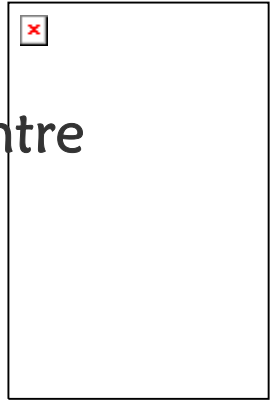


Hunter Community Environment Centre



# **Submission**

## **Draft Lower Hunter**

### **Regional Conservation Plan**

**22 November 2006**

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## Introduction

We appreciate the opportunity to comment on the Draft Lower Hunter Regional Conservation Plan (RCP). The Plan proposes to set out a 25 year program to direct and drive conservation efforts in the Lower. However, the Draft RCP discourages submissions on the Regional Strategy development areas or the conservation reserves. While we have not discussed the development sites, we have identified areas within development sites that should be excluded. We also identify additional areas of public land and private land of conservation significance, and suggest some mechanisms to achieve its protection.

Given the short exhibition period, we have not had adequate time to fully engage with all the issues the Government seeks feedback on. However, we will endeavour to provide such feedback once we get movement from the Government on what we believe are more pressing and pertinent conservation issues.

The Draft RCP identifies serious shortfalls in existing reserves, estimates the potential impacts of the Regional Strategy and sets out many worthwhile conservation objectives. Nevertheless, serious flaws and omissions are apparent in the Draft. Not the least of these is the lack of clarity over what is to be protected and how, although a range of options are canvassed. Aside from crude circles that identify priorities, no delineated conservation areas are apparent. Further, how the proposed funds will be generated for conservation investments is not clear. While we accept that this is a Draft, we would be disappointed if the final RCP was as nebulous as the Draft.

## Issues and recommendations

- An additional 7,300 ha of Public lands must be transferred to the National Park Estate. To fulfil the Government's commitment to protect "over 20,000ha of public land" in conservation reserves, at least 3000 ha must be transferred immediately.
- 52,000 ha of private land should be protected through either voluntary acquisition or secure perpetual conservation mechanisms over the life of the RCP. A *Conservation Investment Zone* must be introduced into new Local Environment Plans through Biodiversity Certification processes to maintain the ecological integrity of these lands until they can be secured.
- All DEC-identified State and Regionally significant vegetation should be protected in a new *Conservation Protection Zone* under new LEPs through Biodiversity Certification processes, to protect State and Regionally significant vegetation that is not included in *Conservation Investment Zoning*.
- The RCP should establish a framework for mitigating the biodiversity impact of the development areas in the Lower Hunter Regional Strategy, and develop mechanisms for raising conservation investment funds from identified development sites.

## Protection of Key Habitats

We are concerned that few areas of Key Habitats are included in the new conservation reserves. The Plan indicates that only just over 20% of Key Habitats in the region are reserved.

The bushland to the south, west and north of the township of Awaba represents substantial area of key habitat. We have attached a map of what we understand are still Crown lands to the south of Awaba, that must be afforded some form of secure protection: Reserved from sale for conservation purposes, declared a State Conservation Area.

It has to be said that a significant area of Key Habitat lies within the development sites identified by the Lower Hunter Strategy. HCEC submitted to the Draft Strategy that the areas identified for development at Northville, east of Holmesville, and one of the areas identified for development immediately north of the intersection of Lake Road and Main Road Cardiff, (and now, immediately south of the promised development site at Link Road South) are totally inappropriate sites for development. We understand that this is not a decision that DEC has control over, but considering the extensive further areas of development added to the Strategy as a result of the Planning Agreements with Hardie Holdings, Coal and Allied and Rosecorp, we feel that some of these sites need to be revisited.

Needless to say, we are disgusted at the scale of development promised to Coal and Allied north and south of the Newcastle Link Road, and would stress that loss of these areas of Key Habitat requires the Government as a whole to ensure that all remaining Key Habitat in the north and west of Lake Macquarie, now be given secure protection.

