



Draft Strategic Assessment  
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Department of Planning  
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### **Draft Sydney Growth Centres Strategic Assessment Draft Program Report**

This is the submission of Western Sydney Conservation Alliance Inc (WSCA) in response to the subject matter.

#### **Preamble**

The strategic assessment is a bitter disappointment. It is not committed to conservation but to development. We are left to decry the desertion of conservation of flora and fauna species and ecological communities on the Cumberland Plain by the NSW Government. Our only hope is that the Commonwealth Government has a higher commitment to conservation provisions of the Environment Protection & Biodiversity Conservation Act (EPBC Act) than the NSW Government has to the NSW Threatened Species Conservation (TSC Act).

#### **Background**

Each major paper emanating from the NSW Government in recent years has disclosed an intent of the NSW Department of Planning and the Department of Climate Change and Water to permit development at cost to biodiversity across Western Sydney. The draft Growth Centres Conservation Plan, exhibited in February 2007, provided for the wide scale destruction of TSC Act and EPBC Act listed ecological communities via argument that small remnants had little or no biodiversity value. But the NSW Scientific Committee, when listing Cumberland Plain Woodland in 1997, acknowledged that small remnants make up the bulk of extant Cumberland Plain Woodland. To negate such losses in the Growth Centres, the NSW Government introduced a concept of Biodiversity Certification which purportedly guaranteed "improve or maintain" outcomes through offset acquisitions, mostly outside the Growth Centres "in other areas of Western Sydney and more broadly in the Sydney Basin." Targeted offsets were to be "Priority Conservation Sites" identified in the Hawkesbury Nepean Catchment Management Authority's (HNCMA) Action Plan.

However, the basis of the assessment lacked ground truthing and was thus scientifically flawed. Conservation groups, including well respected Botanists, were highly critical of the lack of scientific methodology. But the NSW Government was determined to proceed and so was established a critical impact on listed ecological communities based on flimsy methodology. As a concession, some sense of "like for like" ecological community conservation was targeted through offset acquisition of land on the Cumberland Plain. This afforded a wistful hope of Western Sydney fauna conservation, including Macrofauna.

Not all conservation groups agreed with Biodiversity Certification. True Conservation Association Inc challenged the validity of Biodiversity Certification in the Land & Environment Court. They informed us that Senior Counsel advice confirmed the group had excellent prospects of success and it seems the

NSW Government realised this too for it drafted a special Bill of Parliament to quarantine Biodiversity Certification in the Growth Centres from litigation. The Bill was opposed in the Legislative Council of Parliament but the Bill passed by one vote after strong argumentation from opponents. Members of True Conservation Association Inc tell us they will no longer consult with the NSW Government.

WSCA, on the other hand saw acquisition of Priority Conservation Sites on the Cumberland Plain, particularly certain sites in Penrith and Hawkesbury Local Government Areas, as the means to establish the last opportunity for a wildlife corridor - the Cumberland Conservation Corridor - on the Cumberland Plain. This plan, being a connection of Priority Conservation Sites, ensures viable populations of Western Sydney's flora and fauna are sustained for present and future generations.

The long overdue Cumberland Plain Woodland Recovery Plan (12 years overdue) was exhibited in November, 2009 by DECCW in the form of a joint NSW and National draft "Cumberland Plain Recovery Plan." This was an attempt to lump all ecological communities on the Cumberland Plain into the one conservation and recovery plan. Rather than ensuring recovery of ecological communities, this document proposed a retreat to conserving only "Priority Conservation Sites" on the Cumberland Plain as identified in the HNCMA Action Plan. It was criticised for its lack of potential for recovery of listed ecological communities.

However, what was significant about the draft Cumberland Plain Recovery Plan is that it proposed conservation acquisitions on the Cumberland Plain and did not hint, by means of low ranking alternatives, the possibility of going off the Cumberland Plain for offsets such as the Growth Centres Biodiversity Certification decision did. What has become of the draft Cumberland Plain Recovery Plan is unknown to us but the disclosed contrary direction of draft Sydney Growth Centres Strategic Assessment suggests the Cumberland Plain Recovery Plan, when produced, will be sterilized of what little strength it had for conservation of listed ecological communities on Priority Conservation Sites on the Cumberland Plain. This Sydney Growth Centres Strategic Assessment should be deferred until the public is aware of the direction the long overdue Cumberland Plain Woodland Recovery Plan will now take.

