



Cumberland Bird Observers Club Inc

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An Affiliate of Birdlife Australia

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Manager, Cumberland Area
NSW National Parks & Wildlife Service

By email: npws.cumberland@environment.nsw.gov.au

Dear Sir

Shanes Park Feral Predator-free Area - Review of Environment Factors

Thank you for the opportunity to comment on the Review of Environment Factors ("REF") relating to the proposed construction of a fence surrounding Shanes Park to create a predator-free area within the fence line.

Cumberland Bird Observers Club Inc ("CBOC") was established in 1979 in Western Sydney. We are an affiliate of Birdlife Australia, the preeminent ornithological organisation in Australia, which has over 220,000 supporters. CBOC comprises of a group of approximately 400 members having views consistent with the views of Birdlife Australia. We are interested in the conservation and protection of avian fauna and their habitat within Australia generally but particularly within the Cumberland Plain region of Greater Sydney. An area of focus of CBOC is environmental and planning issues that impact on, or have the potential to impact on, avian fauna habitat, raising awareness in the community of developments in government policy, legislation and attendant case law.

We support the proposal in principle, it is a long-awaited development. However, we have a number of concerns as to how the proposal has progressed so far and some of the likely outcomes if the proposal proceeds. They are:

- The loss of 56 hollow-bearing trees which are "...likely to require removal for fence construction";
- The methodology to be adopted to "remove" avian fauna from the trees to be removed (refer section 6.2.3);
- The extremely limited scope of diurnal avian fauna surveys undertaken (refer section 6.2 of Appendix D);
- The total absence of nocturnal avian fauna surveys (refer section 6.2 of Appendix D); and
- The intention to plant trees on the site.

Apart from the foregoing specific concerns, we also have a general concern that the REF has been hurriedly put together.

1. Loss of 56 hollow-bearing trees

Over the last 200 years the Cumberland Plain has suffered an enormous loss of old growth trees containing hollows used by avian fauna for breeding and protection purposes. To see the loss of a further 56 hollow-bearing trees in the Shanes Park area of the Cumberland Plain is disheartening to bird observing enthusiasts to say the least. There is no shadow of a doubt that this will increase

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competition amongst bird species using tree hollows for nesting to the overall detriment of avian fauna.

2. Methodology to be adopted to remove avian fauna from hollows in trees to be removed

The methodology outlined in section 6.2.3 will have a devastating impact on avian fauna using the hollows if conducted during breeding seasons. It is stunning that the biodiversity assessment (Appendix D) does not address this and caution against the use of the proposed methodology at particular times of the year. Different bird species have different breeding cycles.

We offer to put you in contact with a person who has many years experience in observing the avian fauna of Shanes Park to assist with the identification of specific breeding seasons of sedentary and migratory species using Shane Park for breeding purposes.

3. Scope of diurnal avian fauna surveys

Section 6.2 of Appendix D reflects an extremely cursory approach to diurnal bird surveys and may also be reflective of the REF being hurriedly put together. To adequately complete a diurnal survey of birds frequenting Shanes Park they need to be conducted at least monthly over a minimum period of twelve months.

No weight can be put on the results from the surveys completed.

4. Total absence of nocturnal avian fauna surveys

Section 6 of Appendix D includes a statement to the effect that no specific nocturnal surveys were carried out subsequent to the statement that it was "...not considered to compromise the scientific rigour of the field investigations". On the contrary, the absence of any nocturnal avian fauna surveys being carried out does exactly the opposite. It absolutely compromises the scientific rigour of the field investigations into avian fauna. Not to check for the extant nocturnally active birds such as Owls, Boobooks, Bushstone Curlews, Owlet-nightjars and similar is a major flaw in the biodiversity assessment.

In our opinion, this is a further example of the REF being hurriedly put together.

5. The intention to plant trees on the site

We note as part of the project it is the intention to plant trees. Whilst we are certain it is recognised that those trees will not become useful to avian fauna for over 100 years, we are greatly concerned that it is ensured that the trees are not planted in the open meadow areas. Open meadows are the Speckled Warbler's habitat and the planting of trees within those meadows would ultimately see the complete loss of that habitat.

Doug Meredith - Conservation Officer

For and on behalf of the Committee of Cumberland Bird Observers Club Inc

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