Key Habitats in Wallaroo SF: Obviously the reserve additions in Port Stephens will be a great help to wetland and coastal forest species, but we are disappointed that more of Wallaroo SF hasn't been dedicated as Flora Reserve.

## Offsets

The National Parks don't "offset" the Strategy.

Firstly, they are drawn mostly from public land, and the public should not pay to offset the profiteering of private landholders. Secondly, apart from the Werakata extensions, not much of the proposed Park land actually contains the same vegetation communities as the areas earmarked for clearing under the Regional Strategy. Thirdly, the first principle of offsetting is that impacts must be avoided. The RCP states that 1500 ha of vegetation was cleared in our region for development in the last five years. That's 300 ha per year. Under the current zonings, and the proposed Strategy, that clearing rate will actually increase, from 300 to 400 ha per year.

The Draft RCP admits that "Lowland dry forest and woodland are very poorly conserved in the Lower Hunter and are under the most threat from development" (13). But such woodlands and forests are not adequately represented in the Park proposals. This means that while the Park additions are supported, they do not in any way offset the biodiversity the Lower Hunter stands to lose to development over the next 25 years.

Significantly, DEC propose in the RCP that adherence to the “like for like” principle of offsetting would be too complex at this scale and in this timeframe (33).

Moreover, the RCP foreshadows significant further loss of biodiversity beyond the considerable areas already assumed to be lost. Rather than developing and proposing rigorous tests for these further development areas, the RCP lamely flags that “The biodiversity impacts associated with the categories of development not considered in this RCP will need to be assessed and offset through other mechanisms, including biobanking” (17). In this and other respects, we do not feel that DEC has taken full advantage of (admittedly limited) opportunities presented to them, both in their concurrence role, and in the “sustainability criteria” appended to the LHRS.

## Public Land Conservation

The *Draft Lower Hunter Regional Conservation Plan* (October 2006) states that:

*An enormous start has been made on its implementation through historic new commitments such as:*

- *Over **20,000 hectares** of various high conservation value Government lands will be reserved in perpetuity to form the backbone of major new conservation corridors.*

These additional conservation reserves will result in much better biodiversity protection through improved management regimes and assured protection from further clearing, open cut mining and degradation. Much more is required, however, before fauna populations and vegetation communities are secure. The commitment to new conservation reserves and ongoing investment in voluntary acquisitions is reassuring.

There are some anomalies between the committed new conservation reserves and the area of land contained within the legislation that should first be addressed.

The *National Park Estate (Lower Hunter Region Reservations) Bill 2006* identifies only **16,147.5 ha** of public land nominated to be transferred to the conservation estate. This includes

### 1. **8,144 ha of State Forest Land.**

- A. Columbey National Park 787 hectares of Uffington State Forest
- B. Karuah National Park
  - (1) An area of about 414 hectares of Karuah State Forest
  - (2) An area of about 333 hectares of Wallaroo State Forest
- C. Additions to Medowie State Conservation Area
  - (1) An area of about 767 hectares of Medowie State Forest
  - (2) An area of about 19 hectares of Wallaroo State Forest
- D. Sugarloaf State Conservation Area
  - (1) An area of about 2,139 hectares, of Awaba State Forest
  - (2) An area of about 1,428 hectares much of Heaton State Forest
- E. Werakata State Conservation Area
  - An area of about 2,257 hectares of Aberdare State Forest

### 2. **5189 ha of Crown Lands.**

- A. Gir-um-bit National Park
  - An area of about 15 hectares.
- B. Gir-um-bit State Conservation Area

- An area of about 184 hectares
- C. Hunter Estuary National Park
  - An area of about 1 hectare
- D. Karuah National Park
  - An area of about 2 hectares
- E. Addition to Karuah Nature Reserve
  - An area of about 139 hectares
- F. Addition to Lake Macquarie State Conservation Area
  - An area of about 94 hectares
- G. Medowie Nature Reserve
  - An area of about 11 hectares
- H. Sugarloaf State Conservation Area
  - An area of about 370 hectares
- I. Tilligerry National Park
  - An area of about 141 hectares
- J. Addition to Tilligerry Nature Reserve
  - An area of about 5 hectares
- K. Tilligerry State Conservation Area
  - An area of about 4,570 hectares
- L. Additions to Tomaree National Park
  - An area of about 8 hectares
  - An area of about 12 hectares
  - An area of about 25 hectares
- M. Addition to Watagans National Park
  - An area of about 47 hectares

