



Nature Conservation Council

The voice for nature in NSW

Crown Lands Management Review
NSW Trade & Investment
PO Box 2185
DANGAR NSW 2309

By email: Crownlands.whitepaper@trade.nsw.gov.au

20 June 2014

Submission on the Crown Lands Legislation White Paper

Dear Sir / Madam,

The Nature Conservation Council of NSW (NCC) is the peak environment organisation for New South Wales, representing more than 120 member societies across the state. Together we are committed to protecting and conserving the wildlife, landscapes and natural resources of NSW.

We do not support the proposals set out in the *Crown Lands Legislation White Paper (White Paper)*.

We acknowledge that there is a case for reviewing and reforming the numerous pieces of legislation which currently contribute to the management of public land in NSW. However, the White Paper proposes significant changes to the management of public lands that are likely to impact on the environment, including:

- Developing one new piece of legislation to replace eight existing Acts, including the *Crown Lands Act 1989*, *Crown Lands (Continued Tenures) Act 1989*, and *Western Lands Act 1901*;
- Allowing local councils to manage Crown reserves under the *Local Government Act 1993*;
- The conversion of Western Lands grazing leases to freehold;
- Removing the existing land assessment requirements to streamline existing provisions;
- Replacing reserve trusts and reserve trust managers with reserve managers.

These are substantial changes that could potentially result in large parcels of public land being handed over to other agencies or to private management and ownership. The proposed changes also undermine the key principles of Crown land management, set out in section 11 of the *Crown Lands Act 1989*, including environment protection and the conservation of natural resources. In our view, this is not in the public interest.

Public lands should be held on trust for the people of NSW; managed by the Government with management directed at identifying and protecting the diverse values of public lands. The principles of Crown land management must be retained.

We are deeply concerned that the Government is pushing ahead with its reform agenda without having undertaken:

- a) genuine and meaningful community consultation, and
- b) a robust assessment of the environmental, cultural and social values of our public land assets.

This is inconsistent with the State *NSW 2021 Plan*, in particular:

- Goal 22: Protect our natural environment, including to protect and conserve land, biodiversity and native vegetation;¹
- Goal 32: Involve the community in decision making on government policy, services and projects.²

Further, the review has failed to address its original terms of reference, in particular to identify and recommend key public benefits (social, environmental and economic) derived from Crown land.³

The Crown lands estate has diverse environmental, social and cultural values, including opportunities for low impact recreation, education and scientific research.

The opportunity provided by these Crown land reforms is not taken to advance the building of the NPWS parks and reserves system and encourage private land conservation, a key part of the State plan target to 'protect and conserve land, biodiversity and native vegetation'.

The interests of Aboriginal people and their heritage have been given poor consideration, except in relationship to native title. This is despite Goal 26 of the *NSW 2021 Plan* to foster partnerships with Aboriginal people and the associated goal that seeks to 'Increase the number of hectares of public lands that Aboriginal people are actively involved in managing' and 'Aboriginal culturally significant objects and places protected'.

We also note that the Government is undertaking major reviews of the NSW planning system and *Local Government Act 1993*. The outcomes of both these reviews will impact on the management of Crown lands and the proposals in the White Paper. In particular the Crown Lands White Paper refers to proposed changes to the planning system that have not yet been finalised.

¹ *NSW 2021 Plan* (p 43), available at <http://www.2021.nsw.gov.au/>

² *NSW 2021 Plan*, *Ibid*.

³ The terms of reference for the review were to identify and recommend:

- key public benefits (social, environmental and economic) derived from Crown land,
- the NSW Government's future role in the management and stewardship of Crown land,
- the basis of an appropriate return on the Crown estate, including opportunities to enhance revenue,
- business, financial and governance structures that enable achievement of desired outcomes within financial and resource constraints,
- opportunities for efficiency improvement and cost reduction, consistent with red tape reduction objectives and accountability,
- introduction by NSW Government of incentives to enable the Crown Lands Division to manage and develop the Crown estate in line with NSW Government objectives, and
- a contemporary legislative framework

The White Paper also fails to properly explain how proposed changes to the *Local Government Act* will impact on the proposals to streamline the management of Crown reserves by councils.

This submission will outline:

1. Concerns with the review process
2. Conservation values of Crown lands
3. Additional comments on the White Paper

NSW Crown lands have outstanding conservation values. In highlighting the conservation values of Crown lands, our organisation has worked together with the National Parks Association of NSW to undertake an assessment of the conservation values of the NSW Crown lands estate. A summary of this assessment is outlined in this submission and further information, including an explanation of the methodology together with detailed mapping is included as attachments to this submission.

The extremely high conservation values possessed by Crown lands requires the Government to act cautiously in any changes to the management of Crown lands.

In moving ahead, we urge the NSW government to withdraw the White Paper and to:

- Undertake a robust and complete assessment of the environmental, cultural or social values of its Crown land assets.
- Undertake further, broad community consultation on the important issues of Crown land management in NSW.

Our public land estate is an enormous and valued asset and the Government's proposed changes undermine the important role the State has in managing these public lands for the people of NSW, now and in the future.

Yours sincerely,



Pepe Clarke
Chief Executive Officer

Submission on the Crown Lands Legislation White Paper

1. CONCERN WITH REVIEW PROCESS

The Government announced, in June 2012, that it was undertaking a comprehensive review of the NSW Crown land estate. Environment groups saw the review as providing an important opportunity to identify areas of high conservation value, and plan for their effective management into the future.

As early as February 2013, NSW environment group representatives from the Nature Conservation Council, National Parks Association of NSW and Central West Environment Council met with Austin Whitehead, NSW Trade and Investment, to discuss the process of the Crown Land Review. These groups urged the Government to ensure that there was broad community consultation during the review process and to undertake a comprehensive review of the environmental values of Crown land to inform the review process.

In August 2013, a letter raising these same issues was sent to Deputy Premier, Andrew Stoner (**enclosed**).

NCC is disappointed that despite raising concerns with Government from an early stage, the White Paper consultation period is the first formal opportunity that the public have had to provide input into the Crown Land Review process.

The terms of reference for the review were pre-determined with little input from the community or interested stakeholders. Both the 2013 *Crown Lands Management Review*, prepared by a committee of agency stakeholders, and the *Crown Lands Management Review Summary and Government Response*, were also prepared with little, if any, community consultation. This is contrary to Goal 32 of NSW 2021 to involve the community in decision making on government policy, services and projects.⁴

Further, the Government has failed to undertake a robust assessment of the environmental, cultural and social values of Crown lands. This means that essential information about Crown land assets is missing, and does not inform the recommendations of the review or the Government's White Paper.

The drivers of the Crown Land Review appear to be short-term economic outcomes, rather than longer term, integrated environmental, social and economic benefits. This is apparent by the Government's language throughout the review documentation, including 'reducing red tape', 'cost cuts' and 'enhanced revenue'.

The White Paper proposes a significant shift in the way Government will manage Crown land in the future. This is most evident when you look at the proposed changes to the objects of the *Crown Lands Act*. There is a noticeable move away from environmental protection and conservation of natural resources as key objects of the *Crown Lands Act*, towards management through business case development and emphasis on economic outcomes. This approach is not necessarily 'best use in the public interest' or for the 'benefit of the people'.

