

AEP Ref: 3539
Date: 4 February 2026
To: Hodge Developments
Via Email: daniel@seradevelopments.com.au

Dear Daniel,

RE: Rev02: Koala Assessment Letter for the proposed Concept Development Application and approval for Stage 1 Torrens Title subdivision at Lot 1 DP 875804, Heathcote Road, Pleasure Point, NSW.

At the request of Hodge Developments, Anderson Environment & Planning (AEP) has prepared this Koala Assessment Letter to address the items raised within the Liverpool City Council Assessment Report dated 27 November 2025 (Ref: PPSSWC-491 - DA-441/2024) and subsequent Request for Additional Information (dated 22 January 2026, Refer Attachment A). The initial contention raised in relation to Koala was as follows:

'further information be provided to assess the impact of the proposed development on core koala habitat in accordance with Chapter 4 of the Biodiversity & Conservation SEPP. The discussion included in the BDAR is heavily reliant upon fencing, currently excluding the species. An assessment of impacts on the quality and area of core koala habitat that is not reliant upon the fencing should be provided. Mitigation measures should also be further addressed, recognising that there are likely to be more koalas utilising the site once the fence is removed and revegetation work progresses.'

A Sydney Western City Planning Panel was held on 8th December 2025 which resulted in the matter being deferred on account of the above contention. A letter was been produced to elaborate on the initial Koala assessment undertaken within the BDAR (AEP 2025, Rev02) and further evaluate the impact of the proposed development on Koalas and Koala habitat.

Following submission of the initial Koala Assessment Letter (17 January 2026), Liverpool City Council issued a Request for Additional Information (RFI) (22 January 2026) which raised further matters for consideration. A subsequent meeting was held (28 January 2026) to discuss the RFI, attended by: members of Liverpool City Council's Planning and Biodiversity Teams, the applicant and their project team (including AEP). This letter updates and supersedes the original Koala Assessment Letter provided, and addresses the additional points raised within the RFI.

Koala Assessment Report

The *State Environmental Planning Policy (Biodiversity and Conservation) 2021* (BC SEPP) commenced on 1 March 2022 under the *Environmental Planning and Assessment Act 1979*. It supersedes the previous *SEPP (Koala Habitat Protection) 2020* and *SEPP (Koala Habitat Protection) 2021*. The policy aims to promote the conservation and management of koala habitats to support a sustainable population and reverse the species' decline.

Chapter 4 *Koala habitat protection 2021* of the BC SEPP (2021) applies to all zones within the City of Liverpool Local Government Area (LGA). The site, exceeding 1ha, falls within this jurisdiction and does not have an approved Koala Plan of Management. As such, the provisions of Section 4.9 *Development assessment process – no approved koala plan of management for land* of the BC SEPP (2021) apply.

Chapter 4 Considerations	Application
Local government area as listed within Schedule 2.	City of Liverpool
Koala Management Area(s) as defined in Schedule 2.	Central Coast
This Chapter does not apply to:	Chapter 4 applies.

<i>land dedicated or reserved under the National Parks and Wildlife Act 1974, or acquired under Part 11 of that Act, or</i> <i>land dedicated under the Forestry Act 2012 as a State forest or a flora reserve, or</i> <i>land on which biodiversity certification has been conferred, and is in force, under Part 8 of the Biodiversity Conservation Act 2016, or</i> <i>land in the following land use zones, or an equivalent land use zone, unless the zone is in a local government area marked with an * in Schedule 2—</i> <i>Zone RU1 Primary Production,</i> <i>Zone RU2 Rural Landscape,</i> <i>Zone RU3 Forestry.</i>	
---	--

According to Section 4.9 of the BC SEPP (2021), the policy applies if:

(1) *This clause applies to land to which this Policy applies if the land—*

(a) has an area of at least 1 hectare (including adjoining land within the same ownership), and

(b) does not have an approved koala plan of management applying to the land.

The total area of the site is over 1ha and does not have a koala plan of management. Therefore, the BC SEPP 2021 applies and additional assessment is required under Section 4.9. The following clauses are therefore applicable and have been assessed.

