

Sarah Ng

From: [REDACTED]
Sent: Wednesday, 28 October 2020 11:04 PM
To: Public Kean Office Email; Stokes_Office_Email
Subject: Comments and suggestions regarding conservation of Cumberland Plain ecological communities
Attachments: [REDACTED]

Dear Mr Kean and Mr Stokes,

Please see the attached letter. Could you please acknowledge the receipt of this e-mail and the letter.

The drafting of the Cumberland Plain Conservation Plan (CPCP) has focused some attention on the remnant native vegetation and wildlife of the Cumberland Plain.

It is very evident that most of the ecological communities of the Plain are severely under-conserved at the moment, notably the once dominant Cumberland Plain Woodland. However, the CPCP should give us a chance to evaluate the main shortages in ecological reserves, and if and where suitable areas can be found to hopefully fill some of the gaps.

I include descriptions of several sites that would probably form good reserves (preferably national parks in many cases), and which might be able to be secured. The possibilities of this in practice would need to be investigated. Hopefully this can be initiated with some urgency before options start to disappear. There may be other promising options that I do not know about.

I and many others will greatly appreciate progress the NSW Government makes in this important task. Thank you for your interest and assistance in protecting the remaining natural heritage of the Cumberland Plain.

Sincerely,

[REDACTED]

2 Bancroft Ave
WEST PENNANT HILLS 2125

25 October 2020

The Hon Rob Stokes, Minister for Planning and Public Spaces

Email: [REDACTED]

The Hon Matt Kean, Minister for Energy and Environment

Email: [REDACTED]

Dear Messrs Stokes and Kean,

Re: Comments and suggestions for protecting native Cumberland Plain vegetation under the Cumberland Plain Conservation Plan (CPCP) - Sub-plan A

The Cumberland Plain of western Sydney, originally covered by a variety of open forest and woodland ecological communities totalling about 250,000ha, has been almost completely cleared over the last 220 years. Only about 33,000 hectares of native vegetation of all types (12% of the original area) now remains on the Plain. This includes the once dominant Cumberland Plain Woodland (CPW) Threatened Ecological Community (TEC), now reduced to about 7,000 ha (6.6%) of its estimated original extent, in mostly small patches.

"Protected" native vegetation of all types on the Cumberland Plain totals about 5,700 ha, but the long-term security of some of it may be doubtful. NPWS reserves account for about 3,000 ha of the total, but I do not know the area of CPW within this figure - probably under 1,500 ha, found in parts of Scheyville NP and Wianamatta Regional Park. Other significant TECs of the Plain (though with limited original areas compared with CPW) include Shale/sandstone Transition Forest and Sydney Coastal Riverflat Eucalypt Forest (SSTF and CREF).

Value of CPW to Sydney bird biodiversity

The fairly open woodlands of the undulating, shale-based and relatively low-rainfall Cumberland Plain (CP) are habitat for a distinctive suite of birds whose predominant range in NSW is in low rainfall inland areas. There are (or were) about 40 of these bird species confined more or less entirely (in Sydney) to CPW and some adjacent vegetation communities (e.g. ironbark and scribbly gum forests in Castlereagh district).

Most of these "special" woodland birds have declined greatly in numbers over the last few decades as the destruction of remnants of their highest-quality habitat (mostly CPW) has continued apace in the name of urban development.

Planned impacts from new growth areas and offset calculations

Development of the four planned growth areas would destroy about 1,778 ha in total, across 8 important TECs including, most alarmingly, 1,014 ha of scarce CPW (over 10% of its remaining area). I understand the calculated area of "offset" land to compensate for the combined loss across all TECs (1,778 ha) was set at a **minimum** 5,475 ha, including 3,170 ha of CPW and 1,990 ha of SSTF + CREF combined.

CPCP plans include major roads through parts of existing and proposed NPWS reserves (Wianamatta RP and Shanes Park Airservices ("promised", not yet named) NP - total 79 ha destroyed; and Colebee NR surrounded. Wianamatta RP would be split in two, hampering movement of a remnant small Emu flock across the park. Such impacts on any of the scarce, supposedly secure reserves we already have should be forbidden. **Is it not possible to build road tunnels under protected areas like these?** Similar consideration for Cobbity Hills area.

A chance to secure more high quality CPW vegetation in permanent reserves?

The present CPCP project could continue the downwards spiral of habitat destruction, biodiversity decline and outright loss on the Cumberland Plain; or will it ensure there is an effective practical *Conservation Plan* (the second "CP")? The title of the CPCP project suggested the project draft might reveal some exciting new proposals for reserves to help rectify the under-representation of CPW TEC (particularly) in the NSW reserve system.

