



GREATER PENRITH TO EASTERN CREEK DRAFT STRATEGIC FRAMEWORK

“The waterways, open green spaces, and remaining bushland are significant features of this Country, and must be protected. We acknowledge the importance of waterways to Dharug people, who come equally from water and from land, and who find healing and peace in the waterways of this Country.”

This is a strong sentiment. However, it is not matched by the commitment to protect the biodiversity values of Blaxland Creek, or any other water ways or conservation connectivity under the Cumberland Plain Conservation Plan.

“There is a need to protect and value what remains, especially areas of open space and waterways. This requires us to consider the cultural values of the landscape including ridgelines, Wianamatta, Dyarubbin and the creeks within these systems. A Country-centred approach to planning and design will enhance and celebrate these important landscape features.”

Strong language around ‘protecting what remains’ while adding 135,000 people, services, roads, schools, retail and sporting facilities. We are curious how all of this can be achieved and know (from past experience) that biodiversity will be the victim in this challenge to squeeze as many humans into this space as can be politically tolerated.

Extant populations of Eastern grey Kangaroos remain in this precinct. Will they be protected? Will their habitat be enhanced, and their movement corridors retained??? Or, as we witnessed with the construction of the Western Sydney Airport, will their slaughter on local roads as they are displaced from their habitat, simply serve its purpose – the problem became roadkill and has conveniently ‘vanished’.

We hope the NSW Planning Department senses our anger, frustration and mistrust that such bold statements and placating claims will see any commitment whatsoever. Past experience speaks volumes – and biodiversity is simply an inconvenience for politicians and

the NSW Planning Department (with recent comments from our Premier stating “People not plants”). It is impossible for Groups such as ours which have defended Biodiversity in this region for 30 years to even meet with decision makers. Our elected Ministers are inaccessible and local MP’s placate with meaningless sentiment ie “we need to find a balance between development and conservation”. BALANCE??? Where is the balance?? This is not a rhetorical question. I would appreciate a response.

Cumberland Plain Woodland is now at 4%. It was at 10% when the current government came to power. Our dedicated politicians have been comfortable to sit back and watch the slide toward extinction of the native vegetation communities of the Cumberland Plain and they still refuse to do anything regarding Biodiversity Conservation. Offsetting is an abject failure (and was always designed to be so). In a recent meeting with Tanya Davies MP I was able to question what would be delivered in her next term for Biodiversity Conservation. I received a shoulder shrug.

Mulgoa Landcare has been advocating for 15 years, to politicians and to all agencies within the NSW Government, of the importance of the habitat link between the conservation lands on the Defence Establishment Orchard Hills and the “Green Spine” along South Creek. This link is along Blaxland Creek riparian corridor is the ONLY link that will serve to connect two of the most significant remnants on the Cumberland Plain (via riparian corridors). Blaxland Creek as the most pristine creek corridor remaining on the Cumberland Plain. The NSW OEH website once lauded Blaxland Creek on their own webpage. This has been taken down as the progressive slaughter of biodiversity in our region has been sanctioned. Our community ‘representatives’ (aka politicians) have never represented on biodiversity matters and never advocated for protections of these significant waterways. This is our final chance to plan for biodiversity in Orchard Hills. And while on the matter of Biodiversity – our local State government owned ‘Biodiversity reserves’ are choked with weeds, full of illegal mountain bike tracks and vermin such as cats, foxes and deer. This is the real indication of how this Planning department values biodiversity. The nearby Mulgoa Nature Reserve is a cess pit of weeds and illegal human activities – but it is ignored and underfunded. So it is troubling to see the many references to “Biodiversity” when, in the real world, the government’s own actions are laid bare for all to see in the Mulgoa Nature Reserve – a government who actually doesn’t care less about Biodiversity.

Page 10: “The land that stretches from Penrith to Eastern Creek has been home to the Dharug people for 60,000 years. Aboriginal people used the for living, gathering and trade due to its proximity to waterways and the abundance of plants and wildlife. GPEC Country is characterised by the soft undulating hills and grasslands of the Cumberland Plain with important creeks forming and connecting to the main water courses - Wianamatta (South Creek) and Dyarubbin (Hawkesbury-Nepean). Ridgelines and highpoints were important pathways and connectors across Country. GPEC has been a place of movement, as Aboriginal people moved north to south along ridgelines and the banks of the Wianamatta or Dyarubbin, or east to west from the coast to the mountains. Located just outside the boundaries of the GPEC, the banks of the Dyarubbin is an important gathering place and resource area for mob. This area is named Yarramundi, after an important Aboriginal person”.

