

## Sarah Ng

---

**From:** Anthony Tavella on behalf of DPE PS ePlanning Exhibitions Mailbox  
**Sent:** Wednesday, 7 October 2020 3:56 PM  
**To:** DPE PS Biodiversity Mailbox  
**Subject:** FW: Webform submission from: Draft Cumberland Plain Conservation Plan

---

**From:** noreply@feedback.planningportal.nsw.gov.au <noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 7 October 2020 12:10 PM  
**To:** DPE PS ePlanning Exhibitions Mailbox <eplanning.exhibitions@planning.nsw.gov.au>  
**Subject:** Webform submission from: Draft Cumberland Plain Conservation Plan

Submitted on Wed, 07/10/2020 - 12:10

Submitted by: Anonymous

Submitted values are:

Submission Type: I am making a personal submission

First Name: [REDACTED]

Last Name: [REDACTED]

Name Withheld: Yes

Email: [REDACTED]

Suburb/Town & Postcode: 2097

Submission file: [webform\_submission:values:submission\_file]

Submission: Dear Sir/Madam I am writing to express my broad support for the CP conservation plan. My specific area of interest and expertise is in relation to ecological restoration. I do not currently live within the area affected by the plan but have worked for many years on developing methods and resources to restore diverse grassy woodland EVS of that region. In that time, I was asked to give formal advice and guidance to those developing the CP plan in terms of the feasibility of restoration under given scenarios and scales. I note that the Plan has a goal of restoring up to 1,365 ha of native TECs – this being up to 25% of the native vegetation conservation goal. I think this is a very positive and substantial commitment to both increasing native vegetation quality and extent but also for the local seed and restoration sector. As a researcher and a practitioner, I know from the sites established in Victoria and more recently in Western Sydney that it is possible to restore these vegetation systems to high levels of quality (i.e. EVC benchmarks. Evidence of these findings have been published in various peer reviewed journals over the years (e.g. Gibson-Roy et al. 2010, Cuneo et al. 2018). So, I am confident that given the time period (~36 yrs) and the scale, that this is technically feasible. Sadly, now I come to my reservations. I was an instigator and co-author of the ANPCs National Native Seed Sector Survey (full report published 2020 Hancock et.al. <https://www.anpc.asn.au/product/the-australian-native-seed-survey-report-e-version/>). This report presents a snapshot of the native seed sector and its capacity, and in short, its findings are that the sector is poorly resourced, disjointed and with very poor capacity. It also found that native seed supplies are in short supply (especially in TEC regions). Many of the respondents to that survey were practitioners from the Sydney region indicating these issues are of relevance in this Bioregion. Indeed, in my ten plus years working to build capacity in the western Sydney region I would say that there is now a more pronounced lack of seed resources and restoration capacity than was the case in recent years. For this reason, I would urge caution in how the Plan and its managers address and undertake their restoration goals. I believe it will be critical that the Plans goals and intent are signaled clearly and early to the restoration sector so it can make the necessary decisions and investments to increase capacity to meet demand for services. I would strongly urge the Plan engages across the whole sector, in particular, enabling commercial operators to become involved. From my experience too often gov agencies are more inclined to deal with NGO and community groups, and while this may present well in media releases, sadly in many instances these organisations are not structured appropriately or have the leadership to deliver on large and complex projects. Securing native seed resources in the quantities, quality and diversity is likely to be one of, if not the major challenge to meeting the 1,365 ha restoration goal. I have been a leader in the field of native seed production having recently co-authored the SER International standards for seed collection and seed production (Pedrini et al. 2020) and also as lead author to the Florabank guides for seed production and direct seeding. In this capacity I feel I need to stress the importance of the role that seed production will take in supplementing native seed recourses for restoration activities. Seed production infrastructure is very expensive to set up and run (i.e. million + \$). Further, developing seed crops can take several years to reach full productivity (4-5yrs). So, Plan managers must fully understand the costs and timelines involved and have realistic expectations of the time it may take before seed supplies are ready for restoration. To my best knowledge current seed production capacity in Western Sydney is very poor. I was involved, and initially lead, the development of a ~5ha seed production facility at western Sydney university Hawkesbury campus for Greening Australia. This facility allowed my team to test seeding approaches and generate the seed needed to restore ~ 50 ha of CP grassy woodland (see Cuneo et al. 2018). However, in recent years this facility has degraded to a substantial degree. In the near future the current footprint will be dismantled (due to development of that land) and GA has shown very poor capacity to rebuild a new facility to former or increased extent (this is despite significant public funding to do so). So, I would stress that at the moment there is a very limited regional capacity for meeting seed needs for restoration through remnant collections or seed production. Given advanced notice and fair returns for services, I believed the sector can meet this challenge. But this will take time. Plan managers must be very wary of assurances from NGO groups wanting to be associated with such a prominent project who have not shown

