

9 October 2020

Department of Planning, Industry and Environment
Green and Resilient Places Division
Locked Bag 5022
Parramatta, NSW 2124

**Submission on the Draft Cumberland Plain Conservation Plan by the Owners of [REDACTED]
[REDACTED] Wilton**

To Whom It May Concern,

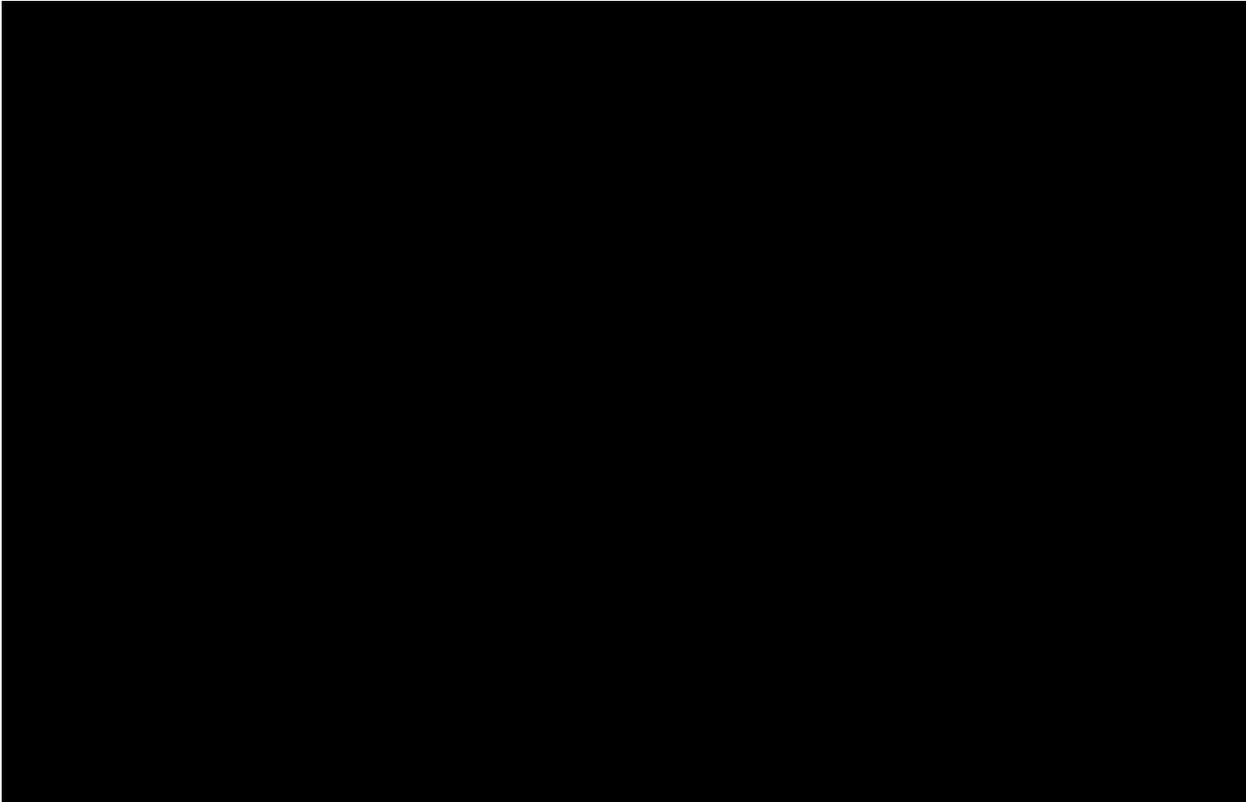
This letter presents our broad-scale ecological assessment of the current and future biodiversity values of the property located at [REDACTED] Wilton, also known as Lot [REDACTED] (the 'subject site'). The assessment is part of a submission to the NSW Department of Planning, Industry and Environment (DPIE), regarding the Draft Cumberland Plain Conservation Plan ('the DCPCP'). The DCPCP has significant implications for the future development of the subject site due to the mapping of areas as 'non-certified – avoided for biodiversity' and 'strategic conservation areas' and these map units are the focus of this review.

Although the areas mapped for strategic conservation do contain biodiversity values, notably the threatened ecological community Shale Sandstone Transition Forest, the mapping has overestimated the area and biodiversity value of the mapped land for strategic conservation. The mapping has not taken into consideration the current condition of forest and grasslands present, mainly in the western section of the site, which have been influenced by disturbances such as historical clearing for agricultural purposes, grazing and mowing for more than 40 years. Hence, this submission objects to the inclusion of the western sections of the subject site in the proposed E2 Environmental Conservation zoning.