So much for the background to the manner in which certain agencies of the NSW Government have disclosed their graduated abandoning of conservation of listed ecological communities in on the Cumberland Plain.

### **Role of Commonwealth Dept of Environment, Water, Heritage and Arts**

Thankfully, Western Sydney's endangered and vulnerable flora and fauna species and ecological communities have another level of government for protection, a government body not necessarily consumed by development interests and hopefully applying an even-handed approach to conservation of its listed ecological communities throughout the nation.

It is to the Commonwealth Dept of Environment, Water, Heritage and Arts (DEWHA) that WSCA, acting for the environment of Western Sydney, appeals for decency, sensitivity and humane regard for those remnants which make up a unique feature of the Australian landscape - the flora and fauna of the Cumberland Plain.

It is our hope that DEWHA will exceed with environmental diligence where the NSW Government has failed due to the latter having given itself over to development interests. In this we remind DEWHA of its role in achieving a superior conservation outcome with the Victorian Government when that body addressed its growth centre issues in Melbourne as per "Delivering Melbourne's Newest Sustainable Communities."

## **Compulsory Acquisitions for Conservation Offsets**

The Victorian Government had to address a similar population growth figure as confronts the NSW Government over the next 20 years. The Program Report "Delivering Melbourne's Newest Sustainable Communities" outlines how the Victorian Government will do this and we note a greater commitment to conserving natural heritage exists within the Victorian Government's program than exists within the NSW Government's program.

The inadequacy of the NSW Government's commitment is best demonstrated by its failure to commit to compulsory acquisitions of high Priority Conservation Sites as offsets for vegetation losses within and not far outside growth centre boundaries. Quite frankly, the difference is "chalk and cheese." Commitment, not cowardice marks the intention of the Victorian Government to secure by zoning and compulsory acquisition approximately 15,000ha of listed Native Grasslands in Melbourne's west, not more than 50km from Central Melbourne.

If far greater conservation of Cumberland Plain Woodland (Shale Plains Woodland), Shale-Gravel Transition Forest and Shale-Sandstone Transition Forest is not achieved within Sydney's Growth Centres it becomes essential, for the sake of equality with Victorian conservation outcomes, that compulsory acquisition of offsets on the Cumberland Plain be mandated.

Further, the NSW Government has instigated compulsory acquisition of some freehold land within the Growth Centres to achieve its poor conservation commitment. In acknowledgment of its Biodiversity Certification intent to achieve "maintain or improve" outcomes despite losses within Growth Centres on the Cumberland Plain it is only sensible, even obligatory, that compulsory acquisitions be instigated by the NSW Government for offset acquisition of Priority Conservation Sites elsewhere on the Cumberland Plain.

## **Discrimination**

The clear intention of the draft Sydney Growth Centres Strategic Assessment to go outside the Cumberland Plain for offset acquisitions discriminates against Western Sydney residents. It is Western Sydney residents who will suffer substantial loss of their natural heritage within the Growth Centres and, by inference that it is too hard to acquire Priority Conservation Sites elsewhere on the Cumberland Plain, they will later lose large amounts outside the Growth Centres. The socio-economic dynamic of Western Sydney places a sizable proportion of the population in the lower economic scale. They are not in a position to travel to far away places, off the Cumberland Plain, to experience and appreciate flora and fauna secured as offsets for the losses they experience on the Cumberland Plain. The direction for offsets expressed in the draft Sydney Growth Centres Strategic Assessment is injurious to the public experiencing and appreciating extensive tracts and populations of their natural heritage.

From the perspective of flora and fauna, the draft Sydney Growth Centres Strategic Assessment discriminates against those species extant on the Cumberland Plain. Their survival will be constrained by their being confined to fewer sites than currently supports them while the compounding threats of an ever increasing human population adds to the burden of survival as humans access and surround suggested minimal conservation sites.

