

BirdLife Australia submission on the Draft Cumberland Plain Conservation Plan

BirdLife Southern NSW

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BirdLife Australia

BirdLife Australia is Australia's largest bird watching, bird research and conservation organisation. For more than 100 years BirdLife has been a leading advocate for native birds and for those who value them. We are an independent not-for-profit organisation with over 190,000 supporters nationally. We have many regional Branches, Special interest Groups Reserves and Observatories, and a single aim: creating a bright future for Australia's birds.

BirdLife Southern NSW Branch covers the Greater Sydney area, and extends north to near Port Macquarie, west to Broken Hill and south to the Victorian border. We have approximately 3,000 members and supporters, with many living in the Sydney Basin.

Introduction

The Cumberland Plain Conservation Plan (CPCP or Plan) has major inadequacies, which are identified in this submission.

If accepted in its current form the Plan will build-in the demise of a range of woodland birds in the Greater Sydney area, leading in some cases to their local extinction and increasing the chances of total extinction in the wild in the next fifty years. Birds are an indicator of the ecological health of a region. Mammals which till now are hanging on in the area will also disappear. The CPCP must aim higher than this.

Many people have drawn attention to the extinction crisis in Australia. Planning in Australia is a fraught process and regularly fails our wildlife. We cannot continue in this current path. The welfare and viability of ecological communities and the fauna inhabiting them must be a central priority for planners.

This submission outlines the significance of the area for key bird species and presents suggested changes to increase the value of the Plan in conserving habitat and wildlife.

Value of the Cumberland Plain for birdlife

The woodlands of the Cumberland Plain are vitally important to a range of threatened and declining woodland birds that have endured a long history of habitat loss and fragmentation. It is well known that migratory shorebirds and seabirds are experiencing heavy declines in population data; our woodland birds are the same and the wooded remnants of the Sydney Basin provide important refuges for many threatened bird species.

Species Critically Endangered nationally

Two of Australia's most endangered woodland birds - the Regent Honeyeater and Swift Parrot – use the Cumberland Plain Woodlands (CPW).

While the **Swift Parrot** breeds only in Tasmania, it winters on the mainland in high quality woodland habitat. BirdLife Australia data reports Swift Parrots in the Western Sydney region almost annually since 1995. Over the last few decades there has been a steady decline in the number of Swift Parrots with fewer than 1,000 breeding pairs left. The main reason for this decline is the loss of habitat. This reduction due to logging and clearing has been exacerbated by the devastating fires of the 2019-20 summer which have reduced the availability of flowering trees.

More significantly, **Regent Honeyeaters** breed in Western Sydney and, as recently as last year, hosted two of only five known successful nesting attempts by Regent Honeyeaters (BirdLife Australia and Australian National University unpublished data). See <https://www.bluemts.com.au/news/rare-birds-successfully-breed-in-mulgoa/> for media surrounding one of the successful nests. That a critically endangered species can have 40% of known breeding success in the most recent breeding season in Western Sydney highlights the importance of the Western Sydney area for this species.

Other threatened bird species

Dusky Woodswallow, **Varied Sittella** and **Little Lorikeet**, all classified as Vulnerable or Threatened under state legislation, breed in CPW. Furthermore, highly mobile species, such as the **White-browed Woodswallow**, have been recorded breeding here as well. These species seek out the highest quality wooded remnants in which to settle and nest. Now is the time to protect their habitats, to avoid the decline of these birds. Regent Honeyeaters also use these same high quality remnants and within the same season.

While there are similar remnants (e.g. Capertee Valley and the Tomalpin Woodlands near Cessnock), the importance of CPW to both Critically Endangered and Threatened bird species must not be underplayed.

Quite simply, the woodlands of the Cumberland Plain are an integral part of a limited network of high-quality woodlands on fertile soils that remain in south-eastern temperate Australia. All wooded remnants on the Cumberland Plain need to be retained to provide breeding habitat for Regent Honeyeaters, as well as all other birds (and flora and fauna generally) that rely on these habitats for survival.

(From a statement by Mick Roderick BirdLife Australia's Woodland Birds for Biodiversity Project Coordinator)

Key Biodiversity Areas (KBAs) in the Sydney Basin

Key Biodiversity Area is a global concept of the International Union for Conservation of Nature (IUCN). IUCN has set a global standard to identify 'sites contributing significantly to the global persistence of biodiversity'. Sites must qualify by meeting one or more of 11 criteria which after independent scientific review and submission of documentation are confirmed as qualifying. BirdLife Australia is the Australian patron of the KBA system.

There is one KBA in the Sydney area, the Richmond Woodlands KBA, of only 333 across Australia. See <http://datazone.birdlife.org/site/factsheet/richmond-woodlands-iba-australia> for additional information. Richmond Woodlands covers 32,000 ha, predominantly of CPW. The Richmond Woodlands KBA is intensively monitored for its birdlife. Records for the past 25 years are available in BirdLife Australia's Birddata database. See the attached list of bird species.

