

Our ref: DA-384/2019
Your Ref: SSD-10352

18 Januray 2021

Planning and Assessment
NSW Department of Planning, Industry and Environment
GPO 39
SYDNEY NSW 2001

Attention: Director – Social and Infrastructure Assessments
C/- Mr Brent Devine
By email: brent.devine@planning.nsw.gov.au

Dear Director - Social and Infrastructure Assessments,

**WAVERLEY COUNCIL SUBMISSION TO APPLICANT'S SUPPLEMENTARY RESPONSE TO SUBMISSIONS
State Significant Development Application (SSD-10352) for Moriah College Redevelopment
Queens Park Road, Queens Park
(Waverley Council Ref.: DA-384/2019)**

Thank you for giving Waverley Council ("Council") the opportunity to respond to the applicant's Supplementary Response to Submissions ("SRtS") documentation for the State Significant Development ("SSD") Application, known as SSD-10352, for the proposed staged redevelopment of the Moriah College Campus in Queens Park.

This response identifies how well all issues raised in the applicant's SRtS to Council's submission made on 24 July 2020, responding to amendments made and additional information provided by the applicant in their Response to Submissions ("RtS") documentation, have been addressed. Please refer to commentary provided in the table in this submission.

Issue raised by Council and Council's Response to RtS	Applicant's Supplementary Response	Has the Issue been Addressed?
1. Traffic and Transport		
<p><i>a. Increase of drop off and pick up (DOPU) activities is the principal point of objection.</i></p> <p>Greater details are required on how the modal shift targets outlined in the Green Travel Plan will be measured and implemented to support growth in student and staff capacity.</p>	<ul style="list-style-type: none"> The Green Travel Plan be monitored on a regular basis through travel surveys, staff meetings, parent consultations, etc. 	Addressed.

Issue raised by Council and Council's Response to RtS	Applicant's Supplementary Response	Has the Issue been Addressed?
	<ul style="list-style-type: none"> A Travel Plan Coordinator should be appointed to oversee measures and resultant impacts of the GTP. 	
<p><i>b. A proactive approach to encouraging greater public transport patronage and green travel modes.</i></p> <p>Additional bicycle parking supported. A condition of consent is recommended to ensure these spaces are demarcated on the architectural plans.</p>	Accepts recommended condition.	Addressed.
<p><i>c. Growth of school population not supported if there will be additional impact on traffic and parking demands on the surrounding road network.</i></p> <p><i>d. Population increase should be staggered and be gradual.</i></p> <p>Therefore, a condition of consent is recommended to stagger the increase of school population up to the year 2036 and subject to satisfactory implementation of the Green Travel Plan.</p>	Accepts recommended condition in-principle, subject to it being suitable and agreed to prior to determination of the SSD.	The wording of this condition is outlined in condition 54 in the Council-written set of conditions of consent provided in Attachment A of Council's previous correspondence dated 24 July 2020.
<p><i>e. A revised questionnaire/study on travel trends is recommended to achieve a</i></p>	Noted.	Addressed.

Issue raised by Council and Council's Response to RtS	Applicant's Supplementary Response	Has the Issue been Addressed?
<p><i>minimum response rate of 80%.</i></p> <p>A response rate of 62% is deemed satisfactory.</p>		
<p><i>f. A dedicated Green Travel Plan required.</i></p> <p>Addressed.</p>	Noted.	Addressed.
<p><i>g. Bicycle parking should be more than minimum rate.</i></p> <p>A condition of consent is recommended to ensure these spaces are demarcated on the architectural plans and designed to be secured and to relevant Australian Standards.</p>	Noted.	Addressed.
<p><i>h. Ample locker or storage areas within the new STEAM building to reduce DOPU for secondary students.</i></p> <p>Addressed.</p>	Noted.	Addressed.
<p><i>i. Increase AM bus travel mode share in consultation with Council and STA.</i></p> <p>Mayor of Waverley convening this consultation. The submission is from Council's staff and is independent of Councillors.</p>	Noted.	Ongoing.
<p><i>j. Increased shuttle bus services between Bondi Junction and the College.</i></p> <p>Somewhat addressed. Lack of details about scheduling and provision (number and capacity per day) provided in</p>	<ul style="list-style-type: none"> Scheduling of additional shuttle bus service will be explored at the appropriate time as part of implementation 	Addressed.