Development Assessment Process – no Koala Plan of Management

Clause	Assessment
<i>(2) Before a council may grant consent to a development application for consent to carry out development on the land, the council must assess whether the development is likely to have any impact on koalas or koala habitat</i>	Clauses apply to City of Liverpool Council. Further discussion is provided below.
<i>(3) If the council is satisfied that the development is likely to have low or no impact on koalas or koala habitat, the council may grant consent to the development application.</i>	
<i>(4) If the council is satisfied that the development is likely to have a higher level of impact on koalas or koala habitat, the council must, in deciding whether to grant consent to the development application, take into account a koala assessment report for the development</i>	
<i>(5) However, despite subsections (3) and (4), the council may grant development consent if the applicant provides to the council—</i> <i>(a) information, prepared by a suitably qualified and experienced person, the council is satisfied demonstrates that the land subject of the development application—</i> <i>(i) does not include any trees belonging to the koala use tree species listed in Schedule 3 for the relevant koala management area, or</i> <i>(ii) is not core koala habitat, or</i> <i>(b) information the council is satisfied demonstrates that the land subject of the development application—</i> <i>(i) does not include any trees with a diameter at breast height over bark of more than 10 centimetres, or</i>	5(a)(i) – Koala use trees applicable to the Central Coast management area was identified within the Study Area. Exclusion does not apply. 5(a)(ii) – Further assessment is required to determine whether the site comprises core koala habitat. Assessment detailed below. 5(b)(i) – Trees with a DBH of >10cm were identified within the Study Area. Exclusion does not apply. 5(b)(ii) – The site includes native vegetation which does not comprise a horticultural or agricultural plantation.

(ii) includes only horticultural or agricultural plantations.	Exclusion does not apply.
---	---------------------------

In order to assess whether the site comprises core koala habitat, a Koala Assessment has been undertaken below.

Koala Assessment

The Koala Assessment is structured as follows:

- Assessment of whether the site comprises core koala habitat by ascertaining:
 - Whether the site is 'Highly Suitable Koala Habitat';
 - Site based assessment of current/recent koala presence within the site; and
 - Desktop assessment of recorded historical koala presence within the site.
- Assessment of the site and proposal development against the 5 key principles listed within the Koala SEPP 2021 Factsheet – Development Applications.

Core Koala Habitat Assessment

Core koala habitat is defined within Section 4.2 of the BC SEPP 2021 as:

- a) *an area of land which has been assessed by a suitably qualified and experienced person as being highly suitable koala habitat and where koalas are recorded as being present at the time of assessment of the land as highly suitable koala habitat, or*
- b) *an area of land which has been assessed by a suitably qualified and experienced person as being highly suitable koala habitat and where koalas have been recorded as being present in the previous 18 years.*

Both definitions of core Koala habitat consider whether the site is an area of land that has been assessed as 'Highly Suitable Koala Habitat'. This assessment has been undertaken below.

Highly Suitable Koala Habitat Criteria

Definition of 'Highly Suitable Koala Habitat'	Assessment
<i>'where 15% or greater of the total number of trees within any Plant Community Type (PCT) are the regionally relevant species of those listed in Schedule 3 of the SEPP.'</i>	Regardless of the density of trees on site, each PCT identified within the site contains >15% abundance of tree species listed under the Central Coast Koala management area, under Schedule 3 of the SEPP. The most abundant species identified on site was <i>Eucalyptus sclerophylla</i> . Other canopy species identified within the site and listed under the Central Coast koala management area include <i>Corymbia gummifera</i> , <i>E. crebra</i> , <i>E. punctata</i> , <i>E. piperita</i> , <i>E. resinifera</i> , <i>E. baueriana</i> , <i>E. moluccana</i> , <i>Casuarina glauca</i> , <i>Angophora bakeri</i> and <i>A. floribunda</i> .
Conclusion	The site meets the definition and as such is considered to comprise 'Highly Suitable Koala Habitat'.

Given the site qualifies as Highly Suitable Koala Habitat, determining whether habitat meets the definition of core Koala habitat depends on recorded Koala presence. This requires evidence of Koalas either at the time of assessment or within the past 18 years. To address this, site surveys and a desktop review of historical records were conducted.

As per the 'Koala SEPP 2021 Factsheet – Development Applications', historical records are to be assessed within a 2.5km search radius from the external boundary of the site for the Central Coast Koala Management Area. Additionally, NSW BioNet Atlas records with a locational accuracy exceeding 1,000m are to be excluded from consideration.

Core Koala Habitat Criteria

Qualification of 'Core koala habitat'	Assessment
<i>'koalas are recorded as being present at the time of assessment'</i>	The following surveys were undertaken to assess current/recent presence: • Camera trap surveys were undertaken between 19/03/2024 and 15/04/2024; • 3x Spot Assessment Technique (SATs) were undertaken within the site; ◦ two (2) on 26/07/2024; ◦ one (1) on (02/09/2024); and • Nocturnal surveys were undertaken on 18/03/2024 & 19/03/2024. No koalas, scats or markings were identified within the Study Area. The site does not meet this qualification of Core Koala Habitat.
<i>'koalas have been recorded as being present in the previous 18 years'</i>	One record of koala from 1997 exists adjacent to the fence line in Pleasure Point Road, however this record is more than 18 years old. An additional 84 koala records exist within 2.5km of the Study area, and there is a known population adjacent to Heathcote Rd. The site does meet this qualification of Core Koala Habitat.
Conclusion	The site does meet at least one qualification to be defined as core koala habitat because koalas have been identified outside the site (within 2.5km) as per the definition

Assessment of the site against the prescribed definition of core Koala habitat concludes that the site does meet the definition and therefore comprises core Koala habitat.