This bird-species data is critical to considerations for permanent conservation of remnant CPW in the Sydney Basin. While the KBA is at the northern range of the area covered by the Plan it indicates the bird species that are likely to be present across the area where remnant Cumberland Plain vegetation still exists but monitoring has been less formal.

Some key flaws of the Plan

This is not a comprehensive critique of the Plan but highlights those aspects of most concern to BirdLife Australia.

1. It will reduce existing remnant CPW by 10% thereby further fragmenting remaining areas. Past development of western Sydney has decimated CPW and only a fraction now remains. It is classified as an Endangered Ecological Community under NSW legislation. Permanent conservation of all remnants should be a key feature of all future plans, with development confined to areas already cleared. Fragmentation will impact on populations of kangaroos and will likely lead to their disappearance. This will have cascading impacts to many other grassy woodland plant and animal species which rely on these grazers to maintain suitable habitat. Key woodland bird species require old growth vegetation, a continuous food source and adequate corridors connecting their favoured sites.
2. The Plan proposes highly inadequate offsetting arrangements including replacing CPW with non-CPW communities. Such communities will not provide habitat for woodland bird species that rely on CPW for their continued presence in the Sydney Basin. The major proposed offsets – koala reserve near Campbelltown, tree planting on sandstone at Gulguer NR and tree planting at 'the Confluence' - are not CPW and not suitable

for revegetation as CPW. They will not provide habitat for woodland bird species.

3. Three CPW reserves already existing as offsets for other projects – Wianamatta Regional Park for Jordan Springs development, Colebee Nature Reserve for M7 and Shanes Park for Western Sydney Growth Centres – will be compromised under the Plan as they will either be cut in half (Wianamatta Regional Park) or totally isolated (Colebee Nature Reserve and Shanes Park). Such treatment of existing offsets is against the principle of offsetting and reduces the usefulness of these sites for woodland birds that favour CPW.
4. Small privately-owned remnant areas are excluded, under the Plan, from consideration as offsets even though areas less than 5 ha can retain high biodiversity. (pers comm. Dr Doug Benson Botanist, ex Royal Botanic Gardens Sydney). Such areas, if owners are not compensated for their retention, are likely to eventually be cleared. This will be a further significant loss of CPW. In addition, these small areas provide stepping stones between larger areas of woodland. Without these stepping stones bird populations become isolated and cannot come together to breed and [REDACTED] this can result in inbreeding and reduced fertility.
5. Revegetation of cleared sites as offsets is not a substitute for intact vegetation communities. Revegetated areas take many years to approximate mature CPW. It can take a hundred years for a seedling to grow to maturity and develop hollows which are necessary for many bird species to breed. Woodland birds which require hollows cannot wait decades for these hollows to develop, they will be extinct before then. Revegetation is a worthwhile activity and will help compensate for the already lost CPW but should not be regarded as acceptable strategy to justify further destruction of CPW.
6. Under the Plan creekline areas are not given adequate conservation status and there will be no requirement to maintain them. Creeklines, where a sufficient buffer is implemented, can provide important connectivity and are likely areas of high-value biodiversity. Without active management, they will become overgrown by weeds and ultimately useless for woodland bird habitat.
7. The Plan fails to provide adequate permanent funding to maintain conserved areas. With development will come increased likelihood of infestation by exotic vegetation and feral animals. Long term weed management programs are required to prevent reserves becoming dominated by woody weeds, such as African olive, which flourish in the rich Cumberland Plain soils. Woodland birds require high quality native vegetation.

The Explanation of Intended Effect released with the Plan recommends the creation of a new State Environmental Planning Policy (SEPP) for strategic conservation planning. Just these points above emphasise that the Plan fails the proposed SEPP on a number of its Part 2 objectives including “identify and protect areas of high-value biodiversity in the nominated areas”, “identify areas...with important connectivity” and “minimise impacts from future development on biodiversity values in areas of high-value biodiversity”.