### **3. 2725.5 ha of Flora Reserves**

- A. Additions to Bar Flora Reserve No 83 No 1 Extension
  - (1) Olney State Forest No 124
    - An area of about 13 hectares of Olney State Forest
  - (2) Watagan State Forest No 123
    - An area of about 0.5 hectare of Watagan State Forest
- B. Olney Flora Reserve No 186
  - Olney State Forest No 124
    - An area of about 802 hectares of Olney State Forest
- C. The Hunter Lakes Flora Reserve No 185
  - (1) Awaba State Forest No 982
    - An area of about 211 hectares, of Awaba State Forest
  - (2) Heaton State Forest No 122
    - An area of about 536 hectares of Heaton State Forest
  - (3) Olney State Forest No 124
    - An area of about 187 hectares of Olney State Forest
- E. Addition to Wallaroo Flora Reserve No 48 No 1 Extension
  - Wallaroo State Forest No 781
    - An area of about 463 hectares of Wallaroo State Forest
- F. Additions to Warrawolong Flora Reserve No 80 No 1 Extension
  - (1) Olney State Forest No 124
    - An area of about 52 hectares of Olney State Forest
  - (2) Watagan State Forest No 123
    - An area of about 461 hectares of Watagan State Forest

### **4. 9 ha of other State Forest vested in NPW Minister**

- An area of about 2 hectares of Awaba State Forest
- An area of about 7 hectares of Awaba State Forest

### **5. 80 ha of other Crown Lands vested in NPW Minister**

- An area of about 80 hectares.

A further 914.5 ha of land owned by the Hunter Central Rivers Catchments Management Authority (CMA) is likely to be transferred to the Department Of Environment and Conservation.

This adds to only 17,062 ha of Government land transferred to conservation reserves, leaving at least a further 2, 948 ha of Government land to be transferred to conservation reserves to fulfil the commitments made by relevant Ministers and in the RCP.

## **Further opportunities for public land transfer to the National Park Estate – 7294 ha**

### ***Crown Land – 5432 ha***

#### **1. Awaba Crown Lands – 2,615.6 ha**

The glaring omission from the public land transferred into conservation reserves is the Awaba Crown Lands (2,615.6 ha). This area of Government-owned land is some of the most species-diverse in the Lower Hunter. Its protection is essential for the persistence of many Lower Hunter species' population, and forms the basis of ongoing community conservation aspiration on the western side of Lake Macquarie.

The area is threatened by open cut mining. We believe that the area's omission from the RCP is due to objections by the Department of Mineral Resources (DMR). The area would be expected to be conserved within State Conservation Area (SCA) tenure to allow for underground mining. The only rational objection by DMR is to the opportunity for open cut mining in this very high conservation value area. This threat must be removed by immediate transferring the land to the DEC within secure SCA tenure.

#### **2. West of Morisset (Brightwater/Balcolyn) - 205 ha**

An area of 205 ha of Crown Reserve west of Morisset in four discreet blocks should be transferred immediately to the conservation reserve as an addition to the Lake Macquarie State Conservation Area.

This addition would consolidate the existing SCA and provide the backbone of protection for the existing vegetated corridor to the Lake's edge.

#### **3. Karuah Wetlands - 429 ha**

An area of 429 ha of Crown lands surrounding the town of Karuah in four discreet blocks should be transferred immediately to the National Park Estate as an addition to the Karuah National Park.

This addition would consolidate the existing reserves and provide secure protection for these important marine wetlands within the Port Stephens – Great Lakes Marine Park.