Assessment of the 5 Key Principles

As the site qualifies as core Koala habitat, an assessment of the site and development proposal has been undertaken against the 5 key principles listed within the 'Koala SEPP 2021 Factsheet – Development Applications'. This aims to also satisfy Chapter 4, Section 4.9, Clauses 2, 3 and 4 of the BC SEPP whereby the Council may grant consent to a development application following assessment of development impact on Koalas or Koala habitat.

The proposal comprises the clearance of approximately 4ha of native vegetation to facilitate the proposed development. The assessment of the site and proposed development in relation to the 5 Key principles is undertaken below.

Assessment of the 5 Key Principles

Principle	Criteria	Assessment
1. Understand Koala habitat values	<i>1. The site is established as containing core koala habitat if a site area survey undertaken by a suitably qualified and experienced person has identified the presence of core koala habitat.</i>	The Study Area has been assessed as comprising core Koala habitat, as assessed above.
	<i>2. Further analysis is undertaken in order to understand the broader values of the core koala habitat, including information about the koala population using the habitat and any specific ecological functions the habitat might serve.</i>	Consecutive surveys found no evidence of a Koala population within the site or the use of the site by the species. The site has undergone extensive clearing and disturbance, resulting in a large expanse (>30ha) of cleared exotic pasture with predominantly scattered canopy and weed incursion in areas. Whilst patches of remnant native vegetation considered as core Koala habitat occur, these exist largely in a degraded to moderate condition (approx. 5.42ha), with one (1) patch assessed as good condition (approx. 0.63ha). Whilst this vegetation provides some foraging opportunities and potential habitat, higher-quality vegetation with greater connectivity is available to the east, south and south-west, where koala records exist within contiguous tracts of native vegetation. Compared to these

Principle	Criteria	Assessment
		areas, the site offers only marginal ecological function for Koalas due to its low density of foraging habitat and scattered canopy, which limit its suitability for Koala use. Additionally, the ecological function of the site for Koala is further reduced owing to its containment within tall chain link fencing topped with barbed wire, restricting access to these resources, as evidenced by the lack of recent records within the Study Area, and the absence of koalas or associated field signs during targeted surveys. It is noted that the fencing of the rail corridor in the north west of the site is required as operational infrastructure maintained by TfNSW and will remain a major obstacle to Koalas entering the site from Voyager Point bushland. The other constraints to Koala entering the site aside from existing fencing in Heathcote Road is the urban subdivision east on Pleasure Point Road. The lack of connectivity to broader areas containing Koala will not be changed as a result of the proposal. The fencing adjoining TfNSW infrastructure and Heathcote Road will be replaced with 3m acoustic fencing and the existing fences of the Crown land will be retained and maintained. This will not improve connectivity in these areas. To the east the residential subdivision along Pleasure Point Road separates the site from Koala habitat further east with only a small vegetated strip along Pleasure Point Reserve providing a viable access point for Koala.
2. Avoid intensifying land use in koala habitat areas through appropriate landscape planning and site selection	3. <i>Site selection for development takes into account koala habitat values.</i>	The proposed development is located on land that is predominantly cleared and has an overall low density of trees providing a marginal foraging resource and limited habitat connectivity. Whilst the development does not entirely exclude core Koala habitat, the quality of the impacted habitat is low, due to its poor, degraded or moderate condition, with its low quality and functionality further exemplified by the absence of a residing local population and no indications of current koala activity within the site. When considering the accessible, undisturbed and protected habitat in the wider landscape, the extent of removal (~4.09ha) of low quality, poorly functioning and disconnected habitat does not comprise a significant impact core Koala habitat. The site represents a highly fragmented landscape owing to extensive historic clearance, such that further removal of approx. 4.09ha of largely scattered canopy will not result in a significant increase to the existing habitat fragmentation. Within the context of the surrounding landscape, the Subject Land represents appropriate site selection for development owing to the limited koala habitat values represented on site. Current movement corridors for Koala within the site are extremely restricted due to the presence of tall chain-link fence, topped with barbed wire, surrounding the site. The development comprises extensive landscaping and street tree planting as well as a dedicated vegetation management plan.
3. Encourage the proper conservation and management of areas of natural vegetation that provide habitat for koalas	4. <i>Development avoids the direct loss of core koala habitat within the site area and avoids fragmentation</i>	
	5. <i>Core koala habitat is excluded from the development footprint</i>	
4. Minimise potential direct impacts to koalas through koala sensitive design	6. <i>Development avoids direct impacts to core koala habitat within the site area.</i>	
	7. <i>Where some loss of core koala habitat cannot be avoided (and provided it is consistent with all other criteria), development is designed in a way that retains higher value areas across the site</i>	