Our assessment to support the submission to DPIE is provided in **Appendix A** to this letter. Supporting figures are attached at the end of this document.

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Our recommended amendments to the Land Category and Land Use Zone mapping of the DCPCP is shown in the map below (red line indicates subject site).



If you have any queries or require any further information, please do not hesitate to contact me at our Sydney office on [REDACTED]

Yours sincerely,

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Cecilia Eriksson Pinatacan
Senior Project Manager/ Ecologist

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APPENDIX A :

Draft Cumberland Plain Conservation Plan: Ecological assessment of [REDACTED] Wilton

A.1. Introduction

This submission has been prepared for Frank Olivieri (the client), to provide ecological advice regarding the mapping of ecologically significant land that is located at Lot [REDACTED] otherwise known as [REDACTED] Wilton (hereafter referred to as the 'subject site').

The subject site is located within the suburb of Wilton in the Wollondilly Local Government Area and covers an area of approximately 18 ha, as shown in **Figure 1**. The subject site is currently zoned RU2 – Rural Landscape and is comprised of a mix of grassland and forest vegetation. A long history of various disturbances has influenced the vegetation on site over more than 40 years, mainly in the western section, including historical vegetation clearing for agricultural purposes, livestock grazing, mowing, slashing and weed infestations. However, areas of intact remnant native vegetation as well as a mapped watercourse are also present within the subject site.

A.2. Draft Cumberland Plain Conservation Plan

A.2.1. Background

The NSW Government has identified four areas for urban growth and other development (referred to as 'nominated areas') and a series of transport corridors within and outside the nominated areas to support the future growth of Western Sydney. The nominated areas include:

- Greater Macarthur Growth Area;
- Greater Penrith to Eastern Creek Investigation Area;
- Western Sydney Aerotropolis; and
- Wilton Growth Area.

The key infrastructure/transport corridors include:

- Metro Rail future extension to Macarthur (excluding areas within the South West Growth Area);
- M7/Ropes Crossing Link Road;
- Outer Sydney Orbital between Box Hill and the Hume Motorway near Menangle; and
- Western Sydney Freight Line corridor.

The nominated areas program is administered by the NSW Department of Planning, Industry and Environment (DPIE) while the transport corridors program is administered by Transport for NSW (TfNSW), who are a major project partner.

As part of the biodiversity approvals required for the development of the nominated areas, DPIE has prepared the Draft Cumberland Plain Conservation Plan (DCPCP) to provide long-term certainty for biodiversity and development in Western Sydney. The DCPCP will support two separate statutory approvals processes under

State and Commonwealth laws that are required to address the impacts of the proposed development on biodiversity values. These include:

- Strategic biodiversity certification under Part 8 of the *Biodiversity Conservation Act 2016* (BC Act); and
- Strategic assessment under Part 10 of the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The aim of the DCPCP is to support the delivery of infrastructure, housing and jobs for Western Sydney in a planned and strategic way that also protects and maintains key biodiversity values of Western Sydney. The DCPCP includes a conservation program of commitments and actions that seeks to improve ecological function and resilience in the Cumberland Plain and provide an enduring conservation legacy for Western Sydney. A structured decision-making process was based around four decision making criteria across environmental, social and economic themes. The criteria were:

- Maximise conservation of biodiversity;
- Minimise the costs of delivering the biodiversity outcome;
- Ensure the biodiversity outcome is feasible; and
- Maximise public amenity.

Overall, the DCPCP identifies the following categories of land within the nominated areas:

- Certified Urban Capable: development can occur without further biodiversity assessments, subject to development approval in accordance with precinct plans;
- Non-certified – Western Sydney Aerotropolis: 1 in 100 year flood affected land and other vegetated land within the Aerotropolis SEPP area;
- Non-certified – avoided for Biodiversity Purposes: land to be protected for its important environmental value and to be rezoned E2 Environmental Conservation;
- Non-certified – avoided for other purposes: land that has riparian corridors, steep slopes or other constraints such as flood risk and is to be rezoned E2 Environmental Conservation; and
- Excluded: land is excluded from the strategic certification as it is either already developed for urban use, is already subject to environmental protection or specific zoning, or is subject to a separate biodiversity approval process.