Issue raised by Council and Council's Response to RtS	Applicant's Supplementary Response	Has the Issue been Addressed?
the Green Travel Plan, other than a 'time scale' in the year 2023/2024.	<p>of measures from the Green Travel Plan.</p> <ul style="list-style-type: none"> Existing shuttle bus services have spare capacity, which can accommodate additional demand. 	
<p>k. <i>Road and intersection upgrades supported with recommended changes.</i></p> <p>Addressed.</p>	Noted.	Addressed.
<p>l. <i>Local Area Traffic Management (LATM) measures to be encouraged for residential streets of Queens Park.</i></p> <p>Council has met with residents of Queens Park to consider LATM for future implementation.</p>	Noted.	Ongoing.
<p>m. <i>Pedestrian traffic conflict as result of new slip lane at the York Road and Baronga Avenue intersection.</i></p> <p>Addressed.</p>	Noted.	Addressed.
2. Built Form and Urban Design		
<p>a. <i>Visual and overshadowing impacts of the STEAM building upon Queens Park and Centennial Park</i></p> <p>The lessening of the overshadowing impact of the Eastern Suburbs Banksia Scrub is welcome. Council's Heritage</p>	<ul style="list-style-type: none"> The proposal will create a new built element on the skyline in views from Queens Park, however, will be screened to differing 	<p>Partially addressed.</p> <ul style="list-style-type: none"> The building height of the new buildings can be accepted if it meets statutory requirements under relevant environmental planning instruments. The applicant claims that the street/boundary wall is to be of face-brick construction, however, the

Issue raised by Council and Council's Response to RtS	Applicant's Supplementary Response	Has the Issue been Addressed?
<p>Advisor is still not satisfied, from a visual impact and curtilage perspective, that the overall building height of the series of new buildings extends above the established tree canopy within the Queens Park and Centennial Park surrounds.</p> <p>Further, the new street/boundary walls to the site present as solid 4 to 5m high walls which dominant the presentation of the site to the streetscape. Council's preference is for lower street walls that incorporate landscaping into the design (particularly where greater security is desired), to reduce the dominance and soften the visual presentation to the streetscape. Note: The elevation plans submitted provide limited detail on boundary fencing.</p>	<p>degrees by vegetation.</p> <ul style="list-style-type: none"> The height of the street/boundary wall is dictated by strict security requirements, which have been carefully designed and integrated in the form of the wall. 	<p>eastern elevation drawing (Drawing No. DA-3001 Revision B) depicting this wall shows that only a small section will be face-brick (that is north of the series of entry gates from Baronga Avenue) while a large remaining portion will be of a "coloured concrete" finish. The southern elevation drawing (Drawing No. DA-3002 Revision B) shows the majority of the boundary/street wall comprising a "coloured concrete" finish. A consistent face brick finish should be utilised across the whole profile of the street/boundary walls that present to York Road and Baronga Avenue.</p>
<p><i>b. Built form and urban design change recommendations relating to:</i></p> <ul style="list-style-type: none"> <i>i. Greater street setback of top level</i> <i>ii. Greater articulation across street façade of the buildings</i> <i>iii. High sound absorption materials</i> <i>iv. Security wall integrated into existing landscaped retaining wall</i> 	<ul style="list-style-type: none"> A 3-10m wide landscaped buffer is to be reinstated along the western boundary of the site adjacent to the Eastern Suburbs Banksia Scrub. The security measures are carefully designed and 	<p>Addressed.</p>

