



THE HON JACKIE KELLY MP
Federal Member for Lindsay

Minister for Environment and Heritage
Senator The Hon. Ian Campbell
Parliament House
Canberra
ACT 2600

Monday, 22 November 2004

RE: Emergency National Heritage Listing - ADI Site Western Precinct

Dear Minister,

This letter seeks from you an Emergency National Heritage listing of the Western Precinct of the former ADI Site St Marys.

The Western Precincts outstanding National Heritage values are now under imminent threat due to the owner of the site, Lend Lease, commencing its urban development of the ADI Site. Before development can proceed Lend Lease must first implement its Macrofauna Management Plan (MFMP) to remove large numbers of Kangaroos from the Eastern Precinct, the first development Precinct. This will result in a drastic increase in the density of Kangaroos in the Western Precinct. The increase in the Kangaroo population will significantly impact approximately 230ha of regenerating Cumberland Plain Woodland (CPW)¹ and other nationally significant/threatened flora including *Pimelea spicata*².

A further threat is urban and industrial development of the entire Western Precinct, which Lend Lease hopes to commence in 2007. Urban and other development has been identified by the Ministers department as a key threatening process to the survival of CPW. Development will devastate the outstanding natural and aesthetic national heritage values of this place.

Urban development of the Eastern Precinct is imminent with Lend Lease expecting to commence infrastructure work this month [November 2004].³ 33% of the ADI Sites Kangaroo population (approximately 3000-3500 Kangaroos) will be translocated from this first development area to the Western and Central Precincts to facilitate construction. Lend Lease have now been issued with licences by the NSW Governments Department of

¹ Endangered Ecological Community EPBC Act 1999

² Endangered Species EPBC Act 1999

³ Penrith Press, pg 1, November 9 2004
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Environment and Conservation (DEC) to begin the translocation process. DEC have imposed conditions on Lend Leases MFMP that they erect macrofauna proof fencing around the Regional Park to maintain non-damaging densities. This condition is to keep translocated Kangaroos out of DEC's Regional Park. (Attachment 1) The Western and Central Precincts will absorb the increased Kangaroo population translocated from the Eastern Precinct.

Lend Lease, in its MFMP, argues that Kangaroo numbers across the entire ADI Site are artificially high and must be radically reduced to stop overgrazing and damage to the understorey of CPW and other high conservation value vegetation types. They state, "Significant endangered ecological communities occur at the St Marys Property including CPW. Grazing by Kangaroos has the potential to damage the understorey of the CPW at the SMP as high grazing numbers can reduce the number of native plants species present and favour the spread of weeds. This is particularly because grazing pressure is highest on palatable species such as native grasses and herbs."⁴

It is asserted that the implementation of the MFMP will increase rather than relieve grazing pressure on CPW and other threatened vegetation in the Western Precinct because of the intention to drastically increase Kangaroo numbers through translocation. This population increase coupled with a reduced foraging range (i.e. the fenced off Western Precinct) will significantly impact the outstanding natural heritage values of the Western Precinct.

Location

The Western Precinct is approximately 230 hectares in size and is that part of the ADI Site that adjoins the western extremity of the proposed Regional Park being contained by the Northern Rd Cranebrook to west and Ninth Ave Llandilo to the north. The Western Precinct is within the Penrith Local Government area and the City of Penrith. It is surrounded by the suburbs of Llandilo to the north, Cranebrook to the west, Cambridge Gardens and Werrington Downs to the south. (Attachment 2 – map of ADI Site)

Land Tenure

Lend Lease Corporation Limited owns the entire 1545-hectare ADI Site including the Western Precinct. Under the NSW Governments Sydney Regional Environmental Plan 30 parts of the ADI Site are zoned urban, industrial, Regional Park and other uses.

ADI Site Western Precinct

Statement of significance as a place of National Heritage Significance

(b) The place has outstanding heritage value to the nation because of the place's possession of uncommon, rare or endangered aspects of Australia's natural history

⁴ St Marys Macrofauna Management Plan s.4.4

(d) The place has outstanding heritage value to the nation because of the place's importance in demonstrating the principal characteristics of a class of Australia's natural places and environments

(e) The place has outstanding heritage value to the nation because of the place's importance in exhibiting particular aesthetic characteristics valued by a community

The Western Precinct contains Cumberland Plain Woodland

It is asserted that the Western Precinct contains approximately 230ha of Cumberland Plain Woodland (CPW) an Endangered Ecological Community that is endemic to the Cumberland Plain of western Sydney. The Western Precinct is one of the largest continuous remnants of CPW remaining on the Cumberland Plain, it also contains a population of the endangered plant, *Pimelea spicata*, a species that is only associated with CPW. The Western Precinct therefore is of outstanding natural heritage value to the nation.