In addition, the DCPCP also identifies the major transport corridors and strategic conservation areas outside of the nominated areas. These strategic conservation areas include lands with potential high-value biodiversity, as well as areas with important connectivity or potential for ecological restoration.

The strategic conservation areas are to be used to identify and prioritise suitable conservation lands as offsets for biodiversity impacts over the life of the Plan. Suitable areas may be protected as a future reserve or

biodiversity stewardship site or enhanced through an ecological restoration project to deliver the Plan's offset targets for affected native vegetation communities.

Not all of the mapped areas in the strategic conservation areas will be established as conservation land under the Plan and identification of suitable conservation lands from within the strategic conservation areas will continue over the life of the Plan to ensure that potential sites are appropriate, can be implemented and are based on the best available information and data.

A.2.2. Mapping of the Subject Site and Surrounds

The entire subject site lies within the nominated area referred to as the Wilton Growth Area.

Most of the subject site is mapped as 'Non-certified – avoided for biodiversity', with the remaining areas comprising small areas along the eastern boundary that are mapped as 'Non-certified – avoided for other'. The entire subject site is also mapped as part of the Strategic Conservation Areas and proposed for Environmental Conservation i.e. they are proposed to be rezoned as E2 Environmental Conservation. Under the DCPCP, development that will be permitted with consent under the proposed environmental conservation (E2) zone will be limited to environmental protection works and flood mitigation works.

It is understood that this mapping is based on the perceived ecological values of the subject site with almost the entirety of the site being mapped in the DCPCP as Shale Sandstone Transition Forest, as shown in **Figure 3**. This vegetation community is listed as a threatened ecological community (TEC) under the *NSW Biodiversity Conservation Act 2016* (BC Act) and Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Furthermore, the subject site contains an unnamed 1st order stream (as per Strahler system) in the south-eastern extent of the site and a 2nd order stream– Allens Creek – along the eastern boundary of the site, as shown in **Figure 1**.

On a wider locality level, land mapped as 'Certified – urban capable' occurs to the immediate west and south-west of the subject site, which includes the proposed Wilton South East Precinct with plans for a business park to be constructed directly west of the subject site. Lands to the north and south of the subject site within the Wilton Growth Area are largely mapped as 'Non-certified – avoided for biodiversity', including land directly north of the site that currently comprises residential properties, except for areas along mapped watercourses which are mapped as 'Non-certified – avoided for other'.

A.3. Methodology

The proposed mapping/zoning under the DCPCP has major implications for the future development of the subject site due to the mapping of areas as 'non-certified – avoided for biodiversity' and as part of the Strategic Conservation Area.

Suitability/accuracy of mapping was assessed to determine the suitability of the proposed mapping/zoning with due consideration to on-ground conditions, future land uses and objectives of the DCPCP.

The methodology for this assessment has been conducted as follows:

A.3.1. Desktop assessments

Desktop assessments involved a detailed review of the Draft Cumberland Plain Conservation Plan and its supporting documents and spatial viewer, as well as available vegetation mapping, threatened species information, and recent (NearMap) and historical aerial imagery for the subject site. The desktop assessment included review of the following resources:

- Detailed Review of DCPCP exhibition documents, as publicly available;
- Vegetation Mapping of the Cumberland Plain (OEH 2013);
- Vegetation Information System (VIS) (EES 2020b);
- BioNet (EES 2020a);
- Recent aerial imagery provided by NearMap; and
- Historical aerial imagery (NSW Government 2020).

A.3.2. Field Surveys

Field surveys were conducted by an ecologist and botanist from Cumberland Ecology on 6 October 2020. This included a site overview, and detailed discussion of past and present land uses and management with the owner of the site. Photographs and notes were taken during the site overview inspection, to allow for a thorough understanding of the conditions and constraints in relation to biodiversity.

Following the site overview, flora and fauna surveys were conducted. The focus of the flora surveys was to verify accuracy of existing vegetation mapping, with particular reference to TECs listed under the BC Act and/or EPBC Act. The vegetation within the subject site was ground-truthed and the plant species recorded. The vegetation survey consisted of random meander transects to compile detailed lists of plant species present within each plant community type and vegetation patch.