Issue raised by Council and Council's Response to RtS	Applicant's Supplementary Response	Has the Issue been Addressed?
Council's Heritage Advisor is concerned with the predominance of hard surfaces, metal fencing, security lighting and CCTV cameras. These elements need to be substantially mitigated by detailed tree and screen planting cohesive with the established planting of the visually related Centennial Parklands, including the Eastern Suburbs Banksia Scrub to the west.	integrated into the built form.	
3. Heritage		
<p><i>i. Reorientate the Stage 1/STEAM building to an east-west alignment.</i></p> <p>Council's Heritage Advisor has suggested that the building identified as 'Stage 1b' could be readily rotated 90 degrees to extend west from Stage 1b and erected partially over existing vehicle hardstands and the through pedestrian way leading to the central campus area. This approach should still be explored.</p>	Urban design options were explored during the design development of the STEAM building. The NSW Government Architect reviewed the design of the STEAM building and did not raise any concern with the orientation of the building.	Noted.
<p><i>ii. Reduce the apparent bulk of Stage 1 building.</i></p> <p>Addressed as a greater front setback of the top fourth floor level provided to the Stage 1/STEAM building. Further landscaping provided.</p>	Noted.	Addressed.
4. Operational and Event Management		
<p><i>a. Map of Campus included in Plan of Management (PoM).</i></p>	Noted.	Addressed.

Issue raised by Council and Council's Response to RtS	Applicant's Supplementary Response	Has the Issue been Addressed?
Addressed.		
<i>b. Moriah College Consultative Committee (MCCC) not necessarily always involve Council.</i>	Noted.	Addressed.
Addressed.		
<i>c. Certain 'out of core' activities not normally ancillary to school use and/or its time/duration extend past 10pm.</i> Council has not and will not endorse activities No. 53 'Year K-2 Sausage Sizzle and Movie Night', No 63 'Moriah College Community Celebrations', and No 86 'Jewish Community /Organisation Events' as 'ancillary' activities and these should not be approved in the PoM	The applicant maintains that these events are ancillary and appropriate with management measures in place to ensure impacts on neighbouring residents are minimised.	Council maintains that these events are not appropriate as they are not deemed ancillary to the principal 'educational establishment' land use of the site. These events should not be approved in the PoM.
<i>d. Maximum capacity of the Early Learning Centre (ELC) restricted to 80 students (as enforced by development consent DA-163/2017).</i> A condition of consent is recommended regarding overall student population growth, including a breakdown of various aspects of the College.	Accepts recommended condition in-principle, subject to it being suitable and agreed to prior to determination of the SSD.	The wording of this condition is outlined in condition 54 in the Council-written set of conditions of consent provided in Attachment A of Council's previous correspondence dated 24 July 2020.
5. Tree Management and Biodiversity Impacts		
<i>a. A condition be adopted to ensure trees to be retained are adequately protected.</i>	Noted.	Addressed.
<i>b. An updated Vegetation Management Plan (VMP) required to effectively manage the Eastern</i>	<ul style="list-style-type: none"> Amended landscape plan identify 100% locally native 	Council's Biodiversity Officer has reviewed both the amended landscape plan and Vegetation Management Plan (VMP) and deems both inadequate. Please refer to

