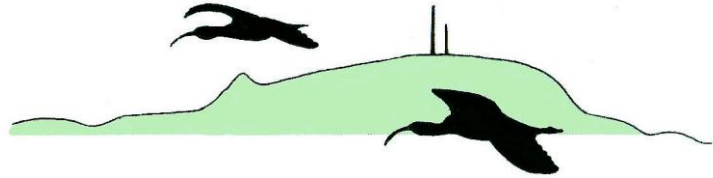


**ORANGE FIELD NATURALIST
& CONSERVATION SOCIETY INC.**
PO Box 369
ORANGE NSW 2800



The General Manager
Orange City Council
POBox 35
Orange NSW 2800

12th February 2011

Dear Sir

ORANGE LOCAL ENVIRONMENT PLAN
RIVERSIDE AREA - BLOOMFIELD BUSHLAND CLASSIFICATION

The goal of the NSW Biodiversity Strategy is to protect the native biological diversity of NSW and maintain ecological processes and systems. It aims to ensure the survival and evolutionary development of all species, populations and communities of plants and animals. It recognises that protecting biodiversity requires management of the threatening processes, addressing the causes of biological diversity loss and the establishment of a comprehensive, adequate and representative reserve system (*Land Assessment Bloomfield* – (Harcombe March 2007).

In addition, the Central West Catchment Blueprint 2002–2012 Draft on page 12, under Vegetation and Biodiversity Catchment Target states that by 2012, 20% of each habitat type across both public and private land is to be managed primarily for native biodiversity and essential ecosystem function. The aim is to use various types of public land to achieve biodiversity outcomes, and have set a target of 15% of public land, such as the Bloomfield Bushland, to contribute to biodiversity conservation.

We regard the proposed reclassification of the Riverside Area, generally known as Bloomfield Bushland, as Residential E4 to contravene the goals of the NSW Biodiversity Strategy and the CMA target and urge that you change the classification to Environmental E2 to reflect the high conservation value of this pocket of remnant old-growth bushland. To the casual onlooker the area appears degraded but that is superficial and is no reason to dismiss its importance.

The reasons for our concerns are outlined below.

- the area contains valuable remnant vegetation, particularly old-growth trees
- a classification of Residential, no matter what the minimum lot size, will compromise the CMA requirement of increasing native vegetation cover to 15%, rather it has the potential to decrease such percentage. Any habitation will necessitate clearing;
- A recent survey of the flora undertaken by Daroo Orange Urban Landcare Group revealed a

diverse suite of native trees, shrubs, forbs, herbs and grasses and details are provided in Appendix 1.

- The area is acknowledged in "Vegetation Greenways, Orange City Council", compiled by David Crooks, 12th January 2007 as native remnant vegetation of high value
- large older trees present in the area are suitable nesting and habitat trees for endangered Superb Parrots which have already been observed breeding in the area and are regularly seen in Bloomfield Park and Hinton Reserve.
- uncommon trees viz. *Eucalyptus stellulata* (Black Sallee) are present on the site
- the eucalypts of the basalt plateau around Orange, *E. viminalis* (Manna Gum), *E. rubida* (Candlebark), *E. pauciflora* (Snowgum) and *E. bridgesiana* (Apple Box) are present in the remnant as well as an association of *E. stellulata/E. viminalis*. These communities have been severely reduced in the Orange area
- hollow bearing trees are present on the site. The loss of trees with such hollows has been identified in a recent preliminary determination under the Threatened Species Conservation Act as a key threatening process. Orange City Council and Orange Field Naturalist and Conservation Society are actively pursuing funds to establish artificial nesting boxes in Hinton Reserve and other local parks but these are no comparison for naturally occurring hollows such as are found in Bloomfield Bushland.
- no proper environmental assessment has been conducted of the land, including no formal survey for microbats or for other fauna including threatened species. An *ad hoc* list of birds, mammals and reptiles sighted in the bushland and surrounding areas by members of OFNCS is attached as Appendix 2
- the endangered Grey-headed Flying Fox, *Pteropus poliocephalus*, has been observed in the bushland.;
- Other arboreal mammals such as Brush-tailed Possums, *Trichosurus vulpecula*, and Sugar Gliders, *Petaurus breviceps*, are known to be present on the site. Although not threatened species, these animals would die if their habitat is destroyed as they have high site fidelity and are indicators that the site has high biodiversity values.
- Council has made a clear statement that it is only paying lip service to the concept of Ecologically Sustainable Development with a residential classification for the area
- without the protection of E2 zoning there is no way of achieving the long-term protection of