#### **4. Tilligerry Peninsula, Boat Harbour and Nelsons Bay - 1526 ha**

Various-sized areas of Crown Lands in the Port Stephens LGA between Tilligerry Peninsula, Nelson Bay and Boat Harbour totalling 1526 ha should be transferred immediately to the conservation reserve as additions to the Tilligerry and Woromi Nature Reserves and Tomaree National Park – subject to Local Aboriginal Land Council (LALC) land claims.

These areas are vital to conserve the area's unique biodiversity. The Port Stephens area is a known area of high species endemism and must be provided with adequate vegetated links and corridors between key habitats currently protected in National Parks and Nature Reserves.

We may have inadvertently identified land that has been successfully claimed under the LALC. We are aware that some of these Crown Lands are the subject of Woromi LALC Land Claims under the *Aboriginal Land Rights Act (ALRA)*. Should these claims be refused the areas subject to claims should be immediately transferred to the National Park Estate.

#### **5. Cessnock - 484 ha**

An area of 484 ha of Crown Reserve in the Cessnock LGA to the south and south-west of the city of Cessnock should be transferred immediately to the National Park Estate to provide secure vegetated corridors between the southernmost to portions of Werakata National Park.

These areas would provide important connectivity for fauna between existing and new RCP additions and secure important areas of Lower Hunter Spotted Gum-Ironbark and Hunter Lowland Redgum communities.

We understand that these areas are in a degraded condition and would require appropriate management responses for their rehabilitation. Nevertheless, their protection in the National Park Estate would prevent their continued degradation and provide an opportunity to secure a large area of Hunter Valley endangered vegetation communities.

#### **6. East Lake Macquarie – 162.6 ha**

Three areas of Crown Reserve in the Lake Macquarie LGA totalling 162.6 ha between the suburbs of Redhead and Highfields should be transferred immediately to the National Park Estate as additions to provide additions to the Glenock State Conservation Area and Awabakal Nature Reserve.

These 3 parcels would protect a significant area of remaining vegetation within a highly urbanised area.

### ***State Forest – 1871.6 ha***

#### **1. Corrobare State Forest - 484.5 ha**

An area of 484.5 ha of unloggable Forest Management Zone (FMZ) in the southwest of Corrobare State Forest (SF compartments 386, 387 and 388) should be transferred to the National Park Estate. This area of predominately Hunter Grey Gum forest is currently

subject to a State Forest grazing lease (Cn.L.No 1937/1) which forms part of Hardie Holdings' developer contributions under their Memorandum of Understanding.

Should this grazing lease be transferred to the DEC as part of Hardie's contributions, the area should also be transferred to the National Park Estate, as Forests NSW would no longer hold any valid interest in the three compartments.

## **2. Heaton State Forest - 677.4 ha**

An area of 677.4 ha of unloggable FMZ in the northern portion of Heaton State Forest (SF compartments 122, 263, 266, 267 and 4008) should be transferred immediately to the National Park Estate. This area of predominantly Coastal Plains Smooth Barked Apple Woodlands formed part of several community reserve proposals. The area does not form part of any timber to any wood supply agreement.

## **3. Wallaroo State Forest – 363 ha**

Four small areas of Wallaroo State Forest (part compartments 420, 421, 422 and 441) should be transferred immediately to the National Park Estate as additions to the Wallaroo Flora Reserve no 48) and Karuah National Park. These areas of predominantly Coastal Scribbly Gum and Smooth-Barked Apple Woodland would provide for essential vegetated corridors between existing and proposed reserves under the RCP.

Almost 150 ha of these State Forest areas are managed under FMZ that prohibit timber extraction. The balance of 89 ha forms a rational corridor between Medowie SCA and Wallaroo Flora Reserve to the north.

## **4. Pokolbin State Forest - 345.7 ha**

Two small areas of largely unloggable FMZ in Pokolbin State Forest (compartments 381 and 382) should be transferred to the National Park Estate. These two Forestry Compartments contain predominately Hunter Range Grey Gum forest and Sheltered Blue Gum Forest and are currently subject to a State Forest grazing lease (Cn.L.No 1957/1 and OP. No 14354) which forms part of Hardie Holdings' developer contributions Memorandum of Understanding.