Issue raised by Council and Council's Response to RtS	Applicant's Supplementary Response	Has the Issue been Addressed?
<p><i>Suburbs Banksia Scrub. The landscape plan is also inadequate.</i></p> <p>Conditions of consent are recommended to ensure the landscape plan provides for at least 90% native plants. A further condition is required to amend the content of VMP to be more robust.</p>	<p>species within the 3-10m wide landscaped buffer zone adjustment to the Eastern Suburbs Banksia Scrub (ESBS).</p> <ul style="list-style-type: none"> An Amended Vegetation Management Plan has been provided. 	<p>Attachment A of this submission that outlines the detailed reasons why these documents are deemed inadequate.</p> <p>In short, the landscape plan should have 90% of <i>all</i> new plantings across the Campus to be selected from Council's preferred species list in Annexure B2-1 of Waverley Development Control Plan 2012, not just for the landscape buffer adjacent to the ESBS.</p> <p>These matters can be addressed by conditions of consent as outlined in conditions 18 and 19 in the Council-written set of conditions of consent provided in Attachment A of Council's previous correspondence dated 24 July 2020. However, there are some discrepancies and inconsistencies in the wording of condition 18 in the recommended set of conditions dated 24 July 2020. Condition 18 has been reworded and revised and is provided in full in Attachment B of this submission.</p>
6. Land Contamination		
<p><i>NSW EPA Accredited Site Auditor required to be engaged to provide either:</i></p> <ol style="list-style-type: none"> <i>A Site Audit Statement</i> <i>Interim Advice.</i> <p><i>This is to conclusively demonstrate if the site is suitable for its intended use.</i></p> <p>The applicant's suggested condition of consent is recommended to be imposed.</p>	Noted.	Addressed.
7. Noise Impacts		
<p><i>a. A detailed acoustic report addressing noise from use of mechanical plant.</i></p>	Noted.	Addressed.

Issue raised by Council and Council's Response to RtS	Applicant's Supplementary Response	Has the Issue been Addressed?
A condition of consent is recommended to this effect.		
<i>b. A detailed acoustic report addressing noise from public address and use of school bell system.</i> A condition of consent is recommended to this effect.	Noted.	Addressed.
<i>c. Compliance testing required for noise emissions from the lecture theatre.</i> A condition of consent is recommended to this effect.	Noted.	Addressed.
<i>d. A detailed construction noise management plan required.</i> A condition of consent is recommended to this effect.	Noted.	Addressed.
8. Ecologically Sustainable Development Measures and Commitments		
<i>A specific Energy Assessment Report should be prepared to demonstrate the project will deliver a development with emissions that are 30% less than a baseline building.</i> Not addressed. A condition of consent is recommended to overcome this matter.	The Sustainability Report details ecologically sustainable development measures and commitments and conditions of consent will require these to be implemented.	Addressed. Energy Assessment Reports are typically required for commercial buildings and large-scale residential buildings. Therefore, Council has reconsidered the requirement for an energy assessment report <i>provided</i> the applicant is committed and required to implement the recommendations made in the Sustainability Report, specifically in relation to energy efficiency/reduction initiatives.
9. Stormwater and Infiltration		
Stormwater plans accord with Council's <i>Waste Management Technical Manual July 2014</i> . A condition of consent is recommended to this effect.	Noted.	Addressed.

Issue raised by Council and Council's Response to RtS	Applicant's Supplementary Response	Has the Issue been Addressed?
10. Waste and Recycling Management		
<p><i>The Operational, Construction and Demolition Waste Management Plan, known as a Site Waste Recycling Management Plan (SWRMP) in Council's terms, is insufficient.</i></p> <p>A standard condition of consent for waste management is recommended to address this deficiency.</p>	Noted.	Addressed.
11. National Construction Code (NCC) and Fire Safety Considerations		
<p><i>NCC and fire safety measures be implemented in the development.</i></p> <p>Relevant conditions recommended.</p>	Noted.	Addressed.
12. Impacts on The Surrounding Existing Public Domain and Opportunities for Improvements		
<p><i>Recommended upgrades of footpath, kerb and gutter, street lighting and other public domain aspects.</i></p> <p>Not addressed. Specific public domain improvements are recommended to be implemented by way of conditions of consent.</p>	Section 7.11 contributions payable will go towards any public domain upgrade works in the area.	<p>Not addressed.</p> <p>Council maintains that the redevelopment of the site, particularly given the sheer scale of the redevelopment, warrants improvement and refurbishment of the immediate public domain that surrounds the site.</p>

A full set of Council-written conditions of consent were provided in Council's previous correspondence on 24 July 2020. Council reiterates that should the Department resolve to support the application; it is recommended these conditions be imposed on any consent granted to the SSD application. As indicated earlier, condition 18 relating to the Vegetation Management Plan has been revised and reworded as per **Attachment B** of this submission.

