

# Referral Response - Environmental Health - Biodiversity

<b>Application Number:</b>	DA17/1092
<b>Referral Officer</b>	Jenna Hore
<b>Referral Unit</b>	Environmental Health - Biodiversity
<b>Date of referral</b>	12 June 2018
<b>Land to be developed (Address):</b>	Lot 2 DP 1108408 13 - 15 Park Road WALLACIA NSW 2745
<b>Proposed Development:</b>	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, including the updated information and information provided in submissions, 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. Regardless of their current level of modification, they are of biodiversity value, containing rare patches of these communities and habitat for associated fauna.
- There is a significant number of exotic plantings across the site and weeds are present in some of the native patches, particularly along the waterways.
- Despite the poor condition of much of the native vegetation, the presence of the native vegetation is important, providing hollows, foraging resources, and general biodiversity resources.
- 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. This appears to have been rectified in the updated information.
- The Landscape Masterplan has been updated to include a species list for plantings and is generally consistent with the recommendations of the flora and fauna report and the Vegetation Management Plan.
- A Vegetation Management Plan (VMP, Travers Bushfire and Ecology (10/4/2018)) has been prepared for the areas of the site that are proposed to be regenerated or restored as Cumberland Plain Woodland, River Flat Eucalypt Forest or other natural area. In general the VMP is suitable, however I request some small modifications be made prior to approval:
  - The VMP does not currently reference the best practice guidelines for western Sydney: *Recovering Bushland on the Cumberland Plain: Best practice guidelines for the management and restoration of bushland* (DEC, 2005). The VMP is to include reference to these guidelines and that all works within the

proposed VMP areas.

- The VMP should include the reuse of Large Woody Debris (LWD) on site. All native trees over 15cm DBH that are scheduled for removal are to be reused on site within the VMP areas in line with benchmark values of LWD in CPW and RFEF communities. This excludes the reuse of hollows which has already been included in the VMP.
- The use of fire as a management tool has not been included in the VMP. This VMP is to look further in to the use of fire for restoration purposes at this site.
- Whilst the VMP details activities for 5 years, it is to specify that the areas of the site that are proposed to be regenerated or restored as Cumberland Plain Woodland, River Flat Eucalypt Forest or other natural area are to be retained and managed in perpetuity in order to maintain the percentage weed cover at 5% or less.
- There is no reference to ongoing maintenance of the habitat boxes. Habitat boxes are to be monitored annually to ensure they are maintained and free of pest animals. Further, the habitat boxes are to be maintained, and replaced where necessary, for a period of 30 years. This is to be included within the VMP.
- Submissions from local residents have raised the possibility of the presence of a yet-to-be-described, rare species of orchid within the golf course grounds. My previous correspondence to the Planner in relation to this requested that *"In light of this new information, it is recommended that a targeted survey and assessment be undertaken by a qualified botanist with experience in orchids for the presence of this undescribed species. The survey is to be undertaken during likely flowering time. It is suggested that the botanist be provided the contact details regarding the submission so that information can be provided with regard to locations, flowering times, etc."* It is my understanding that this information was provided to the applicant, however, the updated information provided does not make any mention of this and there have been no further surveys, and the possible presence has not been addressed. This must be addressed by the applicant prior to any further assessment. Alternatively, Council may wish to engage an independent botanist who specialises in orchids to undertake a survey. I can provide assistance with coordinating this.

Please refer back to the Senior Biodiversity Officer when the issues raised above have been fully addressed.

Yours sincerely,

Jenna Andrews  
**Senior Biodiversity Officer**