Principle	Criteria	Assessment
	<i>and avoids fragmentation of habitat within the site area and more broadly within the region.</i> <i>8. Development is undertaken in a way that maintains the potential function of the core koala habitat.</i>	The proposed landscaping and vegetation management presents potential movement corridors • East-West movement along the foreshore of the Georges River; however this potential movement corridor is limited by the presence of TfNSW fencing associated with the railway corridor which bounds the north-western boundary of the Subject Site); and • North-East South-West movement through the riparian corridor at the centre of the site, between the Georges River and the parcel of Crown Land adjacent to the Subject Site; however, this potential movement corridor is limited by the presence of the existing chain-link fencing on Crown land. Whilst the movement corridors described above are currently limited by factors (i.e. fencing) beyond the influence of the development, the design of the landscaping and vegetation management proposals presents potential future connectivity opportunities, subject to third-party influences. There will be an increase in permeability for Koalas along the eastern and western boundaries of the site following the removal of chain-link fencing. However, connectivity to intact bushland to the west of the site is limited, noting that the vegetation patch north of Heathcote Road is effectively isolated and severed by Heathcote Road. Some Koala movement may occur from the east via Pleasure Point Road; however, this area comprises residential allotments and occurs on the periphery of a larger vegetation patch. It is noted that a Transport NSW lead project delivering Koala fencing and a Koala underpass along Heathcote Road at Deadmans Creek, is located approximately 0.55km south-east of the Subject Site. It is understood that the proposed Koala fencing will tie-in to existing Department of Defence fencing along Heathcote Road, and may increase Koala activity to the east of the Subject Site. While this may occur, it is considered more likely that Koalas would preferentially follow foraging resources to the north towards the Georges River and remain east of established residential areas. Regardless, street tree planting is proposed along Pleasure Point Road to provide refuge habitat and facilitate movement in the event that Koalas disperse from the east supporting connectivity towards the Georges River foreshore. Vegetation within the north of the Study Area will be retained and enhanced through the implementation of a Vegetation Management Plan (VMP). The VMP area covers an area of approx. 5.78ha, encompassing native vegetation along the foreshore and through the centre of the site, including the patch of core koala habitat in good condition (i.e. PCT 4059). As

Principle	Criteria	Assessment
		per the Vegetation Management Plan (Restore 2025) and Landscape Concept Report (Habit8 2025), revegetation will include reconstruction and regeneration of approx. 4.92ha of core Koala habitat. The proposed planting schedules include five (5) species listed as koala use tree species under Schedule 3 of the BC SEPP (2021). In addition, the proposed landscaping within the proposed playground adjoining Crown land at the west of the Subject Site will be amended (subject to Bushfire considerations) to contain native canopy covers, lower canopy, shrub, grasses, vines and scramblers suitable to koala habitat / local ecological communities to encourage koala movements. It is noted that development cannot deliver connectivity from the proposed playground to Crown land in the south due to the presence of fencing on Crown land. The benefit of encouraging Koala movement through this area is dubious, as the southern vegetated patch is highly isolated from areas of intact vegetation and Koala use of this area could result in vehicle strike risk. Bush regeneration works facilitated by the development proposal will improve Koala habitat values notwithstanding the barriers to access through provision of higher quality Koala habitat with greater habitat connectivity along the foreshore of the Georges River. The reconstruction and regeneration works will provide compensatory core Koala habitat of a higher quality and with greater habitat connectivity, therefore improving the potential function of core Koala habitat within the site. There will be some improved connectivity via the Georges River Foreshore parkland at the north-eastern boundary of the site, where the existing metal chain-link fence will be removed along Pleasure Point Road. In reality, whilst the site contains core Koala habitat, it is not accessible due to existing and maintained boundary fencing and other connectivity constraints that will not change substantively when the site is developed. There will be an increase in access to approx. 4.92ha of core Koala habitat to be managed under a VMP which is an overall positive impact on the availability of core Koala habitat to the surrounding population. Connectivity along the western and southern boundaries of the site will remain limited by the replacement of the existing fence and installation of 3m acoustic fencing (not permeable to Koala movement) along the boundaries of the railway corridor and Heathcote Road. This is a preferable outcome for Koalas in the context of the development as this will reduce potential development interface with roads and private properties – instead facilitating connectivity along the foreshore away from these features. Whilst development of the site will provide limited access to core Koala habitat within the bounds of the site, it will not provide a movement corridor along the foreshore owing to the interface with Transport for New South Wales (TFNSW) land at the north-west which must remain fenced as per TFNSW