There is only 943.2ha of CPW reserved nationally. The proposed ADI Site Regional Park will protect a further 372.3ha⁵ bringing the total of CPW reserved to 1315.5ha. The 230ha of CPW in the Western Precinct if it were added to this reserve total would represent 15% of nationally reserved CPW.

The Federal Governments, Australian Terrestrial Biodiversity Assessment 2002, an audit of the nation's land, vegetation and water resources, was a landmark assessment of terrestrial biodiversity in Australia. It put the biodiversity of the Cumberland Plain in the Highest Stress Class primarily because of its threatened vegetation communities. CPW is one of two Cumberland Plain endangered ecological communities protected by the EPBC Act 1999. The Audit states, "...the threatened communities are inadequately reserved and it is unlikely, recognising the pressures and alternate values, that recovery of biodiversity values will occur."⁶

In 1788 CPW covered 107,000 hectares or approximately 30% of the Sydney Basin. Today only 6% remains in small fragments scattered across the western suburbs of Sydney.

CPW was the very first Endangered Ecological Community to be listed for protection under the old Commonwealth Endangered Species Act. Senator Robert Hill, in announcing the listing, stated that "this woodland was once found in abundance but has been reduced to a few fragmented stands as a result of clearing originally for farming and later for industry and housing...only 6 percent or just over 6,000 hectares of the woodland remains...although some areas occur within conservation reserves, this in itself will not be sufficient to ensure the long-term survival of the woodland."⁷

⁵ DEC NSW Regional Park Community Reference Group Handout 15/7/04

⁶ http://audit.deh.gov.au/ANRA/vegetation/docs/biodiversity/bio_assess_cumberland.cfm

⁷ Robert Hill Media Release 22 September 1998

The following advice to the Federal Minister for the Environment and Heritage was given by the Endangered Species Scientific Subcommittee (ESSS) for a proposal to add an ecological community [CPW] to Schedule 2 of the Endangered Species Protection Act 1992 (ESP Act)

Generally accepted name of the ecological community

Cumberland Plain Woodlands. Scientists generally recognise the 'Cumberland Plain Woodlands' to represent those distinct groupings of woodlands dominated by trees of *Eucalyptus moluccana*, (Grey Box), *Eucalyptus tereticornis* (Forest Red Gum) and in some areas *Eucalyptus crebra* (Narrow-leaved Ironbark).

Summary of the nomination

The nomination of 'Cumberland Plain Woodlands' is for Schedule 2, ie, 'Ecological Communities that are Endangered'. The nomination provided a summary of information about the ecological community and evidence about the conservation status of the ecological community type. This community type was once widespread in the Cumberland Plains region west of Sydney NSW but has been reduced to a few fragmented stands by human use of this land for farming, industry and housing. The nomination states that the remaining stands of this ecological community are threatened by the spread of the Sydney suburban areas.

Statement with regard to the Endangered Species Protection Regulations

This nomination has been assessed by officers of the Threatened Species and Communities Section, Biodiversity Group, Environment Australia. ESSS has been advised that the information supplied with the nomination meets all the requirements specified by regulation.

Description of the range and status of the ecological community

The Cumberland Plain Woodlands is the accepted name for the plant community that occurs on soils derived from shale on the Cumberland Plain.

The Cumberland Plain Woodlands ecological community is characteristically of woodland structure but may include both more open and more dense areas, and the canopy is dominated by species including one or more of the following: *Eucalyptus moluccana*, *Eucalyptus tereticornis*, *Eucalyptus crebra*, *Eucalyptus eugenioides* and *Eucalyptus maculata*. The understorey is generally grassy to herbaceous with patches of shrubs, or if disturbed, contains components of the indigenous native species sufficient to re-establish the characteristic native understorey. The Cumberland Plains Woodlands ecological community includes regrowth that is likely to achieve a near natural structure or is a seral stage towards that structure.