Should this grazing Lease be transferred to the DEC as part of Hardies contributions, the area should also be transferred to the National Park Estate, as Forests NSW would no longer hold any valid interest in the three compartments.

## **Areas of Private Land for Conservation Investments**

### ***New Conservation Zones for Local Environment Plans***

Given the 25 year timeframe for conservation under the RCP, through voluntary acquisition, planning agreements, offset mechanisms, voluntary conservation agreements, covenants and management agreements, secure zoning mechanism must be afforded conservation value vegetated areas in Local Environment Plans (LEP) through Biodiversity Certification of LEPs by Local Governments in the Lower Hunter.

While the Draft RCP identifies Stage 2 mechanisms to contribute to the biodiversity impact resulting from development in the Lower Hunter, little in the way of meaningful protection is provided.

## 1. Conservation Investment Zone

The HCEC has identified over almost 36,000 ha of vegetation on 43,000 ha of private land parcels that should form the priority for conservation investment (a further 8,000 ha on 11,000 ha of private parcels is identified north of Port Stephens in the Great Lakes LGA). This zoning must prohibit any change in use for the property, as well as prohibiting the removal or degradation of any vegetation or biodiversity, so that funds made available for conservation over the life of the RCP can be invested within a rational spatial and temporal framework. This zoning should cover the entire property.

## 2. Conservation Protection Zone

A secondary conservation zoning must also be established through the Biodiversity Certification of LEPs that protects State and Regionally significant vegetation not included in the above Conservation Investment Zone. This zoning need not cover the entire property, but should prohibit the clearing of vegetation and inappropriate development. Vegetation within this conservation zone should be made available for rehabilitation investment, covenants and voluntary conservation agreements.

## Lower Hunter Regional Conservation Plan Development Exclusion Areas

The biodiversity of the Lower Hunter has been dealt a savage blow by the Regional Strategy. Over 11,000 ha of vegetation is within areas identified for development. A further 3,000 ha of vegetation is within areas already zoned for urban development. While some of these latter areas afforded protection to some vegetation through existing LEP zones, the LHRS does not identify exclusion areas within employment and urban development areas identified.

The maps attached identify proposed exclusion areas within these development sites. They have been identified using DEC State and Regional corridor and Key Habitats mapping, Squirrel Glider modelling, as well as a 45m riparian buffer along all mapped drainage lines.

Table 1. Vegetation within Lower Hunter Urban Development Land

| Vegetation type                                 | #shapes | HREMS Map Unit | Area (ha) |
|---|---------|----------------|-----------|
| Alluvial Tall Moist Forest                      | 288     | 5              | 496       |
| Apple - Palm Gully Forest                       | 11      | 39             | 3         |
| Central Hunter Riparian Forest                  | 16      | 13             | 15        |
| Coastal Clay Heath                              | 18      | 48             | 15        |
| Coastal Foothills Spotted Gum - Ironbark Forest | 335     | 15             | 646       |
| Coastal Narrabeen Moist Forest                  | 15      | 6              | 2         |
| Coastal Plains Scribbly Gum Woodland            | 214     | 31             | 216       |