There does appear to be an intention in the draft Plan to create new parks and reserves beyond the total "quota" of offset areas (the often-mentioned figure of 5,475 ha). If so, this is laudable. What the "trigger" could be for dedicating permanent reserves unencumbered by offsetting considerations is not detailed. In the case of CPW, regarded as the top but not the only priority TEC for protection, I suggest that any surviving reasonably large areas (tens to hundreds of ha), with fairly to well intact biodiversity - especially of birds and flora - should be proactively sought for reservation. These areas could of course contain other TECs as well.

Initial reserve proposals, in draft Sub-plan A

It is very disappointing that the only specific reserves mentioned as "commitments" at the commencement of the Plan contain little or none of the important CPW ecological community, and would do practically nothing to improve its conservation status. Of the three areas mooted, the one called "Confluence" sounds like a potential liability: no natural forest or woodland; heavy weed growth; prone to flooding; need for artificial "restoration" on large area. (See also below.)

The other two proposals, while having limited CPW conservation value, probably have some merits despite being on mostly sandstone geology. They could be established as "stand alone" reserves or parks, free of consideration as offsets. They could not be regarded as offsets for the loss of CPW under the CPCP, since all three fail the "like-for-like" offset principle. The main importance of the Georges River koala reserve lies in its having a viable, healthy koala population which can only be, and must be, maintained with room to live and move.

Undue emphasis on "ecological restoration"

There is a worrying aim in Sub-plan A that 25% of the total offset area of 5,475 ha (that is, 1,365 ha) should be land on which "restoration" of TECs is attempted (maybe forgoing opportunities to reserve land with existing intact biodiversity). Using scarce resources of money and man-power to try "re-building" TECs from scratch on bulk cleared areas would make little sense - e.g. "Confluence reserve" above. This is because reliable techniques for establishing "new" woodland with ecological attributes of CPW (including all the complex ground vegetation layers) are still in an early research stage. Even if successfully planted, the "new" vegetation would need to:

- survive many hazards (e.g. fire, flood, drought, animal attack, insect attack);
- develop resources needed by wildlife, including tree hollows at maybe 80-120 years old (though some artificial hollows might "work" sooner, on a small scale);
- become self-sustaining (vegetation able to regenerate from its own seeds etc).

In view of these limitations, this type of "ecological restoration" might be considered worthwhile in limited patches of existing degraded vegetation requiring some augmenting of trees or ground vegetation; or in limited extensions of wildlife corridors involving mostly trees. (Areas treated in this way should only be small, and they should not be counted as offsets.) NB. In any cases of restoration it is important to maintain some open or sparsely-treed areas for birds of prey to hunt over.

I strongly recommend following the principle: **Existing natural ecological communities, unless extremely degraded, are almost always superior to man-made constructs, for biodiversity conservation purposes, e.g. reserves.**

Selection of land with CPW and associated TECs, for protection as parks and reserves

Some suggested general criteria for the selection of biodiversity conservation reserves (considering mainly birds) are outlined below:

- If good areas for CPW reserves (or for "offsets") are hard to obtain on the actual Cumberland Plain (CP), it would be legitimate and sensible to select quality areas with similar ecology outside the CP. For example, the Hunter Valley has several woodland TECs with ironbark/box/spotted gum associations and a very similar threatened bird species assemblage to the CP - worth checking for reserve potential. (It also has some favoured Regent Honeyeater breeding locations.)
- Small sites (even a few ha) are worth protecting if habitat quality is high - e.g. healthy mature trees producing abundant blossom; as stepping stones or temporary drought or bush fire refuges. Most birds can fly to and between them if they are not too widely separated.
- Connectivity (corridors) is desirable but not vital. Good quality areas should not be passed up due to lack of corridors (these might be "built in" later).
- **Definitely** no use of any already protected areas as offsets.
- If setting up a biodiversity stewardship agreement (BSA) is really the only way of securing a good site for later designation as national park or similar, BSA might have to be employed initially, as long as it is well supervised with no roting of system.
- To be selected as a reserve, an area should not be required to contain one or a few very rare species (plant or animal). Aim should be to protect all species (as far as possible), not just a few endangered ones; even though this latter group requires special efforts for recovery.
- Conservation areas should not be selected to cater for recreation uses, like sporting areas, large picnic sites, bike tracks etc. These uses (other than perhaps on a very small scale) should be catered for by land within the development areas.
- Reiterated from earlier: bulk reserve areas (as opposed to linear corridors) should contain existing natural vegetation in fair to good condition, requiring nil to minor "repair" by planting, weed control etc.