Key changes we request

- 1. Change proposed developments** to reduce fragmentation:
 - Tunnel 2 km to protect Wianamatta Regional Park
 - Extend the Camden Tunnel 4 km south and 6 km north to save the EMAI-to-Razorback Wildlife Corridor and Cobbitty Hills
 - Reduce the scale to avoid clearing 10% of the remaining CPW
 - Protect a 500m wide koala corridor at Mount Gilead.
- 2. Change proposed offsets** to favour CPW:
 - Protect the Cumberland Conservation Corridor, a Federal [REDACTED] partnership which has made significant improvements to connectivity
 - Allow smaller lots to be eligible for offsetting (SCA)
 - Create new, large public reserves of CPW to offset loss of CPW in three national parks
 - Restore the focus of offsets to CPW, the ecosystem most impacted by these developments
 - Protest landowner-specific exclusions in the SCA.
- 3. Scrap the failed ‘avoided land’ model** (E2 zoning and creeks): The Western Sydney Growth Centres program shows that this model fails – no agency wants to own or manage the unfunded creek corridors, and landowners on E2 zoned lands (left ineligible as offsets) illegally clear bushland. Land in development precincts should either be developed or fully funded as an offset.
- 4. Provide an adequate budget:** The Plan must lock in a sufficient budget to ensure offsets are actually delivered, similar to the \$540m Western Sydney Growth Centres offset program.
- 5. Stage development to match delivery of offsets:** The Plan must stage development and require the satisfactory delivery of offsets from each stage before further development proceeds (as with the Western Sydney Growth Centres).
- 6. Create new conservation reserves, not planting:** Research demonstrates that neither traditional nor scalp-and-seed revegetation compensates for clearing CPW. (for example: Nichols P, Morris EC, Keith

D (2005) Restoration of Cumberland Plain Woodland: is it possible by planting trees? In *'The ecology and management of Cumberland Plain habitats: a symposium.'*) Instead, the Plan should focus on saving the woodlands that remain.

7. **Fast track the three major proposed offsets:** The Plan only proposes completion of the koala reserve, Gulguer NR and the Confluence over the life of the Plan. To ensure their protected status they should be preserved within the next 3 years.

Closing remarks

Thank you for the opportunity to present the views of BirdLife Australia in this submission. Should you have any queries or wish to discuss this submission please contact Elisabeth Dark through the BirdLife Southern NSW office.

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Conservation Committee
BirdLife Southern NSW
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Richmond Woodlands Key Biodiversity Area (KBA). Historic Bird List. (v 2/2) IG Bailey

A Checklist of the 100 most recorded bird species of this KBA over (circa) 50 years.

Key: S=Summer; W=Winter; C=Common; U=Uncommon; R=Rare. (CBOC data) April 2020

Painted Button-quail R	Weebill C
Peaceful Dove U	Striated Thornbill U
Common Bronzewing U	Yellow Thornbill C
Crested Pigeon C	Brown Thornbill C
Spotted Dove C	Buff-rumped Thornbill U
Masked Lapwing C	Yellow-rumped Thornbill U
Australian Wood Duck C	White-browed Scrubwren C
Pacific Black Duck C	Speckled Warbler U
Brown Goshawk U	Tawny Grassbird US
Little Eagle U	Superb Fairy-wren C
Barn Owl R	Variiegated Fairy-wren C
Rainbow Lorikeet C	Dusky Woodswallow U
Little Lorikeet C	Varied Sittella U
Yellow-tailed Black-Cockatoo C	White-throated Treecreeper C
Sulphur-crested Cockatoo C	Mistletoebird U
Galah C	Spotted Pardalote C
Eastern Rosella C	Striated Pardalote U
Swift Parrot U/W (KBA Trigger species)	Silvereye C
Tawny Kingfisher	White-naped Honeyeater U
Laughing Kookaburra C	Black-chinned Honeyeater R
Sacred Kingfisher CS	Brown-headed Honeyeater U
Rainbow Bee-eater US	Scarlet Honeyeater U
Pallid Cuckoo US	Eastern Spinebill C
Fan-tailed Cuckoo C	Regent Honeyeater R (KBA Trigger species)
Horsefield's Bronze-Cuckoo US	Lewin's Honeyeater C
Shining Bronze-Cuckoo US	Fuscous Honeyeater U
Welcome Swallow C	Yellow-faced Honeyeater C
Grey Fantail C	White-eared Honeyeater U
Rufous Fantail US	White-plumed Honeyeater C
Willie Wagtail C	New Holland Honeyeater C
Leaden Flycatcher US	White-cheeked Honeyeater U
Black-faced Monarch US	Bell Miner C
Jacky Winter U	Noisy Miner C
Scarlet Robin RW	Red Wattlebird C
Red-capped Robin R	Noisy Friarbird C
Flame Robin RW	Diamond Firetail R
Rose Robin UW	Zebra Finch R
Eastern Yellow Robin C	Double-barred Finch U
Golden Whistler C	Chestnut-breasted Mannikin U
Rufous Whistler CS	Red-browed Finch C
Grey Shrike-thrush C	Olive-backed Oriole C
Magpie-lark C	White-winged Chough U
Crested Shrike-tit U	Pied Currawong C
Eastern Whipbird C	Grey Butcherbird C
Black-faced Cuckoo-shrike C	Australian Magpie C
White-bellied Cuckoo-shrike U	Restless Flycatcher U
Cicadabird US	Australian Raven C
White-winged Triller US	Red-whiskered Bulbul C
White-throated Gerygone US	Common Myna C
Brown Gerygone C	Common Starling C