⁴ Above no 2

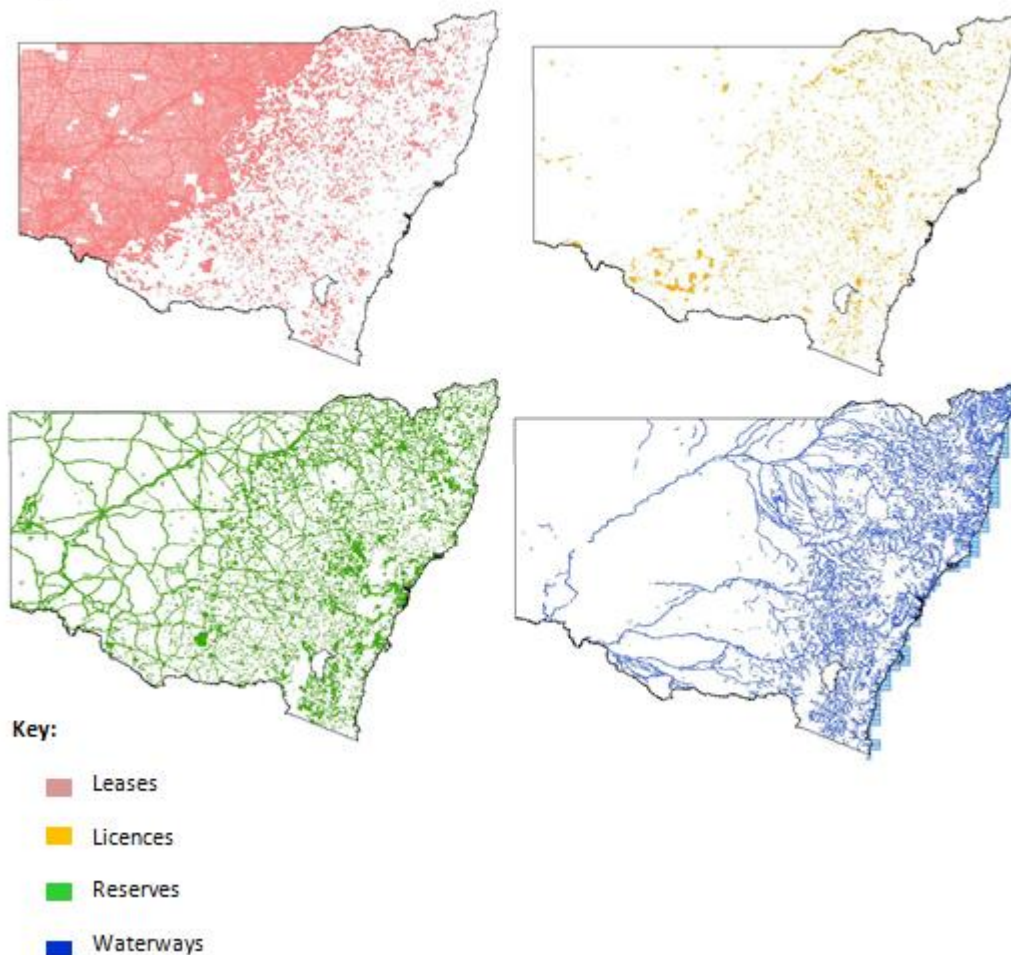
The Government has assumed that ‘disposal of Crown land’ and ‘enhanced revenue’ is the best outcome for Crown land management for the people of NSW, but in making this assumption has failed to even consult with the public or assess the important and long-term environmental and social benefits of Crown lands.

In essence, the Government’s proposals jeopardise the NSW public land estate, including some of our last patches of remnant bushland and important habitats for threatened and endangered species. In doing so, it is putting its own short-term political interests ahead of the public interest and the sustainable future of the people of NSW.

2. CONSERVATION VALUES OF CROWN LAND

The Crown lands estate covers millions of hectares, including significant areas of high conservation value. **Diagram 1** shows the extent of the Crown lands estate in NSW.

Diagram 1: Extent of Crown Lands in NSW



Data source: NSW Crown Lands Division and NSW Office of Environment and Heritage. Analysis performed using ArcGIS.

We are concerned that the Government’s review of the Crown lands estate focuses predominantly on the economic and monetary value of Crown lands and fails to recognise the significant environmental values, including the future value of protecting and enhancing areas of high conservation value.

For example, Crown land, especially in central and western NSW, represents a significant proportion of the remaining vegetation within some catchments. Crown lands in urban areas can contain important remnant vegetation and can be critical to the survival of resident, itinerant and migratory birds and other animals.

In 2005, the National Parks Association of NSW (**NPA**) commissioned research into the conservation values of perpetual Crown lease lands. The key findings of that report are set out in the **Case Study** below.

CASE STUDY - The conservation values of perpetual Crown lease lands

- Crown lands encompass *93,900 hectares of wetlands*, including two Ramsar listed wetlands, and provide habitat for at least *23 migratory bird species protected under international agreements*.
- Crown lands are dominated by *ecosystems* that have always been a very high priority for conservation. Of the *193 ecosystems* that occur within Crown leases, *143 are endangered, vulnerable or poorly reserved*.
- *Vegetation* on Crown lands is of a suitable size and configuration to provide *major habitat refuges*, important additions to existing reserves and *vital landscape connectivity*.
- Crown lands provide *habitat for at least 71 threatened plant species* and *111 threatened fauna species*.
- Crown lands include numerous *areas of outstanding 'iconic' value to nature conservation* in NSW (the Macquarie Marshes, Gwydir Wetlands, and Lowbidgee Floodplain, etc)
- In urban areas, Crown land parcels can contain *important remnant vegetation* and can be *critical to the survival of resident, itinerant and migratory birds and other animals*.

Source: *Our Heritage Under the Hammer, The imminent fire sale of Crown leasehold lands in NSW, their outstanding conservation values, and how they can be saved*, National Parks Association of NSW (2005)

More recently, and in response to the Government's current review, the National Parks Association of NSW and Nature Conservation Council of NSW conducted an assessment of the conservation values of NSW Crown land. The following Crown land types were analysed:

1. Crown reserves – all Crown reserves, including Travelling Stock Routes (**TSRs**)
2. Crown leases – all forms of leases, distinguishing Western Division leases from other leases
3. Crown waterways – all waterways across NSW

Road reserves and enclosure permits were not analysed. Further details about the assessment methodology and results are found in **Attachment 1**.

For each land parcel of each Crown land type the following values were assessed:

1. Statutory/Conservation status:

- a. Number of threatened fauna
- b. Number of threatened flora
- c. SEPP14 Coastal wetland presence
- d. SEPP26 Littoral rainforest presence

2. Landscape Conservation Values:

- a. Landscape % Cleared based on Mitchell landscapes
- b. Connectivity Presence based on statewide extant native vegetation

3. Condition:

- a. Associated Vegetation Patch Size
- b. Disturbance Level – low disturbance located more than 1km from infrastructure

For each Crown land type, tabulated data indicating conservation values for each Catchment Management Authority (**CMA**) was produced. See **Attachment 2**. For each value assessed (except connectivity), a set of detailed maps was produced and are shown in **Attachment 3**. The assessment was limited to readily available statewide spatial datasets and the values of the Crown lands analysed. In short, this assessment understates the conservation values of Crown lands and we believe a more thorough assessment, that should have accompanied this review would have found additional values. Further information about the limitations is in **Attachment 1**.

