

Our ref: DOC22/372465 & DOC22/372338

Your ref: SSD-36156297 & SSD-5248 –MOD 2

Mr Bruce Zhang  
Energy Resource Industry Assessments  
Department of Planning and Environment  
4 Parramatta Square  
12 Darcy Street  
PARRAMATTA NSW 2150

17 June 2022

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**Subject:** EHG comments on Environment Impact Assessment for DHL Warehouse and Distribution Centre, 813-913 Wallgrove Road Horsley Park (SSD-36156297) and Gazcorp Industrial Estate (SSD-5248-MOD 2)

Dear Mr Zhang

Thank you for the email of 10 May 2022 requesting comments on the Environmental Impact Statement (EIS) for this State significant development - SSD-36156297 and SSD-5248-MOD 2. EHG has reviewed the EIS 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](mailto:janne.grose@environment.nsw.gov.au).

Yours sincerely,

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

Susan Harrison  
Senior Team Leader Planning  
Greater Sydney Branch, Biodiversity and Conservation  
Environment and Heritage Group

**Subject:** EHG comments on Environment Impact Assessment for DHL Warehouse and Distribution Centre, 813-913 Wallgrove Road Horsley Park (SSD-36156297) and Gazcorp Industrial Estate (SSD-5248-MOD 2)

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

- Environmental Impact Statement (EIS) – 31 March 2022
- Appendix C1 – Landscape Design letter – 25 March 2022
- Appendix C2 – Landscape Plans
- Appendix J – Stormwater Management Report – DHL Horsley Park (document prepared by Orion Consulting Engineers Pty Ltd for DHL – February 2022 – Revision A)
- Appendix U – Flood Impact Assessment Addendum (document prepared by BMT for DHL – 1 April 2022)

and provides the following comments.

EHG notes the same EIS has been submitted for both SSD-36156297 and SSD-5248-MOD 2 on behalf of the applicant (DHL Supply Chain (Australia) Pty Limited) for SSD-36156297 and the applicant (Gazcorp Pty Ltd) for the SSD-5248-MOD 2 modification application. The EIS relates to both SSD-36156297 as well as the Mod 2 Application of an existing concept approval.

#### **Stormwater Management**

EHG notes the same documents (Appendix J and Appendix U) have been submitted as part of the EIS for both SSD-36156297 and the SSD-5248-MOD 2 application to address flooding condition assessment and stormwater management. The following EHG advice is applicable to both SSD-36156297 and SSD-5248 - Mod 2 application.

Appendix U of the EIS indicates that the impervious area at the development site would increase in Modification 2 from Modification 1 and this would be addressed by revising the stormwater management and limiting the runoff under the pre-development level with on-site detention storage.

Appendix J (Section 2 of Stormwater Management – Adopted Information) does not indicate whether the proposed changes in Modification 2 have been accounted for in the drainage network design including the on-site detention storage.

The proponent should update the stormwater management report by revising the previously designed drainage network and on-site detention storage to demonstrate that the runoff from the entire development site would be maintained at the pre-development level.

These issues relate to stormwater management for the entire development site. EHG provides a nil response regarding flooding for SSD-36156297 and SSD-5248-MOD 2.

#### **Biodiversity**

The SEARs for SSD-36156297 require the EIS to assess any biodiversity impacts associated with the development in accordance with the Biodiversity Conservation Act 2016 (BC Act) and the Biodiversity Assessment Method (BAM) 2020, including the preparation of a Biodiversity Development Assessment Report (BDAR), unless a waiver is granted, or the site is on biodiversity certified land. EHG notes that neither a BDAR, nor a waiver request has been submitted for SSD-36156297.

## Department of Planning and Environment

The EIS notes the proposed DHL warehouse and distribution centre will not have any significant likelihood of causing an impact on biodiversity values, and as such DHL has requested that the need for a BDAR to support the SSD be waived. However, BDAR waivers do not apply to modification applications. Under section 7.17 of the BC Act, a further BDAR is not required to be submitted if the authority or person determining the application for modification, is satisfied that the modification will not increase the impact on biodiversity values.

### Condition C76

Condition C76 in the Development Consent for SSD-5248 states:

C76 Should any of the credits required by Condition C74 not be available for purchase, the Applicant must:

- (a) Place an expression of interest for the purchase of those credits
- (b) Liaise with Heritage Division of the Department of Premier and Cabinet (former OEH) and Councils to obtain a list of potential sites that meet the requirements for offsetting; and
- (c) Consider properties for sale in the required area; or
- (d) Provide evidence of why offset sites are not feasible and propose an alternative in an offset strategy to be approved by the Planning Secretary.