this valuable remnant bushland

- a very large section of the community has been fighting for some years for a permanent protection order over Bloomfield Bushland, yet no effort is being made by OCC for such protection;
- Bloomfield Bushland should be identified as High Biodiversity on the Environmentally Sensitive and Biodiversity Map or the "Natural Resources Water Map".
- the Crown (NSW State Government) as owners will have to apply to Council for rezoning if they wish to sell the land with smaller lot sizes and as OCC has stated there are no further requirements under Sustainable Settlement Strategy for more residential land it would be difficult for Council to justify future rezoning/reclassification;
- we refer to the description of land to the north of Orange at Burrendong Way where it is described as having environmental values yet such values are not mentioned for Bloomfield, which has equally high or higher values;
- zoning the land residential, no matter what controls are put on it, leaves open the possibility of financial gain for Council if developed
- the area is a vital part of the Bloomfield Hospital's facilities for its patients. It is a safe and quiet environment, with intrinsic natural values that should not be in any way be tampered with.

Orange Field Naturalist and Conservation Society strongly objects to the proposed zoning of E4 Residential for the Bloomfield Bushland and requests Council to take the initiative out of the hands of the staff and show leadership in recommending this area be zoned E2 for Environmental Protection. A scientific fauna and flora survey of the area would reveal its considerable ecological values and we recommend that such a survey be undertaken.

A.N.G. Smith
Hon. Secretary
Orange Field Naturalist & Conservation Society Inc

APPENDIX 1.

Native Plant List (not comprehensive) for Bloomfield Reserve
based on a survey undertaken by Bill Josh, Roger Smith and Geoff Selwood

DICOTS

Family APIACEAE

Hydracotyle laxiflora Stinking Pennywort

Family ASTERACEAE

Brachyscome spathulata Spoon Daisy
Chrysocephalum apiculatum Common Everlasting
Cymbonotus lawsonianus Bears Ear
Helichrysum scorpioides Button Everlasting
Solenogyne gunnii Hairy Solenogyne

Family CAMPANULACEAE

Wahlenbergia stricta Tall Bluebell

Family DILLENACEAE

Hibbertia obtusifolia Hoary Guinea Flower
Hibbertia sericea Silky Guinea Flower

Family FABACEAE

Acacia dealbata Silver Wattle
Dillwynia sericea Showy Parrot Pea
Hovea linearis Creeping Hovea
Indigofera australis Austral Indigo

Family GERANIACEAE

Geranium solanderi Native Geranium

Family HYPOXIDACEAE

Hypoxis hygrometrica Golden Weather- grass

Family MYRTACEAE

Eucalyptus bridgesiana Apple Box
Eucalyptus pauciflora Snowgum
Eucalyptus stellulata Black Sallee
Eucalyptus viminalis Ribbon Gum
Leptospermum myrtifolium Swamp Tea-Tree

