

30 November 2020

Our ref: 20SYD\_16049

Catholic Cemeteries Board  
Level 2, 11 Murray Rose Avenue  
Sydney Olympic Park NSW 2127

Attention: David De Angelis

Dear David,

**Re: Nepean Gardens DA 19/0875 RFI from Penrith Council (23 October 2020) Item 7 - Biodiversity**

Eco Logical Australia Pty Ltd (ELA) was engaged by Catholic Cemeteries Board to assist in responding to the above RFI.

Table 1 and the Appendices respond to issues raised by Council.

Regards,



David Bonjer  
Principal Consultant

## Item 7 – Biodiversity

**Table 1 RFI Response to Item 7**

Council Comment	Applicant Response
<p>7a) A consolidated map of impacts on native vegetation is required. Once a consolidated report and plan is provided, Council requests a site walkover with the applicant's representative to assist on site identification of vegetation for removal.</p>	<p>Botanica prepared plans showing impacts to trees (see Appendix A1) as a result of:</p> <ul style="list-style-type: none"> <li>• golf course earthworks</li> <li>• civil works including Park Road</li> <li>• buildings and bushfire Asset Protection Zones</li> <li>• landscaping</li> <li>• removal of trees for safety reasons (as per the Travers Tree Assessment)</li> </ul> <p>These figures were then used to prepare maps showing impacts to Plant Community Types. This consolidated map of impacts is provided in Appendix A2 in Figure 1 and 2.</p> <p>Travers determined the impact to native vegetation as 4.0 ha. ELA has considered all impacts to native vegetation and the impact totals 3.15 ha, a reduction of 0.85 ha due to a more accurate assessment of impacts. The updated assessment was run through the BAMC using the same plot data from the Travers BDAR. The results are provided in the Appendix of this report. Overall there was a reduction in ecosystem credits from 88 to 68 credits required to be retired. The credit assessment report is attached.</p> <p>Council are welcome to attend site on request.</p>
<p>Council's Biodiversity Officer notes the following for your ongoing consideration:</p> <p>Ensure avoid and minimise efforts have been prioritised over offsetting including but not limited to retention of significant habitat trees, integrated landscaping that avoids the removal of existing native vegetation, retention of native vegetation/senescent vegetation and dead or decaying material in situ. Styled landscaping should not be prioritised over integrated</p>	<p>The proposed development has been designed and sited to minimise impacts to native vegetation (Appendix A1). See section 5 of the BDAR (Travers 2019)</p>

Council Comment	Applicant Response
landscaping options, that retain as much native vegetation as possible.	
Where pruning could be an appropriate vegetation management strategy, this should be considered ahead of removal.	Noted. Whilst trees have been assumed to be removed in accordance with the Australian Standard, where-ever possible trees will be pruned rather than removed under the direction of a Project Arborist during the construction phase.
RFS GTAs that might alter the requirements for management of asset protection zones.	Minor changes to the landscaping aspects were made as a result of the RFS GTAs. These have been reflected in the impact footprint.
No works or infrastructure are in conflict with the NRAR GTAs (including any new requirements particularly in relation to waste water management and activities in the north east area of the property).	No significant changes have been made in relation to works on waterfront land. Final plans will be submitted to NRAR when seeking the Controlled Activity Approval.
The additional surveys, that can now be undertaken in warmer months are to be completed.	<p>Based on the findings in the BDAR, removal of hollow bearing trees will not increase risk of SAIL as those SAIL entities known to occur or with potential to occur onsite are either:</p> <p>Species credit species / SAIL for breeding habitat only, for which hollows are not part of the breeding habitat (Large-eared Pied Bat, large and little Bentwing Bats), or</p> <p>Species credit species / SAIL for Mapped Important Habitat only, and which does not occur within the study area (Regent Honeyeater, Swift Parrot).</p> <p>The above species are also ecosystem credit species, with impacts offset through ecosystem credits as calculated in the BDAR. Fauna survey was undertaken in September / October and included ultrasonic survey at 4 locations for 1 night and 2 locations another night. Diurnal and nocturnal bird surveys and spotlighting for arboreal and terrestrial mammals was also conducted (BDAR table 2.1). Based on those species identified during survey or with the potential to occur, removal of HBT with small hollows only will not result in a SAIL.</p>