Principle	Criteria	Assessment
		requirements. As such, whilst this development does not in itself provide a connectivity corridor for Koala, owing to adjacent land-use which is outside the control of the proponent, neither does it impose an impediment.
5. Implement best practice measures for the management of identified risks to koalas.	9. <i>All relevant indirect impacts to koalas and koala habitat associated with the development are identified.</i>	Large areas of the Subject Land will remain fenced to limit the interface between Koala and the residential dwellings and transport infrastructure. This measure will reduce the likelihood of indirect impacts to Koala as a result of the development proposal by reducing the interface between wildlife and operational activities within the site. Roads, residences and land clearing are already present within the Study Area and wider landscape; therefore, indirect impacts such as vehicle strikes, noise and / or light disturbance are not expected to be exacerbated by the development. In addition, further mitigation measures are recommended to mitigate impacts to Koala which may access the foreshore in the future, these include: • Koala warning signage; • Vehicle speed limits and speed control measures; • Pet management measures and signage.
	10. <i>Development uses best practice management measures to address the potential impacts considered likely to pose an increased risk to koalas or their habitat.</i>	
Additional Principles		
6. Use compensatory measures only where they can be shown to better promote the aim of the SEPP	11. <i>Compensatory measures are only used once it has been demonstrated that options to avoid, minimise and manage impacts to core koala habitat have been exhausted.</i>	Impacts to core Koala habitat have been avoided where practicable, minimised and managed as evidenced above. A VMP has been produced for retained native vegetation within the Study Area. The VMP will facilitate enhancement and protection of the core Koala habitat within the Study Area through natural regeneration and planting, in particular along and adjacent to the Georges River, where there is the greatest constraint-free opportunity to access the site once the fencing along Pleasure Point Road is removed. This will immediately result in improved ecological connectivity for the species at the north-east of the site (albeit where the development adjoins Pleasure Point Road and the narrow Pleasure Point Reserve) and over time, increase the available foraging resource through planting of listed Koala feed trees.
	12. <i>Where there is any direct loss of habitat or compromise in the potential function of a koala habitat area (and provided it is consistent with all other criteria outlined here), suitable compensatory measures are provided.</i>	
7. Use adaptive management strategies to monitor, evaluate and deliver appropriate planning outcomes for koalas	13. <i>The development application includes a monitoring, adaptive management and reporting component against the key outcomes.</i>	Koalas were not found to be using the Subject Site; however, it is noted that there is a locally occurring population within proximity and movement into the Subject Site may occur, post development. The proposed development will result in an overall increase in available habitat for Koala, in the unlikely event they enter the site. It is proposed that monitoring of Koala presence within and adjacent to the Subject Site, is carried out in line with the monitoring Schedule of the proposed VMP. The VMP should also contain consideration of adaptive management measures which could be implemented under certain conditions should Koalas be identified during monitoring visits or through updated wildlife records.

Principle	Criteria	Assessment
		Following development, new residents should be provided a flyer outlining the koala habitat, along with do's and don'ts to support the koala population and their movement.



Plate 1: Koala Connectivity

Conclusion

Koala habitat values

The site has been subject to targeted survey for Koala (nocturnal surveys, scat searches (SATs) and camera trapping) as per the requirements of the BAM (in line with the BC Act). There have been no Koalas identified on site and there are no Koala records associated with the property since 1997 (**28 years**). This historic record has limited geographic granularity and may well have occurred outside of

the site. Offsets for Koala these are delivered through the BOS, as prescribed by the BAM and outlined in the BDAR. As the BDAR has not identified Koala on site – offsets are not required.

Further consideration of the Koala habitat values of the site concluded that the site provides marginal foraging habitat and limited ecological connectivity owing to its existing fragmented nature. Further, the site does not currently provide ecological functioning for the species, owing to its containment within tall chain link fencing topped with barbed wire. Vegetation of greater quality and connectivity occurs outside of the site and it is not likely that Koala would preferentially utilise the site to any significant degree in its current state. Core Koala habitat identified within the site exists in predominately degraded to moderate condition with a small area of good condition vegetation at the central northern portion of the site.

Development of the site and enhancement of retained vegetation through implementation of a VMP is considered to benefit Koala by providing potential access to previously restricted lands via the removal of fencing and increasing the potential foraging resource in the longer term.

Habitat Connectivity

As a result of development, there will be minor access for Koala along the foreshore at the north-east corner (50m section along the foreshore) however, for koalas to get there, they would have to access via existing residential homes along an urban Pleasure Point Road or a narrow-vegetated strip along Pleasure Point Reserve. Further opportunistic access to the Subject Site would also be possible via the residential facades following removal of the chain-link fencing. This is a net increase from site conditions pre-development. The development is designed such that it could offer future connectivity for Koala along the foreshore and through the central riparian corridor; however, these are currently limited by transport infrastructure adjoining the site to the north-west and Crown land adjoining the site to the west. Whilst these movement corridors are currently limited by factors (i.e. fencing) beyond the influence of the development, the design of the landscaping and vegetation management proposals presents potential future connectivity opportunities, subject to third-party influences.

Given that the fencing of the Transport for NSW land under the rail easement and Crown Land at the west of the site will need to be retained in perpetuity (and is not a component of the proposed development), there will be no meaningful Koala connection through to Voyager Point or the Crown Land parcel and vice versa. This, together with the existing fencing and acoustic fencing adjacent to the Heathcote Road frontage will mean that the opportunities for Koalas to enter the site are through urban subdivision on both sides of Pleasure Point Road or along the existing foreshore park along the Georges River.