Only a determined effort to provide the greatest expanse of conservation area(s) on the Cumberland Plain avoids discrimination against the interests of flora and fauna and residents of Western Sydney.

## **Growth Centres Conservation Fund**

WSCA is vehemently opposed to the intention to direct 70% of the \$397.5M (which is the 75% of the \$530M Growth Centres Conservation Fund promised by the NSW Government) towards conservation

outcomes for matters of national environmental significance. This 70% equates to a figure of \$278.25M. This means that there will be only \$119.25M left from the Growth Centres fund to be directed towards the acquisition and protection of non EPBC listed ecological communities and threatened species on the Cumberland Plain.

If this occurs it would be another betrayal by the NSW Government as, for some years, the public have been led to believe there were no such conditions and that \$397.5M would be applied equally to the Western Sydney Priority Lands. This new funding arrangement appears a very cynical move by the NSW Government to gain approval for the Strategic Assessment by the Federal Environment Minister. It means the Commonwealth Government gets a \$278.25M gift at the expense of the flora and fauna on the Cumberland Plain and doesn't have to put its hand in its pocket to fund the protection of matters of national environmental significance elsewhere in the Sydney Bioregion e.g. Capertee Valley.

This robbing of the Growth Centres Conservation Fund is further evidence that the NSW Government has abandoned the acquisition and perpetual conservation of vast areas of Western Sydney's Priority Conservation Sites - lands such as the former Crown Lands claimed by the Deerubbin Local Aboriginal Land Council. Thousands of hectares of these Priority Conservation Sites are not yet listed (but under consideration) as matters of national environmental significance and now appear all the more exposed to development.

It is crunch time for flora and fauna of the Cumberland Plain. On present indications, WSCA and The Greens will have to be far more active in the upcoming Federal Election than in 2007. The thrust of our campaign must be: "*Federal and State Labor conspire to rip-off Western Sydney of nearly \$300M in conservation commitments!*"

Of further concern to WSCA is another direction moneys from the Growth Centres Conservation Fund are headed. Within the Growth Centres \$132.5M was to be set aside for acquisitions. However, little or no funding commitment is necessary for sites such as Shane's Park (2007 election commitment by Comm. Govt), South Creek Park (Liverpool Council Park), Kemps Creek Nature Reserve (already public ownership), Rouse Hill Regional Park (already public ownership) Colebee/Kemps Creek/Rouse Hill (M7 Motorway offset commitments), Edmondson Park (Comm. Govt commitment?), Western Sydney Parklands (funded by Landcom development proceeds e.g. Bungarribee) Flood Prone Lands and Major Creeks (already development approved on 285ha at Riverstone West).

\$132.5M seems much more than what is demanded by the remaining scant compulsory acquisition commitments of the NSW Government. Further, we remind recipients of this submission of the following words contained in page 10 of the draft Sydney Growth Centres Strategic Assessment "*Even if large areas of cleared land could be affordably obtained, restoration research has demonstrated that attempts to recreate Cumberland Plain Woodlands have been unsuccessful to date.*" This statement, while not intended to do so, rightly describes the limited potential the Western Sydney Parklands have as an offset for vegetative losses within the Growth Centres (and foreshadowed losses elsewhere on the Cumberland Plain) because the Western Sydney Parklands is (and will be) largely comprised of sporting and recreational venues and revegetated cow paddocks lacking full vegetative structure. These revegetated cow paddocks would hardly satisfy standard EPBC threshold values applied to sites which were the subject of past EPBC referrals. Are we now being told the NSW Government have regarded as representative Cumberland Plain Woodland (Shale Plains Woodland) what developers have previously convinced the Referrals Unit of DEWHA is not representative Cumberland Plain Woodland?