Family OXALIDACEAE

Oxalis perennans Grassland Wood Sorrel

Family PLANTAGINACEAE

<i>Plantago varia</i>	Variable Plantain
Family RANUNCULACEAE	
<i>Ranunculus lappaceus</i>	Common Buttercup
Family ROSACEAE	
<i>Acaena novaezealandiae</i>	Bidgee Widgee
<i>Acaena ovina</i>	Sheeps Burr
<i>Rubus parvifolium</i>	Native Raspberry
Family RUBIACEAE	
<i>Asperula conferta</i>	Common Woodruff
Family STACKHOUSIACEAE	
<i>Stackhousia monogyna</i>	Creamy Candles
Family THYMELEACEAE	
<i>Pimelia curviflora</i>	Curved Rice Flower
<i>Pimelia linifolia</i>	Shrubby Rice Flower
Family VIOLACEAE	
<i>Viola betonicifolia</i>	Mountain Violet
<u>MONOCOTS</u>	
Family COLCHICACEAE	
<i>Wurmbea dioica</i>	Early Nancy
Family CYPERACEAE	
<i>Carex appressa</i>	Saw Sedge
Family JUNCACEAE	
<i>Juncus usitatus</i>	Pinrush
<i>Luzula densiflora</i>	Woodrush
Family LILIACEAE	
<i>Bulbine bulbosa</i>	Native Leek
<i>Dianella caerulea</i>	Blue Flax Lily
<i>Dianella longifolia</i>	Smooth Flax Lily
<i>Dichopogon fimbriatus</i>	Nodding Chocolate Lily
Family LOMANDRACEAE	
<i>Lomandra bracteata</i>	Short Flowered Mat- rush
<i>Lomandra filiformis</i>	Wattle Mat- rush
<i>Lomandra multiflora</i>	Many Flowered Mat- rush
<i>Lomandra patens</i>	Irongrass

Family ORCHIDACEAE

Microtis unifolia

Common Onion Orchid

Family POACEAE

Austrodanthonia ssp

Bothriochloa macra

Chloris truncata

Poa labillardieri

Poa sieberiana

Sorghum leiocladum

Themeda triandra

Wallaby Grass

Red Leg Grass

Windmill Grass

River Tussock

Snow Grass

Native Sorghum

Kangaroo Grass

APPENDIX 2.

Fauna species recorded in Bloomfield Bushland and neighbouring parkland (Hinton Reserve and Bloomfield Park) 2004–2011

Compiled by Orange Field Naturalist and Conservation Society – consisting of Murray Fletcher, Vicki Glover and Peter West.

Bird Species

Family Phasianidae

Brown or Stubble quail	<i>Coturnix ypsilophora</i> or <i>C. pectoralis</i>	Bloomfield Park
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Family Phalacrocoracidae

Little pied cormorant	<i>Phalacrocorax melanoleucos</i>	Hinton Reserve
Pied cormorant	<i>Phalacrocorax varius</i>	Bloomfield Park

Family Ardeidae

Nankeen night heron	<i>Nycticorax caledonicus</i>	Bloomfield Park
White faced heron	<i>Ardea novaehollandiae</i>	Bloomfield Park Hinton Reserve

Family Threskiornidae

Australian white ibis	<i>Threskiornis mollucca</i>	Bloomfield Park Hinton Reserve
Straw necked ibis	<i>Threskiornis spinicollis</i>	Hinton Reserve

Family Anatidae

Pacific black duck	<i>Anas superciliosus</i>	Bloomfield Park
Australian wood duck	<i>Chenonetta jubata</i>	Bloomfield Park
Grey teal	<i>Anas gracilis</i>	Hinton Reserve

Family Accipitridae

Little eagle	<i>Hieraaetus morphnoides</i>	Bloomfield Bushland Bloomfield Park
Black shouldered kite	<i>Elanus axillaris</i>	Bloomfield Park
Collared sparrow hawk	<i>Accipiter cirrhocephalus</i>	Bloomfield Park Hinton Reserve