Areas of land with significant amounts of Cumberland Plain Woodland (CPW) and/or other western Sydney TECs; very worthy of investigation for reservation, as high priority

The first two areas below are probably known to DPIE, and (I understand) are intended for formal reservation, some time. Why this process is taking so long for these extremely important habitat areas is not clear.

1. Airservices site, Shanes Park

Fairly large area (c 550 ha) of varying woodland types. Apparently best CPW is at the eastern end. Many species of woodland birds recorded over past 12 years. Long intended for NSW National Park reservation but south edge threatened by a major road.

2. Defence Establishment Orchard Hills

I am not personally familiar with this area, but understand it to be large (> 1,000 ha), with high quality CPW (mostly) and Riverflat Forest, and a rich complement of woodland birds. Still owned by Commonwealth but with an intention to return it to NSW for conservation in longer term (timing not specified). It sounds as if it could potentially be a "jewel in the crown" of CPW protected areas. However, the pristine Blaxlands Creek corridor is threatened by major road and rail construction in longer term (which should, if feasible, be re-routed).

Other areas suggested by Greater Sydney Landcare Network in their publication *State of the Cumberland Plain 2017-18*

This useful publication lists about 20 areas considered to need formal protection, with notes and aerial photos for each. Below are summaries of 17 of the sites and corridors described in the book, which sound most relevant to conservation of CPW and other Cumberland Plain TECs. Although the book is a few years out of date, many of the areas it describes may still be intact and worth investigating with some urgency. (Page numbers refer to the *State of the Cumberland Plain* book.)

NOTE: Areas/sites with ** notation probably best broad-scale areas of the 17 listed for conservation.

**** Windsor Downs-Castlereagh Corridor - Page 39**

Crown land with natural ironbark and scribbly gum forest (mainly on John Moroney Correction site), linking Windsor Downs and Castlereagh Nature Reserves.

**** Proposed Cobbity Hills Reserve - Page 41**

"The large commercial holdings of Cobbity provide one of the last opportunities to create a large public reserve. Unoccupied and unfarmed portions of seven investment properties total 1,200 hectares, predominantly Cumberland Plain Woodland and grasslands. These properties are in danger of being impacted by the proposed Outer Sydney Orbital and could be compulsorily acquired".

**** Kingshill Migratory Fauna Corridor - Page 42**

Kingshill Road offers one of the last opportunities to secure a decent connection for altitude migrants, linking the large areas of woodland at Defence Establishment Orchard Hills with the Blue Mountains.

Agnes Banks Corridor - Page 43

"The two largest areas of vegetation remaining in the Cumberland Plain area are linked by a small corridor near Bonner Road at Agnes Banks. This corridor is actively used by diverse native fauna to move between the Ham Common Wildlife Refuge (crown land now managed by Western Sydney University) and the large areas of crown and ex-crown land of Castlereagh to the south. A single property - No. 2 Bonner Road - is the only option to preserve this link, and this property should be acquired as an urgent priority."

**** Agnes Banks Nature Reserve additions - Page 44**

"The rear portions of two private properties create a major inclusion into the Nature Reserve. These rear portions are protected by a Heritage Order and were meant to be incorporated in the Nature Reserve, however they have never been acquired, and are being degraded, threatening the surrounding reserve. The Heritage Order portions of these properties should be purchased and incorporated into the Agnes Banks Nature Reserve as originally intended".

**** Doherty's Corridor - Minto to Scenic Hills - Page 45**

"A corridor of public land identified since the 1970s 'Doherty' paper, it links the Holsworthy-Campbelltown bushland (and koala corridor) with the Cumberland Plain Woodlands of the protected Scenic Hills. One property currently under use containing the historic 'Odyssey House'. The house and its surrounds could continue under this arrangement while also securing this key landscape corridor".

**** Fairlight Road - Page 46**

"Lots 1 & 2 Fairlight Road remain undeveloped and protect 25 hectares of Cumberland Plain Woodland. These properties adjoin the large Fernhill BioBank site on two sides and offer high strategic conservation value. These properties are best suited to purchase."