the capacity to deliver in previous works. Any claims to the counter must be very carefully scrutinized, and the track record and capacity of any party aiming to deliver restoration services must be very closely gauged. It is also very likely that biodiversity goals some parts of the restored footprint will be high, and in these settings managers must recognize that new approaches and techniques will be required (rather than older tree and shrub planting type approaches). Please see Cuneo et al. 2018 or Chapter 15 of Land of Sweeping Plains for insights into the approaches and skill levels required to succeed in this type of work. In summary, I wish the Plan managers all the best. There are many obstacles to be overcome in gaining public acceptance for this program. I hope they can do so. My wish then is that, given a mandate to proceed, the Plan can meet its restoration goals successfully in a timely manner. To have any hope of doing so will require a pronounced improvement in the current capacity of the local native seed and restoration sectors. Please be mindful and wary of this. Paul Gibson Roy Cuneo, P. Gibson-Roy, P. Fifield, G. Broadhurst, L. Berryman, T. Crawford, A. Freudenberger, D. (2018). Restoring grassy woodland diversity through direct seeding: insights from six 'best-practice' case studies in southern Australia. *Ecological Management and Restoration*. 19:2. 125-135. Pedrini, S., Gibson-Roy, P., Trivedi, C., Candido, G., Hardwick, K., Shaw, N., Frischie, S., Laverack, G., Dixon, K. 2020. Collection and production of native seeds for ecological restoration. *Restoration Ecology*. 29 April 2020. <https://doi.org/10.1111/rec.13190> Gibson-Roy, P., Zwierson, Breed, M., Harrison, P., Driver, M., Berryman, T., Logie, S. 2020. FloraBank Guidelines Module 4. Seed Production. In Press. Australian Network for Plant Conservation. Canberra. Gibson-Roy, P., Zwierson, T., Millsom, D., Driver, M., Delpratt, J., Berryman, T., Logie, S., Carr, D. 2020. FloraBank Guidelines Module 12. Direct Seeding. In Press. Australian Network for Plant Conservation. Canberra. Delpratt, J. Gibson-Roy, P. 2015. Sourcing Seed for Grassland Restoration in Land of Sweeping Plains – managing and restoring the native grassland of south-eastern Australia. Eds, Williams, N. Marshall, A. Morgan, J. CSIRO Publishing. 285-330. Gibson-Roy, P., Delpratt, J. 2015. The Restoration of Native Grasslands in Land of Sweeping Plains – managing and restoring the native grassland of south-eastern Australia. Eds, Williams, N. Marshall, A. Morgan, J. CSIRO Publishing. 331-389. Gibson-Roy, P., G. M. Moore, C. J. Delpratt, and J. Gardner. 2010. Expanding horizons for herbaceous ecosystem restoration: The Grassy Groundcover Restoration Project. *Ecological Management & Restoration*. 11:175-185.

URL: <https://pp.planningportal.nsw.gov.au/draftplans/exhibition/draft-cumberland-plain-conservation-plan>