The assessment reveals that the Crown lands assessed have the following significant standout conservation values:

- **All Crown land types** offer a range of important conservation values. These values range from providing remnant vegetation and habitat for threatened species in highly cleared landscapes, habitat connectivity and irreplaceable coastal values.
- **Crown leases** and **Crown reserves** overwhelmingly offer high habitat connectivity, especially the Crown leases of the Western Division.
- **Crown leases in the Central and Eastern divisions** and **Crown waterways** contain extremely important vegetation remnants in heavily cleared landscapes, with many Crown leases forming part of remnants larger than 1,000ha.
- Significant records of threatened species have been found across **all Crown land types**, with **Crown reserves** showing the highest abundance of threatened species recorded.
- Most **Crown lands of Central Division** contain endangered ecological communities.
- **Crown leases in Western Division** within Western CMA contain extremely high numbers of threatened species records while for **most Crown land types**, Northern Rivers, Hunter-

Central Rivers and Southern Rivers CMAs tend to have the highest occurrence of threatened species records.

- **Crown reserves** and, to a lesser extent, **Crown waterways** are important sites for coastal wetlands and littoral rainforests recognised in SEPP designations. Over 2,000 of these Crown parcels contain these values.

Further summaries of values for each Crown land type are found in **Attachment 1** under the ‘Summary of conservation assessment’ results heading. **Table 2** below summarises the results of the assessment by Crown land type.

Table 2 - Conservation values by Crown land type

Conservation Value	Leases – Central and Eastern Division	Leases - Western Division	Waterways	Reserves
Number of land parcels	20,102	17,453	21,223	122,711
Proportion cleared - landscape rarity				
0-30% cleared	13%	78%	14%	55%
30-50% cleared	18%	12%	14%	9%
50-70% cleared	24%	9%	25%	14%
>70% cleared	45%	1%	46%	23%
Proportion part of small-large patch size				
Small (<250 ha)	22%	4%	23%	11%
Medium (250-1,000 ha)	10%	6%	7%	4%
Large (>1,000 ha)	38%	82%	22%	9%
Proportion with habitat connectivity	79%	96%	29%	69%
Proportion with low disturbance	61%	58%	33%	16%
Contains threatened flora	93	203	154	974
1-2 species	73	152	112	712
3-6 species	17	45	30	196
7-10 species	2	2	9	35
>10 species	1	4	3	31
Contains threatened fauna	643	1,526	647	3,386

1-2 species	394	902	349	2,272
3-6 species	162	389	137	686
7-10 species	43	117	50	164
>10 species	44	118	111	264
Contains SEPP 14 - coastal wetlands	48	n/a	610	1,415
Contains SEPP26 - littoral rainforest	5	n/a	14	107

The conservation values of Crown lands are significant, particularly taking into account the fact that NSW is facing unprecedented environmental challenges including the loss and fragmentation of native vegetation and wildlife habitat.

The 2012 *State of the Environment* Report confirms that:

“The overall diversity and richness of native species in New South Wales remain under threat of further decline. Thirty-five additional species have been listed as threatened under NSW legislation since 2009, including 11 terrestrial vertebrate species...

*... Currently, 989 species of plants and animals, 49 populations and 107 ecological communities are listed as threatened in NSW legislation, and 45 key threatening processes have been identified. These numbers continue to rise”.*⁵

Our extensive public land estate contains significant remnants of relatively undisturbed natural landscapes in rural, coastal and urban areas that when properly managed contribute enormously to the conservation of native vegetation, wildlife habitat and connectivity, biodiversity and coastal environments, wetlands, rivers and estuaries in NSW.

Often these public lands support threatened species and the last vestiges of endangered ecological communities lost from surrounding private lands due to development pressures. A number of high conservation value Crown lands are identified in Local Environment Plans for transfer to the National Parks Estate, and would be lost to the public should such Crown lands be privatised.

The Crown land estate provides many valuable ecosystem services identified in Catchment Action Plans. The retention and appropriate management of these services will provide a long-term public benefit in the form of landscape resilience and river health.

The importance of Crown lands to the conservation of the natural environment was not properly acknowledged in the White Paper, nor were the consequences of the changes on the natural environment fully considered.

Retaining this land in public ownership and managing it in accordance with the principles of ecologically sustainable development is strongly encouraged in the public interest.

⁵ NSW State of the Environment Report, NSW EPA, 2012

3. ADDITIONAL COMMENTS ON THE CROWN LANDS MANAGEMENT REVIEW AND WHITE PAPER

▪ ***Replacing eight pieces of legislation with one new Act***

As outlined above, we acknowledge that there is a case for reviewing and reforming the numerous pieces of legislation which currently contribute to the management of public land in NSW.

While we are not opposed to new legislation, we do not support a streamlining process that is aimed at significantly changing the objects of the existing Acts and the fundamental principles of Crown land management. In particular, the following issues must be addressed:

- The objects of a new Act must reflect the existing objects, particularly in relation to environment protection and nature conservation. The review process should not lead to a weakening of existing environmental protections. Specifically, the object of ecological sustainable development must be retained (see our comments below on the objects of the proposed new legislation).
- The White Paper does not adequately explain how the provisions of the existing minor Acts will be incorporated into the new legislation. The “historic” relevance of other legislation including the *Commons Management Act 1989*, and *Trustees of Schools of Arts Enabling Act 1902* should not be overlooked.

▪ ***Relationship to other Acts***

At various times the White Paper makes reference to the proposed new planning framework and the proposed local government reforms. Neither of these reform processes have been finalised, and in the case of the planning reforms it is not known if the Government will be moving ahead with its *Planning Bill 2013*.

In particular we are concerned with:

- Suggestions in the White Paper that land use assessments can be done away with in reliance of the strategic planning process proposed in the new planning system (White Paper, p18).
- Proposed changes to the *Local Government Act* which will remove the distinction between community land and operational land. This will have significant implications for the proposals in the White Paper that would allow councils to manage Crown land parcels under the *Local Government Act* rather than the *Crown Lands Act* (White Paper, p 13).

These issues are discussed in more detail below.

Given the strong interrelationship between the White Paper and the local government and planning reforms, the Government should delay moving ahead with its Crown lands reforms until the planning and local government frameworks are in place.

Similarly, the White Paper suggests where there are duplicate protections that currently exist in other legislation (such as the *Native Vegetation Act 2003*) they will not be retained in the new Act (White Paper, p 5). The Government has announced that it will be undertaking a review of key conservation legislation including the *Native Vegetation Act 2003*, *Threatened Species Conservation*

Act 1995 and *National Parks and Wildlife Act 2005*. Again, we are concerned that the Crown lands reforms are relying on other aspects of NSW legislation that are, due to their own review processes, uncertain.

Removal of the protection offered by Crown lands legislation is of concern irrespective of the fate of the reform processes mentioned above. The Crown lands legislation does offer additional protection over and above the *Native Vegetation Act*, the *Threatened Species Conservation Act* and, for lands outside of the NPWS reserve system, the *National Parks and Wildlife Act*. This is proven by the fact that the Crown lands are largely uncleared and have retained significant conservation values compared to adjacent freehold lands. General clauses in Crown land legislation and Crown leases and licenses that ensure environmental protection and prohibit the removal of vegetation have been highly effective at safeguarding a broad range of conservation values.

▪ ***Objects of the proposed new legislation***

The proposed objects of the new Act depart significantly from the existing objects and principles of management in the *Crown Lands Act 1989*.