|   |      |     |             |
|---|------|-----|-------------|
| Coastal Plains Smooth-barked Apple Woodland | 799  | 30  | 1738        |
| Coastal Ranges Open Forest                  | 21   | 9   | 27          |
| Coastal Sand Apple - Blackbutt forest       | 19   | 33  | 22          |
| Coastal Sand Scrub                          | 1    | 50  | 2           |
| Coastal Sand Wallum Woodland - Heath        | 8    | 34  | 3           |
| Coastal Sheltered Apple - Peppermint Forest | 21   | 11  | 15          |
| Coastal Wet Gully Forest                    | 7    | 1   | 0           |
| Coastal Wet Sand Cyperoid Heath             | 27   | 44  | 57          |
| Freshwater Wetland Complex                  | 31   | 46  | 32          |
| Heath                                       | 2    | 36a | 5           |
| Hunter Lowland Redgum Forest                | 209  | 19  | 157         |
| Hunter Valley Dry Rainforest                | 15   | 3   | 33          |
| Hunter Valley Moist Forest                  | 10   | 12  | 38          |
| Kurri Sand Swamp Woodland                   | 74   | 35  | 73          |
| Lower Hunter Spotted Gum - Ironbark Forest  | 1061 | 17  | 3264        |
| Mangrove-Estuarine Complex                  | 4    | 47  | 0           |
| Melaleuca Scrub                             | 2    | 42a | 3           |
| Nerong Smooth Barked Apple Forest           | 2    | 32  | 0           |
| Redgum Rough Barked Apple Forest            | 7    | 38  | 2           |
| Riparian Melaleuca Swamp Woodland           | 208  | 42  | 88          |
| Rushland                                    | 1    | 40a | 0           |
| Scrub                                       | 1    | 32a | 0           |
| Seaham Spotted Gum Iron Bark Forest         | 43   | 16  | 278         |
| Swamp Mahogany - Paperbark Forest           | 92   | 37  | 70          |
| Swamp Oak Rushland Forest                   | 30   | 40  | 18          |
| Tomago Sand Swamp Woodland                  | 20   | 36  | 18          |
| Wyong Paperbark Swamp Forest                | 7    | 43  | 12          |
| <b>Total</b>                                |      |     | <b>7352</b> |

Table 2. Lower Hunter Employment Land – Potential Vegetation Loss

| Vegetation type                                 | Overstory   | HREMS Map_unit | Area (ha) |
|---|---|----------------|-----------|
| Alluvial Tall Moist Forest                      | <i>E. saligna</i> / <i>S. glomulifera</i> / <i>Glochidion ferdinandi</i>                    | 5              | 34.798    |
| Apple - Palm Gully Forest                       | <i>Livistona australis</i> / <i>E. resinifera</i> subsp <i>resimifera</i> / <i>E. umbra</i> | 39             | 0.313     |
| Coastal Foothills Spotted Gum - Ironbark Forest | <i>C. maculata</i> / <i>E. umbra</i> / <i>E. siderophloia</i>                               | 15             | 70.393    |
| Coastal Narrabeen Moist Forest                  | <i>S. glomulifera</i> / <i>E. saligna</i> / <i>E. acmenoides</i>                            | 6              | 0.005     |
| Coastal Plains Scribbly Gum Woodland            | <i>E. haemostoma</i> / <i>C. gummifera</i> / <i>E. capitellata</i> / <i>A. inopina</i>      | 31             | 583.924   |
| Coastal Plains Smooth-barked Apple Woodland     | <i>A. costata</i> / <i>C. gummifera</i> / <i>E. capitellata</i> / <i>E. umbra</i>           | 30             | 989.386   |
| Coastal Sand Apple - Blackbutt forest           | <i>A. costata</i> / <i>E. pilularis</i> / <i>Banksia serrata</i>                            | 33             | 611.097   |
| Coastal Sand Scrub                              | <i>Leptospermum laevigatum</i> / <i>Banksia integrifolia</i> subsp <i>integrifolia</i>      | 50             | 0.002     |