**** Fernhill West - Page 47**

"The 'Western Precinct' of the historic Fernhill estate protects over 100 hectares of Shale-Sandstone Transition Forest regenerating after past illegal clearing. This is a core portion of the regional koala

corridor. While the Mulgoa koala corridor has been recognised in OEH mapping, there has never been a survey of the population. This site has outstanding strategic conservation value, adjoining the Blue Mountains National Park and Fernhill BioBank sites."

**** Greendale opportunities - Page 48**

"Large private and corporate holdings at Greendale offer one of the few opportunities to secure large consolidated areas of Cumberland Plain Woodland. A total area of 420 hectares, most of it CPW, is located across approximately seven holdings adjoining the proposed Western Sydney Airport offset site. Serious conservation of the Cumberland Plain Woodlands as a functional ecosystem cannot be achieved without establishing large consolidated protected areas of this nature."

Camden Airport - Wivenhoe Conservation Link - Page 49

"The two largest conservation areas in Camden LGA are separated by just two private landholdings along the Nepean River. To the south the Environmental Zone (approx 55 hectares) of Camden Airport is protected by a Commonwealth Property Agreement while to the north is over 60 hectares of BioBank (at Wivenhoe) and the biodiversity offsets of Wivenhoe and Harrington Park. Linking these existing conservation areas along the river would create one of the largest conservation areas in the Cumberland Plain."

**** Blaxland Creek Corridor - Page 51**

"Western Sydney's most pristine creek, Blaxland Creek, is impacted by the proposed North-South Rail Line and Outer Sydney Orbital. Two properties connect the Defence Establishment Orchard Hills with the South Creek corridor and are obvious opportunities for conservation and restoration".

Northern Road Corridor - Page 52

"While considerable vegetation remains in the Castlereagh-Londonderry region, the opportunities for retaining connectivity between existing reserves are extremely limited due to the development of narrow residential lots along Northern and Londonderry roads. Lot 5//223798 Northern Road and other private lots present opportunities for connectivity if the owners are interested."

Londonderry Road Corridor - Page 53

"Like Northern Road, the Londonderry Road retains very few opportunities for securing corridors linking Rickaby's Creek with existing conservation reserves. Lot 2/10743 Londonderry Road is a private unoccupied lot which presents the best opportunities for connectivity if the owners are receptive."

**** Old-Growth - Whitegates Road - Page 56**

"Very little mature vegetation remains in the region. The largest known area of old-growth is this patch of Castlereagh Scribbly Gum Forest at Whitegates Road (near Castlereagh NR?). These trees are understood to be the primary breeding habitat for the local population of Yellow-bellied Glider (the last in the Cumberland Plain) as well as the endangered Squirrel Glider. This irreplaceable forest is corporate land and under threat of development."

Old-Growth - EMAI - Page 57

"The 'Macarthur Forest' at Elizabeth Macarthur Agricultural Institute is a popular site accessed by a mountain bike trail. This majestic old-growth was protected by the early Macarthur family in the early 1800s by a hedge fence (still standing). This forest is threatened by a sand mining licence. CCN support the buy-back of this sand mining licence to conserve this heritage."

**** Old-Growth - Menangle Road - Page 58**

"The magnificent old-growth at Lot 2//747563 Menangle Road is the only known patch of old-growth Cumberland Plain Woodland remaining and a sacred site for the Dharawal Aboriginal community. This site is owned by corporate mining company and leased for private uses. The old-growth has been suffered heavy damage from grazing with a number of trees now ringbarked. The landowner has now worked to fence off and restore a selection of trees on the property."

Old-Growth Barkers Lodge Road - Page 59

This property is presently unoccupied and is not used for agricultural purposes. The landowner may be amenable to conservation. Has 6 old trees on mounds, left after sand-mining.

Conclusion

All opportunities under the CPCP (and outside of its considerations) to secure adequate natural areas on the Cumberland Plain for national parks, nature reserves and similar securely protected land categories, need to be seized as soon as possible. Many good opportunities will probably disappear over the next few years; so the task of securing these areas is most urgent - maybe within 5-10 years, not 25 to 35 years.

Therefore I hope the NSW Government will be keen and proactive in seeking out and securing multiple conservation sites with most of their biodiversity still intact. The lists above have several suggestions for suitable potential protected areas - I commend them to you.

The top priority threatened ecological community (TEC) for reservation on the Cumberland Plain is Cumberland Plain Woodland - CPW (or acceptable surrogates such as some Hunter Valley woodlands and forests). However, high quality areas of other western Sydney TECs are also definitely worth protecting as they become available.

Thank you very much for your interest and assistance in this very important matter.

Yours sincerely,

