

28 October 2020

Department of Planning, Industry and Environment

Green and Resilient Places Division

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**Re: Draft Cumberland Plain Conservation Plan**

I am writing to provide commentary on behalf of Blacktown Workers Club in relation to the Draft Cumberland Plan Conservation Plan.

Blacktown Workers Club are the owners of [REDACTED] Luddenham NSW 2745 [REDACTED]

The Draft Cumberland Plan Assessment Report notes that '*detailed mapping of the extent and condition of native vegetation within the nominated areas was undertaken based on field surveys and data analysis, including interpretation of aerial photo imagery.*' Our concern with this document and the maps produced is that in relation to the land owned by the Club it appears that assessment may have been limited to only aerial imagery.

The mapping that has been produced sets an expectation over the vegetation type that that would 'exist' on the site. This expectation would at best complicate future planning and at worst limit the development potential of the land.

The report sets targets under commitments to avoid land containing the listed tree species and given that the current mapping shows some of these species on the subject land, we are writing to voice our concern over reliance on inaccurate mapping over the land.

An example of this is shown by comparison of a recent aerial image of the south eastern corner of the land (refer Figure 1) and a recent photograph of that area from the site (refer Figure 2) against the proposed mapping that has been released for comment (refer Figure 3).

What this indicates is that the majority of the area mapped as Cumberland Plain Woodland is in fact little more than an earthen bank. Furthermore the trees that do exist on this bank are recent regrowth – some native and some exotic.





Figure 1 - Aerial image as of 1/10/20 (Source: Nearmap)

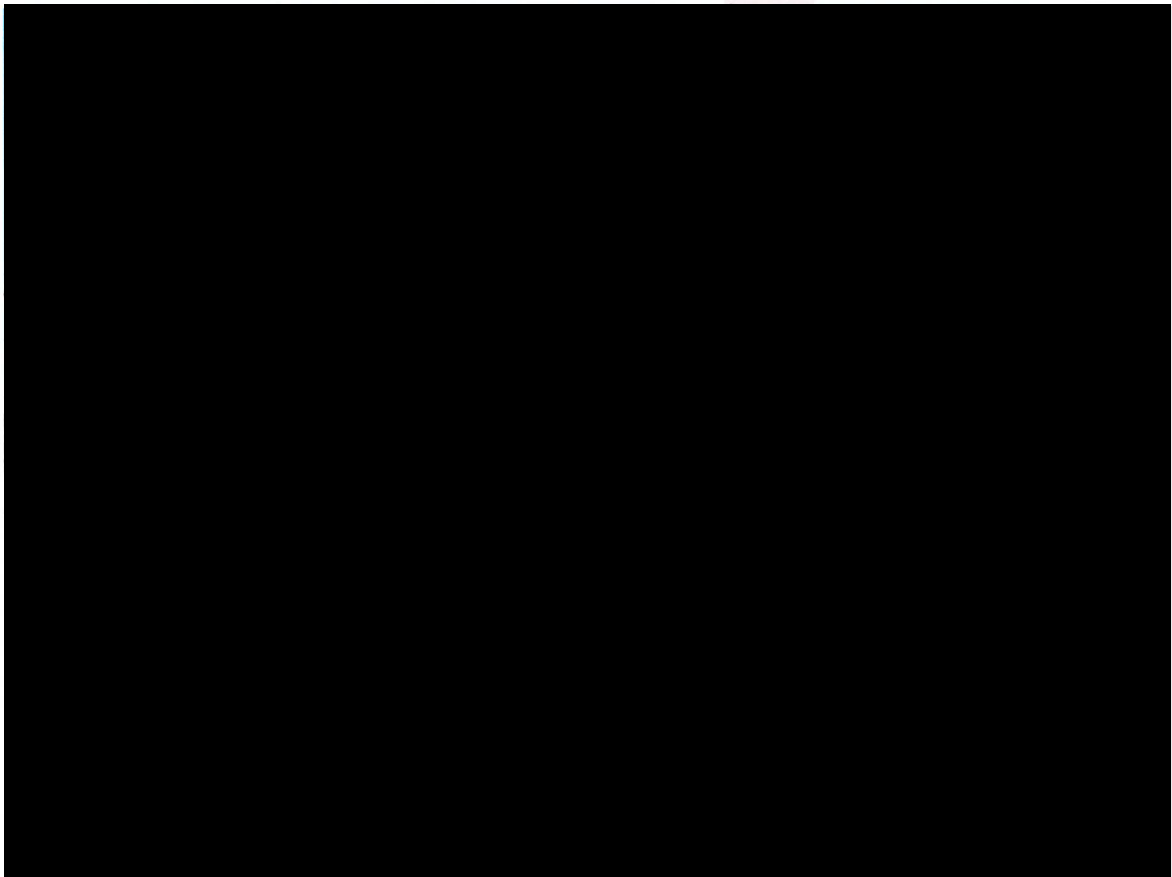


Figure 2 - Photograph of SE corner taken 14/10/20 (Source: Filipec)



Figure 3 - Excerpt from proposed mapping where 'Cumberland Plain Woodland' is shown in orange (Source: Dept Planning)

In conclusion we are concerned that flawed mapping will have a deleterious impact on our land and would contend that reliance on mapping should only occur after a comprehensive Arboricultural Assessment is carried out (*utilising Mattheck & Breloer (1994) Visual Tree Assessment and IACA (2010) Significance of a Tree, Assessment Rating System (STARS)*) by a qualified Arborist, with the data resulting from that assessment used to populate the map.

Yours Sincerely



BLACKTOWN WORKERS CLUB PTY LIMITED