

Mike Williams
Landcom
PO Box 237
Parramatta NSW 2124

ECO LOGICAL AUSTRALIA PTY LTD

ABN 87 096 512 088

www.ecoaus.com.au

12SYDPLA-0009

25/6/2012

Dear Warwick,

Re: Review of landscaping plans of North Penrith Stage 2A

In 2010, Eco Logical Australia prepared a Flora and Fauna Assessment for Landcom in relation to the proposed rezoning and development of the North Penrith site. Concept plan approval was granted by the Minister for Planning for the North Penrith site on 9th November 2011.

Landcom is progressing with Stage 2A in accordance with the approved Concept Plan for North Penrith. Works forming part of Landcom's Stage 2A application included residential subdivision, earthworks, construction of roads, infrastructure and servicing; the creation of the Thornton Hall lot; creation of a superlot; and public domain works associated with Thornton Hall.

The purpose of this letter is to summarise the outcome of a review of plans and documents. This review has been conducted with regards to the proposed public domain works and road/infrastructure plans for Stage 2A for consistency with the 2010 Flora and Fauna Assessment (Eco Logical Australia 2010). In this regard the following documents were reviewed for consistency with 2010 Flora and Fauna Assessment:

- Arboreport 2010. *Landcom Thornton Park Tree Assessment*. Letter to National Project Consultants dated 7 October 2010.
- Arboreport 2011. *Landcom Thornton Park Tree Assessment, Supplementary*. Letter to National Project Consultants dated 5 September 2011.
- Brown Consulting 2012. *North Penrith - Stage 2A, X12016-PA, Road and Drainage Design for State Significant Development Application*. Prepared for Landcom by Brown Consulting (revision 3).
- Place Design 2012. *North Penrith Village - Stage 2A, State Significant Development Application, Thornton Park Landscape Concept*. Prepared for Landcom, April 2012.

Brief Summary of Flora and Fauna Assessment

The Eco Logical Australia (2010) report identified that the proposed North Penrith development would result in the removal of a small area of Cumberland Plain Woodland Critically Endangered Ecological Community (CEEC). The removal of vegetation was associated with:

- Landscaping in the OS2 Park (see Figure 1 for location). These works were to include "...landscaping will remove trees in the middle of this patch to create sightlines, together with installation of retaining walls and a path with steps. Other paths will also be installed elsewhere in the park, resulting in the

clearing of some trees and understorey / groundcover. Weeds will be removed and planting will occur" (p30 of Eco Logical Australia 2010)

- In the C3 area (see Figure 1 for location) some Cumberland Plain Woodland in the west and south of this area was to be removed as a result of the proposal, and some vegetation was to be protected via a section 88b instrument (Figure 2).

The Eco Logical Australia 2010 report also recommended that:

- *"Landcom will prepare a Plan of Management for the Cumberland Plain Woodland within OS2. This Plan will include a suggested planting palette."* (page 36 of Eco Logical Australia 2010). It is noted that a recommended planting palette for the Cumberland Plain Woodland was included in the Eco Logical Australia (2010) report.
- *"Landcom will create a Section 88B instrument within Block C3 to protect:*
 - *The Cumberland Plain Woodland identified for retention (Figure 12) (provided as Figure 2 in this letter); and*
 - *Indigenous archaeological values."*

Review of Landscape Concept Plan for Consistency

The Thornton Park Landscape Concept (Place Design 2012) is very similar to the plan included with the concept plan approval, and assessed in the Eco Logical Australia (2010) report. The Flora and Fauna Assessment Report identified that there would be the removal of trees and vegetation for the installation of walls, paths, and trees to create sightlines. The number of trees to be removed was not identified in Eco Logical Australia (2010). On review of Place Design (2012) it appears that a total of 9 trees for Cumberland Plain Woodland within the OS2 Park are proposed for removal, which is understood to be based on tree health assessments by Arboreport (2010, 2011), for installation of walls and paths, or to create sightlines. This is consistent with Eco Logical Australia (2010), which noted that *"The remnant trees of the CPW will mostly remain intact, subject to health and vigour assessments of a qualified Arborist"* (page 91, Eco Logical Australia 2010).

