

Referral Response - Environmental Health - Biodiversity

Application Number:	DA17/1092
Referral Officer	Jenna Hore
Referral Unit	Environmental Health - Biodiversity
Date of referral	15 November 2017
Land to be developed (Address):	Lot 2 DP 1108408 13 - 15 Park Road WALLACIA NSW 2745
Proposed Development:	Staged Construction of Wallacia Memorial Park including Cemetery for 88,000 Burial Plots, Chapel & Related Crematorium & Function Rooms, Administration Building, Services Outbuilding, Parkland Areas, Internal Roads, Car Parking & Associated Landscaping & Site Servicing Works

Recommendation

Not supported

Detailed assessment

I have reviewed the application and associated documentation in regards to flora and fauna for DA17/1092. I have not undertaken an inspection of the site. The following comments are provided for your consideration and assessment:

Biodiversity

- The site is currently a golf course, so whilst there is some vegetation across the site, it is generally highly modified.
- A Flora and Fauna Assessment Report has been prepared for the site by Travers Bushfire and Ecology (October 2017). The site contains some scattered remnants of Cumberland Plain Woodland (Critically Endangered under the *NSW Biodiversity Conservation Act 2016* and the commonwealth *Environment Protection and Biodiversity Conservation Act 1999*), and River-flat Eucalypt Forest (Endangered under the *NSW Biodiversity Conservation Act 2016*). These are generally highly modified with little to no understory, however they do meet the definition of the EECs at a state level, with some patches meeting the definition at the federal level.
- There is a significant number of exotic plantings across the site and weeds are present in some of the native patches, particularly along the river course.
- Despite the poor condition of much of the native vegetation, the presence of the native vegetation is important, providing hollows, foraging resources, and generally biodiversity resources.
- The majority of vegetation is proposed to be retained, however, I believe that there is opportunity to retain additional vegetation, particularly some of the more significant trees, including hollow bearing trees.
- A Tree Assessment Report has been prepared by Travers Bushfire and Ecology (October 2017). There are some considerable discrepancies within the report with many instances where trees listed for retention in the tables are shown as being removed in the maps and vice versa.
- The Landscape Masterplan has not identified plant species to be used on site.
- The application states that they will restore areas of Cumberland Plain Woodland and vegetation within the riparian areas. A vegetation management plan should be prepared.

Based on the above comments and review of the proposal, the proposed application is unsatisfactory. Prior to further assessment by the Senior Biodiversity Officer, the following must be addressed by the applicant.

1. The applicant is to resubmit the Tree Assessment report fixing all the discrepancies between the tables and the maps.

2. The applicant is to ensure that all 'weed' species are prioritised for removal above the removal of a native species. There are instances where privet is retained instead of natives.
3. Additional consideration is to be given to the retention of the following trees: T133, T238, T244, T247, T784, T876, T877, and all habitat trees/hollow-bearing trees. The trees in the patch of Cumberland Plain Woodland that falls within the APZ area of the Chapel should also be reconsidered. As stated in the Flora and Fauna Assessment Report, it is unlikely that clearing will be required for the APZ as they already generally meet the IPA requirements. No native trees should be cleared without a clear and demonstrated need and unless all alternatives have been considered.
4. A Vegetation Management Plan is to be prepared for the site. The VMP is to be jointly prepared by a Landscape Architect and an Ecological Consultant or Bush Regenerator with theoretical and practical experience in bushland restoration and management on the Cumberland Plain (a Certificate IV in Conservation and Land Management or equivalent is required as a minimum). It is to be informed by both the Flora and Fauna Assessment Report and the Landscape Masterplan. The VMP is to:
 - be consistent with relevant environmental legislation and policies, including, but not limited to, the NSW Biodiversity Conservation Act 2016, the Biosecurity Act 2016 the Water Management Act 2002, the Rural Fires Act 1997 as well as the federal Environment Protection and Biodiversity Conservation Act 1999, and guidelines such as the Rural Fire Services Planning for Bushfire Protection 2006 and Recovering Bushland on the Cumberland Plain: Best practice guidelines for the management and restoration of bushland (DEC, 2005).
 - Identify and map the various vegetation management zones across the site and the primary objectives for each zone.
 - A detailed plan that clearly outlines how vegetation should be protected and managed in each zone both during construction/establishment of the development and the ongoing future management of the vegetation over the life of the development.
 - In areas identified as Cumberland Plain Woodland and River Flat Eucalypt Forest, the focus is to be on best practice bush regeneration methods and habitat improvement and augmentation.
 - Specify a plant species list to be used on site with a clear focus on species from the Cumberland Plain. This is to align with the Landscape Plan, which should also have a planting palette that is dominated by species native to western Sydney.
 - The VMP is to identify potential future impacts on the vegetation from the development and road, including access, weed encroachment, pest animals, stormwater etc, and is to outline how these impacts will be managed in the long term.
 - Project tasks should be defined and described, including a schedule detailing the sequence and duration of works necessary for the initial 5 years of the implementation of the VMP.
 - Costings for the initial 5 years of implementation of all components and stages of the work including materials, labour, watering, maintenance, monitoring and reporting should be included.
 - Processes for monitoring and review, including a method of performance evaluation should be identified. This should include replacing plant losses, addressing deficiencies, problems, climatic conditions and successful completion of works.

Please refer back to the Environment team when the issues raised above have been fully addressed.

Yours sincerely,

Jenna Andrews
Senior Biodiversity Officer