Yarramundi is located outside the northern boundary of the Penrith LGA and NOT EVEN CLOSE to the GPEC boundary. Yarramundi is a significant distance. We are confused by the reference to Yarramundi in this report when it is not proximal to this development area. referred to. Is there NO OTHER MEETING PLACE within the GPEC boundary – or proximal to it. There were meeting places in Mulgoa – far more proximal to Orchard Hills than Yarramundi. Does the department mean that we need to reproduce an indigenous meeting place similar to Yarramundi but within this development zone?

Please provide a list of the ‘many places that are significant for Dharug People’ within the GPEC.

Page 12: *Aboriginal communities across the area deeply value the open space, waterways and wildlife that keep them connected to Country. Wianamatta and Dyarubbin hold a special significance to the community and there is a strong desire to enable access for connecting to Country. Yarramundi remains an important place for the community to visit and practice culture.*

More on Yarramundi? Will there be a cultural meeting place in the GPEC precinct? Or will Yarramundi be the only cultural meeting place in this region? It's a 40 minute drive and not even located within the Penrith LGA. I hope the Planning Department are embarrassed by this – I know I am.

Page 12: *Country in this area has already changed so much because of development, there is a need to protect and value what remains, especially areas of open space and waterways. This requires us to consider the cultural values of the landscape including ridgelines, Wianamatta, Dyarubbin and the creeks within these systems. A Country-centred approach to planning and design will enhance and celebrate these important landscape features.*

And yet this plan identifies a narrow 40 metre strip along the most important creek (Blaxland) on the Cumberland Plain. Is this sufficient? This will not serve to protect biodiversity, nor can it function as a viable wildlife corridor. We suggest broadening the width of the conservation area along Blaxland Creek to at least 450m (just in case there is ever reintroduction of Koala at DEOH and release of those being translocated into Shanes Park.

Page 18: *Planning for Orchard Hills, one of the GPEC precincts, provides a unique opportunity to develop a town centre amongst the Cumberland Plain Woodland identified in the plan. This will create a town centre defined by green links, creek lines and open spaces, enabling residents to connect with the landscape around them.*

But there are still references to “engineered waterways” – we presume that we will be seeing what we see in Glenmore Park stages 1,2 and 3 – natural watercourses ripped out and large concrete pipes buried under neatly mown biodiversity deserts. Standard practice and less maintenance for Council moving forward!

Page 21: There is no simple solution to managing or reducing the valley's high flood risk.

In fact, there is a VERY simple solution to managing the flood risk...don't allow any more development on the flood plain and fund a long term development retreat from these areas. It will take time – but “planning” has been under the care and control of politically aligned developers for so long in the Sydney Basin that we can't expect the mess to be sorted in a few short years. This is simple fact. As for an 'inquiry' into flooding in 2022 – the **colonials** knew well the flood risks in the Hawkesbury valley which is why the area was the target for agricultural activities. Governor Macquarie himself declared no further construction in the flood prone areas back in the early 1800's. But dirty politics has prevailed.

Pleased to add that it seems very nice that the Dharug are being recognised and placed front and centre in this planning exercise. What about the Gandangarra? Afterall, it's the same planning department that will flood their cultural waterways and meeting places. We ask DPIE to please explain their efforts to recognise the Dharug and the cultural landscape connections while on the other hand ignore the Gandangarra. We look forward to your reply. The Planning Department might also provide an explanation as to why Penrith Council will not recognise or utter the word Dharug? All acknowledgements undertaken by Penrith Council are for “Traditional owners” – yet this framework is for the LGA of Penrith.

Page 23: GPEC will be the urban heart of a resilient, liveable and green Western Parkland City. New homes and renewed centres will integrate with iconic natural assets - the Blue Mountains, Dyarubbin- Hawkesbury Nepean River, the central green spine of Wianamatta-South Creek, Ropes Creek, Western Sydney Parklands and Eastern Creek. Wianamatta Regional Park and a future national park in Shanes Park to the north of GPEC will provide opportunities to connect people with nature and conserve valuable biodiversity.

