifies *Native Vegetation* (being part *Shale Sandstone Transition Forest*) within Stonequarry. It also proposes that the majority of Stonequarry be included as part of a *Strategic Conservation Area* south of Barkers Lodge Road.

Extent of *Native Vegetation* / *Shale Sandstone Transition Forest*

In respect to the spatial viewer 'layers' of *Native Vegetation* and *Shale Sandstone Transition Forest*, it would appear that the identified extent of each is inconsistent with the actual 'on ground' extent. We say this on the basis of comparing these layers with the *NSW imagery* 'layer' of the spatial viewer. Further, a comparison of the spatial viewer *NSW imagery* 'layer' with the overall master plan of the approved development at **Attachment A** demonstrates that the actual extent of vegetation is consistent with that being retained as part of the commenced golf course component of the approved development.

Strategic Conservation Area ('SCA')

The exhibition package, in discussing the proposed SCAs, outlines:

- The proposed SCAs represent the best opportunities to deliver biodiversity outcomes and support the Cumberland subregion's ecological function.
- Approximately 28,300 ha of the Plan Area has been identified and mapped as SCA.
- Not all of the mapped SCA will be established as conservation land under the Plan. However, it is estimated that around 11,000 ha of land will need to be protected to meet the draft Plan's offset target of 5,475 ha of native vegetation. The 11,000 ha takes into account non-target vegetation communities, cleared areas to

accommodate recreational and visitor facilities, and lots that may be needed to meet boundary configurations necessary for efficient management of a public reserve or national park.

- New conservation lands will be acquired on a voluntary basis, in consultation with landowners. Compulsory acquisition is proposed to be used in limited circumstances to acquire land that is critical for creating a proposed conservation reserve when voluntary acquisition has not been otherwise successful.
- Identifying suitable conservation lands from the SCA will continue over the life of the Plan to ensure that potential sites are appropriate, can be implemented and are based on the best available information and data. This includes a review of the SCA mapping, in line with proposed five-yearly reports.

Bradcorp appreciates the purpose of the proposed SCA nomination over Stonequarry as part of a possible broader conservation area. However, it would appear that this has been done unaware of the approved and commenced resort and residential development on the land. In these circumstances it will not be available as potential conservation lands. It would therefore serve no strategic purpose for the SCA nomination over Stonequarry to remain in the finalised plan. The removal of the nomination, in our view, would not compromise the intended outcomes given the extent of the remaining surplus of SCA nominated land above the offset target.

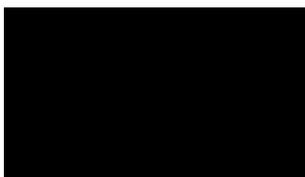
Conclusion

In summary:

- Bradcorp congratulates the NSW Government and the Department in its efforts to enable the long-term growth of Western Sydney and protect important regional biodiversity.
- Bradcorp recommends that in respect to Stonequarry:
 - That the mapped extent of *Native Vegetation* and *Shale Sandstone Transition Forest* in the exhibition documents be revised to reflect the 'on-ground' situation as a result of the commencing of the approved resort and residential development of the site.
 - That the SCA nomination over it be removed as the land will not be available as potential conservation lands by reason of the approved/commenced development and therefore serve no strategic purpose in the finalised plan

Thank you for considering our submissions. We would welcome the opportunity to discuss the above in further detail. If you wish to do so or have any questions please don't hesitate to contact us.

Yours sincerely,



Grahame Kelly
Executive Director