One of the key objects of the *Crown Lands Act* is the management of Crown land having regard to the principles of Crown land management, which include:

- a) that environmental protection principles be observed in relation to the management and administration of Crown land,
- b) that the natural resources of Crown land (including water, soil, flora, fauna and scenic quality) be conserved wherever possible,
- c) that public use and enjoyment of appropriate Crown land be encouraged,
- d) that, where appropriate, multiple use of Crown land be encouraged,
- e) that, where appropriate, Crown land should be used and managed in such a way that both the land and its resources are sustained in perpetuity, and
- f) that Crown land be occupied, used, sold, leased, licensed or otherwise dealt with in the best interests of the State consistent with the above principles.⁶

Similarly, lands in the Western Division must be used in accordance with the principles of ecologically sustainable development.⁷

The proposed objects of the new Act weaken existing objectives, and in particular do not include the protection of high conservation values or ecosystem services of Crown Land, the conservation of natural resources or the principles of ecologically sustainable development.

We do not support the proposed objects of the new Act, which shift the emphasis away from environmental protection and conservation of natural resources.

⁶ *Crown Lands Act 1989*, section 11

⁷ *Western Lands Act 1901*, section 2(e)

The following changes to the proposed objects of the new Act are recommended:

- Object (a): *'To provide for the management of Crown land for the benefit of the environment and the people of NSW.'*
- Object (b): *'To provide a system of management for Crown land that is consistent with the principles of ecologically sustainable development.'*
- Object (c): *'To provide transparent and inclusive decision making processes.'*
- NCC does not support proposed Object (e) that provides for the disposal of Crown land.
- ***Transfer of responsibility to Local Government***

According to the White Paper, there are currently 7,765 Crown reserves managed by councils, as reserve trusts or through direct management under the *Crown Lands Act*. The White Paper proposes to allow local government to manage Crown land under the *Local Government Act*, similar to how councils currently manage community land under that Act.

However, the White Paper fails to articulate a transparent and accountable process for any transfers of responsibility and ongoing stewardship of Crown land.

We also have significant concerns regarding proposed changes to the *Local Government Act* which would remove the distinction between community land and operational land, essentially allowing councils to sell off parcels of land that were previously managed as community land. Our specific concerns on this issue are outlined in our submission to the *Discussion Paper: A New Local Government Act for NSW (enclosed)*.

If, as the White Paper proposes, councils are allowed to manage Crown lands under the *Local Government Act*, there are significant questions surrounding how that land is managed and concerns that proposed changes to the *Local Government Act* would allow councils to sell off Crown land under its management.

In our view, any transfer of land to Local Government must include sufficient safeguards to prevent council from being able to treat Crown Land as operational land and/or sell off Crown land. One solution may be to require councils to manage Crown land as Community land in perpetuity.

- ***Land Assessment Requirements***

The removal of land assessment requirements is not supported. The White Paper proposes that Crown land be assessed as part of the process of developing local plans under the new planning framework.

We have a number of concerns with this approach:

- First, the Government has not implemented any new planning framework for strategic planning.
- Second, in our view, the proposed strategic planning framework in the *Planning Bill 2013* is inadequate because the proposed strategic planning principles do not establish clear

outcomes-based objectives for achieving environmental and social outcomes and there are no clear and mandatory provisions requiring a consistent and reliable base data set to be established across NSW to underpin strategic planning.

- Third, the existing land assessment requirements under the *Crown Lands Act* are for the specific purpose of identifying and managing Crown land and require considerations not currently in the strategic planning framework including an assessment of the capabilities of land includes assessment of the land's use for community or public purposes, environmental protection, nature conservation, water conservation, forestry, recreation, tourism, grazing, agriculture, residential purposes, commerce, industry or mining.
- Fourth, the existing land assessment process allows for a detailed assessment of the values of an area, detail that is unlikely to be gathered in the development of local plans under the new planning framework.

We recommend that existing land assessment requirements under the *Crown Lands Act* be retained and strengthened.

- ***Conversion of Western Lands grazing lease to freehold***

NCC supports the view of the Western Lands Advisory Council, that perpetual leases are appropriate and effective in limiting damage to sensitive rangelands. We do not support the proposal to convert grazing leases to freehold.

In considering changes to Western Lands leases, management of leases for conservation appears to have been overlooked. A number of Western Land leases are managed for conservation, often under conservation agreements (*National Parks and Wildlife Act 1974*) or trust agreements (*Nature Conservation Trust Act 2001*). The Western Division includes leases managed as conservation reserves by Bush Heritage Australia and the Australian Wildlife Conservancy.

For the proposed uses for Western Lands leases, no consideration was given to environmental protection being a legitimate purpose of a Crown lease. Here is a legitimate case for unnecessary administration to be removed where lessees agree to be bound by these agreements, clearly a good public interest outcome. Additionally, where a perpetual conservation agreement is in place, timber and carbon rights should be granted to the Western Lands lessee to act as an incentive for conservation and to prevent degradation from third party timber harvesting.

NCC also supports the retention of the Western Lands Commission to regulate appropriate use of Western Division lands.

If the Government does go down the path of converting some Western Lands leases, then the determination as to whether land should be converted to freehold must be assessed in accordance with the principles of ecologically sustainable development.

The high conservation values of the Western Lands leases were identified in our assessment of conservation values in **Attachment 1**. In particular the assessment finds that the Western Division native vegetation is largely intact with high connectivity and low disturbance and high numbers of threatened species, particularly threatened fauna species.

- **National parks and private land conservation**

The Crown land reforms fail to take advantage of the chance to advance State Plan Goal 22 to protect the natural environment. This goal has a target to 'protect and conserve land, biodiversity and native vegetation'. Specific measures under this target include 'identify and seek to acquire land of high conservation and strategic conservation value, for permanent conservation measures' and to 'establish voluntary arrangements with landowners'.

The NSW National Parks Establishment Plan 2008, which is endorsed government policy, provides an ideal direction for this work. Specifically areas of the Far West and the Central Western Plains are identified as areas of high priority for expanding the reserve system.

High conservation value Crown lands throughout NSW should be considered for mandatory addition to the NPWS parks and reserve system. When leases expire, the suitability of the area for permanent conservation should be given a high priority. Prior to any proposal to privatise Crown land, the land should be considered for addition, at no cost, to NPWS parks and reserves. For any lease with a statutory right to convert, NPWS should be offered first option to purchase the lease, otherwise, in order to retain areas of high conservation value, incentives should be offered to encourage protection of conservation values, such as through a conservation covenant.

Private land conservation through conservation covenants could be encouraged by the provision of incentives and mandatory requirements when changes to Crown lands take place. Until recently, the conversion of Crown leases was preceded by a requirement to protect high conservation values with a conservation covenant.

- **Increased enforcement**

NCC supports proposals to increase enforcement powers and penalties under the new legislation, for example, improved provisions for increased auditing, officer powers consistent with *Protection of the Environment Operations Act 1995*, longer time limit for commencing proceedings against breaches, prosecutions to be brought to Land and Environment Court, and stop work orders.

- **Other issues**

We also note the following matters and suggest that further consideration of these issues is required:

- **Travelling Stock Routes (TSRs)**

The network of Travelling Stock Routes and Reserves has significant environmental, cultural heritage and social values. We note the recommendation of the Crown Land Management Review to have Local Land Services (LLS) work with the relevant stakeholders to develop assessment criteria to review all TSRs and determine their future ownership and management.

We do not consider the LLS to be the appropriate body to review the future use and management of TSRs. The individual LLS offices are localised in their operations and do not have a broad overview of the TSR system. They also do not have appropriate expertise in assessing the environmental significance of ecosystems.