Eco Logical Australia (2010) identified a recommended planting palette for the Cumberland Plain Woodland area. A planting palette for both 'open space' and the 'Cumberland Plain Woodland Revegetation' is proposed in Place Design 2012. The 'open space' planting palette is specifically designed to "aid in the enforcement of a European styled village character" and thus is not consistent with the recommended Cumberland Plain Woodland planting palette. The 'Cumberland Plain Woodland Revegetation' planting palette includes many of the species recommended in the Flora and Fauna Assessment, though a number of cultivars are also included in the planting palette. The planting palettes are thus not fully consistent with the recommended planting palette provided in Eco Logical Australia 2010. However, although not completely consistent with the planting palette recommended in Eco Logical Australia (2010), the concept plan for Thornton Park, which was included in the Flora and Fauna Assessment report, identified proposed plantings including *"a mix of natives and some exotics such as Dietes"* (refer to page 34 of Eco Logical Australia 2010).

It is recommended that the cultivars proposed for the 'Cumberland Plain Woodland Revegetation' planting palette (Dianella 'Breeze', Lomandra 'Tanika', *Pennisetum alopecuroides* 'Nafray', and *Poa labillardieri* 'Eskdale') are switched to the 'open space' planting palette.

It is understood that a Plan of Management for the Cumberland Plain Woodland within Thornton Park will be prepared and submitted prior to issue of Construction Certificate.

Review of Outcomes in Zone C3 for Consistency

In Zone C3 the engineering plans identify "trees to be retained", but propose to *"Fill & re-grade depression to drain stage 1 system in accordance with Worley Parsons Stage 1CC Drawings Reference No: 301015-00NP-ST1-F11, Dated 27.10.10"* (Brown Consulting 2012). These plans include a notation that *"Maximum 0.15m fill around base of existing trees"*.

Whilst the placement of fill within the area identified as being Cumberland Plain Woodland would not strictly be consistent with creation of a Section 88B instrument within Block C3 to protect Cumberland Plain Woodland (Eco Logical Australia 2010), it is noted that the engineering plans are notated with a commitment to additional ecological assessment. It is recommended that the placement of fill not occur within Section 88B instrument areas for Cumberland Plain Woodland, subject to any engineering or overland flow issues the Department of Planning and Infrastructure may have in this part of the site.

It is understood that a Section 88B instrument within Block C3 to protect Cumberland Plain Woodland will be prepared and submitted prior to issue of Construction Certificate.

Overall Consistency with Concept Plan Flora and Fauna Assessment

The plans proposed with North Penrith Stage 2A are broadly comparable with the previous Flora and Fauna Assessment (Eco Logical Australia 2010).

To achieve consistency with the Flora and Fauna Assessment the following works would need to occur:

- Preparation of a Plan of Management for the Cumberland Plain Woodland within OS2 (Thornton Park);
- Cultivars proposed for the 'Cumberland Plain Woodland Revegetation' planting palette (Dianella 'Breeze', Lomandra 'Tanika', *Pennisetum alopecuroides* 'Nafray', and *Poa labillardieri* 'Eskdale') are to be switched to the 'open space' planting palette
- Prepare and submit prior to issue of Construction Certificate Section 88B instrument within Block C3 to protect the Cumberland Plain Woodland identified for retention (and indigenous archaeological values); and,
- The placement of fill not occur within Section 88B instrument areas for Cumberland Plain Woodland, subject to any engineering or overland flow issues Department of Planning and Infrastructure may have in this part of the site.

Regards,



Dr Steven Ward
Senior Environmental Planner

References

Arboreport 2010. *Landcom Thornton Park Tree Assessment*. Letter to National Project Consultants dated 7 October 2010.

