



870 Ophir Road,
Summer Hill Creek

NSW 2800

Dear Sir or Madam

Submission on the draft State Strategic Plan for Crown Land.

Central West Environment Council (CWEC) is an umbrella organization representing conservation groups and individuals in central west NSW working to protect the local environment for future generations.

We are very pleased to have the opportunity to comment on this plan. There are many parcels of Crown land in the Central West with very high values in respect of nature, environment, education, science, culture and passive recreation, Many of our members have close connections to these parcels of land and I personally am familiar with many of them as I have used for teaching, biodiversity surveys and hiking.

Whilst there are some very good sections in this plan, which is very broad in scope, there are also many statements that need better definition, areas where we disagree with the priorities and many gaps that need plugging. Of major concern is the very lower priority status given too the environment in most areas, for example, in the statement concerning the quadruple bottom line. Following that principle, the environment will always come last and that would be devastating for many of these areas of land of high conservation value. The draft plan is, therefore, at odds with the stated aims of state government in trying to stem the loss of biodiversity.

What little is left of the natural landscape in the Central West forms a critical network of diverse natural habitat and corridors and it is really important that as much as possible of this is left in its natural state to provide a refuge for native flora and fauna, including our rapidly diminishing threatened species.

A good example of this can be found close to Orange. Many (over 40) parcels of land were at one time included in the Canobolas Regional Parkland Trust. When this was broken up, some lands, such as Mount Canobolas and Borenore Caves, were incorporated into the

national parks system. Other lands of equally high conservation status were left as Crown land due to their potential for mineral exploration. One such land, South Mullion Reserve, became the subject of a Community Biodiversity Survey, in which I participated, and was found to contain many threatened species, but again it was not possible to have it converted to national park due to ministerial veto. I describe this land as it is a typical example of an area of crown land that should not be considered as available for any kind of impactful development. The environmental values are extremely high and it is only due to its potential mineral content that it has not already been gazetted as national park.

The draft Strategic plan falls short in respect of acknowledging and making provision for environmental values and we would very strongly support an additional priority to conserve high conservation value lands and enhance environment values in all lands.

Below, please find some comments for each section.

VISION

The vision should include a statement about the environment, not just about human communities

PRIORITIES

Priority 1 re commercialisation. The first priority is clearly inappropriate for much of our crown lands. We do not agree that Crown Land is merely a resource to be exploited for jobs. Obviously, provision of means of employment or source of income is important, particularly in regional areas, but this can be achieved by managing the lands in a sympathetic manner eg through weed and pest animal control, cultural burns, provision of seed banks for revegetation projects etc. Crown lands could also be leased for conservation purposes to individuals and NGOs. The Crown land adjacent to our own property at Summer Hill Creek is leased by us in this way so that it can managed sympathetically and not used inappropriately. This draft strategic plan does little to address this potential or alternative approaches.

Development should be in areas already destroyed or disturbed through farming and industry, not in bushland or areas of natural open space. Crown land should not be subject to the whims of government to enable commercial opportunities. Expanding industries, unless to benefit the environment, should be not be permitted in Crown land with natural values.

Priority 2 Expanding green space. This could be an excellent initiative, but needs to be better defined. If it is simply more football fields, it will not help meet the state's ecological sustainability goals. Where is the priority to provide habitat for threatened species and communities? And why would you include social housing in this section. Firstly, we do not agree that social housing should be placed on crown land, unless it is already incorporated in the urban landscape, and secondly, it should be included under Priority 1.

Priority 3 Strengthening communities. We support the outcomes ‘support and restore environmental values on Crown land’ and ‘to build resilience in a changing climate’ but feel that these statements are at odds with most of the other strategies. How will these outcomes be weighed up against the development strategies?.

This outcome also appears to be in an inappropriate section as it is not really about ‘strengthening communities’. We strongly suggest that this outcome ‘support and restore environmental values on Crown land’ be changed into a priority of its own with its own set of outcomes. This section could then include policies in respect of how to manage high conservation value land, particularly Travelling Stock Reserves, so the areas needed conservation could easily be identified and kept safe from development.

Priority 4 Aboriginal communities. We support this priority of expediting the transfer of title on lands where there are title claims and to effect employment opportunities, particularly in respect of managing the land. These lands are all that is left to make restitution to the original people of this land.

