



Our ref: DOC20/294527

Your ref: SSD-10285

Minoshi Weerasinghe
Planning and Assessment Group
Department of Planning, Industry & Environment
GPO Locked Bag 5022
PARRAMATTA NSW 2124

Dear Ms Weerasinghe

Subject: EES comments on Response to Submissions – Royal Randwick Racecourse – Leger Lawn Development – SSD-10285

Thank you for your email of 9 April 2020 requesting advice on the Response to Submissions (RTS) for this State Significant Development.

The Environment, Energy and Science Group (EES) has reviewed the RTS and provides its recommendations and comments at Attachment A.

If you have any queries regarding this matter, please do not hesitate to contact Janne Grose, Senior Conservation Planning Officer on 02 8837 6017 or at janne.grose@environment.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads 'S. Harrison'.

22/04/20

Susan Harrison

**Senior Team Leader Planning
Greater Sydney Branch
Environment, Energy and Science**

Attachment A

Subject: EES comments on Response to Submissions for Royal Randwick Racecourse Leger Lawn Development – SSD-10285

The Environment, Energy and Science Group (EES) has reviewed the following documents:

- Response to Submissions – 9 April 2020
- Revised Landscape Plan – Issue E – 22 January 2020

and provides the following comments.

Landscaping

The EES submission of 27 November 2019 on the EIS advised the Indicative Planting Schedule incorporates an invasive exotic species (Indian Hawthorn - *Rhaphiolepis indica*) and exotic species, such as:

- Red Hot Poker - *Kniphofia uvaria* 'Flamenco'
- Japanese Box – *Buxus japonica*
- 'Magnifica' Gardenia - *Gardenia augusta*

The Summary of Submissions in the RTS (Table 7) does not specifically provide a response to the EES comments in relation to the proposed use of these plant species, instead it refers to item 8 in Table 7 (see pages 35-36 of RTS) which is a response to Randwick City Council's submission. The indicative planting schedule in the Revised Landscape Plan and the amended indicative planting schedule in the RTS still propose to use Indian Hawthorn (Figure 4, see page 8 of RTS). As the fruit of Indian Hawthorn is easily dispersed by birds and Indian Hawthorn is a problem in remnant bushland in the Sydney region, EES recommended it not be used in the Landscape Plan, especially as the site is near Centennial Park which contains Eastern Suburbs Banksia Scrub which is critically endangered. EES repeats this recommendation.

EES notes the Revised Landscape Plan has removed Red Hot Poker from the plant species list but exotic species such as Japanese Box and 'Magnifica' Gardenia are still proposed to be used. It is noted however that *Buxus sp.* are to be used on level 1 of the Winx Stand as a formal hedge and the RTS states it is not invasive (page 52 of RTS). The EES submission did not state that Japanese Box was invasive but rather that it is an exotic species (i.e. non-native). Where landscaping is proposed at ground level it is recommended local native provenance plants are used.

EES previously noted the proposed use of non-local native species such as the Firewheel tree (*Stenocarpus sinuatus*) and recommended the landscaping at the site uses a diversity of native trees, shrubs and groundcover species from the relevant local native vegetation communities (local provenance material) that once occurred in this locality (rather than use exotic species and non-locally occurring native species). The RTS states "it is proposed the Queensland Firewheel Trees are changed to *Banksia integrifolia floribunda* 'Sweeper' (see Table 7, page 27) but the indicative planting schedule in the Revised Landscape Plan and the amended indicative planting schedule in the RTS do not reflect this, as they still propose to use Firewheel Trees (Figure 4, page 8 in RTS). It is recommended the Department clarifies with the proponent whether it is proposed to remove the Firewheel tree from the planting schedule.

Urban Tree Canopy

The EES submission recommended the development replaces any removed trees at a ratio greater than 1:1 to mitigate the urban heat island effect. The RTS confirms that "no trees are proposed to be removed and that the three (3) *Magnolia Little Gems* are to be relocated and five

(5) *new canopy trees are proposed to be planted* (page 28). EES recommends the new canopy trees to be planted are local provenance native species.

Recommended conditions of consent

The EES submission on the EIS recommended the following conditions (1-5) are included if the SSD is approved:

- 1 Invasive exotic species are removed from the Landscape Plan and replaced by a diversity of local native provenance trees, shrubs and groundcover species (rather than exotic species or non-local native species) from the relevant native vegetation community which once occurred in this locality*

The RTS notes the Landscape plans prepared by SNA have been amended to remove invasive exotic species from the plant list (Table 8, page 52) but according to the indicative planting schedule in the revised Landscape Plan and the amended indicative planting schedule in the RTS, the proponent still proposes to use Indian Hawthorn (Figure 4, page 8 of RTS). EES repeats its recommendation that invasive exotic species are removed from the Landscape Plan.

The RTS states the use of native vegetation that once occurred on the site (Eastern Suburbs Banksia Scrub) would be out of place on this highly trafficked and maintained site (page 52). EES notes the Development Consent (dated 29 November 2019) for the Qantas Flight Training Centre which is located at 297 King Street Mascot (SSD-10154) includes a condition (B45(a)) which requires the species to be planted on-site “to include a diversity of local provenance plant species from the Eastern Suburbs Banksia Scrub in the Sydney Bioregion”. If SSD-10154 can use local provenance species it is unclear why the landscaping plan for the Royal Randwick Racecourse can’t also use a diversity of local native provenance species from the Eastern Suburbs Banksia Scrub. EES recommends its draft condition (1) as above is included in the development consent.

- 2 Trees removed, shall be replaced at a ratio greater than 1:1*

Table 8 in the RTS confirms that the existing exotic 3 trees are not to be removed and that 5 trees will be planted (page 53). EES recommends the planted trees are local provenance native species.

- 3. Enough area/space is provided on site to allow the trees to grow to maturity*

The RTS requests that this draft condition is deleted as it is a duplicate condition as per item 5(e) below (page 53). EES agrees to this.

- 4. Tree planting at the site shall use advanced and established trees with a minimum plant container pot size of 75-100 litres, or greater for local native tree species which are commercially available. Other local native tree species which are not commercially available may be sourced as juvenile sized trees or pre-grown from provenance seed*

The RTS notes this condition is unnecessary and requests it is deleted as the landscape plans indicate all trees are proposed to be 100L container size (page 53). EES suggests this condition is included in the consent in case it is not be possible to obtain local provenance trees which are commercially available in a plant container pot size of 100 litres.

5 *The Landscape Plan shall include details on:*

- a) the native vegetation community that occur or once occurred in this locality*
- b) a list of local provenance tree, shrub and groundcovers to be used in the landscaping*
- c) the quantity and location of plantings*
- d) the pot size of the local native trees to be planted*
- e) the area/space required to allow the planted trees to grow to maturity*
- f) plant maintenance regime. The planted vegetation should be regularly maintained and watered for 12 months following planting. Should any plant loss occur during the maintenance period the plants should be replaced by the same plant species.*

In response to the EES draft Condition 5(a) and (b), the RTS states it does not propose to use species based on the native vegetation community in the area and it requests 5 (a) and (b) are deleted (page 53). EES recommends that a condition is included which requires the Landscape Plan to use local provenance tree, shrub and groundcovers in the site landscaping.

In relation to draft Condition 5(c)-(e), the RTS notes details will be provided in detailed Construction Certificate documentation. The Department needs to be satisfied with this approach.

EES considers it is important that a condition is included in relation to the plant maintenance regime at the site as per EES's recommended draft condition 5(f).

End of Submission