No mention of connecting THE LARGEST remnant of CPW that will ever exist to the most important 'Green Spine' through this region? How will they connect? Will Blaxland reek be given sufficient corridor width to sustain exiting biodiversity. Eastern Grey Kangaroos are not a threatened species (yet) but they perform irreplaceable ecosystem roles (grazing and seed dispersal) in a Critically Endangered vegetation community. Destroying the last remaining populations of wild kangaroos on the Cumberland relegates our struggling native vegetation communities to further irreversible impacts.

Will the Planning Department sustain kangaroos in our landscape? Or is the Planning department quietly preparing for the **loss of Biodiversity** and will watch on as the slaughter on local roads eliminates the problem?

Page 24: protect key natural areas and biodiversity and create quality public open space and green infrastructure

Blaxland Creek is the most important example of Green infrastructure at Orchard Hills – doesn't even rate a mention? Blaxland Creek still contains fresh water mussels. I suspect

this is important to indigenous culture and would be one of few creeks on the Cumberland Plain that can still boast aquatic integrity that sustains such diversity.

Page 31: Undertake detailed Aboriginal Cultural Heritage investigations for development within 300 m of waterways iv. support and encourage living cultural practices, such as protecting cultural sites in suitable land use and development controls, addressing accessibility, and providing all-weather gathering spaces within the open space network and public areas v. prioritise planting and design outcomes that honour the health and wellbeing of Country such as restoring landscape ..."

all of this can be achieved by conserving a wide corridor at Blaxland Creek. Emus and kangaroos are important totems to Dharug culture. If a sufficiently wide connection is maintained between DEOH and South Creek – populations can be retained into the future.

Page 34:

2.3.1: CPCP is an **unofficial Plan** and has not received the support for Biocertification by the Commonwealth.

2.3.2 **"encouraging landowner uptake of BSA's"**. This is a meaningless statement. No landowner in Orchard Hills will willingly uptake a BSA as the NSW Government has actively disincentivised private participation by flooding the market with bio-credits to reduce costs to itself and to developers. This was achieved by allowing Councils to 'BioBank' public reserves (which are already reserved and not at risk from development). This is underhanded action by the NSW Planning Department and has rendered the whole scheme as entirely useless. Private landholders will receive 10x more for their land from a developer than from a BSA. Quite simply, the CPCP cannot deliver when the credits generated are not worth the market value of the property.

No incentive = no participation.

And that is entirely the fault of a greedy government which lacks moral compass – not a government whose intentions are about biodiversity conservation, just a government finding ways of legally progressing development amongst an almost extinct vegetation community. Are we angry? Yes – we are beyond angry and the vernacular in this 'framework' is so disingenuous it is almost comical.

Page 49; Grossly misleading mapping. The aqua colour that denotes "significant riparian and vegetation areas for POTENTIAL PROTECTION". More than 50% of that is **already protected**. Please **remove** the already protected areas which have occurred as a consequence of biodiversity losses elsewhere - and what you will see is an extremely poor outcome for "potential protection" in the study area.

Regardless of the hollow commitments made in this framework document to 'green canopies' and biodiversity, Orchard Hills, like all other suburbs of Western Sydney, will be just another sweltering suburb like to horror landscapes that have evolved at Glenmore

Park and Oran Park - a sea of rooftops and concrete. This supposed 'framework' provides no mapping for green connections, there is no commitment to the 30% conservation of lands about to be agreed internationally – oh that's right - this rule will only apply to cheap rural land.

Finally, with such a stated 'commitment' to conservation of waterways – the first and foremost issue with this strategic plan is the lack of appropriate conservation of the biodiversity values along the Blaxland Creek corridor and the vital connection it provides in a landscape context. There is seemingly no other natural connection in the current mapping giving developers carte blanche (as usual). Biodiversity cannot be retro-fitted into a landscape – so the biodiversity outcomes should be already in place at this 'early stage'. Instead, what we see is a few patches of green which may or may not become conserved under the CPCP - a plan which currently fails to exist (as it has not received Federal Government Support). There are no biodiversity 'wins' and no identified biodiversity corridors. While developers and community of not been provided with realistic expectations about the extent and location of Biodiversity corridors this lack of responsible planning will lead to outrageous expectations form every landholder in that Precinct.

As always, this is a depressing document that has 'weasel words' about biodiversity and cultural connections but will not actually deliver.

Sincerely
Lisa Harrold
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