

Thank you for this opportunity to comment on this Draft Cumberland Plain Conservation Plan. Please accept for your consideration the following, which is my submission in regard to this Plan.

My name is [REDACTED] and I wish to at this outset to raise my objection to the Plan in its current form, for the reasons which I will list below.

Whereas I welcome such a broadscale planning document, both in terms of geographical scope and the timescale involved, I am most concerned about the following major issues, some of which I propose to expand upon below:

- The provision for a significant further loss of rural land, with over 10,000 hectares of rural land being relegated to the category of 'urban capable', with the resultant attribution of its status as being out of consideration for further environmental impact statements.
- Further significant reduction of the much diminished, critically endangered Cumberland Plain Woodland.
- Commitments for allocation of conservation land are lacking in clarity, and in any case are not underpinned by conservation principles per se. Instead, they appear to attach to the progress of developer initiatives and countenance very long-term completion dates.
- Provisions for protection of koala habitat, which has been justifiably the subject of much urgent scrutiny, appear to be insufficient and severely flawed - arguably at times dangerously counter-productive.

1 – Loss of Rural land

I am concerned about each of the following consequences of the acquisition of this land for urban development:

- a) Yet again it appears that expediency for opening it up to development is being allowed to trump conservation considerations: the Cumberland Plain was previously identified as a prime target for biodiversity conservation offsetting.
- b) As with our state's wildlife habitat, I am very concerned about the poor level of importance that this government is attaching to our state's food security and the need for having a strategy to safeguard it. In both these cases, we are witnessing a constant chipping away of available land that should *a priori* be set aside responsibly and adequately for our wildlife and for growing the food for our major cities and for our regional areas. It is high time that our governments fulfilled their role in providing for proper governance of our environment and for the social welfare of all of our people. Clearing of land for development of residential habitation and other exploitative purposes should be planned to occur outside of these areas of primary conservation value. But instead, I believe once again we are witnessing a rationalisation of the principles that are to be applied, so that market-driven imperatives are allowed to reshape and rescale the context to suit.

2 – Further reduction of the Cumberland Plain Woodland

The plan provides for a 16 percent reduction of the critically endangered Cumberland Plain Woodland, which has already been diminished to 6 percent of its original size. It seems to me that we have already gone too far in destroying this ecosystem. We know now that it is already critically endangered, so how can we justify such a massive further reduction?

3 – Lack of commitment to deliver conservation land

The NSW State government has recently made much publicly of their apparent dedication to improved ecological management, with their facilitation of significant media coverage about their plans for the setting up of the Georges River Koala Reserve. However, it appears that this reserve may not become a reality in its entirety until 2040, and much of its rollout will be linked to offsets by developers. I object to this persistent lack of governmental input in the underwriting of conservation areas: must it always be the case that, if someone does not make a dollar out of it, it cannot be allowed to happen? Is that to be the constraint on our legacy for future generations?

4 – Insufficient protection of koala habitat

The Plan appears to ignore or run counter to the recommendations of the Chief Scientist in the Report on the Protection of Koala Habitat. Most obviously, the east-west corridor provisions are very lacking. Please refer below in the list of recommendations from the Georges River Environmental Alliance, which elaborates on this issue and also puts the recommendations for improvement / rectification. Despite the obvious public recognition of the ever more threatened status of koalas in NSW since the recent bushfires, our government appears to be struggling – or reluctant - to provide comprehensive measures to secure their survival, even with the assistance of the scientific experts after major investigation and the tabling of those scientists' recommendations.

MY ENDORSEMENT OF THE RECOMMENDATIONS OF THE GEORGES RIVER ENVIRONMENTAL ALLIANCE

I wish to make clear that I fully endorse the recommendations in relation to the Draft Cumberland Plain Conservation Plan from the Georges River Environmental Alliance, and would wish you to consider them in full on my behalf, as I fully concur with them. I have extracted them below:

1. The Plan must establish **multiple new Conservation Reserves**, to off-set any Cumberland Plain vegetation loss. Any off-sets must be 'like for like', and create additionality. The 3 proposals, (the Koala Reserve, Gulguer and The Confluence), are not sufficient. This plan will partially destroy two reserves that were specifically set aside as offsets for the M7. **Offsets are meant to be in perpetuity, so this must never happen.**
2. The need is to '**save**' woodlands that remain, not do 'replacement' plantings, which will take generations to yield any cool canopy and biodiversity protection and enhancement.
3. **Six E-W koala corridors** should be established to link the Georges River koalas to bushland of the Nepean, to that of the Cumberland Plain, and beyond to the Blue Mountains. The priority koala corridors of more than 425m in width should be at Noorumba Reserve and Beulah-Woodhouse Creek, (at Mt Gilead), and they must extend even beyond the Nepean to reach Mt Annan and the Western Sydney Parklands. **The Koala Reserve** must include the important Peter Meadows Creek koala habitat, and abandon the road named as the 'Georges River Parkway' as it will threaten the koala population.
4. The **main roads should be re-aligned or tunnel** to avoid high value bushland and open space. For example, the Camden tunnel needs to be extended 6kms northwards and 4kms southwards to save the Camden Park to Razorback wildlife corridor and Cobbitty Hills bushland. The South Creek corridor and Colbee NR should be untouched by road development. A tunnel of 2kms is required to save Wianamatta Park.
5. The CPCP must **lock in a budget** of at least \$540M up-front (as per Western Sydney Growth centres offset program), stage developments so that **no new development** happens until past offset commitments have been delivered and not use loopholes in NSW law to re-label existing public reserves as offsets for developers. **Public land should not be used for offsets** under any circumstances because this does not achieve **additionality**.

Yours faithfully,