Should you require any further information, please do not hesitate to contact Ben Magistrale, Senior Development Assessment Planner, by email ben.magistrale@waverley.nsw.gov.au.

Yours faithfully



Peter Monks
Director, Planning, Environment and Regulatory
Waverley Council

Attachment A – Full commentary from Council's Biodiversity Officer regarding the amended Landscape Plan and Vegetation Management Plan

Attachment B – Reworded/revised condition 18 of Council-written conditions of consent.

Attachment A

Full commentary from Council's Biodiversity Officer regarding the amended Landscape Plan and Vegetation Management Plan

From: Sue Stevens <Sue.Stevens@waverley.nsw.gov.au>

Sent: Thursday, 14 January 2021 2:19 PM

To: Ben Magistrale <Ben.Magistrale@waverley.nsw.gov.au>

Cc: Sue Stevens <Sue.Stevens@waverley.nsw.gov.au>; Sam McGuinness <Sam.McGuinness@waverley.nsw.gov.au>

Subject: FW: DA-384/2019, Moriah College, 3 Queens Park Road, QUEENS PARK NSW 2022

Hi Ben

Thanks for referring this. I've looked at Appendices D, E and F - the VMP, landscape plans (from a biodiversity perspective) and BDAR. They all need some improvement/s.

The VMP notes that Council requires

- The VMP needs to specify how ESBS vegetation will be protected from development, weed invasion and other damage, and how it will be rehabilitated from its current state to one of greater health; and
- The VMP needs to demonstrate how this will be undertaken on an ongoing basis (into perpetuity), including the type of work to be undertaken, timeframes, and how the site's response to this work will be monitored and evaluated.

Notes around Revegetation Plan Section 7

Planting densities

The ESBS Planting List in the is inconsistent with the DCP Appendix B2-1. This will need to be resolved. It may not be desirable to plant the buffer with ESBS species. It is the opinion of some ecologists that, unless seed for revegetation (e.g. of this buffer) can be collected from locally occurring vegetation, it is best to not use these species. An alternative view is that small fragmented remnant patches are likely to be inbred and expanding their gene pool to include genes from elsewhere may improve the health and resilience of the vegetation community. Either way, it would be beneficial to be able to clearly identify the provenance of any planted ESBS species and keep records as part of the VMP reporting requirements. The location of the nursery from where plants are sourced is largely irrelevant – it is the location of the seed collected that needs to be noted.

It is noted that Appendix C claims to lists species suitable for planting - that is plants that are not likely to regenerate on site to avoid any potential gene pool contamination, however, some of the plants listed are likely to regenerate on site, for instance *Monotoca elliptica*, *Microlaena stiopoides*, *Acacia longifolia*, *Kunzea ambigua* and *Gonocarpus* sp. as these have already been found to regenerate on York Road verge. Some are just unsuitable e.g. *Pittosporum undulatum*, *Acacia longifolia* and *Commelina cyanea*

are unsuitable for revegetation where plant species diversity is required as they will outcompete most other species.

Other planting specifications that require amendment area Planting Densities 7.3.1.2 . A ratio of 4 / 1 m² is suitable for grasses, but too high for groundcovers. Suggest 1 / 1m² for groundcovers.

Section 7.5: Protective Fencing. A protective fence between Moriah buffer and the ESBS must be installed prior to any works commencing including any clearing.

Section 9: Timing and Responsibilities 'Timing' column needs to be more detailed and specific, around weeding, maintenance program and monitoring program. For instance specifying time periods that KPIs are required to be met – month and year wherever possible.

In terms of timelines around weeding, this section needs to specify how many weeding visits are required per year, in which seasons these need to be undertaken and maximum time periods between weeding visits. Area proposed to be treated at each visit also needs to be specified.