As indicated, outside the Growth Centres, \$397.5M was to be set aside for offsets. Of the Priority Conservation Sites on the Cumberland Plain, already the Commonwealth Govt has committed 1370ha of the Orchard Hills Defence Establishment to a conservation future. In addition, the Commonwealth Govt has also committed the bulk of funding for acquisition of a developer owned 181ha site at Cranebrook which is also a Priority Conservation Site.

Already, significant parcels of Priority Conservation Sites are committed to the public with hardly any of the Growth Centres Conservation Fund being expended.

Surely, grounds exist for better conservation outcomes within and outside the Growth Centres via offset acquisition of privately owned Priority Conservation Sites on the Cumberland Plain with the balance of the Growth Centres Conservation Fund.

### **Ecological Communities on the Cumberland Plain Awaiting TSC and EPBC Listing**

Tardiness of the NSW Government to nominate to both the NSW Scientific Committee and its Commonwealth equivalent ecological communities and species which are reduced in population should not prejudice those ecological communities from consideration towards protection afforded by the Growth Centres offsets program. For example, Castlereagh Scribbly Gum Woodland in the Sydney Basin Bioregion has been overlooked by DECCW but Humane Society International, concerned at threats to this ecological community, nominated it to the NSW Scientific Committee for listing under the TSC Act for scheduling as "Vulnerable". The Committee recently announced its Preliminary Determination to consider listing the ecological community as such. The Commonwealth Government is currently considering listing of Hinterland Sand Flats Forest & Woodland of the Sydney Basin Bioregion as "Endangered" under the EPBC Act. The nomination identifies Castlereagh Scribbly Gum Woodland and Castlereagh Swamp Woodland (the latter listed as "Endangered" under TSC Act) as requisite components of Hinterland Sand Flats Forest & Woodland of the Sydney Basin Bioregion when represented on the Cumberland Plain.

WSCA urges that Castlereagh Scribbly Gum, Castlereagh Swamp Woodland and other ecological communities on the Cumberland Plain which are awaiting TSC Act and EPBC Act listing be included in this current evaluation of conservation measures, via offset acquisition, so that greater certainty for survival is assured.

### **EPBC Listed Flora and Fauna Species**

The draft Sydney Growth Centres Strategic Assessment, with its clear intention to go off the Cumberland Plain for offset acquisitions, seriously compromises the intention of the EPBC Act to conserve listed flora and fauna species. While DECCW will attempt to argue that populations of these species are being conserved within and outside the Growth Centres there is an inescapable truth which overrules all the rhetoric. Over time, pressures including loss of habitat have reduced populations of species and necessitated their listing in respective State and Commonwealth environmental protection legislation. It follows that further losses in populations, seed banks and habitat as proposed with ecological community destruction within the Growth Centres and the now the declared retreat from securing Priority Conservation Sites on the Cumberland Plain will further threaten already listed species and only add other species to listing.

One only need observe the slide of Cumberland Plain Woodland from being unlisted prior to 1997 to being listed as "Endangered" in 1997 and eventually listed as "Critically Endangered" in 2009. This has all happened because of government being insufficiently committed to conservation. Those in government prior to 1997 did not have the scientific evidence to consider but those in government since 1997 ought to be utterly ashamed of themselves. They have presided over the destruction of our environment despite all the scientific evidence. Worse still, there are people employed in government agencies who, while "flying the banner" of environmental protection, draw high wages as they allow this destruction to occur.

What is now presented by the NSW Government as the draft Sydney Growth Centres Strategic Assessment is a continuation of the same disgraceful attitude toward environmental destruction on the Cumberland Plain. It serves as the final assault on ecological communities, their flora and fauna, on the

Cumberland Plain. It is a craven abandoning of Western Sydney's environment because, in respect of listed flora and fauna species, several exist only on the Cumberland Plain with others in few other places yet no attempt is being made to conserve sufficient habitat on the Cumberland Plain by way of offsets. Surely the range of possible threats to species including climate change (as in Department of **Climate Change** & Water) demand the greatest possible measures to ensure survival of species.