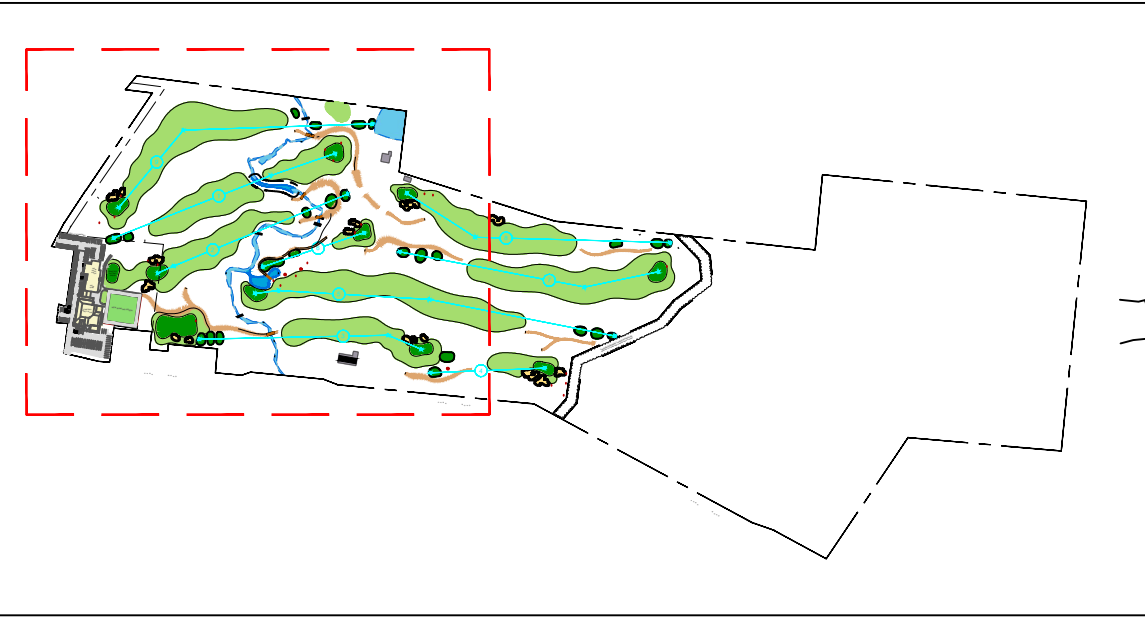
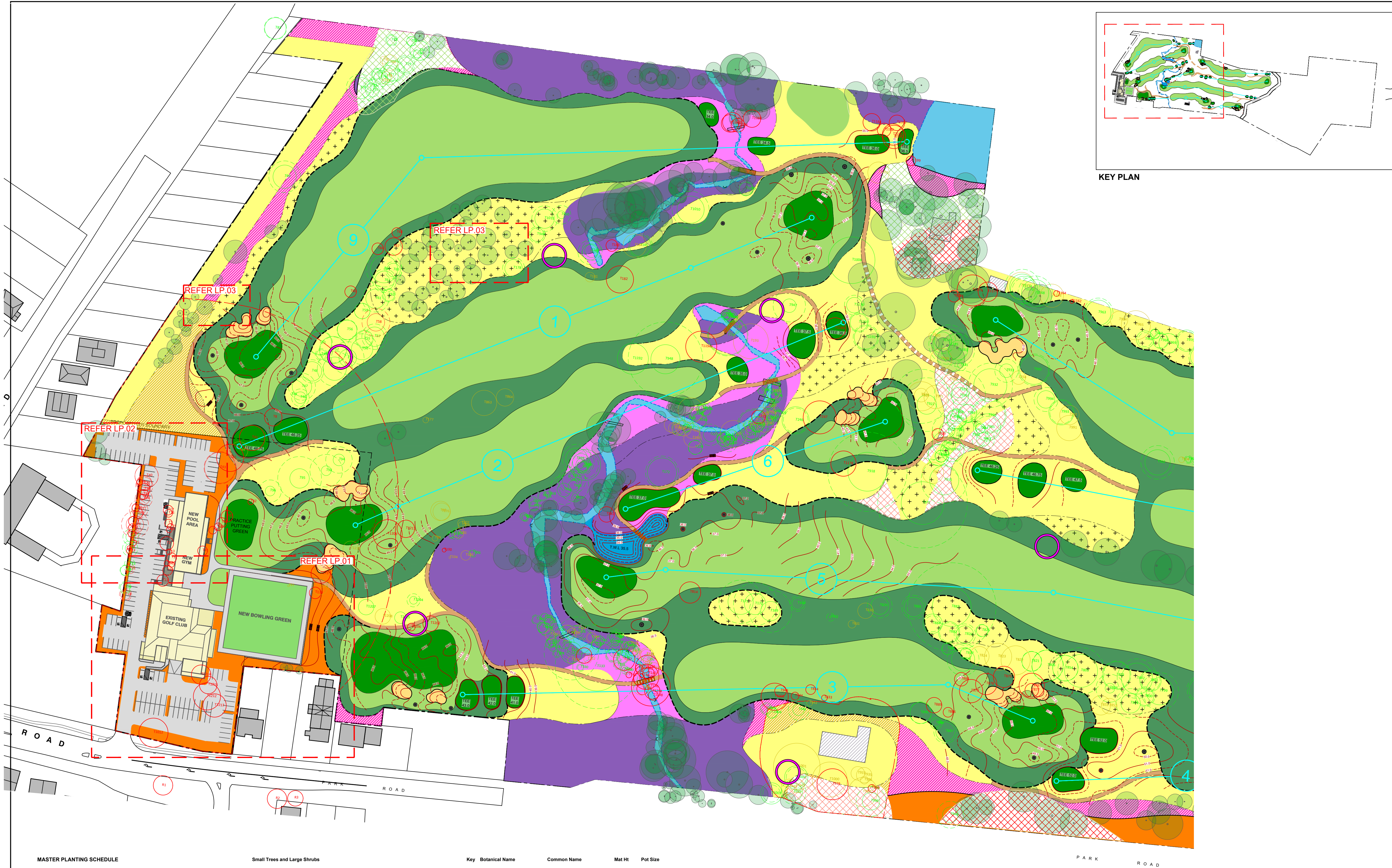
Council Comment	Applicant Response
	<p>Orchid survey: No targeted survey for threatened orchids has been undertaken and documented in the BDAR. Section 4.3.1 includes one threatened orchid (<i>Caladenia tessellata</i>) within the BAM-C produced list). Section 4.3.2 clarifies that the species was excluded as candidate species as it is known in Sydney from old records only (&gt; 30 years old), none of those records are within 10 km of study area, and habitat was considered marginal. The BDAR was authored by a senior botanist and botanist (both BAM accredited). Given the above, it would seem appropriate to assume these species have low potential occur within the study area and to exclude as candidate species.</p> <p>The survey undertaken is adequate for the site. Stag watching is not necessary for the BDAR as the relevant species listed are ecosystem-credit species which do not require survey. The stag watching and fauna rescue will however be undertaken prior to construction as a method to minimise injury to animals during construction phase.</p>
<p>Either the letter previously requested from DPIE in relation to a suggested system error in the calculator for planted native vegetation, is supplied with the updated assessment OR that the matter is addressed through the revised credits/credit summary due to the reported update to the calculator being actioned.</p>	<p>ELA has applied the streamlined assessment criteria in BAM 2020 for planted native vegetation. Whilst it is likely that some of the vegetation is planted, the vegetation is part of a mosaic that includes remnant vegetation and therefore cannot be excluded from the assessment.</p>
<p>The revised assessment must have an accompanying map that consolidates all development and construction activities and therefore all affected vegetation.</p>	<p>See Appendix A1 of this letter report.</p>
<p>Given the extent of the operation / access hours, plans should reflect National Light Pollution Guidelines for Wildlife.</p>	<p>The Commonwealth Guidelines are designed to protect Important Habitat for Commonwealth threatened species, with particular reference to migratory seabirds, turtles and shorebirds. There is no Important Habitat within or adjoining the site. However, the following is noted:</p> <ul style="list-style-type: none"> <li>• The cemetery and golf course will not be lit.</li> </ul>



