



Photo credit: Royal Botanic Gardens

## **The Draft Cumberland Plain Conservation Plan: An extinction plan for the South West Sydney koalas and other wildlife**

### **Introduction**

The Cumberland Plain is home to the largest koala population in Greater Sydney and one of the only chlamydia-free populations in NSW. This unique region also contains 100 threatened or migratory animal and plant species, 680 kilometres of waterways including three water catchment areas and 68 hectares of wetlands of national importance.

The [Draft Cumberland Plain Conservation Plan](#) (the Plan) covers approximately 200,000 hectares from north of Windsor to the south of Picton, and from the Hawkesbury—Nepean River in the west to the Georges River near Campbelltown in the east. It has been developed to offset the detrimental environmental impacts of the new urban growth centres of Greater Macarthur, Wilton, the Greater Penrith to Eastern Creek Investigation Area and to some extent the Western Sydney Aerotropolis.

If the Plan receives biodiversity certification from the state and federal governments, a total of 10,014 hectares of rural land will be reclassified as ‘urban capable’ and become eligible for release without the need for further environmental impact assessments. The Government, not the developers, will take responsibility for identifying and setting aside land for conservation over the next 30 odd years.

The Minister for Planning and Public Spaces Rob Stokes describes the Plan “as one of the largest strategic conservation planning exercises ever... and a once-in-a-generation commitment to protect south-west Sydney’s rich environmental assets and important koala population while providing certainty for investment in a growing part of Sydney.”

The Plan, however, falls short of meeting this goal and will not adequately protect the koalas for the following reasons:

### **Key Criticisms of the Plan**

- The Plan proposes massive urban development on the Cumberland Plain, a region that was designated as a “first priority” biodiversity offset area by the federal government in 2012 for two other major Growth Centres. The designation was in recognition of its severely degraded environmental state.

- The Plan will reclassify a total of 10,014 hectares of rural land as 'urban capable' while only promising to initially set aside 5,475 hectares of native vegetation in new conservation lands.
- The Plan acknowledges that 1,014.6 hectares of critically endangered Cumberland Plain Woodland or around 16% of the remaining 6,400 hectares will be impacted by the proposed development.
- The Plan provides no assessment about how the loss of so much rural land will impact the Sydney region's food bowl capacity.
- The Plan acknowledges that the urban heat island effect in Western Sydney "will increase as urbanisation increases" but proposes only minimal measures to mitigate its effect. This area regularly experiences record summer temperatures.
- The Plan fails to set aside enough land to properly protect a thriving population of 600 to 1,000 koalas, the largest chlamydia-free koala population in NSW.
- The Plan's proposed construction of 120 km of Koala exclusion fencing will isolate and fragment Koala colonies, especially because the Plan protects only one of the six east-west movement corridors recommended in the Chief Scientist Koala Report.
- The Plan acknowledges that conservation land will only be secured slowly over time. No firm commitment has been made about how much land will eventually be protected.
- The Plan does not address the significant adverse impact on the scenic, historic and physical qualities of one of the most heritage rich and picturesque rural landscapes in NSW.

### In detail

- **Massive urban development is being proposed in a subregion that has been previously designated as a “first priority” biodiversity offset area.** The Cumberland Plain was designated as a “first priority” offset area when the federal government granted strategic biodiversity certification to the North West and South West Growth Centres in 2012 (Growth Centres Biodiversity Offset Program). Now, four more growth centres have now been added in or near the subregion, representing a 50% increase in land in the area classified as 'urban capable'. More intensive development than originally planned has also been proposed for both the North West and South West Growth Centres. The population of Menangle Park, Mount Gilead and Appin, an area that is home to the Campbelltown koalas, will swell from 3,000 to 109,00 people over the next 36 years.
- **The Plan will release a total of 10,014 hectares of rural land for urban redevelopment while setting aside only 5,475 hectares of native vegetation in new conservation lands.** The conservation program will include the likely addition of three new reserves but some of this land is already publicly held. The Office of Strategic Reserves, for example, currently owns 60% of the 1,130 hectares of land to be initially set aside for the proposed Georges River Koala Reserve. At least 25% of the targeted 5,475 hectares of native vegetation will be delivered through the ecological restoration of threatened native vegetation. Agreements will also be entered for biodiversity stewardships on private lands.
- **The Plan will impact 1,014.6 hectares or almost 16% of the critically endangered Cumberland Plain Woodland.** Only [6,400 hectares or 6% of the original 107.00 hectares](#) of Cumberland Plain Woodland still exists. The Growth Centres Biodiversity Offset Program is meant to protect at [least 2,400 hectares](#) of Cumberland Plain Woodland or other ‘grassy woodland’ communities. Its most recent [Annual Report](#) acknowledges that cost and suitability constraints may impede its ability to secure high-value biodiversity offsets on the Cumberland Plain. To date, this Program has only protected [715 hectares of native vegetation](#), of which 369 hectares is Cumberland Plain Woodland. Because land purchases and biodiversity stewardship agreements are primarily funded by Special Infrastructure Contributions (SICs) levied on developers, they are staged to coincide with the rate of development instead of being secured upfront.