The draft Sydney Growth Centres Strategic Assessment, on page 58, presents a case study for abandoning the Cumberland Plain with offset funding and going as far away as Capertee Valley for offsets. The case study names EPBC listed species most of which are known to exist on the Cumberland Plain and omits some EPBC listed species found only on the Cumberland Plain and not Capertee Valley. Is this an argument for abandoning pursuit, via conservation zoning and compulsory acquisition, of Priority Conservation Sites on the Cumberland Plain? Science and commonsense surely say no!

Further, Priority Conservation Sites on the Cumberland Plain in Londonderry and Castlereagh are known to be populated by ironbark trees e.g. Mugga Ironbark, which flowers in the migratory period of EPBC listed Regent Honeyeater and Swift Parrot. These birds have consistently been observed foraging on flowering Mugga Ironbark trees in Londonderry and Castlereagh by members of Cumberland Bird Observers. Indeed, Edwin Vella of that group observed fifteen (15) Regent Honeyeaters foraging in one tree last year (oral comment - Edwin Vella, Cumberland Bird Observers, June 2010). The point is, it is not good enough to argue for Capertee Valley as the migratory breeding goal location for the Regent Honeyeater and ignore essential foraging locations along the way. In effect, no migratory foraging - no Capertee Valley! Priority Conservation Sites, particularly in Londonderry and Castlereagh, are essential to sustaining populations of EPBC listed Regent Honeyeater and Swift Parrot species. It is bad enough losing possible foraging sites within the Growth Centres but the foreshadowed additional loss of known foraging sites identified as Priority Conservation Sites on the Cumberland Plain is deplorable.

### **Cumberland Conservation Corridor**

Since year 2006, WSCA has pursued establishment of the Cumberland Conservation Corridor. This is a linking of Priority Conservation Sites from Mulgoa Nature Reserve, east to the Register of National Estate listed 1370ha of the Orchard Hills Defence Establishment, east to flood/riparian margin of South and Ropes Creek, north to confluence in Wianamatta Regional Park, branching either **a)** north-east through conservation dedicated Commonwealth land at Shane's Park, following flood/riparian margin of tributary of South Creek to confluence in State Heritage listed "Clydesdale" then following the flood/riparian margin of South Creek and linking up with Windsor Downs Nature Reserve or **b)** branching from Wianamatta Regional Park north through bushland sites to Castlereagh Nature Reserve then north-east through John Moroney Correctional Centre to Mulgoa Nature Reserve and, **c)** going north-west from Wianamatta Regional Park through bushland sites (one of which is Priority Conservation Site) to recently NPWS acquired 181ha Cranebrook site, then going north through 500+ha Priority Conservation Site to Agnes Banks Nature Reserve and **d)** branching north-east from recently NPWS acquired 181ha Cranebrook site through Priority Conservation Sites to Castlereagh Nature Reserve, north through John Moroney Correctional Centre to Windsor Downs Nature Reserve.

The route for the Cumberland Conservation Corridor is intersected by roads, bridges and a rail line which present a temporary problem for connectivity of the corridor. This will be overcome by design specifications for future road and rail upgrades incorporating land bridges and tunnels for fauna migration. This is a long term strategy which, by no means, is impinged by seeming but not insurmountable present connectivity problems.

The Cumberland Conservation Corridor is the last opportunity to provide a wildlife corridor in Western Sydney. It requires commitment now. It requires an equal commitment to conservation as to

land supply in Western Sydney. Any less commitment to conservation is empty rhetoric demonstrating subservience to development interests. DECCW, to our knowledge, has no strategy for conservation of Macrofauna on the Cumberland Plain. Indeed, we have only seen calculated elimination of Macrofauna on certain sites and otherwise negligence of effects to Macrofauna in decisions emanating from DECCW. The Cumberland Conservation Corridor is a remedy to the destructive and negligent practices of DECCW because it provides an extensive corridor allowing migration of Macrofauna for foraging and escape from predatory threats. Thus, a viable population of Macrofauna is maintained for future residents of Western Sydney to observe and appreciate in their original estate. More than that, the Cumberland Conservation Corridor guarantees the foraging and habitat requirements of all other fauna species inhabiting and migrating through Western Sydney in addition to being the known habitat and guaranteeing survival of NSW TSC and Commonwealth EPBC listed flora species. Now, several of these listed flora species are well supplied on Priority Conservation Sites which the draft Sydney Growth Centres Strategic Assessment foreshadows abandonment. It is disappointing that DECCW pursues such a course in the absence of 'ground truthing' whereas WSCA has 'ground truthing' to confirm the real losses which will occur if the draft Sydney Growth Centres Strategic Assessment is adopted.