Council Comment	Applicant Response
	<ul style="list-style-type: none"> <li>Lighting design of the clubhouse, pool and gym has not yet been prepared, however the proponent can use external down lighting.</li> </ul>
Comprehensive consideration of indirect impacts please include any treatments that will be integrated into the plans to minimise the impacts during all phases of construction and operation.	A Construction Environment Management Plan will be prepared and implemented to avoid, minimise and manage indirect impacts.
Consideration of the Regent Honeyeater and any other species identified in updated field and desktop surveys is to be included.	Regent Honeyeater is a dual (ecosystem and species credit) species. It is included as an ecosystem credit candidate species in the BDAR but excluded as a species credit candidate species. The Regent Honeyeater is only a species credit species for Mapped Important Habitat which does not occur within the study area. As such, targeted survey for this species is not required.
The updated Credit Summary is to be finalised and included in the submission.	See Appendix A2, Table 2, Table 3 and 4. The revised impact calculations were re-run through the BAMC. ELA used the Travers plot data in Appendix 4 to generate Vegetation Integrity Scores (VIS). ELA notes that there are differences in the Travers and ELA VIS scores. The changes to the impact area and to the VIS for some PCTs has decreased the credit requirement from 88 credits (Travers 2019) to 68 credits (ELA 2020). The credit assessment report is attached.