|   |   |       |                 |
|---|---|-------|-----------------|
| Coastal Sand Wallum Woodland - Heath        | <i>Banksia aemula</i> / <i>C. gummifera</i> / <i>A. costata</i>   | 34    | 27.299          |
| Coastal Sheltered Apple - Peppermint Forest | <i>A. costata</i> / <i>E. piperita</i>  | 11    | 31.452          |
| Freshwater Wetland Complex                  | <i>Ludwigia peploides</i> subsp <i>montevidensis</i> / <i>Paspalum distichum</i> / <i>Eleocharis sphacelata</i> / <i>Juncus usitatus</i>      | 46    | 0.261           |
| Heath                                       | <i>Banksia aemula</i> / <i>Isopogon anemonifolius</i>   | 34a   | 28.006          |
| Hunter Lowland Redgum Forest                | <i>E. tereticornis</i> / <i>E. punctata</i> / <i>E. crebra</i> / <i>A. floribunda</i> / <i>C. maculata</i>                                    | 19    | 60.485          |
| Kurri Sand Swamp Woodland                   | <i>E. parramattensis</i> subsp <i>decadens</i> / <i>A. bakeri</i> / <i>Melaleuca nodosa</i>   | 35    | 64.552          |
| Lepironia Swamp                             | <i>Lepironia articulata</i> / <i>Lepidosperma concavum</i> / <i>Pseudanthus orientalis</i>  | 45    | 0.265           |
| Lower Hunter Spotted Gum - Ironbark Forest  | <i>C. maculata</i> / <i>E. fibrosa</i> / <i>E. punctata</i>   | 17    | 766.911         |
| Mangrove-Estuarine Complex                  | <i>Avicennia marina</i> subsp <i>australasica</i> / <i>Sarcocornia quinqueflora</i> subsp <i>quinqueflora</i> / <i>Aegiceras corniculatum</i> | 47    | 14.798          |
| Melaleuca Scrub                             | <i>Melaleuca sieberi</i> / <i>Gahnia clarkei</i>  | 42a   | 11.327          |
| Redgum Rough Barked Apple Forest            | <i>E. tereticornis</i> / <i>A. floribunda</i> / <i>E. resinifera</i> subsp <i>resinifera</i>  | 38    | 53.239          |
| Riparian Melaleuca Swamp Woodland           | <i>Melaleuca sieberi</i> / <i>E. robusta</i>  | 42    | 158.119         |
| Rushland                                    | <i>Phragmites australis</i>   | 40a   | 6.02            |
| Saltmarsh                                   | <i>Sarcocornia quinqueflora</i> subsp <i>quinqueflora</i> / <i>Sporobolus virginicus</i>  | 47a   | 0.252           |
| Seaham Spotted Gum Iron Bark Forest         | <i>C. maculata</i> / <i>E. crebra</i> / <i>E. punctata</i> / <i>E. fibrosa</i>  | 16    | 0.088           |
| Swamp Mahogany - Paperbark Forest           | <i>Melaleuca quinquinervia</i> / <i>E. robusta</i> / <i>C. glauca</i>   | 37    | 96.595          |
| Swamp Oak Rushland Forest                   | <i>C. glauca</i> / <i>Melaleuca ericifolia</i> / <i>Baumea juncea</i>   | 40    | 15.378          |
| Swamp Oak Sedge Forest                      | <i>Casuarina glauca</i> / <i>Melaleuca linariifolia</i> / <i>Carex appressa</i>   | 41    | 8.079           |
| Water                                       | Water   | Water | 6.903           |
| Wyong Paperbark Swamp Forest                | <i>Melaleuca nodosa</i> / <i>C. maculata</i>  | 43    | 0.431           |
| <b>Total</b>                                |   |       | <b>3640.378</b> |

## Conclusions

After the ecological disaster of the Regional Strategy, the Draft RCP is at least a foundation for adequate conservation measures in the Lower Hunter. The security of Lower Hunter biodiversity cannot be assured, however, unless this Government commits to substantial additional public land dedications and substantial sums are either generated from developers or allocated from treasury, to purchase private land for the National Park Estate.

Should developer contributions be imposed on new release development areas, the quantum must be proportional to the value of the land, so that contributions keep pace with the values of the land being purchased.

However, it is now likely that Biobanking will be constrained within the five LGAs of the Lower Hunter. This will provide an opportunity for a closed system of Biobank sites and development credit purchases. While we have an abundance of development that could be required to purchase credits from within the Lower Hunter, the situation of Biobank sites must be guided. The HCEC has identified areas we believe should be the focus of conservation investment. The final RCP should accept these areas to guide the establishment of Biobank sites in areas where the maximum conservation benefit will be achieved.

Whether Biobanking and/or Developer contributions can meet the challenge of securing the bulk of the remaining vegetation in the Lower Hunter is unclear. What is clear, however, is that further vegetation clearing for development and agriculture must be avoided. Therefore, contributions and Biobanking debits must be sourced from identified development sites and Biocertification of LEPs must be achieved early.