In 2008, the Commonwealth Government made a commitment to the Cumberland Conservation Corridor including dedication of the Register of National Estate listed 1370ha of the Orchard Hills Defence Establishment, the 558ha Commonwealth land at Shane's Park to a conservation future as well as \$15M for further acquisitions. Most of that \$15M was expended on acquiring the 181ha Priority Conservation Site at Cranebrook. This is a significant contribution by the Commonwealth Government to the Cumberland Conservation Corridor but, wisely, the Commonwealth Government recognises that funding of projects under the "Caring for Our Country" initiative often requires ongoing commitment for recognisable outcomes. We trust the Commonwealth Government will remain committed to securing Priority Conservation Sites and smaller linking sites for establishment of the Cumberland Conservation Corridor.

The Commonwealth Government can play another role for viable conservation outcomes in Western Sydney by requiring, under EPBC provisions, that the NSW Government match the Commonwealth Government's contribution of more than 2,000ha of Priority Conservation Sites for the Cumberland Conservation Corridor by zoning and compulsorily acquiring Priority Conservation Site lands not yet in public ownership which are required for the Cumberland Conservation Corridor.

As indicated earlier, we are disappointed at the loss of ecological communities within the Growth Centres. Those communities should be conserved because of their reduced representation on the Cumberland Plain irrespective of their listing status under the TSC Act and EPBC Act. Similarly, ecological communities represented on Priority Conservation Sites elsewhere on the Cumberland Plain should be conserved even if not yet EPBC listed. In most respects these latter mentioned communities merge with those EPBC listed communities represented on the Cumberland Plain. Notwithstanding their being considered for EPBC listing at present, it makes scientific and common sense for DECCW to be pursuing, as offsets for intended losses within the Growth Centres, Priority Conservation Sites on the Cumberland Plain because they contain ecological communities nearest by geographical location and species overlap. This is the only scientifically valid scenario presenting for consideration in discussion of offsets for proposed losses within the Growth Centres.

The flora and fauna extant on Priority Conservation Sites which we propose to be incorporated into the Cumberland Conservation Corridor provide the conservation outcome the Commonwealth Government would be proud to present to the public of Greater Sydney as a legacy for future generations to appreciate and thank this generation for. It withstands scientific scrutiny whereas going the other side of the Great Dividing Range for offsets does not. Further, it recognises the failures of the past and 'draws the line in the sand' declaring the natural heritage of the nation, as represented on the Cumberland Plain, will no longer be compromised to oblivion.

## **Penultimate Statement**

Western Sydney residents are being betrayed by certain people within DECCW and Dept of Planning who have agendas or pet projects they are pursuing at the expense of the environment on the Cumberland Plain. When the draft Conservation Plan for the Growth Centres was exhibited a few years ago, WSCA was informed orally by officers within DEC (now DECCW) that to have \$530M by way of the Conservation Fund was a great means to achieve a significant conservation outcome on the Cumberland Plain. We were concerned at the loss of our natural heritage within the Growth Centres but noted a seeming intention from oral advice and wording of the draft Conservation Plan to acquire substantial parcels of privately owned land on the Cumberland Plain which would achieve a viable wildlife corridor albeit largely at the expense of flora and fauna within the Growth Centres.

The draft Sydney Growth Centres Strategic Assessment gives the lie to what was being presented to us. The flora and fauna of the Cumberland Plain, the ecological communities listed as "Endangered" and "Vulnerable" and those under consideration for listing are being abandoned by the NSW Government. Conservation on the Cumberland Plain is just about being confined to sites committed by Commonwealth Government and Nature Reserves established by a NSW Government of bygone days. Moneys accumulated from destruction of the natural heritage of the Cumberland Plain within the Growth Centres is to be expended largely off the Cumberland Plain and a plan is exposed to abandon once Priority Conservation Sites on the Cumberland Plain to bulldozers in future years.