A1 Landscape Plans





KEY PLAN

- LEGEND**
- EXISTING TREES TO BE RETAINED
  - EXISTING TREES TO BE REMOVED DUE TO DEVELOPMENT
  - EXISTING TREES TO BE REMOVED DUE TO HEALTH
  - ASSET PROTECTION ZONE (APZ)
  - GROUNDWATER MONITORING WELLS

REVEGETATION AREAS:  
(REFER TRAVERS DOCUMENTATION FOR FULL EXTENT OF REVEGETATION ACROSS SITE)

- RIVER FLAT EUCALYPT FULL REVEGETATION
- CUMBERLAND PLAIN WOODLAND FULL REVEGETATION
- CUMBERLAND PLAIN WOODLAND (NO MID STOREY)

GOLF COURSE AREAS:

- PROPOSED BUNKER
- PROPOSED GREEN
- PROPOSED TEE
- PROPOSED FAIRWAY
- PROPOSED SHORT ROUGH
- CREEK/WETLAND EXISTING REVEGETATION WITH TRAVERS
- CREEK/WETLAND EXISTING REVEGETATION WITH TRAVERS
- LANDSCAPE PLANTING - REFER LP.02 & LP.03
- BUSHLAND BUFFER PLANTING - REFER LP.01
- BUFFER PLANTING WITHIN APZ - REFER LP.01
- RIPARIAN REVEGETATION (HIGH) IN CONSULTATION WITH TRAVERS
- RIPARIAN REVEGETATION (LOW) IN CONSULTATION WITH TRAVERS
- MOWN LONG ROUGH (WITH TREES)
- MOWN LONG ROUGH INCLUDING EXISTING TREES

NOTE: REFER TRAVERS 'FLORA & FAUNA SURVEY REPORT AND RESULTS' FOR DETAILS ON ALL REVEGETATION AND REGENERATION WORKS ON SITE

Issue:	Rev:	Description:	Date:
DA		FOR APPROVAL	05.12.19
DA	A	RFI	14.07.20
DA	B	OCTOBER 2020 RFI	27.11.20

Project title:  
WALLACIA COUNTRY CLUB

Drawing title:  
LANDSCAPE SITE PLAN 1 of 2

N A R E L L E S O N T E R  
**BOTANICA**  
LANDSCAPE AND HORTICULTURAL SPECIALISTS  
PO Box 911 Avonlea NSW 2107  
Tel: (02) 9918 4018 Mobile: 0419 991 144

Job no: 191112

Drawn by: EH

Checked by: NS

Scale: 1:1000 @ A1

CAD file name:

Plot date:

Drw no:  
LPS.01

Sheet no:  
1/6

MASTER PLANTING SCHEDULE

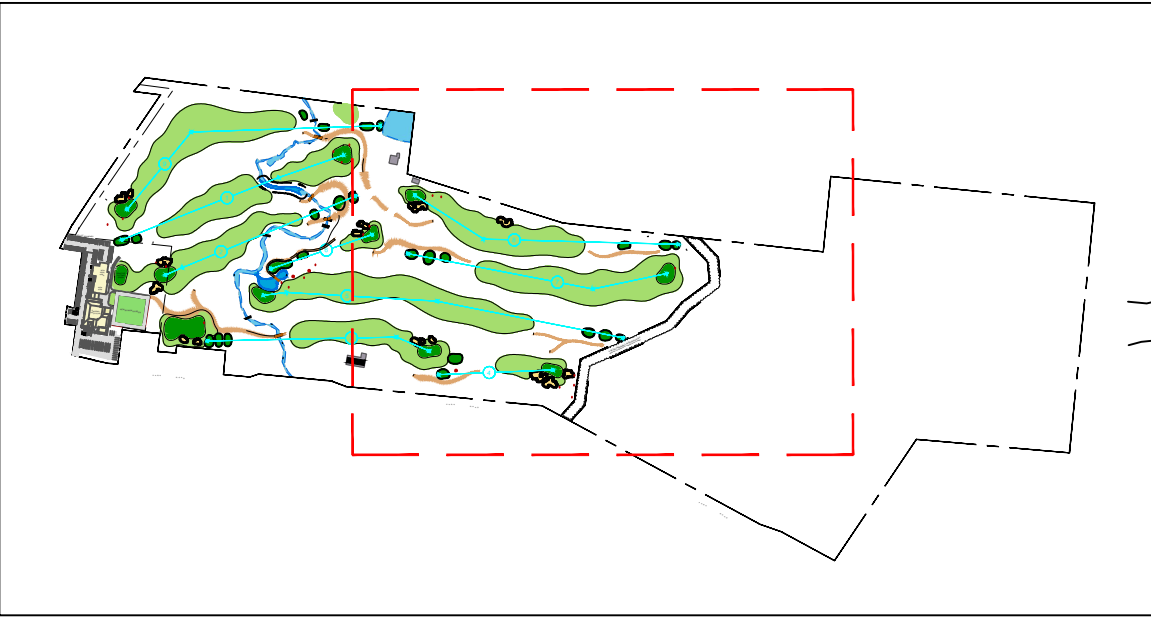
Key	Botanical Name	Common Name	Mat Ht	Pot Size
<b>Large Trees</b>				
AC	Angophora costata	Smooth-Barked Apple	25m	75 litre
ACS	Acmena smithii	Lilly Pilly	12m	75 litre
AF*	Angophora floribunda	Rough-Barked Apple	25m	75 litre
AS*	Angophora subvelutina	Broad-Leaved Apple	12-20m	75 litre
AT	Allocasuarina torulosa	Forest Oak	12-20m	75 litre
AS	Angophora subvelutina	Broad-Leaved Apple	20m	75 litre
CCM	Casuarina cunninghamiana	River Sheoak	20m	75 litre
CSG	Casuarina glauca	Swamp Oak	20m	75 litre
CG	Corymbia gummitera	Red Bloodwood	15m	75 litre
CM*	Corymbia maculata	Spotted Gum	15-20m	75 litre
EA*	Eucalyptus angulifolia	Cabbage Gum	15-20m	75 litre
EE*	Eucalyptus eugenioides	Thin-Leaved Stringybark	25m	75 litre
EF*	Eucalyptus fibrosa	Red Ironbark	20-25m	75 litre
EG*	Eucalyptus globoides	White Stringybark	20m	75 litre
EM*	Eucalyptus moluccana	Grey Box	25-30m	75 litre
EP*	Eucalyptus paniculata	Grey Ironbark	25-30m	75 litre
EPA*	Eucalyptus punctata	Grey Gum	25-35m	75 litre
ESA	Eucalyptus saligna	Sydney Blue Gum	20-30m	75 litre
ES	Eucalyptus sideroxylon	Mugga Ironbark	25m	75 litre
ET*	Eucalyptus terebinthifolia	Forest Red Gum	25m	75 litre
SC*	Syncarpia glomulifera	Turpentine	15-20m	75 litre
TL	Tristanopsis laurina	Water Gum	15m	75 litre

Key	Botanical Name	Common Name	Mat Ht	Pot Size
<b>Small and Medium Shrubs</b>				
AB*	Angophora bakeri	Narrow-Leaved Apple	15m	75 litre
ACG	Acacia cognata	Bower Wattle	5m	25 litre
AD*	Acacia decurrens	Black Wattle	10-15m	75 litre
AI*	Acacia implexa	Hickory Wattle	4-10m	45 litre
AFL	Acacia falcata	Sickle Wattle	5m	25 litre
AFB	Acacia floribunda	Sally Wattle	4-6m	25 litre
AP	Acacia paramattensis	Sydney Green Wattle	8m	45 litre
ASM	Acmena smithii 'Minor'	Minor Lilly Pilly	5m	25 litre
ASS	Acmena smithii 'Sublime'	Sublime Lilly Pilly	3-5m	25 litre
BM	Banksia myrsinifolia	Grey Myrtle	3-4m	25 litre
BE	Banksia encolofa	Heath Banksia	2-5m	25 litre
BS	Banksia serrata	Old Man Banksia	4-6m	45 litre
BSP	Banksia spinulosa	Harpin Banksia	2m	25 litre
BUS*	Bursaria spinosa	Blackthorn	2-3m	25 litre
CC	Callistemon salignus	Common Bottlebrush	2m	25 litre
CDR	Callistemon Dawson River Weeper	Dawson River Callistemon	5-6m	25 litre
CGM	Ceratopetalum gummiterum	Christmas Bush	2-4m	25 litre
CS	Callistemon salignus	Willow Leaf Hakea	3-4m	25 litre
DV*	Dodonaea viscosa	Hop Bush	2m	25 litre
ER*	Elaeocarpus reticulatus	Blueberry Ash	4-10m	45 litre
HSA	Hakea salicifolia	Cherry Ballart	2-4m	45 litre
HN	Hakea nesophila	Willow Leaf Hakea	3m	25 litre
NE	Hakea sericea	Needle-Bush	3m	25 litre
MA	Malealeuca amabilis	White Feather Honey	7m	25 litre
MD	Malealeuca decora	Snow In Summer	8m	45 litre
MLV	Malealeuca lanifolia	Broad-Leaved Greebung	4m	25 litre
PLV	Persea laevis	Elite Lilly Pilly	3-4m	25 litre
SAE	Syzygium australe 'Elite'	Cascade Lilly Pilly	2.5m	25 litre
SC	Syzygium 'Cascade'	Resilience Lilly Pilly	5m	25 litre
SR	Syzygium 'Resilience'			