The landscape plans still do not satisfy the DCP Control for development proposal adjoining remnant vegetation.

My referral 20 December 2019 said:

It is important that in addition that the works include landscaping that supports and is connected to the remnant bushland on the Moriah property. As this property lies adjacent to a bushland remnant, section 3.1 of Part B3 of Part B3 of Waverley Development Control Plan 2012 applies. The applicable control is (c) A minimum of 90% of the proposed plantings (not including turfed areas) are to be indigenous or local native plants listed in Annexure B2 - 1. The landscape plans cannot be properly assessed against this control until a planting schedule with proposed numbers of each species is provided.

My understanding of this control is that it applies to *all* of the proposed landscaping associated with this development, not just a narrow strip that borders the ESBS.

Planting schedules have now been included on the amended plans, making it clear that these plans do not meet the control.

Some of the plant species identified on the Landscape Plans as ESBS are not ESBS species according to the *ESBS Recovery Plan 2004* e.g. some eucalypts. Regardless, the Control requires the 90% of species to be selected from Annexure B2-1.

It also appears that numbers of native shrubs have been inflated to attempt to meet the control, but would not fit into the spaces proposed .e.g almost 6000 plants (including around 2000 shrubs that will grow to widths of around 2 m or more) into a space of 2018 m² (Early Learning Centre).

The BDAR looks like some of it may have been a copy and paste from someone else's. The previously cleared ESBS along the south-western boundary of site has not been clearly identified as such. The only mention of it is here in (blue) - I cannot identify the label here as the font pixellates when enlarged. It does correlate to the 'ESBS Buffer' on the landscape plans.



The patch of ESBS within the development site was not surveyed. You can see from page 77 that the BAM plot (light green box below) is outside the development site. None of 'Banksia Reserve' is identified as ESBS in the mapping.



Please get in touch if you wish to discuss or require further information.

Kind regards

Sue

Sue Stevens
Acting Executive Manager
Environmental Sustainability
Cnr Paul St and Bondi Rd, Bondi Junction NSW 2022
P: 02 9083 8226 M: 0466 426 929
E: sue.stevens@waverley.nsw.gov.au
W: www.waverley.nsw.gov.au

Connect with us

facebook | twitter | youtube

Please consider the environment before printing this e-mail or any attachments.

Waverley Council acknowledges the Bidjigal and Gadigal people who traditionally occupied the Sydney coast. We acknowledge all elders past and present and extend this respect to all Aboriginal people living in, working in, or visiting Waverley

-----Original Message-----

From: Ben Magistrale <ben.magistrale@waverley.nsw.gov.au>

Sent: Monday, 21 December 2020 11:20 AM

To: Sustainable Waverley Referral <sustainablewaverleyreferral@waverley.nsw.gov.au>

Subject: DA-384/2019, Moriah College, 3 Queens Park Road, QUEENS PARK NSW 2022

Hi Sue,

The applicant on behalf of Moriah College has responded to Council's submission made in July this year about the part redevelopment of the College that is adjacent to the ESBS.

They have amended the proposal to include a further landscaped buffer adjacent to the ESBS and have amended their landscape plan and vegetation management plan as well as their biodiversity assessment.

I have saved these all in TRIM under DA-384/2019 - documents registered on 21/12/2020 for your review.

We have until 18 January 2021 to respond to the Department of Planning. I appreciate the difficult timing of this, but if you get the chance, could you please review and comment before then. Otherwise, we have adopted your previous comments as a recommended condition of consent such that this matter can be addressed prior to the release of a construction certificate.

Any questions, please let me know. I will be on leave between 24 Dec and 12 Jan.
Thank you, Ben.

Attachment B

Reworded/revised condition 18 of Council-written conditions of consent.

