

Department of Planning and Environment

Our ref: DOC22/279527

Your ref: SSD-10472 MOD 2

Ms Amy Watson
Key Sites Assessment
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

14 April 2022

Subject: EHG comments on applicants RtS - additional information for the Museum Discovery Centre - SSD-10472 MOD 2

Dear Ms Watson

Thank you for the email of 7 April 2022 requesting comments on the applicants Response to Submissions (RtS) for this State significant development modification proposal - SSD-10472 MOD 2.

Please note on 1 April 2022, the Environment, Energy and Science Group (EES) changed its name to the Environment and Heritage Group (EHG). EHG has reviewed the RtS and additional information 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,

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

Susan Harrison
Acting Director
Greater Sydney Branch, Biodiversity and Conservation
Environment and Heritage Group

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Attachment A

Subject: EHG comments on the Response to Submissions for Museum Discovery Centre - SSD-10472 MOD 2

The Environment and Heritage Group (EHG) has reviewed the following reports for this State Significant Development (SSD):

- Response to Submissions (RtS)
- Taronga Conservation Society letter to Create NSW – 30 March 2022
- Letter from Create NSW to DPE – 22 March 2022

and provides the following comments.

EHG met with Create NSW on 13 April 2022 to discuss the issues raised by EES in its submission on the MOD 2 proposal (dated 15 March 2022). Following this meeting EHG reviewed the RtS and still considers the advice previously provided by EES in its submission is relevant.

The existing Condition B13 requires the 674 replacement trees to be planted within the Hills Shire Council's open space. EHG explained at the meeting that when trees are removed from a site, replacement trees should be planted as close as possible to the impacted area to benefit biodiversity, increase green grid connections, and canopy cover in the local area. The replanting of all 674 trees in open space areas in the Hills Shire LGA would ensure there is no net loss of trees in the LGA because of the SSD. The MOD 2 proposes that 600 of the 674 replacement trees be planted at the Western Sydney University (WSU), Richmond Campus, in the Hawkesbury Shire to mitigate the impact of SSD-10472 removing 337 existing trees from the TAFE site (located 2 Green Road, Castle Hill) to allow for the expansion of the Museum Discovery Centre.

EHG acknowledges the planting of koala browse trees at WSU Richmond Campus is an important initiative but considers the plantings required for this SSD and the plantings of koala browse trees at Richmond are two separate projects. EHG advised at the meeting that while EHG supports the Koala Strategy, EHG is providing advice on this SSD and there is little or no connection between the SSD and the proposed planting of replacement trees at the WSU Richmond Campus for use by Taronga Zoo as koala browse trees.

EHG advised at the meeting it is unclear how replanting 600 trees at the WSU Richmond campus site would be protected in perpetuity and noting that tree planting on council owned land offers that protection.

The Tree Replacement Strategy (TRS) noted the benefits of planting 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). In its submission on the MOD 2 proposal EES noted the revised Tree Replacement Implementation Plan (TRIP) made no mention of this. In response, the RtS states "upon further investigation this location proved to be problematic as there are multiple landowners along Caddies Creek, and it would be too complex and lengthy an exercise to negotiate approvals from all of the landowners".

Create NSW advised at the meeting that on further investigation the land along Caddies Creek and Cattai Creek was found to be not owned by Council and is owned by multiple stakeholders and that while Council may oversee the area, they do not own the land. As noted above, it is important the replacement trees are protected in perpetuity and EHG acknowledges that this protection cannot be guaranteed on private land.

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EES previously advised that none of the six council reserve sites had been selected for replanting in the revised TRIP and that no explanation has been provided on this. The RtS clarifies that two possible sites nominated in the Hills LGA were part of the original six sites that were identified. Create NSW advised at the meeting that Council wants the replacement planting sites to be reduced to two reserves and confirmed that the maximum number of trees that council wants to plant in the Hills Shire LGA is 74 trees. It is unclear why Council is not proposing to plant more than 74 trees in its LGA at the two nominated council reserves (Centenary of ANZAC Reserve and Arnold Avenue Reserve) or at other Council reserves in the LGA rather than the MOD 2 proposal planting 600 trees in the Hawkesbury LGA. DPE should be satisfied that the Hills Shire Council does not want to receive all the trees or more than 74.

Tree Species

EES noted 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 Reserve). EES recommended 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. The Create NSW response to DPE indicates the council's landscape architect has chosen endemic replacement tree species that are suited to the particular locations chosen, and also provide fodder for the Glossy Black Cockatoo but it does not confirm that a diversity of local provenance tree species are to be used. Given that these are council managed lands, and the trees are not required to offset biodiversity impacts, EES acknowledges council is best placed to determine the species selection.

Maintenance

In its submission on the MOD 2 proposal EES previously recommended a longer maintenance period than one month to assist with the survival of the plantings. EES suggested the plant maintenance regime incorporates regular maintenance as required including watering for a minimum of 12 months following. In response the RtS notes "the maintenance of the trees after one month will be undertaken by Council, as part of their regular maintenance program". It is unclear why the proponent is only maintaining the trees for one month and not maintaining the plantings for 12 months. However, this is a matter for council and proponent.

EES previously provided comments on the Planning Proposal for the land at 2 Green Road, Castlehill for the proposed expansion of the Museum of Applied Arts and Sciences. The Planning Proposal Report and Attachments A and B indicated the maintenance of replanted trees will be undertaken by the proponent in accordance with Council's required 6-month maintenance period. If the MOD 2 proposal is approved EGH recommends the proponent regularly maintains the plantings for at least 6-12 months and a condition of approval is included to this effect

EES recommended 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 consist of local provenance native plants. If the MOD 2 proposal is approved EGH recommends this is included as a condition of consent.

End of Submission