Arboreport 2011. *Landcom Thornton Park Tree Assessment, Supplementary*. Letter to National Project Consultants dated 5 September 2011.

Brown Consulting 2012. *North Penrith - Stage 2A, X12016-PA, Road and Drainage Design for State Significant Development Application*. Prepared for Landcom by Brown Consulting.

Eco Logical Australia (2010). *North Penrith – Flora and Fauna Assessment*. Prepared for Landcom by Eco Logical Australia, Sutherland.

Place Design 2012. *North Penrith Village - Stage 2A, State Significant Development Application, Thornton Park Landscape Concept*. Prepared for Landcom, April 2012.

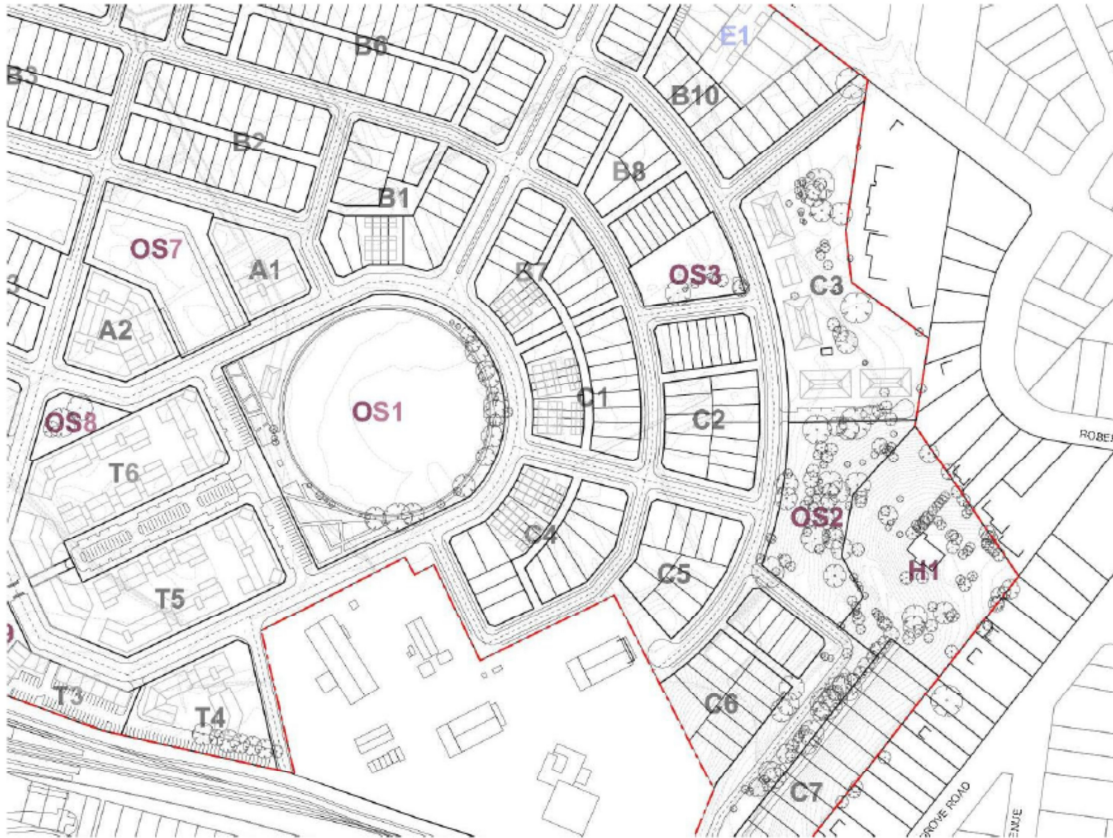


Figure 1. The Cumberland Plain Woodland remnants occur primarily in the areas marked as OS2 and C3 (included in Eco Logical Australia 2010 as Figure 10).



Figure 2. The shaded Cumberland Plain Woodland within the C3 to be protected by section 88b instrument (included in Eco Logical Australia 2010 as Figure 12).