*Note: If the Applicant seeks a variation to the offset rules, the Applicant must demonstrate that reasonable steps have been taken to find like-for-like offsets in accordance with Section 10.5.4.2 of the FBA and Appendix A of the (former) OEH's NSW Biodiversity Offsets Policy for Major Projects 2014*

Condition C76 allowed for the preparation and implementation of an alternative offset strategy if credits are not available for purchase and offset sites are not feasible. EHG notes the SEARs were issued prior to the commencement of the BC Act and therefore condition does not refer to current requirements under the BC Act.

This MOD 2 proposal provides an opportunity to amend the Condition C76, and EHG recommends subsection (d) is amended to state that if credits are not available for purchase then the proponent is to pay into the Biodiversity Conservation Fund, for example:

**C76** The requirement to retire credits in Condition C74 above may be satisfied by payment to the Biodiversity Conservation Fund of an amount equivalent to the number and classes of credits, as calculated by the EHG's Biodiversity Offsets Payment Calculator and following an assessment of reasonable equivalence.

Evidence of the retirement of credits or payment to the Biodiversity Conservation Fund must be submitted to the Planning Secretary prior to carrying out development that will impact on biodiversity values

If it is not possible to amend Condition C76, EHG notes Condition C76 in the consent requires that any alternative offset strategy is to be approved by the Planning Secretary, so if an alternative offset strategy is prepared and EHG receives a copy of it for review, EHG will require that the strategy must be in accordance with the BAM/BC Act.

### Vegetation and Riparian Management Plan

The EIS indicates that once the applicant takes possession of the site for the purposes of constructing the proposed DHL warehouse and distribution centre, it will contain no vegetation, and no natural topographical features or watercourses, and therefore will not contain any biodiversity or ecological values (see page 8 of EIS).

## Department of Planning and Environment

The EIS notes the Cumberland Ecology Ecological Impact Assessment recommended avoidance and mitigation measures, including the retention, protection, and rehabilitation of the riparian corridor along Reedy Creek on the western boundary of the industrial estate (see Section 7.20.8 of EIS).

The EIS includes the following Mitigation Measure for biodiversity (see Table 16 in Section 8):

- *To the extent that it contains relevant avoidance and management measures the Vegetation and Riparian Management Plan required under Conditions C77 and C78 of SSD-5248 will be applied during the DHL warehouse and distribution centre construction works*

The EIS states Conditions C77 and C78 require the preparation and implementation of a Vegetation and Riparian Management Plan (VRMP) in relation to the Stage 1 clearing and bulk earthworks (Section 7.10.8). The EIS indicates this VRMP is to be prepared by Gazcorp in relation to the estate-wide bulk earthworks and it will also be applied during the DHL warehouse and distribution centre construction works, to ensure no indirect biodiversity impacts occur during the works (see Section 9.2). It appears the VRMP has not yet been prepared by Gazcorp so it is unclear how the avoidance and management measures will be applied.

Details are required on when the VRMP is proposed to be prepared and how it will apply to the DHL warehouse site. Condition C77 requires that prior to the commencement of construction, the Applicant must prepare the VRMP. DPE needs to ensure the VRMP is prepared, so that it can be implemented for the SSD proposals. The RtS should provide details on this.

EHG considers the SSD-5248-MOD 2 proposal provides an opportunity to amend, improve and strengthen the environmental outcomes of the existing condition C77. EHG recommends condition C77 is amended to include the following:

***The VRMP must be prepared by an appropriately qualified and experienced ecologist or bush regenerator and implemented as part of the SSD for the protection, maintenance, management and improvement in perpetuity of existing and planted native vegetation and fauna habitats on the site.***

***The VRMP must include, but not be limited to, the following:***  
***Establishment Phase:***

- i. ***A scaled plan showing the location of:***
  - ***Reedy Creek on the site***
  - ***the top of the highest bank***
  - ***the riparian corridor width (measured from the top of the highest bank)***
  - ***any existing vegetation along the creek to be removed and retained***
  - ***the site boundary***
  - ***APZ requirements***
- ii. ***A list of any plant species to be removed and details on whether the plants are exotic, non-local native species or local natives.***
- iii. ***Details of the project timelines for any vegetation clearing and vegetation reinstatement.***
- iv. ***Details on the native vegetation communities and plant species that currently occur on the site.***
- v. ***A diversity of local provenance species (trees, shrubs and groundcovers) must be used from the relevant native vegetation communities that occur, or once occurred on the site***
- vi. ***Details of revegetation works, including a list of local native provenance species to be utilised.***