Hobby falcon	<i>Falco longipennis</i>	Hinton Reserve
<u>Family Scolopacidae</u>		
Latham's snipe	<i>Gallinago hardwickii</i>	Hinton Reserve
<u>Family Laridae</u>		
Silver gull	<i>Larus novaehollandiae</i>	Bloomfield Park
<u>Family Columbidae</u>		
Crested pigeon	<i>Geophaps lophotes</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
<u>Family Cacatuidae</u>		
Galah	<i>Cacatua roseicapilla</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Sulphur crested cockatoo	<i>Cacatua galerita</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
<u>Family Platyceridae</u>		
Australian king parrot	<i>Alisterus scapularis</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Superb parrot	<i>Polytelis swainsonii</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Crimson rosella	<i>Platycercus elegans</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Eastern rosella	<i>Platycercus eximius</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Red rumped parrot	<i>Psephotus haematonotus</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
<u>Family Psittacidae</u>		
Little lorikeet	<i>Glossopsitta pusilla</i>	Bloomfield Bushland Bloomfield Park

		Hinton Reserve
<u>Family Cuculidae</u>		
Common koel	<i>Eudynamys scolopacea</i>	Hinton Reserve
Pallid cuckoo	<i>Cuculus pallidus</i>	Bloomfield Park Hinton Reserve
Horsfields Bronze-Cuckoo	<i>Chrysococcyx basalis</i>	Hinton Reserve
<u>Family Alcedinidae</u>		
Kookaburra	<i>Dacelo novaeguineae</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Sacred kingfisher	<i>Todiramphus sanctus</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
<u>Family Podargidae</u>		
Tawny frogmouth	<i>Podargus strigoides</i>	Bloomfield Park Hinton Reserve
<u>Family Strigidae</u>		
Southern Boobook	<i>Ninox novaeseelandiae</i>	Bloomfield Park Hinton Reserve
<u>Family Coraciidae</u>		
Dollarbird	<i>Eurystomus orientalis</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
<u>Family Meropidae</u>		
Rainbow bee-eater	<i>Merops ornatus</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
<u>Family Hirundinidae</u>		
Tree martin	<i>Hirundo nigricans</i>	Hinton Reserve
Welcome swallow	<i>Hirundo neoxena</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
<u>Family Campephagidae</u>		
Black faced cuckoo shrike	<i>Coracina novaehollandiae</i>	Bloomfield Bushland Bloomfield Park

		Hinton Reserve
<u>Family Muscicapidae</u>		
Golden whistler	<i>Pachycephala pectoralis</i>	Bloomfield Park
Rufous whistler	<i>Pachycephala rufiventris</i>	Bloomfield Park Hinton Reserve
Grey fantail	<i>Rhipidura albiscapa</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Willy wagtail	<i>Rhipidura leucophrys</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Blackbird	<i>Turdus merula</i>	Bloomfield Bushland Hinton Reserve
Rufous songlark	<i>Cinclorhamphus mathewsi</i>	Hinton Reserve
<u>Family Pachycephalidae</u>		
Grey-shrike thrush	<i>Colluricincla harmonica</i>	Bloomfield Park Hinton Reserve
<u>Family Climacteridae</u>		
White throated tree creeper	<i>Cormobates leucophaeus</i>	Bloomfield Park Hinton Reserve
<u>Family Acrocephalidae</u>		
Clamorous reed warbler	<i>Acrocephalus stentoreus</i>	Bloomfield Park
<u>Family Maluridae</u>		
Superb fairy wren	<i>Malurus cyaneus</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
<u>Family Acanthizidae</u>		
Brown thornbill	<i>Acanthiza pusilla</i>	Bloomfield Bushland
Striated thornbill	<i>Acanthiza lineata</i>	Bloomfield Park Hinton Reserve
Yellow rumped thornbill	<i>Acanthiza chrysorrhoa</i>	Bloomfield Park Hinton Reserve
Yellow thornbill	<i>Acanthiza nana</i>	Hinton Reserve