ENABLING INITIATIVES

We support most of the enabling initiatives, especially making information more transparent. This section of the draft is to be commended. A map showing all crown land, including TSRs, with the supporting data available for interrogation, would be a good start.

However, we do not support reducing red tape if it means that there is a higher risk of damage to the environment. Due process, a sophisticated approach environmental assessment and comprehensive community consultation are all essential to ensure that these lands are managed in a way that will enhance environmental values and prevent inappropriate development

OMISSIONS

Travelling Stock Reserves (Tsrs)

Although it is clear that TSRs form part of the Crown land estate, they are barely mentioned in this document and I at first assumed that they have been excluded deliberately and would have a separate plan. And that is what is recommended, or, failing that, they should at least have a section in this plan which outlines their special requirements.

Travelling Stock Reserves need special attention. They often hold the highest environmental values due to their position in the landscape and their connectivity. Often they are only pieces of land where the original vegetation such as woodland comes down to river banks as, on private land, most of this riparian vegetation has been cleared. For this reason, they are hot spots for threatened species and ecosystems and form a vital part of the conservation of flora and fauna at a landscape scale. They are also critical in providing refuge areas for those affected by climate change and as study and education sites.

A good example is Heifer Station Creek TSR, near Orange. I used this land for many years to teach biology. Not only was it one of the few areas around that still had abundant native

grasses, it also contained a rich avifauna and almost all the known eucalypt species in the district, so it was a superb outdoor laboratory.

Further complications arise when considering TSRs and their role in the agriculture landscape and production systems. They are simply not comparable to other areas of Crown land. Many of the reserves are being managed in a way that is not sympathetic to their natural values and this aspect, especially the contentious long-term grazing leases, has not been addressed.

A large environmental assessment study of all TSRs managed by the Local Land Services was undertaken by the Environmental Trust recently. Whilst the final results are not readily available, it was clear from reports in 2017 that most TSRs had high conservation value, especially when conservation status, and not just condition was considered.

This draft Plan does not appear to have taken this study into account and provides no clear statements on the highly significant cultural, ecological and social values of the TSR network and the importance in maintaining its integrity as State significant Crown lands.

To reiterate, either TSRs should not be included in this plan, or they should be provided with their own section, which accounts for their special status.

Waterways

The draft plan needs to include a section on the importance of Crown Land in the management and protection of water catchments. This is especially significant in light of the fact that so much Crown Land occurs near, and often immediately adjacent to, waterways.

GENERAL RECOMMENDATIONS

Overall, there is far too little emphasis on the conservation of nature in this document. Much of the Crown land in NSW is not in national parks due to restrictions imposed by the need to keep them open for mineral exploration. This does not mean, however, that they have low conservation status and can be sold off or developed. There needs to be much clearer guidelines in this document in respect of the strategy to enhance natural values.

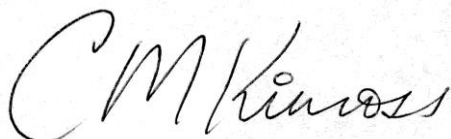
This draft strategic plan, should therefore address the following:

- A document should be produced covering all Crown lands, including TSRs, showing the location, conservation attributes and tenure or management status (lease permits etc.) of each. This should be publicly available. Where there are gaps in knowledge, these should be filled.
- The plan should then address the protection of all areas that can still contribute to nature conservation, prevent inappropriate development, tenure of management, including unsustainable grazing practices.
- The plan should have an extra priority added to address the management of environmental values on Crown lands. This should include the provision of funding

for management and restoration of all Crown Lands, including Travelling Stock Reserves, with natural values.

- A separate plan (or section within this plan) should be prepared to address the special needs of Travelling Stock Reserves.

We thank you for the opportunity to comment on this plan.



Cilla Kinross

President

Central West Environment Council

20th August 2020.

How to get involved and make a submission

Feedback on the draft State Strategic Plan for Crown land can be provided until midnight **Thursday 20 August 2020**. You can use an online submission tool or fill in a submission form.

Both are available here: <https://www.industry.nsw.gov.au/lands/public/on-exhibition/draft-state-strategic-plan-for-crown-land>

NCC is hosting a webinar with the Crown lands Commissioner at 10am, 20 August 2020. Please contact Amy via astrandquist@nature.org.au to RSVP.