- vii. *Procedures to demonstrate how plants and seed of local provenance are to be obtained and used – the plant species should be from the relevant native plant communities that occur in this area.*
- viii. *Details on the number of plants to be planted, planting densities and species mix for replanting and demonstrate this is representative of the vegetation communities in its natural state/unmodified condition in this locality.*
- ix. *Specific ecological fire management, mulch, soil and stormwater management measures.*
- x. *A scaled plan showing clearly defined vegetation protection areas.*
- xi. *Vegetation and tree protection measures to be employed in vegetation protection areas*
- xii. *Any APZ requirements must be located entirely outside the riparian corridor.*

**Maintenance Phase:**

- i. *Details on specific timeframes, performance monitoring (including the timing, number and frequency of visits); maintenance post completion of primary restoration works (including details on what the maintenance will entail, the duration, frequency and number of visits) and ongoing maintenance in perpetuity, performance measures, expected outcomes and responses.*
- ii. *Details on plant loss replacement – any plant loss should be replaced by the same plant species.*
- iii. *Specific management responsibilities.*
- iv. *Other necessary habitat management or improvement measures.*

EHG also considers the MOD 2 proposal provides an opportunity to improve environmental outcomes across the Gazcorp Estate site, including the DHL site, and recommends the following are included as conditions of consent.

**Seed collection from local native plants to be removed**

For any local native vegetation (including trees) that is approved for removal, EHG recommends seed is collected prior to its removal of any local native vegetation and the following condition of consent is included:

- *Prior to the removal of any local native vegetation from the Gazcorp Industrial Estate site (including the DHL site) seed from native vegetation (trees, shrubs and groundcover) that has been approved for removal is collected and it is propagated by a suitably qualified bush regenerator and used in the site plantings including along the Reedy Creek riparian corridor and landscape areas on the Gazcorp Industrial Estate (including the DHL site).*

**Pre-clearance fauna surveys and Relocation of native fauna**

The EIS for SSD-5248 includes as a Flora and Fauna Mitigation Measure:

- Where clearing of vegetation and fauna habitats will take place, pre-clearing and clearing protocols are recommended that include:
  - Preparation of an inventory of trees and hollows to be removed, prior to clearing;
  - Pre-clearance checks of hollow-bearing trees for the presence of bird nests and arboreal mammals, such as possums, gliders and bats, prior to felling;
  - Safe removal of animals found to be occupying trees prior to the clearing of trees and their appropriate relocation into nearby woodlands; and
  - Relocation of transportable features such as salvaged tree hollows, felled timber and large logs in the woodland areas to be retained to allow their continued use as fauna habitat.



## Department of Planning and Environment

The EIS for SSD-36156297 and SSD-5348-Mod 2 indicates native vegetation is to be cleared from the site, but it makes no reference to pre-clearance surveys being undertaken. To ensure this occurs, and ensure consistency with the original SSD-5248 mitigation measures, EHG recommends the following condition is included in the consent to engage a suitably qualified and experienced ecologist to undertake pre-clearance surveys:

***Prior to removing any vegetation or other habitat that has been approved for removal from the Gazcorp Industrial Estate site (including the DHL site), the applicant must engage a qualified and experienced ecologist to:***

- ***undertake a pre-clearing survey to delineate, map, and mark habitat-bearing trees and shrubs to be retained/removed and other fauna habitat features and determine the presence of any resident native fauna using nests, dreys, hollows etc***
- ***native fauna found during pre-clearing surveys including in tree hollows must be captured and relocated to appropriate nearby habitat.***
- ***Cover the tree hollows once checked for native fauna to ensure the hollows are not reoccupied prior to removal of the trees***
- ***supervise the clearance of trees and shrubs (native and exotic) and other habitat to capture, treat and/or relocate any displaced native fauna to an appropriate nearby location***
- ***remove sections of a tree containing a hollow or habitat prior to clearing and felling the tree and reuse as habitat on the site.***