Weebill	<i>Smicrornis brevirostris</i>	Bloomfield Park
White browed scrubwren	<i>Sericornis frontalis</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
<u>Family Meliphagidae</u>		
Eastern spinebill	<i>Acanthorhynchus tenuirostris</i>	Bloomfield Park Hinton Reserve
Noisy miner	<i>Manorina melanocephala</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Red wattlebird	<i>Anthochaera carunculata</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Noisy friarbird	<i>Philemon corniculatus</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Blue faced honeyeater	<i>Entomyzon cyanotis</i>	Hinton Reserve
White naped honeyeater	<i>Melithreptus lunatus</i>	Bloomfield Park
Yellow faced honeyeater	<i>Lichenostomus chrysops</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
<u>Family Dicaeidae</u>		
Mistletoebird	<i>Dicaeum hirundinaceum</i>	Hinton Reserve
<u>Family Pardalotidae</u>		
Spotted pardalote	<i>Pardalotus punctatus</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Striated pardalote	<i>Pardalotus striatus</i>	Bloomfield Park Hinton Reserve
<u>Family Zosteropidae</u>		
Silvereye	<i>Zosterops lateralis</i>	Bloomfield Park
<u>Family Fringillidae</u>		
European goldfinch	<i>Carduelis carduelis</i>	Bloomfield Park

Family Estrildidae

Red browed finch *Neochmia temporalis* Bloomfield Park
Hinton Reserve

Family Sturnidae

Common starling *Sturnus vulgaris* **Bloomfield Bushland**
Bloomfield Park
Hinton Reserve

Family Artamidae

Dusky woodswallow *Artamus cyanopterus* Bloomfield Park
Hinton Reserve

Family Grallinidae

Magpie lark *Grallina cyanoleuca* **Bloomfield Bushland**
Bloomfield Park
Hinton Reserve

Family Cracticidae

Australian magpie *Gymnorhina tibicen* **Bloomfield Bushland**
Bloomfield Park
Hinton Reserve

Grey butcherbird *Cracticus torquatus* **Bloomfield Bushland**
Hinton Reserve

Pied butcherbird *Cracticus nigrogularis* Bloomfield Park

Pied currawong *Strepera graculina* **Bloomfield Bushland**
Bloomfield Park
Hinton Reserve

Family Corvidae

Australian raven *Corvus coronoides* **Bloomfield Bushland**
Bloomfield Park
Hinton Reserve

Mammals

Eastern grey kangaroo	<i>Macropus giganteus</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Echidna	<i>Tachyglossus aculeatus</i>	Bloomfield Bushland Hinton Reserve
Sugar glider	<i>Petaurus breviceps</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Brush tailed possum	<i>Trichosurus vulpecula</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Swamp wallaby	<i>Wallabia bicolor</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Rabbit (exotic)	<i>Oryctolagus cuniculus</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve

Reptiles and amphibians

Shingle back skink	<i>Trachydosaurus rugosus</i>	Hinton Reserve
Eastern blue tongue lizard	<i>Tiliqua scincoides</i>	Bloomfield Park Hinton Reserve
Blotched blue tongue lizard	<i>Tiliqua nigrolutea</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Copperhead (highland)	<i>Austrelaps ramsayi</i>	Bloomfield Park Hinton Reserve
<i>Lampropholis</i> skink	<i>Lampropholis guichenoti</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Eastern water skink	<i>Eulamprus quoyii</i>	Bloomfield Park Hinton Reserve
Cunninghams Skink	<i>Egernia cunninghami</i>	Hinton Reserve
Red-throated skink	<i>Pseudomoia platynota</i>	Bloomfield Park Hinton Reserve
<i>Ctenotus</i> species	<i>Ctenotus robustus</i> or <i>C. taeniolatus</i>	Bloomfield Park Hinton Reserve

Eastern froglet	<i>Crinia signifera</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Eastern Pobblebonk frog	<i>Limnodynastes dumerilii</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Perons tree frog	<i>Litoria peronii</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Verreaux's tree frog	<i>Litoria verreauxii</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve
Spotted marsh frog	<i>Limnodynastes tasmaniensis</i>	Bloomfield Bushland Bloomfield Park Hinton Reserve