- **The Plan only commits to the creation of one reserve - the Georges River Koala Reserve.** Two other reserves, the Gulguer and the Confluence are still under investigation for feasibility. The Plan also acknowledges that the 755 hectares of land to be incorporated into the Georges River Koala Reserve will only be secured by 2040. Sufficient clarity is also lacking about the representation of Cumberland Plain Woodland or other ‘grassy woodland communities’ in the 4,795 hectares of ‘avoided land’ to be zoned E2 (environmental conservation).
- **The Plan lacks a firm commitment to the amount of land to be protected and acknowledges that conservation land will be secured slowly over time.** The Plan says “it expects that around 11,000 hectares, or approximately double the Plan’s offset commitment of 5,475 hectares of impacted native vegetation, will be protected within new conservation lands.” Through a peer-review process, a “strategic conservation area” of 28,300 hectares, which includes 18,300 hectares of native vegetation, has been identified. It apparently “represents the areas in the Cumberland subregion that are considered most likely to be viable in the long-term and to maximise ecological function and connectivity across the landscape.” But the Plan does not indicate whether any steps will be taken to protect the integrity of the strategic conservation area before the additional land can be set aside or protected in other ways. Consequently, the Plan could face similar suitability and cost constraints to those already identified in the Growth Centres Biodiversity Offset Program’s [most recent annual report](#).
- **The Plan provides no assessment about how the loss of so much rural land will impact the Sydney region’s food bowl capacity.** A [recent article](#) in *The Australian* quoted research that shows that agricultural production in the Greater Sydney region accounts for a \$1 billion of the state’s \$16 billion annual total. According to the recently published [Sydney’s Food Futures Report](#), produced by UTS’s Institute for Sustainable Futures, if current trends in urbanisation continue, the Sydney region will lose 60% of its total food production by 2031. Instead of meeting 20% of the city’s fresh food needs, in just over a decade, the Sydney basin will provide just 5% of demand.
- **The Plan acknowledges that the urban heat island effect in Western Sydney "will increase as urbanisation increases," but measures to mitigate its impact are minimal.** Western Sydney University [research](#) has identified that in Sydney’s treeless urban areas, morning summer surface temperatures are nearly 13 degrees celsius higher than in vegetated areas. Summer temperatures can often soar to over 50 degrees celsius in Western Sydney. While the Plan notes that "large amounts of hard and dark-coloured surfaces such as roads and roofs cause localised warming," the main solution put forward to address the heat island effect is ‘Greening our city’ - a Premier’s Priority program that was announced in 2019 and designed to ensure one million trees are planted by 2022. In the meantime, [developers have already been granted permission to remove even small clusters of mature trees](#) and dams on rural properties for new housing estates. New block sizes are typically too small to accommodate trees or even significant greenery.
- **The Plan fails to set aside enough land to properly protect the koala population.** The proposed Georges River Koala Reserve will eventually set aside 1,885 hectares to protect the koalas’ important north-south primary habitat corridor and the Plan commits to protecting an additional 610 hectares of important koala habitat. But it falls far short of securing all of the primary, secondary and tertiary koala habitat corridors. The Department of Planning, Industry and Environment (DPIE) 2018 report, [Conserving Koalas in the Wollondilly and Campbelltown Local Government Areas](#) estimated that 8,293.46 hectares would need to be set aside for this purpose.
- **The Plan’s lack of emphasis on adequately protecting koala habitat for a recovering and healthy population is both shocking and surprising given that recent events have decimated the state’s koala populations.** Last season’s horrific bushfires killed thousands of koalas and destroyed as much as a fifth of their habitat in NSW. In fact, a recent study by Biolink, commissioned by the World Wide Fund for Nature Australia, reported an [overall 71 per cent fall in the koala population across six firegrounds](#), from south of Port Macquarie on NSW’s mid-north coast to near Ballina in the state’s north. The state’s koala population is now predicted to become functionally extinct in the wild before 2050,

