

Department of Planning and Environment

Our ref: DOC22/174209

Your ref: SSD-10472-MOD 2

Mr Marcus Jennejohn
Industry Key Sites
Department of Planning and Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

15 March 2022

Subject: EES comments on the Modification of the Museum Discovery Centre – SSD-10472 MOD 2 – 172 Showground Road, Castle Hill - Change to Tree Replacement Implementation Plan and conditions

Dear Mr Jennejohn

Thank you for the email of 2 March 2022 requesting advice on the proposed modification to this State significant development proposal project - SSD-10472 MOD 2

The Environment, Energy and Science Group (EES) has reviewed the MOD 2 proposal and provides its comments and recommendations 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,



Susan Harrison

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

Subject: EES comments on the Modification of the Museum Discovery Centre – SSD-10472 MOD 2 – Change to Tree Replacement Plan and conditions

The Environment, Energy and Science Group (EES) has reviewed the following reports for this State Significant Development (SSD):

- revised Tree Replacement Implementation Plan
- letter to DPIE regarding Modification 2 – 4 February 2022
- Modification of Consent

and provides the following comments.

Proposed Amendment to Condition B13 and Off-site tree replacement planting sites

Condition B13 of the Development Consent for SSD-10472 currently requires that:

Prior to commencement of construction of Building J, a final Tree Replacement Implementation Plan (TRIP) must be developed in consultation with Council and approved by the Planning Secretary. The TRIP must include the final planting locations, species, pot sizes and maintenance of the replacement planting for 674 trees within Council's open space (EES emphasis).

Condition B13 requires the 674 replacement trees to be planted within the Hills Shire Council's open space. The Tree Replacement Strategy (TRS) which accompanied the EIS outlined "the trees to be removed would be replaced at a 2:1 ratio on the chosen site which results in 674 trees to be planted in the Hills LGA".

The replanting of 674 trees is required to mitigate the impact of SSD-10472 removing 337 existing trees from the TAFE site, 2 Green Road, Castle Hill to allow for the expansion of the Museum Discovery Centre (MDC) which is located at 172 Showground Road, Castle Hill by constructing a new building J for use by the MDC on the adjoining TAFE site.

The Modification of Consent proposes to amend condition B13 (section 3) as follows:

Prior to the commencement of construction of Building J, a final Tree Replacement Implementation Plan (TRIP) must be developed in consultation with Council and approved by the Planning Secretary. The TRIP must include planting locations, species, pot sizes and maintenance of the replacement planting for the 674 trees (74 trees are to be within the Council's open space and 600 trees are to be within land leased by Taronga Conservation Society Australia to be grown and maintained for the purpose of zoo animal food).

The revised TRIP indicates Council has nominated two locations within its LGA for planting of 74 of the 674 replacement trees and the 74 replacement trees will be distributed across either or both of the following two reserves - Centenary of ANZAC Reserve, and Arnold Avenue Reserve. It notes the remainder of the 600 replacement trees are now proposed to be planted at the Western Sydney University (WSU), Richmond Campus, as part of the Taronga Zoo Koala Project.

It is unclear why the 674 replacement trees for this SDD are no longer proposed to be planted within The Hills Shire Council open space rather than as part of the Taronga Zoo Koala Project in the Hawkesbury LGA. There appears to be no relationship between the Museum site and WSU or Taronga Zoo.

The Modification of Consent states "the remainder of the 600 replacement trees will be planted at the UWS, Richmond Campus, as part of the Taronga Zoo Koala Project" but it also indicates there

Department of Planning and Environment

are several possible sites identified in the Zoo's proposal for planting that will comfortably accommodate 600 eucalyptus trees. It is unclear if all the sites are to be located at the WSU Richmond Campus. Section 3 of the Modification of Consent states "the planting would occur over multiple council boundaries". It is unclear what is meant by "multiple council boundaries". Clarification is required on this. It is preferable that the original Condition B13 is met which required the replanting of trees within the Hills Shire Council's open space rather than at Richmond.

The TRS previously noted that ideally the replacement planting site would be a park or council bushland site on the Cumberland Plain adjacent to an existing remnant of Cumberland Plain Woodland or other threatened ecological community (TEC). The TRS previously identified six potential natural areas as planting locations within the LGA but none of these sites have been selected for replanting in the revised TRIP. No explanation has been provided on this.

The TRIP indicates Council's preference is that all 74 of the replacement trees are planted at Arnold Avenue Reserve at Kellyville (Section 3 of TRP). This reserve does not appear to be adjacent to existing remnant of Cumberland Plain Woodland or other TEC as proposed by the TRS. Nor does the Centenary of ANZAC Reserve which has also now been nominated by Council, although there is a mapped TEC on adjacent land to the north along Smalls Creek.

The TRS also noted the benefits of planting the trees at locations within the Caddies Creek Corridor and the Cattai Creek Corridor as it will contribute to achieving the outcomes specified for the Green Grids West Central District (section 7.3) but the revised TRIP makes no mention of this.

EES recommends the replacement planting is undertaken in the Hills Shire LGA as originally proposed to contribute to improving biodiversity values in the LGA. Also, the site (s) selected for the off-site planting should protect the replacement tree plantings in perpetuity.

The TRIP states that the WSU site includes a site established with trees for koala browse trees, but that the number of trees was reduced due to the recent drought and flooding. EES questions the suitability of the site if it is prone to flooding. Furthermore, the replacement planting from the Museum site should be in addition to any existing requirements at WSU. If the existing tree planting at WSU was established through grant funding or other conservation initiatives or requirements, then WSU should replace any trees lost. If the tree planting from the Museum is used to replace the trees supplied from a previous initiative, this will result in a net loss of trees.

Tree Species

Section 4.1 of the revised TRIP proposes to plant a variety of *Allocasuarina* spp. split across the two Council sites and these include:

1. *Allocasuarina littoralis*
2. *Allocasuarina torulosa*
3. *Allocasuarina inophloia*

Appendix A of the TRS contains a much more diverse list of Cumberland Plain Woodland tree species that are suggested for the Council tree replacement sites compared to the list provided above in the revised TRIP. Also, Section 5.1 of the TRS notes if a Blue Gum High Forest, Turpentine Ironbark Forest, sandstone, or shale / sandstone transition site is chosen then tree species will need to be adjusted as appropriate. Appendix A of the TRS includes species from these communities but no details are provided in the revised TRIP on the vegetation communities that occur or once occurred at the two nominated council reserves (Centenary of ANZAC Reserve and Arnold Avenue

Department of Planning and Environment

Reserve) and if the above listed species are appropriate for planting at these sites. Further details are required on this.

EES recommends the replacement tree planting uses a diversity of local provenance tree species from the native vegetation community (or communities) that once occurred at the council reserve sites to improve biodiversity and the TRIP is amended accordingly.

Maintenance

Section 4.3 of the revised TRIP states “Following consultation with Council a one month maintenance period is agreed to - until plant establishment occurs”. However, Section 6.2 of the TRS outlines that “once plants are installed at the site, the plantings will require regular maintenance for period of one year to ensure survival.” EES recommends a longer maintenance period than one month to assist with the survival of the plantings. It is suggested the plant maintenance regime incorporates regular maintenance as required including watering for a minimum of 12 months following planting.

If there are any plant losses during the maintenance period, the proponent should undertake maintenance replanting to replace plants by the same species. Any maintenance replanting should not decrease species diversity and must still be from the community being emulated and consist of local provenance native plants.

End of Submission