The site does not present a Koala connectivity corridor, predominantly owing to adjacent land-use. Further, access will be predominantly limited to the north east corner (50m section along the foreshore), or through residential urban streets – thus it will be highly unlikely that Koalas are encouraged to this development. As such, whilst this development does not in itself provide a connectivity corridor for koala, owing to adjacent land-use which is outside the control of the proponent, neither does it impose an impediment. Proposed street tree planting along Pleasure Point Road will provide refuge opportunities (i.e. from potential impacts associated with the urban interface e.g. traffic and pets); and, a partial corridor to facilitate movement away from Heathcote Road, toward the Georges River foreshore.

The Georges River corridor to be transferred to Council in Stage 2, provides a variable width corridor along the foreshore. Dedication of these lands allows for further connectivity opportunities to be realised by Council, should third party stakeholders (i.e. TfNSW) implement future Koala crossing treatments.

Whilst unlikely, should Koalas enter the site the following conditions will help mitigate potential threats in this new urban environment.

Recommendations

Whilst it is considered that the development will result in an overall increase in core koala habitat accessible to Koala through (i.e. through improved access to VMP lands) there remains a small risk of Koala interface with the development should Koalas access the foreshore in the future. As such, AEP propose the following condition is adopted to mitigate this potential interface:

Proposed Condition 1: Koala Protection and Post-Development Management

Prior to the issue of the Construction Certificate, the applicant must submit a Koala Habitat Interface Plan to Council's Ecologist and Planning Officer for review and approval. The plan must be prepared in conjunction with a suitably qualified ecologist and must address the following matters:

a) Fencing and Boundary Structures

A fencing and boundary structure plan showing:

- existing fencing to be retained along the interface with adjacent land;
- proposed replacement fencing or boundary features along the southern boundary with Heathcote Road and the western boundary adjoining the railway corridor;
- features that allow for the movement of Koalas.

b) Koala-Sensitive Road Design and Traffic Controls

- Location and design of Koala warning signage;
- Proposed internal speed limits to reduce vehicle strike risk;
- Locations of speed control devices, including speed bumps or equivalent measures.

c) Pet Management Control

- VMP Lands and the foreshore area must be designated as an on-leash area for domestic pets;
- Signage must be installed at all pedestrian access points entering VMP lands and the foreshore area to enforce pet management requirements; and

d) Other management and monitoring actions to help protect and manage Koalas.

Proposed Condition 2: Landscape Management Plan

Unless otherwise restricted by Bushfire considerations, the landscaping proposals for the western playground adjoining Crown land must be amended to contain native canopy covers, lower canopy, shrub, grasses, vines and scramblers suitable to koala habitat / local ecological communities.

Proposed Condition 3: Vegetation Management Plan

The Vegetation Management Plan must be updated to include monitoring and adaptive management strategies for pest species and Koala.

Regards,



Ben Jones

Senior Ecologist & Project Manager

0416 644 501

Anderson Environment & Planning

Attachment A: Request For Additional Information (Liverpool City Council, 22/01/2026)

HODGE DEVELOPMENTS PTY LTD
18 RUTHERFORD AVE
BURRANEER NSW 2230

REQUEST FOR ADDITIONAL INFORMATION

(In accordance with the provisions under Section 36, 94 and 104 of the *EP&A Regulations 2021*)

ADDRESS: LOT 1 DP 817692, LOT 1 DP 875804, LOT 2 DP 817692
LOT 1 HEATHCOTE ROAD, PLEASURE POINT NSW 2172, LOT 2
PLEASURE POINT ROAD, PLEASURE POINT NSW 2172
DESCRIPTION: CONCEPT DEVELOPMENT APPLICATION FOR TORRENS TITLE
SUBDIVISION ON LOT 1 DP 875804 AND LOT 2 DP 817692. THE
CONCEPT INCLUDES THE FOLLOWING:

- THE GENERAL ARRANGEMENT OF ROADS, IDENTIFICATION
OF LAND FOR PUBLIC OPEN SPACES, ESTABLISHMENT OF
ENVIRONMENTAL CORRIDORS, AND STORMWATER
INFRASTRUCTURE ON BOTH LOTS; AND

- STAGE 1 WORKS COMPRISING A RESIDENTIAL SUBDIVISION
OF APPROXIMATELY 380 LOTS OVER 7 SUBSTAGES,
INCLUDING THE CONSTRUCTION OF INTERNAL ROADS AND
DEDICATION AND EMBELLISHMENT OF THE ENVIRONMENTAL
CORRIDOR ON PART OF LOT 1 DP 875804, AND STORMWATER
INFRASTRUCTURE FOR STAGE 1 ON LOT 2 DP817692. WORKS
ALSO INCLUDE THE UPGRADE TO PLEASURE POINT ROAD
AND THE INTERSECTION WITH HEATHCOTE ROAD INCLUDING
RECONSTRUCTION OF SUBURB ENTRY STATEMENT, A NEW
SITE ENTRY, AND CONSTRUCTION OF NEW PEDESTRIAN AND
CYCLE CONNECTIONS WITHIN THE SITE AND ADJOINING THE
LAND.