Key	Botanical Name	Common Name	Mat Ht	Pot Size
<b>Small and Medium Shrubs</b>				
ASA	Asplenium australasicum	Bird's Nest Fern	1m	5 litre
ACC	Acacia cognata	Little Cog	0.9m	5 litre
AE	Aspidistra elatior	Cast Iron Plant	0.7m	5 litre
BHP	Banksia spinulosa 'Honey Pots'	Honey Pots	1m	5 litre
BVN	Baeckea virgata 'Nana'	Dwarf Baeckea	1m	5 litre
CAW	Callistemon 'Arzac White'	Arzac White	1m	5 litre
CE	Crocea exaltata 'Little Dome'	Little Dome	0.4m	5 litre
CI	Chives minima	Trumpet Lily	0.5m	5 litre
CS	Callistemon subulatus	Dwarf Bottlebrush	1.2m	5 litre
DU*	Daviesia ulicifolia	Gorse Bitter Pea	1m	5 litre
DS*	Dillwynia sieberi	Parrot Pea	1.5m	5 litre
DE	Doryanthes excelsa	Gymea Lily	1.2m	5 litre
EAC	Erastromon australicus	Pink Wax Flower	1.2m	5 litre
GF	Gardenia 'Florida'	Florida Gardenia	1.5m	5 litre
EFC	Grevillea 'Fire Cracker'	Fire Cracker	1m	5 litre
GJ	Grevillea juniperina	Prickly Spider Flower	2m	5 litre
GM	Grevillea mucronulata	Green Spider Flower	1.2m	5 litre
GO*	Goodenia ovata	Goodenia	1.5m	5 litre
GS	Grevillea sericea	Pink Spider Flower	1.2m	5 litre
HGN	Hymenoporum 'Gold Nugget'	Gold Nugget Frangipani	0.7m	5 litre
IA*	Indigofera australis	Native Indigo	1.5m	5 litre
KA	Kunzea ambigua	Tick Bush	2-3m	25 litre
LLB	Leptospermum 'Little Lemon Scents'	Lemon, Lime Bitters	1m	5 litre
LLS	Leptospermum polygalifolium	Yellow Tea Tree	2-3m	25 litre
LLF*	Malealeuca thymifolia	Thyme Honey Myrtle	1m	5 litre
MT	Malealeuca 'Cotton Candy'	Cotton Candy Honey Myrtle	1m	5 litre
MTV	Malealeuca 'White Lace'	White Lace Honey Myrtle	1m	5 litre
MO	Oleandra microphylla	Small-Leaved Daisy Bush	1m	5 litre
OD	Ozothamnus diosmifolium	Sage Flower	2m	5 litre
PF	Phalaena 'Flower Girl'	Phalaena	1.5m	5 litre
PL	Personia linearis	Narrow-Leaf Greebung	2-3m	25 litre
PML	Pinetela infolia	Slender Rice Flower	0.4m	5 litre
PY*	Pultenaea villosa	Wildflower	0.5-2m	5 litre
STT	Syzygium 'Tiny Trev'	Tiny Trev	0.7m	5 litre
WF	Westringia frutescens	Coastal Rosemary	1.5m	5 litre
XE	Xanthorrhoea australis	Austral Grass Tree	1.2m	25 litre
YF	Yucca filamentosa	Adam's Needle	1.2m	5 litre

\*Cumberland Plain Woodland Species





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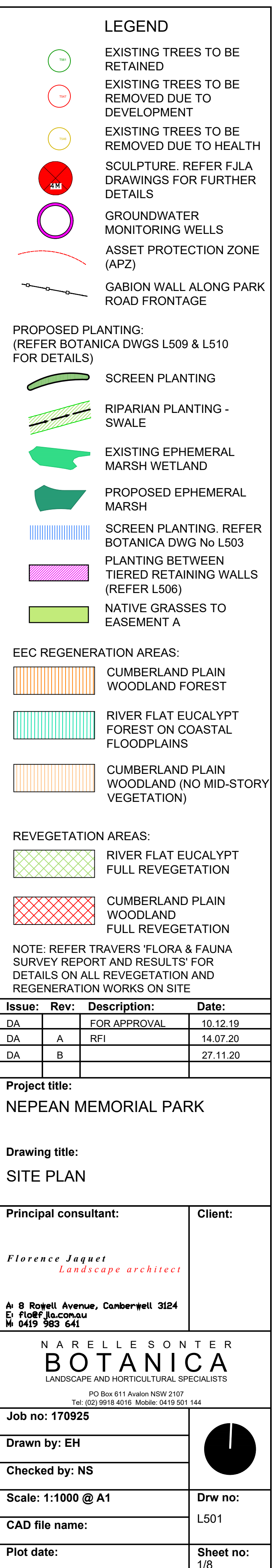
Project title:  
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Drawing title:  
LANDSCAPE SITE PLAN 2 of 2