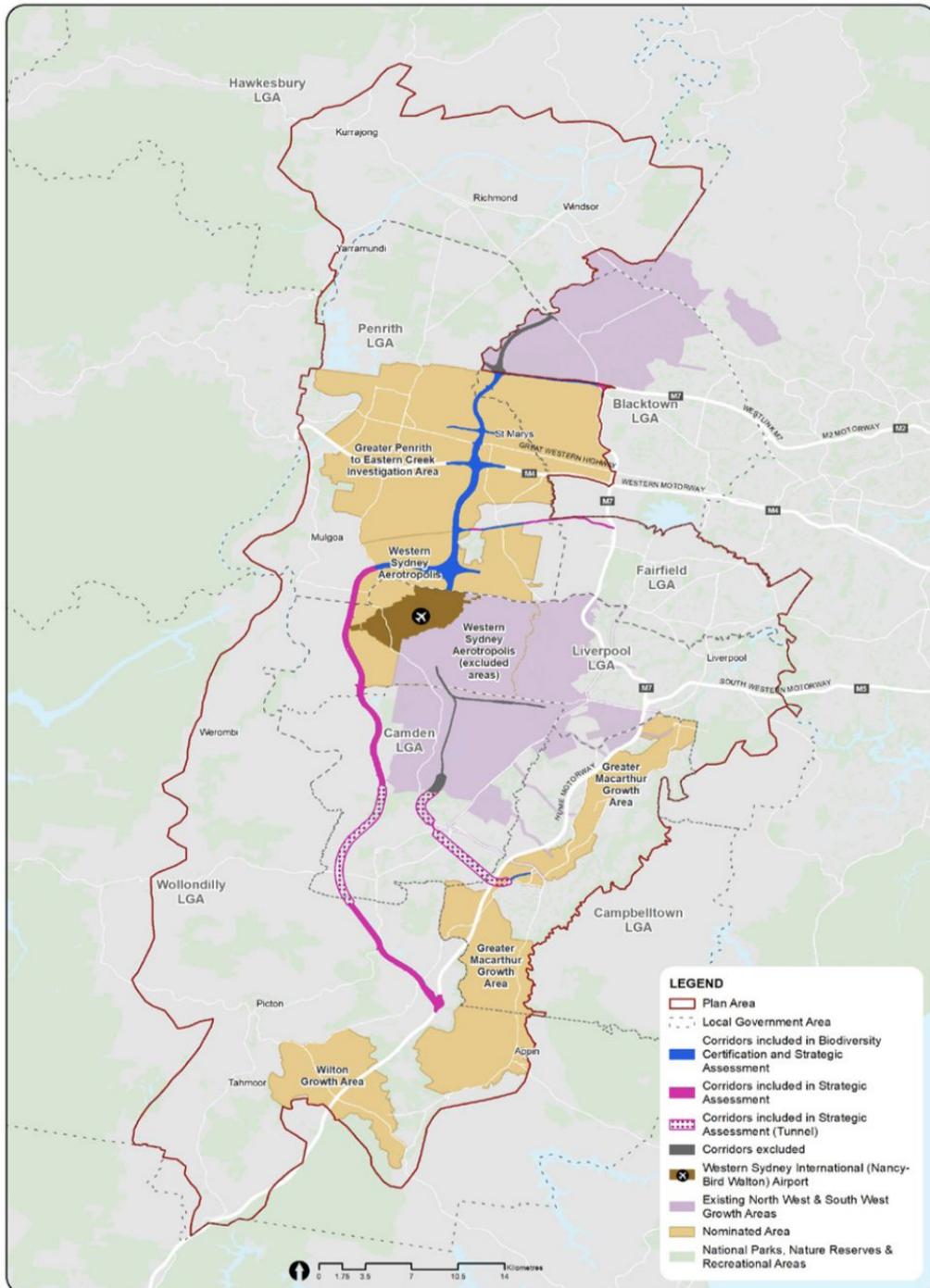
according to a report released in June by the Upper House Inquiry into [Koala populations and habitat in NSW](#).