18. VEGETATION MANAGEMENT PLAN (VMP)

The VMP must be amended and be submitted to and approved by Council's Executive Manager, Environmental Sustainability (or delegate) prior to the issue of any relevant construction certificate.

The following amendments shall be made to the VMP prior to resubmission:

(a) Section 4. Vegetation Management

The VMP needs to clearly prescribe that all bush regeneration and revegetation undertaken in both Zone 1 and Zone 2 must be carried out by professional bush regenerators with demonstrated experience working within the critically endangered ecological community Eastern Suburbs Banksia Scrub (ESBS).

(b) Section 7. Revegetation Plan

Zone 2 replanting objective needs to state that a broad range of species from Appendix C Planting list are to be planted in this zone to maximise the biodiversity of this space – noting that not all species on this list may be suitable. See further notes below regarding Appendix C and species selection.

Species Selection

While Appendix C lists suitable ESBS species for planting into Zone 2, the species selection objectives require that plant that are likely to naturally regenerate on site are to be excluded, but nowhere are these species listed. These species need to be either listed in this section and/or deleted from Appendix C. The deletions need to include those species that have been observed in lot 23 or on York Road verge in recent years. These are, but are not limited to, *Monotoca elliptica*, *Microlaena stipoides*, *Acacia longifolia*, *Acacia longifolia* subsp *sophorae*, *Acacia suaveolens*, *Kunzea ambigua*, *Micrantheum ericoides*, *Leocopogon juniperinus*, *Dianella revoluta*, *Eragrostis brownii*, *Sporobolus creber*, and *Gonocarpus* species.

Requiring seed to be collected within 10km of subject land is very limiting, given the location of the site where planting is to occur. Suggest this be broadened to, say 50 km north and south, but no less than 10 km from the coast.

The location of the nursery from where plants are sourced is largely irrelevant – it is the location of the seed collection that is important. Most nurseries that will be able to propagate sufficient numbers of such species are on the fringes of Sydney or beyond.

It needs to be noted that plants will need to be ordered at least 18 months in advance of proposed planting date/s, to enable seed to be collected and plants propagated to a size where they have a chance of surviving transplantation.

Maintenance of Plantings.

Watering of newly installed plants on four to five occasions is insufficient in times of little or no rainfall and plants will die. Experience in maintaining similar plantings in Queens Park has demonstrated that weekly watering for six months will be required under these conditions.

Protective Fencing.

A protective fence such as a silt fence must be erected between Moriah buffer and the ESBS must be installed prior to any works commencing - including any clearing, building or hardstand demolition. This fence must be inspected and maintained throughout the period of the VMP.

(c) Section 8. Monitoring and Reporting

The monitoring and reporting program must include recording of any species regeneration, including location of these, especially in Zone 1. This must be recorded in monthly reports submitted by bush regeneration contractors.

A table showing species planted into Zone 2, the number of each species planted and their provenance must be included in monthly reports.

(d) Section 9. Timing and Responsibilities

Table 3 does not indicate how much of the site is to be worked on each visit. Either it needs to be specified up front that all of Zones 1 and 2 are to be worked at each bush regeneration visit, or a column added to the table specify areas expected to be worked at each visit.

‘Timing’ column needs to be more detailed and specific, around weeding, maintenance program and monitoring program. For instance specifying time periods that KPIs are required to be met – month and year wherever possible.

In terms of timelines around weeding, this section needs to specify how many weeding visits are required per year, in which seasons these need to be undertaken and maximum time periods between weeding visits. Area proposed to be treated at each visit also needs to be specified.

Maintenance of plantings needs to include more watering – see above.

(e) Appendix C

Appendix C needs to be amended to exclude species that are vigorous growers and will outcompete other, slower-growing species. Species that need to be excluded from this list include *Pittosporum undulatum*, *Acacia longifolia*, *Acacia longifolia* subsp. *Sophorae*, *Hibbertia scandens* and *Commelina cyanea*.

It could be helpful to also delete species that are likely to regenerate naturally, as noted above.