We emphasise that any future review of TSRs must include a genuine transparent consultation process, require mandatory input from the Office of Environment and Heritage, and require a robust assessment of the environmental, cultural heritage and social values of TSRs on a landscape scale.

- ***New management structure for Crown Reserves***

The NSW Government proposes to establish the Crown Lands Division as a Public Trading Enterprise. We are concerned with public agencies adopting a 'corporation' style business model to manage public land with an unbalanced emphasis on economic outcomes. This approach is likely to downgrade the lands' environmental needs, the public interest and other intangible values that are difficult or impossible to cost.

- ***Notification requirements***

The White Paper proposes new notification provisions for informing the public about proposals for the use or disposal of Crown land. Any new notification processes must not reduce community engagement at the expense of seeking more streamlined administrative processes. While we generally support proposals to develop an online portal, best practice community engagement requires a wide range of notification tools, and must take into account the fact that not everyone has access to reliable internet services. We submit that existing notification requirements, including requirements for notification in the Government Gazette, should be retained.

- ***CSG Exploration***

Given the high conservation values of Crown land, we submit that CSG exploration is incompatible with the proper management and use of these lands and should not be permitted.

- ***Carbon sequestration***

There are strong advantages in retaining the carbon sequestration rights held by the government for Crown leasehold land. It is in the public interest that these rights are retained in the Western Division and across the state.

- ***Implications for Aboriginal land claim rights***

It is unclear what implications the proposed changes to Crown land management will have on future Aboriginal land claim rights. In particular consideration must be given as to what effect proposals to transfer or sell land to agencies or private persons will have on future claims.

It is noted that the white paper largely ignores the protection of Aboriginal cultural heritage on Crown lands.

ATTACHMENT 1: Assessment of conservation values of NSW Crown lands

Introduction

Between June 2013 and June 2014 the National Parks Association of NSW and Nature Conservation Council of NSW conducted an assessment of the conservation values of NSW Crown land. The following Crown land types were analysed.

1. Crown reserves – all Crown reserves including TSRs
2. Crown leases – all forms of leases, distinguishing Western Division leases from other leases
3. Crown waterways – all waterways across NSW

Road reserves and enclosure permits were not analysed.

The assessment was carried out by pro-bono GIS consultants with further analysis conducted by pro-bono technical consultant Andrew Cox.

Conservation values assessed

The assessment was carried out by using available spatial data of conservation values and intersecting this with each Crown land type. The following values were identified for each land parcel of each Crown land type:

1. Statutory/Conservation status:

- a. **Number of threatened fauna** – Total number of different threatened fauna recorded on the parcel from the Atlas of NSW Wildlife. Threatened status was based on the Threatened Species Conservation Act.
- b. **Number of threatened flora** – Total number of different threatened flora recorded on the parcel from the Atlas of NSW Wildlife. Threatened status was based on the Threatened Species Conservation Act.
- c. **SEPP14 Presence** – value of SEPP14 denotes presence
- d. **SEPP26 Presence** -value of SEPP26 denotes presence

2. Landscape Conservation Values:

- a. **Landscape % Cleared** – rarity of the landscape unit on which the reserve parcel sits based on Mitchell landscapes. The following ranges were recorded:
 - i. 0-30% largely uncleared
 - ii. 30-50%
 - iii. 50-70%
 - iv. > 70% over-cleared landscapes & therefore high rarity
- b. **Connectivity Presence** – presence of connected habitat associated with the reserve parcel based on statewide extant native vegetation

3. Condition:

- a. **Associated Vegetation Patch Size** – size of overall vegetation patch that the reserve parcel is associated with (extending beyond the boundaries of the reserve parcel). This reflects the ability of the size of the patch to support fauna generally from small (low or local) to large (regional significance)
 - i. Small: 1 – 250 ha
 - ii. 250 – 1000 ha
 - iii. Large: > 1000 ha
- b. **Disturbance Level** – low disturbance = reserve parcels associated with areas located > 1,000m from infrastructure

Maps of conservation values

For each value assessed, a set of maps was produced. The maps also show the CMA regions. For each Crown land type there are two sets of maps. One set covers the coastal CMAs while the other covers the inland CMAs. CMAs were used since the Local Land Services boundaries were not available when the assessment was undertaken in mid-2013. No map showing connectivity was produced.

The following maps were produced for each Crown land type:

- Threatened flora
- Threatened fauna
- Coastal wetland and littoral rainforest presence (coastal CMAs only)
- Low disturbance
- Patch size
- Landscape clearance

The maps are displayed in **Attachment 3**.

Summary of conservation assessment results

The assessment reveals that the Crown lands assessed have significant conservation values.

Standout values across all Crown land types

- **All Crown lease types** offer a range of important conservation values. These values range from providing remnant vegetation and habitat for threatened species in highly cleared landscapes, habitat connectivity and irreplaceable coastal values.
- **Crown leases** and **Crown reserves** overwhelmingly offer high habitat connectivity, especially the Crown leases of the Western Division.
- **Crown leases in the Central and Eastern divisions** and **Crown waterways** contain extremely important vegetation remnants in heavily cleared landscapes, with many Crown leases forming part of remnants larger than 1,000ha.
- Significant records of threatened species have been found across **all Crown land types**, with **Crown reserves** showing the highest abundance of threatened species recorded.
- Most **Crown lands of Central Division** contain endangered ecological communities.
- **Crown leases in Western Division** within Western CMA contain extremely high numbers of threatened species records while for **most Crown land types**, Northern Rivers, Hunter-Central Rivers and Southern Rivers CMAs tend to have the highest occurrence of threatened species records.
- **Crown reserves** and, to a lesser extent, **Crown waterways** are important sites for coastal wetlands and littoral rainforests recognised in SEPP designations. Over 2,000 of these Crown parcels contain these values.

Central and Eastern Division Crown leases

- **Crown leases within Eastern Division** mostly protect landscapes that are generally uncleared (less than 50% cleared)
- **Crown leases** within Northern Rivers, Hawkesbury-Nepean and Southern Rivers CMAs mostly form part of large patches of vegetation (>1,000 ha).
- All **Crown leases in Central and Eastern divisions** are well connected, with an average of 79% of leases having high habitat connectivity. Crown leases in Sydney Metro, Lachlan and Murrumbidgee CMAs are the least connected (between 57% and 66% of leases connected).
- More than half of **Crown leases in the Central Division** are important for protecting heavily cleared landscapes. Lachlan, Central West, Namoi and Murray CMAs have between 58 and 72% of Crown leases within these heavily cleared landscapes.

- Almost all **Crown leases of Central Division** are likely to contain endangered ecological communities (see related point regarding limitations of this assessment)

Western Division Crown leases

- **Western Division** leases are extremely well connected and are part of large remnants in largely intact uncleared landscapes. Over 95% of Western lease parcels are well connected, over 80% are part of remnants greater than 1,000 ha and close to 80% are found in intact landscapes with less than 30% cleared.
- Within the **Western Division**, the **Crown leases** within the Murray, Murrumbidgee and Central West CMAs are particularly important since they are found in more cleared landscapes, and in the case of the Murray and Murrumbidgee CMAs, are likely to protect smaller remnants that are less well connected.
- **Western Division leases** generally have lower disturbance, most being found more than 1km from infrastructure.
- **Western Division leases** have high records of threatened fauna, with the Western CMA part of Western Division containing extremely high numbers of land parcels with threatened fauna records (858 parcels, 54 of these with more than 10 different threatened fauna species).