- **The Plan does not accept the Chief Scientist's recommendation to secure all of the east-west habitat corridors for the koalas.** The Plan acknowledges "east-west connectivity between the Georges and Nepean rivers is important for the resilience of the Southern Sydney koala population," but it discounts the recommendation made in a recent report prepared by the Chief Scientist's expert panel, [Advice on the protection of the Campbelltown Koala population](#) (Chief Scientist Koala Report), to protect the habitat of the six east-west corridors. Instead, the Plan sites unspecified "scientific advice from the department and the research community...that the existing six east-west corridors in the Greater Macarthur Growth Area are too fragmented and not wide enough to support koalas over the long term." Only the Ousedale Creek to Appin North east-west corridor will be protected.
- **The Plan has not adopted a holistic planning approach to protecting the South West Sydney koalas.** The Plan does not address the importance of maintaining the Woodhouse Creek to Beulah (east-west corridor) at Mount Gilead, which is the fastest and easiest route for the koalas between the Georges and Nepean rivers. Mount Gilead and Menangle Park are not part of the land subject to biodiversity certification in the Plan because they are covered by an alternative development assessment process. Nevertheless, the Chief Scientist Koala Report highlights "the importance of a holistic planning approach," arguing that "by their very nature, the habitat corridors within the two study areas cross multiple tenures and landscapes, connect internally and with each other," and that "koalas, in using these corridors, do not recognise lines on maps." With respect to the benefit of maintaining east-west connectivity between the Georges River and Nepean River, the Chief Scientist Koala Report underscores its importance:

*The habitat in this region contains high quality feed trees due to the sandstone shale transition forest... it is essential that this habitat supports the movement of koalas such that dispersing koalas can move through the landscape, can breed to ensure genetic diversity, and can access refugia in times of stress, drought or other threats.*