THE PROPOSAL IS NOMINATED INTEGRATED DEVELOPMENT,
PURSUANT TO THE ENVIRONMENTAL PLANNING AND
ASSESSMENT ACT 1979, REQUIRING A CONTROLLED ACTIVITY
APPROVAL FROM THE DEPARTMENT OF PLANNING &
ENVIRONMENT – WATER UNDER SECTION 91 OF THE WATER
MANAGEMENT ACT 2000.

THE PROPOSAL IS INTEGRATED DEVELOPMENT, PURSUANT
TO THE ENVIRONMENTAL PLANNING AND ASSESSMENT ACT
1979, REQUIRING GENERAL TERMS OF APPROVAL FROM
WATER NSW UNDER SECTION 90 OF THE WATER
MANAGEMENT ACT 2000.

THE PROPOSAL IS INTEGRATED DEVELOPMENT, PURSUANT
TO THE ENVIRONMENTAL PLANNING AND ASSESSMENT ACT
1979, REQUIRING GENERAL TERMS OF APPROVAL FROM NSW

RURAL FIRE SERVICES UNDER SECTION 100B OF THE RURAL FIRES ACT 1997.

THE PROPOSAL IS INTEGRATED DEVELOPMENT, PURSUANT TO THE ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979, REQUIRING A PERMIT FROM THE NSW DEPARTMENT OF PRIMARY INDUSTRIES UNDER SECTIONS 205 AND 221ZV OF THE FISHERIES MANAGEMENT ACT 1994.

THE PROPOSAL IS INTEGRATED DEVELOPMENT, PURSUANT TO THE ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979, REQUIRING CONCURRENCE FROM NSW DEPARTMENT OF PLANNING AND ENVIRONMENT UNDER THE COASTAL MANAGEMENT ACT 2016.

THE PROPOSAL IS INTEGRATED DEVELOPMENT, PURSUANT TO THE ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979, REQUIRING CONCURRENCE FROM TRANSPORT FOR NSW UNDER SECTION 138 OF THE ROADS ACT.

THE PROPOSAL IS A REGIONALLY SIGNIFICANT DEVELOPMENT UNDER SCHEDULE 6 OF THE STATE ENVIRONMENTAL POLICY (PLANNING SYSTEMS) 2021

Council has conducted an assessment of Development Application DA-441/2024, and the following matters are identified, which prevent Council from supporting the proposal in its current form:

1. Koala Assessment Letter (KAL) & Landscape Plan

The Koala Assessment Letter (KAL) should be revised to give greater consideration to movement corridors (both current, potential, and future) and monitoring. It should be considered whether there could be changes to factors such as the acoustic wall and boundary fences to facilitate movements. This is further explained below with specific examples, which are in accordance with the criteria listed in the Koala SEPP 2021 Factsheet – development applications, which should be considered for Koala Assessment Reports.

1.1 Criteria 6 - Development avoids direct impacts to core koala habitat within the site area.

Under criteria 6, where there are impacts to core koala habitat, development needs to show the ability for koalas to move across landscape. Further consider existing and potential habitat connections. The KAL assumes that the only potential habitat connection is along the foreshore at the northeast corner (50m section along the foreshore). The following additional factors should be considered:

- Railway underpass proposed as part of stage 2, which would allow for koala movements;
- Potential design permeability along the boundary with the lot to the south-west (lot 792 DP 48718, Lot 485 DP 752034 and Lot 489 DP 752034) i.e. still offer security from human movement but allow for koala movements through the fence;



Customer Service Centre Ground floor, 33 Moore Street, Liverpool NSW 2170

All correspondence to Locked Bag 7064 Liverpool BC NSW 1871

Call Centre 1300 36 2170 **Email** lcc@liverpool.nsw.gov.au

Web www.liverpool.nsw.gov.au **NRS** 13 36 77 **ABN** 84 181 182 471

- Playground proposed adjoining the lot above on the southwest, should contain native canopy covers, lower canopy, shrub, grasses, vines and scramblers suitable to koala habitat / local ecological communities to encourage koala movements towards the intact bushland.

The KAL assumes that the Pleasure Point houses create a barrier to koala movements, but many are only one block deep and can be traversed readily by koalas. Some lots to the east of Pleasure Point Road still provide open and natural areas, including Property No. 19 Green Street; Lot 5 Pleasure Point Road; Nos. 20, 24, 27, and 66 Pleasure Point Road; and Lot 7. These areas continue to provide potential access for koala movement between the subject land and habitat to the east. Koalas may use these pathways for dispersal during mating seasons and for establishing territory in the nearby intact bushland.

