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## **Submission Re: Broader Western Sydney Employment Area (BWSEA) Draft Structure Plan**

The BWSEA structure plan will establish the vision, framework and strategies for development within the identified area over the next 30+ years. The draft plan fails to satisfactorily address, however, important challenges that we face as a region, nation and globally within this timeframe and beyond. The economic report identifies important global trends associated with climate change, renewable energy and carbon reduction but these do not form any significant part of the plan. This is unacceptable particularly when the Australian Government is strongly committed to reducing carbon emissions by 5-25% by 2020. The people of western Sydney deserve development that is truly ecologically sustainable, something that is frequently promised but rarely delivered. The key issues I would like to raise are summarised below:

### **Land Use**

The plan has not seriously considered the natural resources and existing land uses of the subject area despite the plan identifying the following principle – “protection of existing uses in environmental areas including agribusiness, recreation and sporting activities”. I would like to see the potential for farming/agribusiness to be investigated in greater detail. Farming is more compatible with biodiversity conservation, floodplain management and carbon capture than extensive industrial development. The farming sector also contributes to sustainable communities through producing and selling food & associated products locally. There is no serious consideration of biodiversity as a legitimate land use or employer despite its credentials in relation to protection and management of threatened communities and species, carbon capture and recreation/tourism.

### **Environment**

The Ecology Study that accompanies the plan identifies a total of 1,724 ha of native vegetation occurring across the subject area, ALL of which are threatened communities and most of which are identified as of “core” status. A significant proportion of this vegetation is the *critically endangered* Cumberland Plain Woodland, listed at both state & national levels. Although this is clearly a significant constraint to development the plan does not identify it as such. In the Environment section of the plan the second principle reads “*Vulnerable* species should be identified, protected and managed”. It is a confusing choice of word – does it mean vulnerable as per TSC Act/EPBC Act and if so what about the endangered and critically endangered species and ecological communities? This needs to be clarified. If it does encompass all threatened entities then this principle has not been incorporated into the plan in any meaningful way. There is no vision or strategy to protect 1,724 ha of TEC’s (even though this is only 16% of the total area) and as such the principle is misleading. In Precinct A only 254 ha of environmental conservation land is identified (section 5.3, figure 36). On closer examination it is evident that part of this conservation area is currently a quarry devoid of native vegetation. It appears that CPW will be cleared and offset with plantings in this instance.

## Ecology studies

The Ecology study is a desktop analysis and dependant on the adequacy of existing information. As an ecologist myself I am fully aware that desktop reporting does not provide an accurate and reliable picture of what is on the ground. It is inconsistent that despite other themes having been considered in detail the environment has not with “sensitive environmental areas to be identified later”. How can transport hubs & corridors, employment zones etc. be planned without knowing the location of these sensitive areas. Even when an area *is* identified as conservation land as in precinct A, it has also been identified as a potential interchange site. Section 1.3 of the plan states that detailed ecological assessments of the study area have been undertaken – I believe this is misleading.

\*A basic requirement prior to finalization of the structure plan is thorough survey for endangered flora and fauna throughout the study area. Most importantly this should include mapping of all native grasslands derived from CPW which are part of the CEEC.

Additional matters of concern:

- No reference to the Cumberland Plain Recovery Plan (CPRP) despite consideration of other regional plans.
- Based on Precinct A, the lack of ecological connectivity particularly away from creek lines and lack of consolidation. Reliance on narrow riparian corridors does not provide for adequate protection of other communities e.g. CPW or effective management (larger areas with low perimeter to area ratio).
- There is insufficient Cumberland Woodland left to offset the extent of clearing proposed. It is unacceptable to continue (as with the Growth Centers) to avoid this problem by protecting other vegetation types often outside the region. Any offsets should be local and like-for-like.
- The likelihood of Cumberland Plain Woodland being offset by the planting of trees along creeks and in areas currently devoid of native vegetation e.g. quarry within Precinct A. This is inconsistent with offsetting principles and misleading.

## Economics

The economic issue study does not include biodiversity in its sectoral analysis. It is well acknowledged that biodiversity (both intrinsic and extrinsic) is important - ecosystem services, scientific value, recreational, tourism, medicinal, food etc. and these have economic values. Why should they not be considered? The subject area is centred on the South Creek catchment and includes several major tributaries. Protection of these riparian corridors together with threatened biodiversity and existing agricultural lands makes good economic and environmental sense.

**In summary**, I find that the draft structure plan fails to adequately consider a range of environmental and land use issues or meet the significant challenges we face over the next 30-50+ years. These issues have not been given the same level of investigation as those of a developmental nature. Constraints to development have been broadly identified but do not properly inform the plan and in some areas have been presented in a misleading way. On-ground survey and assessment is essential prior to finalisation of any structure plan and the results used to inform the plan. Based on detail provided for Precinct A, conservation outcomes are likely to be very poor and will require significant

dilution of the “maintain or improve” principle. These outcomes need to be identified and addressed upfront and not after the structural framework has been set.

More ecologically sustainable and progressive development is required, and is possible, that provides a sound balance between natural areas, agricultural land, development and transport zones, and that supports government /global trends and initiatives that address climate change and recognise a carbon constrained future . It is within this sustainable economic context that I recommend planning of the BWSEA to be undertaken.

**Teresa James**