Crown waterways

- **Crown waterways** are extremely important in protecting vegetation in heavily cleared landscapes in central NSW. In Central West, Lachlan and Murrumbidgee CMAs, between 65% and 79% of Crown waterways are found within heavily cleared landscapes.
- Most **Crown waterways** are part of small vegetation patches (less than 250ha), however in western NSW they overwhelmingly form part of large patches of vegetation.
- **Crown waterways** are highly connected, with an average of 71% of land parcels being connected, ranging from 45% in Murrumbidgee CMA to over 96% for Lower Murray-Darling and Western CMAs.
- Most **Crown waterways** are disturbed, being located close to infrastructure, however an average of one third of all waterways are undisturbed, with Western and Lower Murray-Darling CMA's being the least disturbed with over half of waterway parcels being distant from infrastructure.
- **Crown waterways** are important sites for coastal wetlands and littoral rainforests recognised in SEPP designations. Over 624 of these Crown parcels contain these habitats.

Crown reserves

- **Crown reserves** are highly connected, with an average of 69% of land parcels being connected, ranging from half in Sydney Metro and Murrumbidgee to over 90% for Western and Murray CMAs.
- **Crown reserves** are especially important as remnants in cleared landscapes, with between 36% and 41% of Crown leases in Central West, Lachlan and Namoi CMAs safeguarding these remnants.
- **Crown reserves** are usually protecting lands forming parts of small patches, with less than 9% of Crown reserves forming parts of patches larger than 1,000 ha.
- **Crown reserves** are extremely important sites for coastal wetlands and littoral rainforests recognised in SEPP designations. Over 1,500 of these Crown parcels contain these values.
- **Crown reserves** have extremely high abundance of threatened species recorded in more than 3,300 Crown reserve parcels. These Crown reserves have about half of the 20,300 records in all Crown land types.

Detailed information about the occurrence of each conservation values for each Crown land type and each CMA is provided as tabulated data in **Attachment 2**. This information is summarised in Tables 1 and 2 below. A set of maps for each Crown land type in **Attachment 3** provides information about the location of each of these values (see 'Maps of conservation values' section above).

Table 1. Conservation values by Crown land type

Conservation Value	Leases – Central and Eastern Division	Leases - Western Division	Waterways	Reserves
Number of land parcels	20,102	17,453	21,223	122,711
Proportion cleared - landscape rarity				
0-30% cleared	13%	78%	14%	55%
30-50% cleared	18%	12%	14%	9%
50-70% cleared	24%	9%	25%	14%
>70% cleared	45%	1%	46%	23%
Proportion part of small-large patch size				
Small (<250 ha)	22%	4%	23%	11%
Medium (250-1,000 ha)	10%	6%	7%	4%
Large (>1,000 ha)	38%	82%	22%	9%
Proportion with habitat connectivity	79%	96%	29%	69%
Proportion with low disturbance	61%	58%	33%	16%
Contains threatened flora	93	203	154	974
1-2 species	73	152	112	712
3-6 species	17	45	30	196
7-10 species	2	2	9	35
>10 species	1	4	3	31
Contains threatened fauna	643	1,526	647	3,386
1-2 species	394	902	349	2,272
3-6 species	162	389	137	686
7-10 species	43	117	50	164
>10 species	44	118	111	264
Contains SEPP 14 - coastal wetlands	48	n/a	610	1,415
Contains SEPP26 - littoral rainforest	5	n/a	14	107

Table 2. Conservation values by CMA region

CMA's	Threatened species recorded on Crown lands		Crown land parcels with statutory conservation significant SEPPs		Crown land parcels >1km from infrastructure
	Number of threatened fauna species	Number of threatened flora species	SEPP14 coastal wetland	SEPP26 littoral rainforests	Parcels with low disturbance
Border Rivers-Gwydir	864	135	0	0	1,573
Central West	1,099	62	0	0	2,403
Hawkesbury-Nepean	519	891	0	0	888
Hunter-Central Rivers	2,573	408	553	43	2,061
Lachlan	602	48	0	0	1,925
Lower Murray-Darling	431	56	0	0	1,046
Murray	176	93	0	0	648

Murrumbidgee	1,343	54	0	0	1,820
Namoi	605	81	0	0	904
Northern Rivers	3,247	327	595	60	2,486
Southern Rivers	1,315	283	267	4	1,455
Sydney Metro	598	216	0	0	302
Western	693	52	0	0	2,691
Grand	14,114	2,707	1,415	107	20,288

Limitations of the assessment:

1. The assessment was reliant on readily available statewide GIS datasets. The lack of reliable statewide datasets indicating vegetation type and condition and information on biodiversity values limits the ability to comprehensively determine the conservation values of Crown lands.
2. For example there is no dataset indicating endangered ecological communities. Almost all Crown land parcels in the Central Division with trees or native grasses are likely to fall under a defined endangered ecological community.
3. Flora and fauna records were based on records of actual sightings/trappings/collection. Due to difficulties with public access to many lands and the limited survey effort, most Crown land has not been surveyed. This information is a major underestimate of the occurrence of threatened species. It would be far more useful to use flora and fauna modelled habitat to indicate presence or absence of threatened species.
4. The assessment did not compare the values of the Crown land types with the values of other lands in the same locality.
5. A definitive Crown land dataset cannot be obtained due to poor digital record-keeping by Crown Lands Division
6. The result of the assessment of connectivity presence was not mapped.

ATTACHMENT 2 Tabulated analysis by Crown land reserve type

ATTACHMENT 2A. Crown leases – Central and Eastern Division

1. Proportion cleared

CMA	0-30% cleared	30-50% cleared	50-70% cleared	>70% cleared	Total
Border Rivers-Gwydir	0%	23%	30%	46%	100%
Central West	4%	7%	25%	65%	100%
Hawkesbury-Nepean	32%	14%	40%	14%	100%
Hunter-Central Rivers	30%	21%	22%	26%	100%
Lachlan	4%	6%	18%	72%	100%
Murray	0%	5%	37%	58%	100%
Murrumbidgee	11%	6%	36%	48%	100%
Namoi	6%	22%	15%	58%	100%
Northern Rivers	39%	29%	12%	20%	100%
Southern Rivers	38%	16%	27%	18%	100%
Sydney Metro	35%	20%	20%	25%	100%
Western	29%	71%	0%	0%	100%
Total	13%	18%	24%	45%	100%

2. Proportion part of patch size

CMA	Small	Medium	Large
Border Rivers-Gwydir	26%	13%	36%
Central West	29%	16%	30%
Hawkesbury-Nepean	12%	7%	62%
Hunter-Central Rivers	15%	6%	39%
Lachlan	28%	10%	19%
Murray	44%	4%	18%
Murrumbidgee	17%	5%	32%
Namoi	19%	15%	40%
Northern Rivers	13%	3%	61%
Southern Rivers	15%	12%	51%
Sydney Metro	29%	5%	2%
Western	8%	7%	67%
Total	22%	10%	38%

small: part of patch 1-250 ha medium: part of patch 251- 1,000 ha large: part of patch >1,000 ha

3. Proportion with habitat connectivity

CMA	Habitat Connectivity
Border Rivers-Gwydir	83%
Central West	85%
Hawkesbury-Nepean	91%
Hunter-Central Rivers	81%
Lachlan	66%
Murray	78%
Murrumbidgee	62%
Namoi	83%
Northern Rivers	88%