Therefore, it is recommended that existing trees be retained where feasible along the eastern (along Pleasure Point Road edge) and southern edge (the northern edge of Heathcote Road) of the subject lot, and a linear revegetation zone be established along these edges. This zone should incorporate canopy species, lower canopy, shrubs, grasses, vines, and scramblers suitable for koala habitat. This would help strengthen connectivity north toward the VMP area and south toward the southwest intact bushland.

- Strengthen corridor along Pleasure Point Road to encourage koalas towards proposed VMP land and railway underpass;
- Potential permeability of acoustic walls;
- Interaction with the TfNSW wildlife fence being constructed along Heathcote Road should be considered. Increased koala movements through the site may occur due to the end of fence treatment, which is to connect to existing fencing along the northern boundary of Heathcote Road, which could direct more movements towards site;
- Recovery and expansion of the population.

1.2 Criteria 13 - The development application includes a monitoring, adaptive management and reporting component against the key outcomes.

The KAL proposes no monitoring, adaptive management, or reporting. This should be reconsidered given the following:

- the KAL states that it is considered unlikely that koala would enter the site post-development. Due to the apparent frequency of recordings of koalas in the locality and proposed changes to the site, this statement is not considered justified. Changes to adjacent land, such as the installation of wildlife fencing along Heathcote Road may also influence the likelihood of koalas entering the site;
- The changes to the site and surrounding land leads to uncertainty of future movement patterns for Koalas. Therefore, there should be monitored and adaptive management in place;
- Monitoring and control of pest species should be considered;
- Following development, new residents should be provided a flyer outlining the koala habitat, along with do's and don'ts to support the koala population and their movement.

1.3 Suggested Condition Wording



Customer Service Centre Ground floor, 33 Moore Street, Liverpool NSW 2170

All correspondence to Locked Bag 7064 Liverpool BC NSW 1871

Call Centre 1300 36 2170 **Email** lcc@liverpool.nsw.gov.au

Web www.liverpool.nsw.gov.au **NRS** 13 36 77 **ABN** 84 181 182 471

The KAL includes a suggested condition for koala protection and post-development management. A revised version of the condition is proposed by Council as per below wording in *italic*:

Condition: Koala Protection and Post-Development Management

Prior to the issue of the Construction Certificate, the applicant must submit a Koala Habitat Interface Plan to Council's Ecologist and Planning Officer for review and approval. The plan must be prepared in conjunction with a suitably qualified ecologist and must address the following matters:

a. *Fencing and Boundary Structures*

A fencing and boundary structure plan showing:

- existing fencing to be retained along the interface with adjacent land;*
- proposed replacement fencing or boundary features along the southern boundary with Heathcote Road and the western boundary adjoining the railway corridor;*
- proposed perimeter treatment of the VMP lands;*
- features that allow for the movement of Koalas.*

b. *Koala-Sensitive Road Design and Traffic Controls*

- Location and design of Koala warning signage;*
- Proposed internal speed limits to reduce vehicle strike risk;*
- Locations of speed control devices, including speed bumps or equivalent measures.*

c. *Pet Management Control*

- VMP Lands and the foreshore area must be designated as an on-leash area for domestic pets;*
- Signage must be installed at all pedestrian access points entering VMP lands and the foreshore area to enforce pet management requirements.*

d. *Other management and monitoring actions to help protect and manage Koalas*

2. River Front Vegetated Corridor Width

As identified in the Sydney Western City Planning Panel (SWCPP) record of deferral. The subdivision plan includes a river front vegetated corridor that is generally 50m wide. There is one section of that corridor that is significantly less towards the rail bridge underpass, such that the boundary will be close to the river front footpath (see Figure 1). The panel has questioned whether that narrowing is appropriate or necessary.



Customer Service Centre Ground floor, 33 Moore Street, Liverpool NSW 2170

All correspondence to Locked Bag 7064 Liverpool BC NSW 1871

Call Centre 1300 36 2170 **Email** lcc@liverpool.nsw.gov.au

Web www.liverpool.nsw.gov.au **NRS** 13 36 77 **ABN** 84 181 182 471



Figure 1: Excerpt from SWCPP record of deferral – Narrow section of vegetated corridor.

Council has measured the narrow section of the corridor to be approximately 40m in width, resulting in a lot boundary that is approximately 9m from the river front footpath. It is recommended that plans are amended to widen this narrow section consistent with SWCPP advice to avoid any potential delays.

If a response is not received within **fourteen (14) days** of the date of this letter, the application will be determined on the basis of the available information, which may result in refusal of the application.

If you have any further enquiries, please contact Ben Paterson on the abovementioned contact details.

Yours faithfully

Ben Paterson
DEVELOPMENT ASSESSMENT



Customer Service Centre Ground floor, 33 Moore Street, Liverpool NSW 2170

All correspondence to Locked Bag 7064 Liverpool BC NSW 1871

Call Centre 1300 36 2170 **Email** lcc@liverpool.nsw.gov.au

Web www.liverpool.nsw.gov.au **NRS** 13 36 77 **ABN** 84 181 182 471