***The clearing of trees and shrubs should be avoided in late winter/spring during breeding/nesting period for birds***

***Evidence of the pre-clearing surveys and inspections for fauna and any relocation of fauna must be provided to the satisfaction of the Secretary of Planning***

### Replacement nest boxes

As noted above, the EIS for SSD-5248 includes as a Flora and Fauna Mitigation Measure:

- Where clearing of vegetation and fauna habitats will take place, pre-clearing and clearing protocols are recommended that include:
  - Preparation of an inventory of trees and hollows to be removed, prior to clearing;
  - Pre-clearance checks of hollow-bearing trees for the presence of bird nests and arboreal mammals, such as possums, gliders and bats, prior to felling;
  - Safe removal of animals found to be occupying trees prior to the clearing of trees and their appropriate relocation into nearby woodlands; and
  - Relocation of transportable features such as salvaged tree hollows, felled timber and large logs in the woodland areas to be retained to allow their continued use as fauna habitat.

Where existing tree hollows can't be salvaged and relocated for use as fauna habitat, it is recommended replacement habitat/ installation of nest boxes / bat boxes are provided and affixed to suitable retained trees along the Reedy Creek riparian corridor and the following condition of consent is included:

- ***Where tree hollows are to be removed, and/or hollow dependent native fauna are found using existing hollows compensatory tree hollows should be provided prior to removing the tree hollows and prior to the release of the hollow dependent fauna unless the removed tree hollows can be relocated and installed on the same day they are removed.***
- ***The applicant should:***
  - ***provide details on the size, type, number, and location of nest boxes required – this would be based on the results of the pre-clearing survey***

## Department of Planning and Environment

- *install replacement nest boxes in trees being retained*
- *install replacement nest boxes prior to any vegetation removal (preferably one month prior), to provide alternate habitat for hollow-dependent fauna displaced during clearing*
- *salvage and relocate the tree hollows approved for removal to appropriate locations on the same day the tree hollows are removed and prior to the release of any native fauna found using the tree hollows*
- *install other habitat features such as logs on the ground.*

### Translocation of juvenile native plants

The EIS indicates native species present on the GIE site comprise several regenerating patches spread across the estate site that consists of open forest and woodland at various stages of canopy regeneration (Section 3.3, page 20). EHG notes Nearmap still shows native vegetation currently occurs on the site.

EHG recommends prior to clearing juvenile local native plants that are in areas approved for removal are relocated and replanted along the Reedy Creek riparian corridor and the landscape areas on the Gazcorp Industrial Estate (including the DHL site). The juvenile plants must be translocated prior to any earthworks and clearing of native vegetation commencing and a condition of consent is included to this effect:

- ***Juvenile remnant native vegetation that is to be removed from the site, shall be relocated by a suitably qualified bush regenerator to the Reedy Creek riparian corridor on the site and landscape areas of the Gazcorp Industrial Estate including the DHL site. The plants should be relocated when plant growth conditions are ideal to give the native plants the best possible opportunity to survive and should be maintained until established***

### Reuse of removed trees and hollows

The EIS for SSD-5248 includes as a Flora and Fauna Mitigation Measure:

- Where clearing of vegetation and fauna habitats will take place, pre-clearing and clearing protocols are recommended that include:
  - Relocation of transportable features such as salvaged tree hollows, felled timber and large logs in the woodland areas to be retained to allow their continued use as fauna habitat.

The EIS for SSD-36156297 and SSD-5348-Mod 2 indicates native vegetation is to be cleared from the DHL site, but it makes no reference to relocating salvaged tree hollows, felled timber and logs. EHG recommends a condition of consent is included to ensure consistency with the original SSD-5248 mitigation measure and the project salvages and reuses any native trees that are approved for removal including hollows and tree trunks (greater than approximately 25-30cm in diameter and 2-3m in length) and root balls and these are placed along the Reedy Creek riparian corridor on the site and the landscape areas of the Gazcorp Industrial Estate that are to be replanted with local native species to enhance habitat.