The following assemblage of grass, forb and sub-shrub species characterises the understorey of the Cumberland Plain Woodlands ecological community: *Cheilanthes sieberi*, *Aristida ramosa*, *Aristida vagans*, *Arthropodium milleflorum*, *Chloris truncata*, *Chloris ventricosa*, *Commelina cyanea*, *Cyperus gracilis*, *Dianella revoluta*, *Dichelachne micrantha*, *Echinopogon caespitosus*, *Echinopogon ovatus*, *Entolasia marginata*, *Eragrostis leptostachya*, *Hypoxis hygrometrica*, *Lepidosperma laterale*, *Lomandra filiformis*, *Lomandra multiflora*, *Microlaena stipoides*, *Oplismenus aemulus*, *Panicum simile*, *Themeda australis*, *Tricoryne elatior*, *Asperula conferta*, *Brunoniella australis*, *Dichondra repens*, *Glycine dardantina*, *Glycine tabacina*,

Goodenia hederacea, *Hardenbergia violacea*, *Hibbertia diffusa*, *Hypericum gramineum*, *Lissanthe strigosa*, *Oxalis exilis*, *Phyllanthus filicaulis*, *Pratia purpurascens*, *Solanum pungetium*, *Vernonia cinerea* and *Wahlenbergia gracilis*. The characteristic taller shrub assemblage is: *Acacia decurrens*, *Acacia falcata*, *Acacia implexa*, *Acacia parramattensis*, *Bursaria spinosa*, *Daviesia ulicifolia*, *Dillwynia sieberi*, *Exocarpos cupressiformis*, *Indigofera australis*, *Melaleuca decora* and *Eremophila debilis*. The following assemblage characterises the tree canopy: *Eucalyptus crebra*, *Eucalyptus eugenioides*, *Eucalyptus fibrosa*, *Eucalyptus maculata*, *Eucalyptus moluccana* and *Eucalyptus tereticornis*.

Not all species listed as characteristic of the assemblage occur in every single stand of the community. Also, the total list of plant species that occurs in the community is much larger than the characteristic assemblage, with many species occurring in one or a few sites, or in very low abundance. A detailed description of the ecological community is provided in Benson D. (1992). *The natural vegetation of Penrith. Cunninghamia* 2(4): 541-596.

The distribution of Cumberland Plain Woodlands in the County of Cumberland in 1788 was approximately 107,000 hectares. Only 6% (6,420 hectares) of the original community remained in 1988 in the form of small fragmented stands. Although some areas occur within conservation reserves, this is in itself not sufficient to ensure the long-term survival of the community unless the factors threatening the integrity and survival of the community are ameliorated.

Threats to the community include clearance for agriculture, grazing, hobby and poultry farming, housing and other developments, invasion by exotic plants and increased nutrient loads due to fertiliser run-off from gardens or farmland, dumped refuse or sewer discharge.

How judged by ESSS in regard to the ESP Act criteria

It is the view of ESSS that the ecological community known as 'Cumberland Plain Woodlands' is subject to current and continuing threats likely to lead to extinction as demonstrated by the following two of the four criteria for an ecological community provided in the document 'Listing Endangered Ecological Communities under the Endangered species Protection Act 1992: Guidelines for Nomination and Assessment of Proposals':

- a) marked decrease in geographic distribution (to 6% of the original community), and
- d) restricted geographic distribution such that the community could be lost rapidly by the action of a threatening process (such as clearance for farming, industry and housing).

ESSS judges that this ecological community meets the criteria for endangered under s6. (3) for the following reasons:

- § it is likely to become extinct in nature unless less the circumstances and factors affecting its abundance, survival or evolutionary development cease to operate.

Recommendation

'Cumberland Plain Woodlands', should be listed under 'Schedule 2 Listed Ecological Communities' of the Endangered Species Protection Act 1992.⁸

The NSW Scientific Committee, established by the NSW Threatened Species Conservation Act, made a Final Determination to list CPW as an Endangered Ecological Community on Part 3 of Schedule 1 of the Act on the 27th June 1997. (Attachment 3) They established that:

The understorey is generally grassy to herbaceous with patches of shrubs, or if disturbed, contains components of indigenous native species sufficient to re-establish the characteristic native understorey.

The Cumberland Plain Woodland includes regrowth which is likely to achieve a near natural structure or is a seral stage towards that structure.

