



**DAROO**

*Orange Urban Landcare Group*

Daroo Orange Urban Landcare Group  
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Major Projects  
Department of Planning  
NSW Government  
SYDNEY NSW 2000

Attention: Belinda Scott  
[belinda.scott@planning.nsw.gov.au](mailto:belinda.scott@planning.nsw.gov.au)

Re: Macquarie River to Orange Pipeline Project. Ref No: 10\_0235

Dear Belinda Scott

Daroo Orange Urban Landcare Group is a group of voluntary landcarers working on a remnant bushland reserve known as Wentworth Reserve, in the city of Orange. We have received numerous grants over the past ten years from both Federal and State governments in order to carry out restoration and rehabilitation of this small reserve.

We are therefore very much aware of the value to the landscape of old growth trees, such as are present in Wentworth Reserve, as well as the importance of younger trees which will take the place of the old ones in the future. Our submission is mainly concerned with

1. the loss of hollow-bearing trees, and
2. the impact on the three Threatened Ecological Communities along the proposed pipeline route for the Macquarie River Pipeline project.

The loss of hollow-bearing trees has been classified by the Scientific Committee as a Key Threatening Process (Schedule 3 of the Threatened Species Act, Scientific Committee 2007b). The three Threatened Ecological Communities occurring within the area of concern are Blakely's Red Gum-Yellow Box open-woodland of the tablelands (as listed

under the TSC Act), Blakely's Red Gum-Yellow Box open-woodland of the tablelands (as listed under the EPBC Act) and Shrubby White Box woodland (as listed under both the TSC and EPBC Acts).

The Executive Summary describes the project as likely to impose a significant effect on these communities describing the impact of the proposal will result in the permanent loss of an estimated 7.77 ha as direct impact; the temporary disturbance of an estimated 12.80 ha through direct impact; and the modification of an estimated 2.26 ha through indirect impact. As seen in the Assessments of Significance in the Environmental Assessment, it concludes that the project would be likely to result in a significant impact on the TEC's. Even actions undertaken to avoid, mitigate and manage the impacts, would have the likelihood of resulting in an unavoidable residual impact on the TECs. DECCW (2010b) suggests that in light of the current highly fragmented and degraded state of Box-Gum Grassy Woodlands in all areas of the proposal, even those areas that only meet the minimum condition criteria, *should be considered critical to the survival of this ecological community viz. Grassy Box Woodland.*

The proposed route of the pipeline has been surveyed by our group to ascertain the presence of hollow-bearing trees and those approaching the stage of developing hollows. Our results calculated a loss of more trees with more than 39 hollows in the first 13 kms of the proposed route. The direct residual impact that is noted as unavoidable in the EA would furthermore result in a loss of biodiversity values. This is quite unacceptable. The purpose of listing vegetation communities as threatened, and the loss of hollow-bearing trees as a Key Threatening Process, is to alert the community and local governments to their significant values. Under mitigation plans it is stated that *trees with high conservation value such as those with hollows*, would be retained in preference to smaller trees. Our survey noted that such choices would not be possible, unless the route was realigned to NOT pass through any remnant woodland.

## OFFSETS

Orange City Council is preparing a Biodiversity Offset Strategy to compensate for these *unavoidable residual impacts*, according to the Director-General's requirements. Our group disputes the possibility of offsetting the losses outlined above, as such losses cannot be replicated in view of the paucity of the vegetation in the proposal. Along Oakey

Lane the proposed route passes through Grassy White Box Woodland with are mature trees on the alignment of the pipeline. As retention of these trees *should be considered critical to the survival of this ecological community* (Grass White Box Woodland) we cannot see how any losses in this section can be permitted.

## MITIGATION

Despite the consideration of avoiding *removal of habitat features such as loose surface rocks, boulders and fallen timber (including hollow logs)*, and if necessary of reinstating them later, it will not avoid a loss of habitat for a considerable period. Not only is habitat lost, the foraging areas for Brown Treecreepers is lessened, posing a further threat to this threatened bird's welfare. No offsets can compensate for any loss of biodiversity value in this context, as shown above the scarcity of habitat for offsets precludes success of this strategy, nor can it *ensure the Macquarie River to Orange Pipeline Project will maintain or improve the biodiversity values present within the study area*. No matter how much thought is put into such offsets this is not possible to achieve in the area of *19.5 ha of native vegetation* that would be affected.

Proposed offsets cannot provide hollows that have been lost, even with the use of constructed nesting boxes as there will be insufficient suitable trees to locate these in. The clearing of large vegetation will open up of the landscape and provide habitat for Starlings, which are a threat to the success of boxes for native wildlife. It is not widely known that the Superb Parrot will not utilise hollows for nesting unless they fulfil the criteria of facing a certain direction and height above ground level. Nesting boxes will not be able to be located to fill this criteria. The presence of Mullion Conservation Area and Girralong Nature Reserve nearby cannot be utilised for offsets for species that require open woodland as they do not contain sufficient of those vegetation communities that will be lost if the pipeline goes ahead. A look at the maps provided in the EA will demonstrate the highly fragmented nature of the landscape and how important the roadside cover is to dispersal and movement through the landscape for fauna and flora.

The presence of original flora in these roadsides is almost unknown elsewhere due to the highly cleared nature of the landscape; the loss of visual amenity must also be taken into consideration due to the impact the proposal will have on the very narrow road reserves - leaving almost no other vegetation. Visual amenity was not considered in the Heritage Study of the EA which would have picked up on this feature of the proposal. The loss of

so many big and small trees and their associated understorey would be a terrible tragedy.

Our group urges the government to refuse Orange City Council permission to go ahead with the Macquarie River to Orange Pipeline Project on the basis of our argument, together with relevant considerations from others.

Yours sincerely

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for Daroo Orange Urban Landcare Group  
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