Southern Rivers	90%
Sydney Metro	57%
Western	88%
Total	79%

4. Proportion with low disturbance

CMA	Low Disturbance
Border Rivers-Gwydir	65%
Central West	71%
Hawkesbury-Nepean	46%
Hunter-Central Rivers	48%
Lachlan	62%
Murray	51%
Murrumbidgee	56%
Namoi	68%
Northern Rivers	64%
Southern Rivers	46%
Sydney Metro	7%
Western	55%
Total	61%

5. Number of threatened flora

CMA	1-2	3-6	7-10	>10	Total
Border Rivers-Gwydir	12	5		1	18
Central West	5	1			6
Hawkesbury-Nepean	5	2			7
Hunter-Central Rivers	5				5
Lachlan	5				5
Murray	8				8
Murrumbidgee	6	2			8
Namoi	3	3	1		7
Northern Rivers	12	1			13
Southern Rivers	5	2	1		8
Sydney Metro	3				3
Western	4	1			5
Total	73	17	2	1	93

6. Number of threatened fauna

CMA	1-2	3-6	7-10	>10	Total
Border Rivers-Gwydir	27	19	7	5	58
Central West	75	34	10	6	125
Hawkesbury-Nepean	13	2			15
Hunter-Central Rivers	34	6	3	3	46
Lachlan	24	9	5	3	41

Murray	6	2		2	10
Murrumbidgee	39	12	3	10	64
Namoi	39	13	2	4	58
Northern Rivers	60	24	6	6	96
Southern Rivers	26	9	1		36
Sydney Metro	5	2			7
Western	46	30	6	5	87
Total	394	162	43	44	643

7. Contains SEPP14 - coastal wetland

CMA	Total
Hunter-Central Rivers	16
Northern Rivers	24
Southern Rivers	8
Total	48

8. Contains SEPP26 - littoral rainforest

CMA	Total
Hunter-Central Rivers	3
Northern Rivers	2
Total	5

9. Total Central and Eastern Division Crown lease parcels

CMA	Total
Border Rivers-Gwydir	2,736
Central West	4,243
Hawkesbury-Nepean	384
Hunter-Central Rivers	1,292
Lachlan	1,896
Murray	832
Murrumbidgee	2,809
Namoi	1,590
Northern Rivers	1,898
Southern Rivers	904
Sydney Metro	184
Western	1,334
Total	20,102

ATTACHMENT 2B. Crown lands – Western Division

1. Proportion cleared

CMA	0-30% cleared	30-50% cleared	50-70% cleared	>70% cleared	Total
Central West	31%	27%	38%	3%	100%
Lachlan	38%	47%	10%	5%	100%
Lower Murray-Darling	85%	4%	11%	0%	100%
Murray	51%	0%	47%	2%	100%
Murrumbidgee	40%	5%	44%	10%	100%
Western	87%	8%	5%	0%	100%
Total	78%	12%	9%	1%	100%

2. Proportion part of patch size

CMA	Small	Medium	Large
Central West	2%	15%	81%
Lachlan	8%	6%	78%
Lower Murray-Darling	4%	9%	77%
Murray	15%	2%	9%
Murrumbidgee	7%	1%	32%
Western	3%	3%	89%
Total	4%	6%	82%

small: part of patch 1-250 ha medium: part of patch 251- 1,000 ha large: part of patch >1,000 ha

3. Proportion with habitat connectivity

CMA	Habitat Connectivity
Central West	99%
Lachlan	96%
Lower Murray-Darling	95%
Murray	46%
Murrumbidgee	63%
Western	98%
Total	96%

4. Proportion with low disturbance

CMA	Low Disturbance
Central West	75%
Lachlan	61%
Lower Murray-Darling	45%
Murray	31%
Murrumbidgee	31%
Western	68%
Total	58%

5. Number of threatened flora

CMA	1-2	3-6	7-10	>10	Total
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Central West	1				1
Lachlan	13	6		1	20
Lower Murray-Darling	72	20	2	2	96
Murrumbidgee	1				1
Western	65	19		1	85
Total	152	45	2	4	203

6. Number of threatened fauna

CMA	1-2	3-6	7-10	>10	Total
Central West	9	4	3	1	17
Lachlan	82	47	12	13	154
Lower Murray-Darling	268	126	43	49	486
Murray	1		2	1	4
Murrumbidgee	6	1			7
Western	536	211	57	54	858
Total	902	389	117	118	1,526

7. Total Western Division Crown lease parcels

CMA	Total
Central West	182
Lachlan	2347
Lower Murray-Darling	6108
Murray	130
Murrumbidgee	211
Western	8475
Total	17,453

ATTACHMENT 2C. Crown waterways

1. Proportion cleared

CMA	0-30% cleared	30-50% cleared	50-70% cleared	>70% cleared	Total
Border Rivers-Gwydir	0%	26%	43%	30%	100%
Central West	1%	3%	25%	71%	100%
Hawkesbury-Nepean	26%	14%	20%	40%	100%
Hunter-Central Rivers	17%	16%	27%	40%	100%
Lachlan	5%	4%	13%	79%	100%
Lower Murray-Darling	61%	8%	31%	0%	100%
Murray	4%	7%	50%	39%	100%
Murrumbidgee	8%	11%	17%	65%	100%
Namoi	6%	8%	30%	55%	100%
Northern Rivers	16%	20%	24%	40%	100%
Southern Rivers	33%	19%	26%	22%	100%
Sydney Metro	50%	4%	10%	36%	100%
Western	72%	25%	3%	0%	100%
Total	14%	14%	25%	46%	100%

2. Proportion part of patch size

CMA	Small	Medium	Large
Border Rivers-Gwydir	27%	10%	22%
Central West	34%	6%	10%
Hawkesbury-Nepean	27%	9%	31%
Hunter-Central Rivers	21%	5%	20%
Lachlan	33%	4%	8%
Lower Murray-Darling	3%	8%	81%
Murray	32%	9%	19%
Murrumbidgee	14%	4%	15%
Namoi	25%	10%	23%
Northern Rivers	16%	5%	27%
Southern Rivers	21%	9%	35%
Sydney Metro	26%	9%	7%
Western	5%	4%	88%
Total	23%	7%	22%

small: part of patch 1-250 ha medium: part of patch 251- 1,000 ha large: part of patch >1,000 ha

3. Proportion with habitat connectivity

CMA	Connectivity
Border Rivers-Gwydir	75%
Central West	71%
Hawkesbury-Nepean	85%
Hunter-Central Rivers	68%
Lachlan	61%
Lower Murray-Darling	96%
Murray	76%
Murrumbidgee	45%

Namoi	74%
Northern Rivers	71%
Southern Rivers	84%
Sydney Metro	61%
Western	98%
Total	71%

4. Proportion with low disturbance

CMA	Low Disturbance
Border Rivers-Gwydir	42%
Central West	37%
Hawkesbury-Nepean	27%
Hunter-Central Rivers	27%
Lachlan	39%
Lower Murray-Darling	56%
Murray	41%
Murrumbidgee	34%
Namoi	32%
Northern Rivers	31%
Southern Rivers	28%
Sydney Metro	12%
Western	65%
Total	33%