The draft Sydney Growth Centres Strategic Assessment is a filthy rag which the Commonwealth Government should deign not to touch.

The appeal of Western Sydney Conservation Alliance Inc to the Commonwealth Government is to remember the offsets achieved in Melbourne when the Victorian Government was assessing the environment in its growth centres. A commitment to zone for conservation and compulsorily acquire 15,000ha in offsets in West Melbourne is "light years" ahead of what is being proposed by the NSW Government.

That which WSCA seeks through the Cumberland Conservation Corridor is only modest in comparison with what the Victorian Government has committed itself to through its growth centres. Nevertheless, we see that acquisition of all Priority Conservation Sites necessary for the Cumberland Conservation Corridor as well as connecting links will deliver conservation of viable populations of most, if not all, Cumberland Plain flora and fauna species listed in State and Commonwealth legislation, listed fauna species which migrate through the Cumberland Plain as well as limiting addition of further species to listing. Surely, sufficient offset funds also exist for securing other Priority Conservation Sites not required for the Cumberland Conservation Corridor?

We urge the Commonwealth Government to pursue its established commitment to the Cumberland Conservation Corridor and reject the draft Sydney Growth Centres Strategic Assessment wherever it fails to deliver on that commitment. And please, please have representatives of the Department of Environment, Water, Conservation and Arts consult with conservation minded people with commitment to Western Sydney and not just representatives of the NSW Government on this vital issue.

## **Summary**

This submission is lengthy. Much more could be said but time forbids. There is strong feeling within the membership of WSCA at what is seen as a betrayal of environmental protection on the Cumberland Plain by people who occupy positions within the NSW Government; hence the strength of words and phrases contained within this submission. The following dot points identify the issues addressed more broadly in this submission:

- The NSW Government's approach to flora and fauna protection in the Growth Centres is scant on ground truthing.
- All subsequent strategies toward conservation of TSC Act and EPBC Act listed flora and fauna species are thus founded on an absence of scientific rigour and akin to a 'house of cards.'
- The Biodiversity Certification decision for the Growth Centres was dressed in an intention to spend \$397.5M acquiring Priority Conservation Sites on the Cumberland Plain to achieve "maintain or improve" outcomes.
- The draft Sydney Growth Centres Strategic Assessment subverts the Biodiversity Certification intention to achieve "maintain or improve" outcomes on the Cumberland Plain.
- \$278.25M of intended expenditure for conservation is being ripped out of the Cumberland Plain.
- Until the Cumberland Plain Vegetation Recovery Plan is clearly known the public is handicapped in responding to the draft Sydney Growth Centres Strategic Assessment.
- The Victorian Government is far more environmentally sensitive in securing offsets in reasonable proximity to its growth centres.
- Conservation zoning and compulsory acquisitions for Priority Conservation Sites on the Cumberland Plain are essential to achieve anything approaching that achieved in Victoria.
- Potential for the draft Sydney Growth Centres Strategic Assessment to commit to destruction of ecological communities currently under consideration for TSC and EPBC Act listing must be avoided.
- The draft Sydney Growth Centres Strategic Assessment lacks science showing how reducing habitat as well as foraging sources for migratory EPBC listed fauna species will not hinder species.
- The Cumberland Conservation Corridor incorporates and links Priority Conservation Sites on the Cumberland Plain and affords the only opportunity to sustain viable populations of listed flora and fauna while limiting the likelihood of later listing other species.
- The Commonwealth Government should not fall for a trap of convenience by accepting funding commitments which pursue conservation of EPBC Act listed species well removed from areas of intended losses. All offsets to the loss of EPBC listed EEC's and Species within the Growth Centres must be found within Western Sydney, specifically through the perpetual conservation of Western Sydney Priority Conservation Lands.

Yours sincerely,

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