N A R E L L E S O N T E R  
**BOTANICA**  
LANDSCAPE AND HORTICULTURAL SPECIALISTS  
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Tel: (02) 9918 4016 Mobile: 0419 501 144

Job no: 191112	
Drawn by: EH	
Checked by: NS	
Scale: 1:1000 @ A1	Drw no:
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Plot date:	Sheet no:
	2/6







A2 Development footprint, impacts and calculations



Figure 1: Assessment of all direct impacts (removed for development and removed for poor tree health) based on Travers vegetation mapping (2020) and the Landscape Plans from Botanica.



## Plant Community Types and Development Footprint

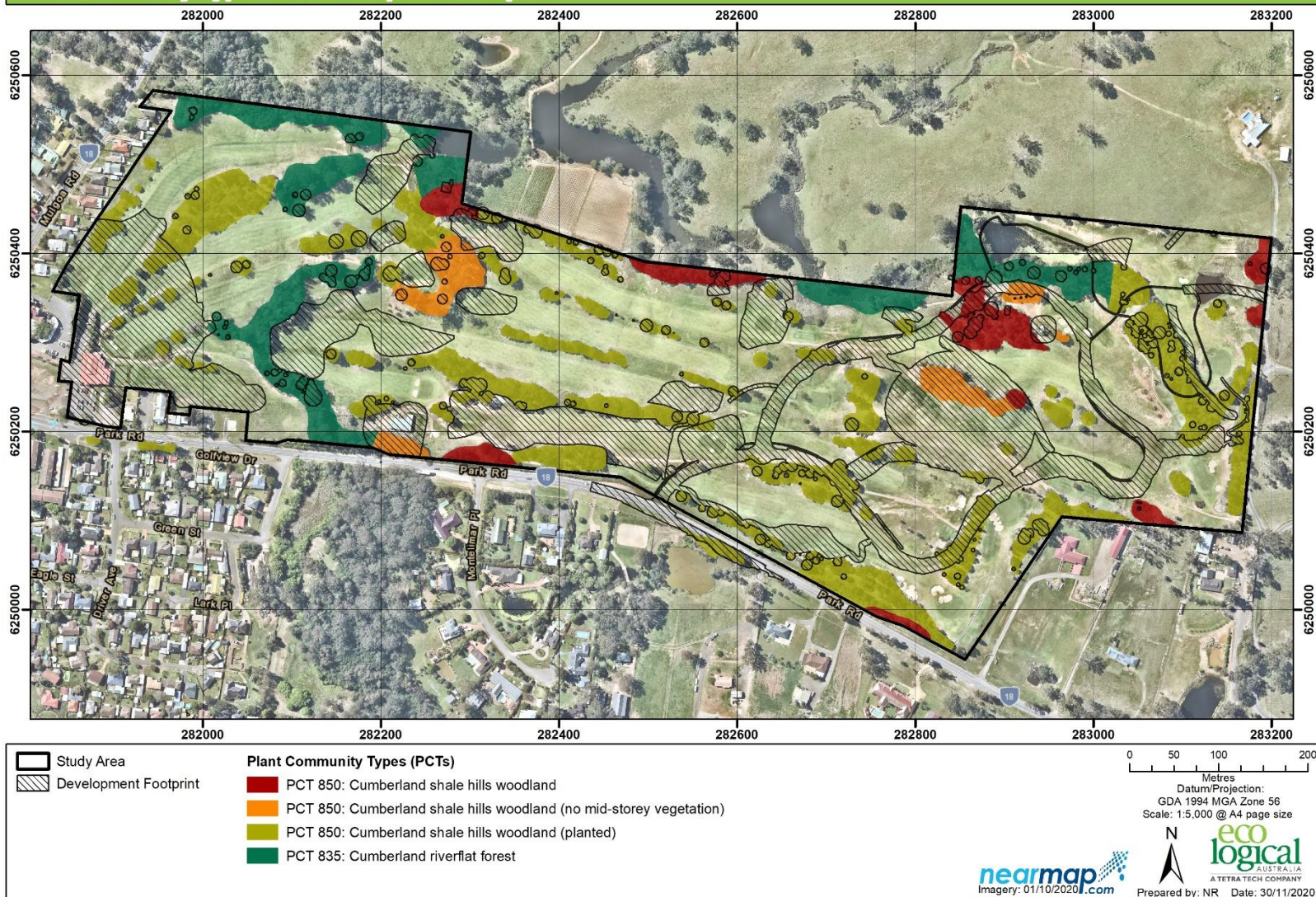


Figure 2: Development footprint (including trees to be removed for health reasons)