Threats to the survival of the community include clearance for agriculture, grazing, hobby and poultry farms, housing and other developments, invasion by exotic plants, and increased nutrient loads due to fertiliser run off from gardens and farmland, dumped refuse or sewer discharge.

In view of the substantial reduction in the area occupied by the Community, its fragmentation and the numerous threats to the integrity of the Community, the Scientific Committee is of the opinion that the Cumberland Plain Woodland is likely to become extinct in nature in New South Wales unless the factors threatening its survival cease to operate.⁹

It is clear from the determinations of the Endangered Species Scientific Subcommittee and the NSW Scientific Committee that the 230ha of CPW in the Western Precinct has outstanding National heritage value.

National Trust of Australia (NSW) listing

In March 1996 the Landscape Conservation Committee of the National Trust of Australia (New South Wales) listed the ADI Site [including the Western Precinct] for its significant contribution to biodiversity conservation and mapped and identified the Grey Box Woodland on the western sector of the ADI Site¹⁰. The Trust states (Attachment 4) the following: "44 plant species considered to be vulnerable in Western Sydney occur on the site. 25 per cent of the species on the ADI site (48 out of the total of 191) are considered rare or vulnerable.

"110 bird species, nine endemic mammals, eight frog and ten reptile species have been recorded for the ADI site. Endangered fauna recorded for the site are the Common Bent-wing Bat, Greater Broad-nosed Bat and Black Bittern. Regionally significant fauna recorded for the site are the Azure Kingfisher, Chestnut-breasted Mannikin, Crested Shrike-Tit,

⁸ <http://www.deh.gov.au/biodiversity/threatened/communities/cumberland-plains.html>

⁹ <http://www.nationalparks.nsw.gov.au/npws.nsf/Content/Cumberland+Plain+woodland+endangered+ecological+community+listing>

¹⁰ http://www.savetheadiseite.bmt.com.au/why_save.html

Diamond Firetail, Peregrine Falcon, Rufous Night Heron, Speckled Warbler, White-winged Chough, Bearded Dragon and Lace Monitor.”

Interim List of Register of the National Estate

On June 20, 1997, the Chair of the Australian Heritage Commission Wendy McCarthy AO, in announcing that 1100ha of the ADI Site [including the entire Western Precinct] was being entered into the Interim List of the Register of the National Estate, described the St Marys site as a ‘priceless piece of our heritage’. (Attachment 5)

“This site is one of the prime natural habitats for the region and is the home of various endangered native plants and vulnerable animal species... The size, good condition and diversity of species found in this area make it an important research site for understanding the original vegetation.”

Lend Lease objected to the AHC entering 1100ha of the ADI Site into the Interim List of the Register of the National Estate. They strongly argued that the western part of the ADI Site [the majority being now known as the Western Precinct] had little National Estate value. Biosis Research was appointed as an independent assessor to assess Lend Leases objection. They rejected most of Lend Leases objections but suggested modification to the Interim Listing Boundary. Lend Lease again objected to this boundary assessment by Biosis and the AHC employed Ian Perkins Consultancy Service to provide a more detailed level of information on the disputed areas of the site. Following the Perkins assessment of Lend Leases objections the AHC announced that only 828ha would be Listed in the Register of the National Estate.

The area the subject of this Emergency Heritage nomination, the Western Precinct, although listed on the Interim RNE was not included in the final listing.

Since the Biosis and Perkins assessment of Lend Leases of the interim listing, broadacre slashing has stopped on the western precinct and the Cumberland Plain Woodland region.

The Biosis assessment is based upon information they gathered from a one-day site visit with Lend Leases consultants and a literature review of available data. They also relied upon personal communication including consultants employed by Lend Lease. They divided the disputed western areas into; area 1 – Grey Box Savannah in the north west, area 1a – Grey Box Savannah in the central west and area 2 – Grey Box Savannah in the south western corner. Biosis suggested that areas 1 and 2 [area 1 is a majority of the western precinct] should be National Estate listed but found that information about area 1a was inadequate and that although it may have National Estate value that it be removed from the Interim Listing boundary. (Attachment 6) Biosis concludes “area 1a requires further assessment in order to determine conclusively whether it forms part of the modified Grey Box Woodland.”¹¹

Perkins, in his assessment of Lend Leases objections, conducted a series of on ground plot surveys to determine species diversity and significance. Attachment 7 shows the locations of the Perkins

¹¹ Assessment of Objection to Listing of Western Sydney Shale Woodland (Biosis Research October 1998)

additional plots (denoted by an X) compared to Gunninah Consultants survey plots (denoted by dots). Attachment 7 also shows the final AHC listing.