If the Gazcorp Industrial Estate site is not able to reuse all removed native trees, it is recommended a condition of consent is included that the proponent consults with the local community restoration/rehabilitation groups, Landcare groups, and relevant public authorities including local councils, and Greater Sydney Local Land Services prior to any clearing commencing to determine if the removed trees can be re-used by others in habitat enhancement and rehabilitation work. This detail including consultation with the community groups and their responses should be documented

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It is recommended the following condition of consent is included:

***The Proponent must where it is practicable reuse any of the native trees that are to be removed as part of this project, including tree hollows, tree trunks (greater than 25-30 centimetres in diameter and 2-3 metres in length), root balls and logs on the ground to enhance habitat:***

- ***Any hollow sections of wood removed should be salvaged and re-located to appropriate locations to provide natural nest boxes prior to the release of any native fauna found using the tree hollows.***
- ***If removed native trees are not able to be entirely re-used by the project, the proponent should consult with local community restoration/rehabilitation groups, Landcare groups, and relevant public authorities, local councils, and Greater Sydney Local Land Services prior to removing any native trees to determine if the removed trees can be reused in habitat enhancement and rehabilitation work. This detail including consultation with the community groups and their responses must be documented.***

### Reuse of topsoil

The EIS for SSD-5248 includes in the Flora and Fauna Mitigation Measures:

- Topsoils being stored for reapplication should be stabilised using a blanket type Method.
- Any topsoil that is reapplied will be stabilised by seeding using a grass species native to the Cumberland Plain.

The EIS for SSD-36156297 and SSD-5348-Mod 2 indicates the Gazcorp Industrial Estate site will be subject of estate wide bulk earthworks altering the topography across the estate, but it makes no reference to removing, storing, and reusing topsoil from areas of native vegetation that are to be cleared. To ensure topsoil is removed, stored, and reused EHG recommends the project includes the following condition of consent:

- the topsoil from areas of native vegetation that are to be cleared for the development shall be collected, stored and reused in the Reedy Creek riparian corridor on the site and landscape areas of the Gazcorp Industrial Estate including the DHL site.

### Site landscaping and use of native provenance species

The EIS for this SSD-36156297 and SSD-5248 MOD 2 indicates a range of native species are proposed across the site and it refers to the large area of buffer planting made up of Cumberland Plain Woodland (CPW) species can provide a transition and connection zones for local ecosystems and habitats. Corridors and steppingstones of native landscaping and vegetation will further support urban ecology, ecosystems and habitat. It also refers to the CPW planting throughout the 10m landscaped setback along the northern boundary of the site will also contribute to improved greening along the edge of the future Southern Link Road (section 7.2.3, pages 54 -55 of EIS).

EHG recommends any planting/ landscaping, rehabilitation, street planting associated with the Gazcorp Industrial Estate (including the DHL site) uses a diversity of local provenance native trees, shrubs and groundcover species from the relevant native vegetation community (or communities) that occur or once occurred on the site/ local area rather than use exotic species or non-local native species. The landscape plans and planting schedules for the site should be prepared by a qualified bush regenerator. The planting schedule/planting mix in the Landscape Plans should demonstrate that the plant species are from the local native vegetation community that once occurred on the site and are of local provenance.

The street setbacks should ensure that adequate space is available to accommodate any proposed footpaths plus allow for street trees to grow to maturity.



## Department of Planning and Environment

### Opportunities to retain trees on the DHL site

The SEARs issued for SSD-36156297 on 11 February 2022 require a detailed site-wide landscape plan to be prepared which:

- *identifies the number and location of the trees to be removed and retained and how opportunities to retain significant trees have been explored and/or informs the plan.*
  - EHG notes Table 7 in the EIS indicates this key issue is addressed in Section 3.10.4 of the EIS and Appendix C, however neither of these addresses how opportunities to retain existing trees on the DHL site have been explored, nor are details provided on the number and location of trees to be removed
- *details the proposed site planting, including location, number and species of plantings, height of trees at maturity and proposed canopy coverage.*
- *demonstrates how the proposed development would contribute to long term landscape setting in respect of the site and streetscape, mitigate the urban heat island effect ..., contribute to the objective of increased urban tree canopy cover, maximise opportunities for green infrastructure, consistent with Greener Places*
  - Table 7 in the EIS indicates this key issue is addressed in Section 7.2.3 of the EIS and Appendix C. While Section 7.2.3 states “car park shade trees will also supply shade and reduce the heat island effect”, EHG notes carpark shade trees do not appear to be shown in Figures 11 and 19 of the EIS. EHG notes however that tree canopy cover is shown in the carpark in the Tree Canopy Plan in Appendix C2.