**Table 2: Comparison of impact to PCTs associated with the development footprint**

PCT and Veg Zone	Travers direct impact mapping (ha)	ELA direct impact mapping (ha)	Change in impact (ha)
PCT 835_moderate_poor	0.5	0.37	-0.13
PCT 850_poor_planted	2.3	2.01	-0.29
PCT 850_mod_poor	0.5	0.28	-0.22
PCT 850_poor_no understorey	0.7	0.49	-0.21
<b>Total</b>	<b>4.0</b>	<b>3.15</b>	<b>-0.75</b>

**Table 3: Comparison of Travers Vegetation Integrity Scores versus output of Vegetation Integrity Scores used in ELA calculations**

\*\*Please note that the data used by ELA in the BAM Calculator to generate the new credit requirement, including the VIS scores shown below, was taken from the plot data sheets provided in Appendix A4 of Travers BDAR (December 2019).

PCT and Veg Zone	Travers VIS	ELA VIS	Change in VIS
PCT 835_moderate_poor	42.9	42.9	0
PCT 850_poor_planted	30.6	32	+ 1.4
PCT 850_mod_poor	53.8	42.6	- 11.2
PCT 850_poor_no understorey	43.8	43.8	0

**Table 4: Comparison of ecosystem credit requirement detailed in Travers BDAR (Dec 2019) and revised credit requirement (ELA)**

PCT and Veg Zone	Travers credit requirement	ELA credit requirement	Change in credit requirement
PCT 835_moderate_poor	11	8	-3
PCT 850_poor_planted	44	40	-4
PCT 850_mod_poor	15	7	-8
PCT 850_poor_no understorey	18	13	-5
<b>Total</b>	<b>88</b>	<b>68</b>	<b>-20</b>

## Proposal Details

Assessment Id	Proposal Name	BAM data last updated *
00023160/BAAS17001/20/00023161	Nepean Gardens	19/11/2020
Assessor Name	Report Created	BAM Data version *
Meredith Henderson	30/11/2020	32
Assessor Number	BAM Case Status	Date Finalised
BAAS17001	Open	To be finalised
Assessment Revision	Assessment Type	BOS entry trigger
0	Part 4 Developments (General)	BOS Threshold: Biodiversity Values Map and area clearing threshold

\* Disclaimer: BAM data last updated may indicate either complete or partial update of the BAM calculator database. BAM calculator database may not be completely aligned with Bionet.

## Ecosystem credits for plant communities types (PCT), ecological communities & threatened species habitat

Zone	Vegetation zone name	TEC name	Current Vegetation integrity score	Change in Vegetation integrity (loss / gain)	Area (ha)	BC Act Listing status	EPBC Act listing status	Species sensitivity to gain class (for BRW)	Biodiversity risk weighting	Potential SAIL	Ecosystem credits

# BAM Credit Summary Report

Cumberland riverflat forest											
1	835_Mod_poor	River-Flat Eucalypt Forest on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions	42.9	42.9	0.37	Endangered Ecological Community	Not Listed	High Sensitivity to Potential Gain	2.00		8
									<b>Subtotal</b>		<b>8</b>
Cumberland shale hills woodland											
2	850_No_mind	Cumberland Plain Woodland in the Sydney Basin Bioregion	43.8	43.8	0.49	Critically Endangered Ecological Community	Critically Endangered	High Sensitivity to Potential Gain	2.50	TRUE	13
3	850_Mod_poor	Cumberland Plain Woodland in the Sydney Basin Bioregion	42.6	42.6	0.28	Critically Endangered Ecological Community	Critically Endangered	High Sensitivity to Potential Gain	2.50	TRUE	7
4	850_Planted	Cumberland Plain Woodland in the Sydney Basin Bioregion	32	32.0	2	Critically Endangered Ecological Community	Critically Endangered	High Sensitivity to Potential Gain	2.50	TRUE	40
									<b>Subtotal</b>		<b>60</b>
									<b>Total</b>		<b>68</b>

## Species credits for threatened species

## BAM Credit Summary Report

Vegetation zone name	Habitat condition (Vegetation Integrity)	Change in habitat condition	Area (ha)/Count (no. individuals)	BC Act Listing status	EPBC Act listing status	Biodiversity risk weighting	Potential SAI	Species credits
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