What is obvious from Attachment 7 is that Perkins only surveyed one additional plot in the central west, an area of approximately 200ha. Recently a population of the endangered species *Pimelea spicata* (EPBC Act 1999) in the central west part of the Western Precinct was discovered.

It must be stressed that broad acre slashing of the Western Precinct has now ceased and is limited to perimeter fencing and some internal tracks. The cessation of slashing in the last two years has resulted in regeneration of CPW in the Western Precinct. This is a crucial factor in this nomination, as this regrowth would assist any future assessment of the Western Precinct as compared to the time of Perkins assessment when all vegetation in the Western Precinct was routinely slashed to the ground.

Legal Precedent - CPW exists on Western Precinct

A legal precedent has established that CPW exists in the Western Precinct. This is a crucial point in this nomination, as objectors may again dispute that the Western Precinct contains any significant CPW.

In the NSW Land and Environment Court, *Plumb v Penrith City Council and Anor* [2002] NSWLEC 223 (File number: (4)0393 of 2002) Judge Pearlman heard evidence from botanist/ecologist M. Doherty. Mr Doherty had inspected, Xavier College, a school site on the Western Precinct and found Cumberland Plain Woodland. In par 16 of his affidavit of 27 September 2002, Judge Pearlman stated:

“In relation to the criteria in the CPW (Cumberland Plain Woodland) determination: a) the soil on the site is derived from shale; b) the species recorded and observed on the site are consistent with the list recorded for CPW; c) the structure, although very sparse, is still woodland; d) the understorey is grassy and contains components of native species which in my opinion would be sufficient to re-establish the characteristic native understorey, once intensive management by slashing, mowing and grazing has been removed; e) if such management pressures were lifted, it is my opinion that a more natural structure would eventuate, given existing and potential regeneration.” (Attachment 8)

Based on the weight of expert evidence in supporting that CPW existed across the whole of the school site Judge Pearlman found it to be so. Judge Pearlman referred to the fact that previous studies of the site had failed to identify CPW occurring on the school site. Those studies referred to included: the NSW National Parks and Wildlife Service in 2000, the vegetation map of Penrith by D H Benson in 1992 and the flora assessment prepared for the AHC by Ian Perkins Consultancy Services in 1999.

Michael Doherty a renowned CSIRO Ecologist has supported this nomination with a letter. (Attachment 9) Mr Doherty asserts that CPW exists across the whole of the Western Precinct. He refers to the LEC decision emphasising that the Western Precinct has shown to have an even higher number of CPW diagnostic species than the Xavier school site.

Doherty's March 2000 report, *Review of Biodiversity Issues in Relation to the Proposed Re-Zoning and Development of ADI Land, St Marys, Sydney*, argues that in the case of Cumberland Plain vegetation it is the sum total of what is left that is important and that assigning priority to what is left is misdirected. In relation to CPW he states, "...in a vegetation type with less than 90% of its former distribution extant, any patch however small will have high conservation value."¹²

The Minister should therefore note the Xavier school legal precedent and Doherty's findings when applying a significance threshold to this nomination. The Western Precinct is a large intact CPW remnant with high conservation value and therefore has outstanding national heritage value to the nation.

Western Precinct has outstanding national value because of its aesthetic characteristics

The Western Precinct has unique natural aesthetic characteristics that have been enjoyed by the public for generations. The Northern Rd borders the place to the west and is a major road stretching between Richmond/Windsor to the north and Narellan/Camden to the south. It carries tens of thousands of cars daily and will be utilised even further by a growing population. The public has almost 2 km of uninterrupted views of the Western Precinct from the Northern Rd. The place is also visible from nearby residential areas that are enhanced by uninterrupted bushland views over the Western Precinct. Many tourist bus operators are capitalising on the aesthetics of the place by stopping at the side of the Northern Rd to give overseas tourists a glimpse of Kangaroos and Emus grazing in a natural bushland setting. To many tourists this may be their only experience of seeing wild macrofauna in a truly Australian context. It is truly a unique situation that these aesthetic values exist surrounded by suburbia and so close to the largest city of the nation. The aesthetic values of the Western Precinct have also been acknowledged by the Australian film industry. Channel Nine's telemovie, *The Alice*, which was viewed by 1.8 million Australians, was partly filmed at the place. The natural landscape and macrofauna of the Western Precinct perfectly typified the Australian bush.