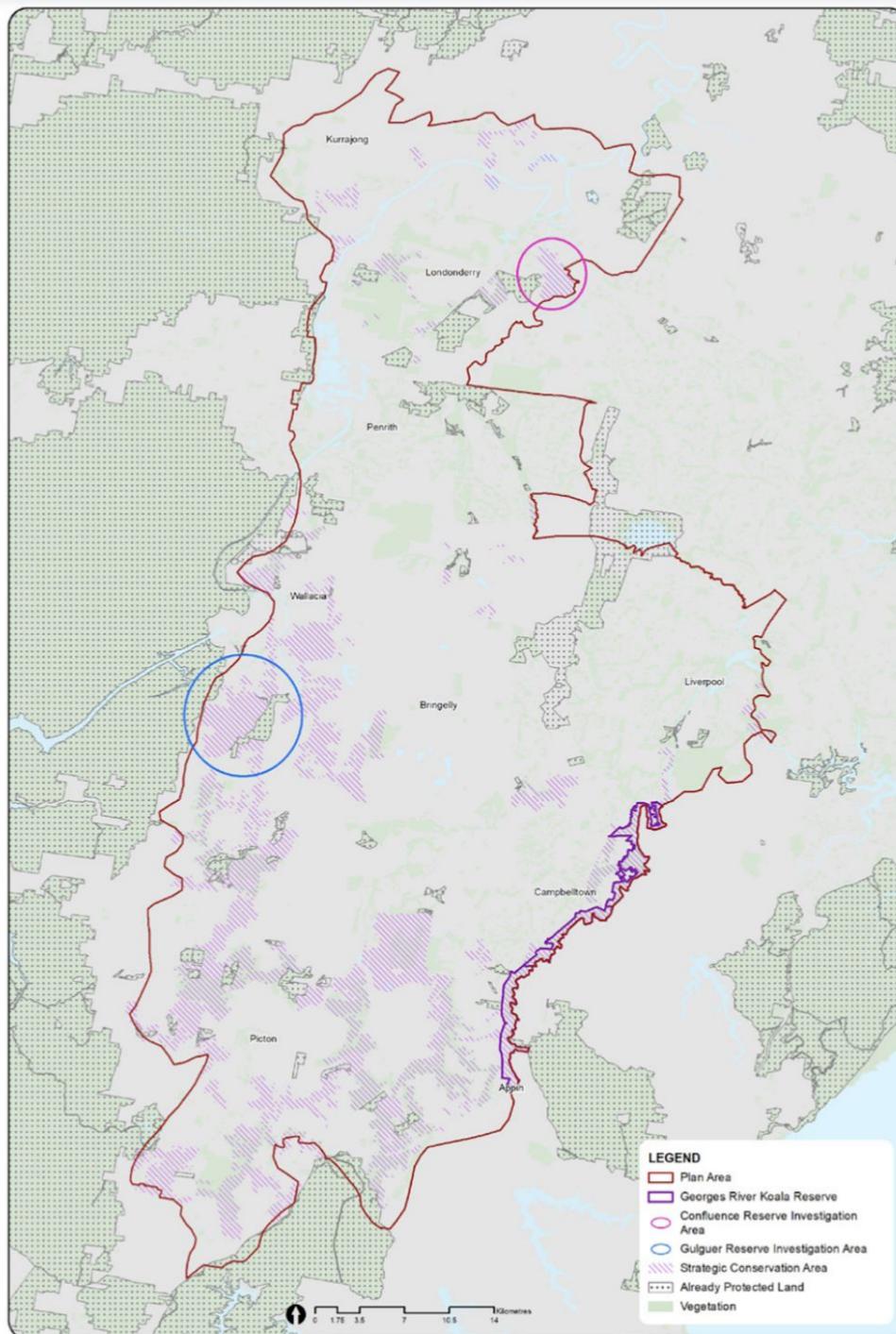
- **The proposed construction of 120 km of Koala exclusion fencing will isolate and fragment an expanding and thriving koala population.** While the Chief Scientist Koala Report also recommends koala fencing to keep wildlife away from roads and residential areas, the Plan does not incorporate the Report's recommendation for habitat corridors with a recommended width of 390-450 metres, to be enhanced by 'Asset Protection Zones' and 30 metre wide buffers on either side of the corridor to "reduce the impact of threats, light and noise on koalas." Further, the Chief Scientist Koala Report notes that the Ousedale Creek to Appin North corridor, the Plan's preferred east-west corridor, is impeded by "numerous suburban and rural properties between the habitat edge and road surface, on both the east and west sides." The Plan also doesn't specify an adequate number of koala underpasses or suitable crossings across busy Appin Road.
- **The Plan only includes limited measures to mitigate the effects of climate change on wildlife.** The Plan acknowledges that "koala habitat in river and creek valleys provides important refugia and resilience to warming and drying climates, a characteristic that is likely to become increasingly important with climate change." But if the proposal to build 120 km of koala fencing is implemented without an adequate number of appropriately sized movement corridors, the koalas will be trapped. The Chief Scientist Koala Report confirms the need to maintain connectivity, noting that it helps to "avoid the creation of dead ends where koalas face threats without routes of escape." The Report notes that "once housing development occurs along the western flank of the Mount Gilead site" (Stage 2 of the Lendlease Mount Gilead development), "the route for koalas to move east or west will be through a narrow strip of habitat at the confluence of the Nepean River and Menangle Creek...and conceptual plans illustrate this habitat being potentially surrounded by three roads." Effectively this habitat corridor will become a functional 'dead-end.'

- The Plan does not address the significant adverse impact on the scenic, historic and physical qualities of this unique landscape.** The protection of the undeveloped, rural character of the landscape of the Scenic Hills around Campbelltown has been a priority since the earliest planning schemes of the Post-WW2 period. This Plan will completely undo a visionary planning process that attempted to constrain the footprint of the urban areas and encourage only development that would be sympathetic to the scenic and cultural values of one of the most picturesque and historic rural landscapes in NSW.



**Figure 2.** Draft Cumberland Plain Conservation Plan Area and scope

Note: The yellow areas are the new nominated Growth Areas.



**Figure 4.** Western Sydney strategic conservation area and reserve investigation areas

Note: Only the Georges River Koala Reserve (outlined in dark purple) has so far been designated for protection. The Plan says it expects that around 11,000 hectares of the Strategic Conservation Area (28,300 hectares, see map above) will be protected over the life of the Plan (30+ years) but the Plan offers no guarantees about whether the land will be acquired or permanently secured for biodiversity conservation. Assurances also aren't given about how the Strategic Conservation Area will be protected in the interim period from environmental degradation or further development pressures. Cost and suitability are already constraining the ability of the Biodiversity Offset Program for the South West and North West Growth Centres to secure biodiversity offsets of high conservation value on the Cumberland Plain.