5. Number of threatened flora

CMA	1-2	3-6	7-10	>10	Total
Border Rivers-Gwydir	2				2
Hawkesbury-Nepean	16	3			19
Hunter-Central Rivers	15	2	2	1	20
Lower Murray-Darling	2	1			3
Murray	2				2
Murrumbidgee	2				2
Northern Rivers	40	18	5	2	65
Southern Rivers	22	3			25
Sydney Metro	11	2	2		15
Western		1			1
Total	112	30	9	3	154

6. Number of threatened fauna

CMA	1-2	3-6	7-10	>10	Total
Border Rivers-Gwydir	14	8	2	1	25
Central West	23	7	1	2	33
Hawkesbury-Nepean	16	7	2	5	30
Hunter-Central Rivers	58	16	10	21	105
Lachlan	8	4	1	2	15
Lower Murray-Darling	6	2	1	4	13
Murray	9	1	2	1	13

Murrumbidgee	16	3		2	21
Namoi	10	4	1	1	16
Northern Rivers	130	55	17	49	251
Southern Rivers	37	23	10	20	90
Sydney Metro	16	7	2	2	27
Western	6		1	1	8
Total	349	137	50	111	647

7. Contains SEPP14 - coastal wetland

CMA	Total
Hunter-Central Rivers	199
Northern Rivers	252
Southern Rivers	159
Total	610

8. Contains SEPP26 - littoral rainforest

CMA	Total
Hunter-Central Rivers	4
Northern Rivers	10
Total	14

9. Total Crown waterways parcels

CMA	Total
Border Rivers-Gwydir	1,750
Central West	2,399
Hawkesbury-Nepean	1,265
Hunter-Central Rivers	2,886
Lachlan	1,752
Lower Murray-Darling	102
Murray	762
Murrumbidgee	1,536
Namoi	1,223
Northern Rivers	4,748
Southern Rivers	1,914
Sydney Metro	734
Western	152
Total	21,223

ATTACHMENT 2D. Crown reserves

1. Proportion cleared

CMA	0-30% cleared	30-50% cleared	50-70% cleared	>70% cleared	Total
Border Rivers-Gwydir	30%	17%	24%	29%	100%
Central West	33%	2%	24%	41%	100%
Hawkesbury-Nepean	58%	9%	21%	12%	100%
Hunter-Central Rivers	44%	19%	18%	19%	100%
Lachlan	58%	1%	5%	36%	100%
Lower Murray-Darling	100%	0%	0%	0%	100%
Murray	76%	4%	6%	14%	100%
Murrumbidgee	53%	4%	15%	27%	100%
Namoi	41%	6%	16%	37%	100%
Northern Rivers	45%	20%	13%	23%	100%
Southern Rivers	60%	14%	19%	7%	100%
Sydney Metro	56%	9%	11%	23%	100%
Western	96%	4%	0%	0%	100%
Total	55%	9%	14%	23%	100%

2. Proportion of patch size

CMA	Small	Medium	Large
Border Rivers-Gwydir	19%	5%	9%
Central West	16%	4%	7%
Hawkesbury-Nepean	12%	6%	25%
Hunter-Central Rivers	11%	6%	12%
Lachlan	12%	2%	2%
Lower Murray-Darling	0%	0%	0%
Murray	6%	1%	2%
Murrumbidgee	7%	3%	5%
Namoi	12%	5%	10%
Northern Rivers	12%	3%	14%
Southern Rivers	14%	6%	17%
Sydney Metro	10%	4%	2%
Western	1%	1%	10%
Total	11%	4%	9%

small: part of patch 1-250 ha medium: part of patch 251- 1,000 ha large: part of patch >1,000 ha

3. Proportion with habitat connectivity

CMA	Habitat Connectivity
Border Rivers-Gwydir	70%
Central West	64%
Hawkesbury-Nepean	88%
Hunter-Central Rivers	73%
Lachlan	60%
Lower Murray-Darling	93%
Murray	66%
Murrumbidgee	49%

Namoi	64%
Northern Rivers	69%
Southern Rivers	81%
Sydney Metro	47%
Western	94%
Total	69%

4. Proportion with low disturbance

CMA	Low Disturbance
Border Rivers-Gwydir	15%
Central West	18%
Hawkesbury-Nepean	14%
Hunter-Central Rivers	20%
Lachlan	14%
Lower Murray-Darling	18%
Murray	11%
Murrumbidgee	14%
Namoi	14%
Northern Rivers	19%
Southern Rivers	18%
Sydney Metro	6%
Western	26%
Total	16%

5. Threatened flora

CMA	1-2	3-6	7-10	>10	Total
Border Rivers-Gwydir	56	12		1	69
Central West	21	7		1	29
Hawkesbury-Nepean	162	61	7	12	242
Hunter-Central Rivers	108	40	8	2	158
Lachlan	29	3			32
Lower Murray-Darling	16	6	1		23
Murray	23	3	3	1	30
Murrumbidgee	36	3			39
Namoi	16	3	2	2	23
Northern Rivers	116	24	6	3	149
Southern Rivers	72	14	5	5	96
Sydney Metro	38	16	2	4	60
Western	19	4	1		24
Total	712	196	35	31	974

6. Threatened fauna

CMA	1-2	3-6	7-10	>10	Total
Border Rivers-Gwydir	154	42	8	17	221
Central West	157	41	11	15	224
Hawkesbury-Nepean	157	36	12	6	211
Hunter-Central Rivers	296	91	21	59	467

Lachlan	134	44	8	7	193
Lower Murray-Darling	76	34	7	8	125
Murray	60	15	5	1	81
Murrumbidgee	182	50	8	30	270
Namoi	78	32	6	14	130
Northern Rivers	392	149	41	70	652
Southern Rivers	258	80	25	19	382
Sydney Metro	100	32	2	10	144
Western	228	40	10	8	286
Total	2,272	686	164	264	3,386

7. Contains SEPP14 - coastal wetland

CMA	Total
Hunter-Central Rivers	553
Northern Rivers	595
Southern Rivers	267
Total	1,415

8. Contains SEPP26 - littoral rainforest

CMA	Total
Hunter-Central Rivers	43
Northern Rivers	60
Southern Rivers	4
Total	107

9. Total reserve parcels

CMA	Total
Border Rivers-Gwydir	10,568
Central West	13,657
Hawkesbury-Nepean	6,355
Hunter-Central Rivers	10,500
Lachlan	13,499
Lower Murray-Darling	5,693
Murray	5,893
Murrumbidgee	13,331
Namoi	6,696
Northern Rivers	12,960
Southern Rivers	8,163
Sydney Metro	4,854
Western	10,542
Total	122,711

ATTACHMENT 3 - Maps of Conservation Values

The following maps can be downloaded from the link below (and are available in hardcopy on request):

ATTACHMENT 3A – Percentage cleared / rarity

ATTACHMENT 3B – Low Disturbance

ATTACHMENT 3C – Part of patch size

ATTACHMENT 3D – Threatened flora records

ATTACHMENT 3E – Threatened fauna records

ATTACHMENT 3F – SEPP coastal wetland and littoral rainforest

Available for download at:

https://drive.google.com/folderview?id=0BxLsiuTM_UrnS0dTeDJPSFZGbVE&usp=sharing

Maps prepared by the Nature Conservation Council of NSW and National Parks Association of NSW in 2014. Data source: NSW Crown Lands Division and NSW Office of Environment and Heritage. Analysis performed using ArcGIS. If you wish to use these maps, please credit Nature Conservation Council of NSW and National Parks Association of NSW, 2014.