The applicant needs to address the SEARs. There appears to be inconsistency between the EIS and the SEARs for SSD-36156297 which requires identification of ‘*how opportunities to retain significant trees have been explored*’. The EIS states:

- “clearing of the entire Gazcorp Industrial Estate has already been approved under SSD 5248 and Conditions C74 and C75 of the development consent for SSD 5248 already specify the biodiversity offsets required to be secured in order to facilitate the clearing of on-site vegetation for the entire Gazcorp Industrial Estate” (section 7.9 of EIS)
- “once DHL takes possession of the site for the purposes of constructing the proposed DHL warehouse and distribution centre, it will contain no vegetation, and no natural topographical features or watercourses, and therefore will not contain any biodiversity values” (section 7.9 of EIS).

The SEARs for SSD-36156297 indicates the landscape plan should not only be identifying trees to be removed but trees to be retained. According to the EIS, the SSD is not proposing to retain any existing native vegetation on the DHL site. It is noted that as part of the estate-wide bulk earthworks program approved under SSD 5248, the DHL site will be subject of clearing, as well as bulk earthworks comprising filling by up to 10m of fill (see Section 7.9 of EIS, page 66). The inconsistency between the SEARs and the EIS need to be addressed and details provided as to whether it is possible to retain any remnant native trees/vegetation on the DHL site.

Section 3.10.4 of the EIS notes the 20 m setback from the northern boundary will include a 10m wide section that will be landscaped using a Cumberland Plain Woodland Buffer Planting Matrix and that the southern boundary with a frontage to the proposed internal estate road will have 3m landscaped frontage. It indicates in total 472 trees are proposed to be planted on the DHL site (page 27) but according to Appendix C2 only 158 trees are proposed to be planted. The RtS for SSD-

## Department of Planning and Environment

36156297 needs clarify the total number of trees that are proposed to be planted on the DHL site in accordance with the SEARs.

Appendix C2 indicates a number of the trees, shrubs and groundcovers proposed to be planted on the DHL site are not CPW species. EHG recommends the plant schedule is amended and all planting on the site (including the setbacks from the boundaries and any tree planting) consists of a diversity of native species of local provenance from the CPW (Shale Hills Woodland and Shale Plains Woodland) vegetation community that occurs on the site and a condition of consent is included to this effect (see below).

### *Maximise areas of tree canopy*

Condition C94(f) in the Development Consent for SSD-5248 requires that the Landscape Management Plan for the development must:

- (f) where practicable and feasible provide for landscaping within car parking areas and along access roads that supports tree species which, with appropriate spacing and when mature, will maximise areas of tree canopy.

Figures 11 and 19 in the EIS do not appear to show that areas of tree canopy are to be maximised on the DHL site. Key Issue 7 (Trees and Landscaping) in the SEARs for SSD-36156297 as noted above requires the SSD to demonstrate how the proposed development would mitigate the urban heat island effect and contribute to the objective of increased urban tree canopy cover. The RtS needs to provide details on the number of existing trees on the site that are to be removed (as required by the SEARs) and the number of trees proposed to be planted at the DHL site. This needs to be clarified as there is inconsistency between Section 3.10.4 of the EIS which indicates 472 trees are to be planted and Appendix C2 which indicates 158 trees are to be planted on the DHL site.

EHG recommends the following conditions of consent are included:

- ***Any planting/ landscaping, rehabilitation associated with the Gazcorp Industrial Estate (including the DHL site) will use a diversity of local provenance native trees, shrubs and groundcover species from the relevant native vegetation community (or communities) that occur or once occurred on the site (rather than use exotic species or non-local native species)***
- ***Tree planting shall use advanced and established local native trees 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***
- ***Enough area/space is provided to allow the trees to grow to maturity.***
- ***A Landscape Plan is to be prepared and implemented by an appropriately qualified bush regenerator and include details on:***
  - a. the native vegetation community (or communities) that occur or once occurred on the site and the plan demonstrates that the proposed plant species are from the relevant vegetation community***
  - b. seed collection – the location of all native seed sources should be identified***
  - c. the type, species, size, quantity, and location of replacement trees***
  - d. the species, quantity and location of shrubs and groundcover plantings***
  - e. the local provenance tree, shrub and groundcover species to be used***
  - f. the quantity and location of plantings***
  - g. the pot size of the trees to be planted***
  - h. the area/space required to allow the planted trees to grow to maturity***

- i. plant maintenance regime. The planted vegetation must 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.*

End of Submission