The Western Precinct is a Western Sydney icon. Often people make no connection with the place by the name, ADI Site, but instantly recall the place when referred to 'that big bushland place on the Northern Rd with the Kangaroos and Emus'.

This year the Daily Telegraph highlighted the environmental significance of the ADI site in a series of news articles. A picture of a wetland in the Western Precinct [a dammed natural creek] was extensively used by the Telegraph to feature the beauty of the ADI Site. The beauty of this wetland and other photos (Attachment 10, Daily Telegraph, April 24 2004) inspired hundreds of Telegraph readers to write letters to the Editor expressing their concerns about the development of such a natural place, some letters were received from overseas.

The NSW National Parks Association highlighted the Western Precinct on the cover of their National Parks Journal in June 2001. (Attachment 11) The cover depicts Emus grazing adjacent to the fence along the Northern Rd with regenerating CPW vegetation [subsequently slashed] in the background

¹² Review of Biodiversity Issues in Relation to the Proposed Re-Zoning and Development of ADI Land, St Marys, Sydney (Doherty M 2000)

Attachment 12 contains photographs taken of the Western Precinct highlighting CPW vegetation that is regenerating following the cessation of slashing. Also included are some of the individuals of a population of the endangered plant *Pimelea spicata* found in the Western Precinct.

The proposed urban and industrial development of the Western Precinct will change the natural landscape of the Western Precinct forever and in the process destroy the aesthetic values that millions of Australians and overseas visitors have experienced and developed a deep appreciation of.

The Western Precinct's outstanding national aesthetic values are characterised by the following:

- § Being a natural landscape unique to the Cumberland Plain and Western Sydney
- § Being a large intact CPW remnant of some 230ha
- § Being a large remnant of an Endangered Ecological Community within a highly populated area
- § Being the only large remnant of CPW that can be readily viewed by thousands of members of the public and overseas visitors on a daily basis.
- § Offering 2 km's of uninterrupted views of intergrading Shale Plains and Shale Hills CPW.
- § Being the only place in Sydney, the largest city in the nation, where a wild population of Kangaroos can be readily viewed grazing in a natural area consisting of CPW.
- § Being the only place within hours of Sydney, the largest city in the nation, where a wild population of Emus can be readily viewed grazing in a natural area consisting of CPW.
- § Being a place that is said to resemble typical pre 1788 Cumberland Plain savannah/landscape.
- § Offers a sense of Australiana with its combination of open plains/savannah, woodland, wetlands and macrofauna.
- § Landmarks that remind of its previous use as a munitions manufacturing facility 1940's - 1994.
- § Natural attributes that are recognised as having value to the Australian Film Industry
- § Its natural landscapes offer the public inspiration for creativity and expression such as: painting, poetry and verse
- § The places natural landscapes have inspired democratic processes valued by the Australian community [conservation].
- § Efforts to conserve the place have defined an era in Western Sydney's history.
- § The place is the foremost visual reminder of the conservation campaign.

Summary

The nominated place is of outstanding natural and aesthetic value to the nation. These values are under imminent threat due to overgrazing by macrofauna and future urban and industrial development.

The Minister is urged to refer this Emergency National Heritage Listing nomination of the Western Precinct to the Australian Heritage Council for its assessment for inclusion in the National Heritage list.

Yours Sincerely,

Jackie Kelly MP
Member for Lindsay
E1151104

Attachments

1. NSW Department of Environment and Conservation Handout. Macrofauna fencing condition for Regional Park
2. Map of Western Precinct
3. NSW Scientific Committee final determination - Cumberland Plain Woodland
4. National Trust of Australia (NSW) Listing
5. Australian Heritage Commission Interim Listing announcement
6. Biosis map indicating proposed amendments to Interim Listing boundary
7. Map of survey plots locations used by Ian Perkins to assess objections to Interim Listing boundary
8. NSW Land and Environment Court decision
9. Letter from Michael Doherty
10. Daily Telegraph news articles
11. Front cover of NSW National Parks Association Journal
12. Assorted photos of CPW regeneration and *Pimelea spicata* in Western Precinct