Where differences compared to the existing vegetation mapping were observed, BAM plots were conducted to support the remapping of the subject site. A total of two (2) BAM plots were completed within the relevant vegetation communities/conditions classes. The results of the BAM plot data were analysed to determine the appropriate Plant Community Type (PCT) and association with Threatened Ecological Communities (TECs), as well as the general values for biodiversity of the site.

Fauna habitat assessments were conducted concurrently with the vegetation mapping and included recording key habitat resources for threatened species, such as the presence of hollows, logs, dense understorey vegetation, flowering and fruiting plants, bush rock and watercourses.

Survey locations are shown in **Figure 4**.

A.4. Key Findings

A.4.1. Vegetation of the Subject Site

The field surveys confirmed that the native forest and grasslands on the subject site comprises a mix of remnant and sparse, young/regrowth vegetation, influenced by the historical clearing of the western section of the site. Consequently, the forest vegetation on site varies in condition, based on the time of historic clearing and various more recent impacts from weed management, mowing and slashing, and livestock grazing.

The previous disturbance of the western section of the subject site is evident when reviewing historical aerial photographs, with photographs from 1970 showing the entire western section of the subject site as cleared, with the eastern section comprising remnant intact forest (**Figure 5**). In 2005, the western section of the site appears to still be relatively sparsely vegetated, with occurrences of shrubby regrowth and scattered trees, as seen in **Figure 6**.

Across the eastern section of the site, the DCPCP vegetation mapping as shown in **Figure 3** was found to be largely accurate with field surveys confirming the presence of the TEC Shale Sandstone Transition Forest and the non-listed community Western Sandstone Gully Forest. However, in the western section the extent of the TEC Shale Sandstone Transition Forest was found to be exaggerated in the DCPCP vegetation mapping, with the Cumberland Ecology field surveys confirming a relatively large area of derived native grassland occurring in the most western part of the site as described in subsequent sections. Although treed parts of the western section still conform to the TEC Shale Sandstone Transition Forest, the condition of this occurrence is considered lower than the intact condition in the eastern extent of the subject site, with indications of the historical clearing and more recent disturbances present.

Cumberland Ecology's updated ground-truthed vegetation map, including the extent of the vegetation communities and different conditions states, is shown in **Figure 7**. Detailed descriptions of the vegetation communities and conditions classes are provided in subsequent sections.

A.4.1.1. Shale Sandstone Transition Forest

- BC Act Status: Critically Endangered
- EPBC Act Status: Critically Endangered

This community occurs across the majority of the site with the exception of the western grassland areas and eastern gully slopes associated with Allens Creek. The community is present in three condition classes described under sub-headings below. There is an intact condition class of the community, an under scrubbed class, subject to historical clearing in which the ground layer is maintained by slashing and mowing, and a condition class of the community which has been burnt in recent years. With the exception of the under-scrubbed class, which has a shorter ground layer than the other two conditions due to the ground layer being slashed and a sparser and younger canopy due to historical clearing, differences are predominately in the height/presence of the shrub layer and species composition does not vary by condition class, besides a natural variation between areas with higher shale versus sandstone influence in the soils.

Western areas of the community within the site have a higher shale influence and the canopy in this area is dominated by *Eucalyptus moluccana* (Grey Gum) and *Eucalyptus tereticornis* (Forest Red Gum). As the sandstone influence increases to the east, the central areas of the site are dominated by *Eucalyptus eugenioides* (Thin-leaved Scribbly Gum) and *Eucalyptus tereticornis*, and the areas in the east with the highest sandstone influence and the lowest shale influence have a canopy comprising occurrences of *Eucalyptus punctata* (Grey Gum), *Eucalyptus eugenioides*, and the ironbarks *Eucalyptus crebra* (Narrow-leaved Ironbark), and *Eucalyptus fibrosa* (Red Ironbark).

The small tree species *Allocasuarina littoralis* dominates the sub-canopy across the whole site, and there are several occurrences of *Melaleuca styphelioides* (Prickly-leaved Ironbark) in this stratum in the central area of the site.

Shrub species present include *Kunzea ambigua* (Tick-bush), *Bursaria spinosa* (Blackthorn), *Solanum aviculare* (Kangaroo Apple), *Lasiopetalum ferrugineum* var. *cordatum*, and the sub-shrub *Hibbertia diffusa* (Wedge Guinea-flower).

The ground layer is dominated by the native grasses *Microlaena stipoides* var. *stipoides*, *Austrostipa rudis*, and *Themeda triandra*. Other grass species present include *Dichelachne rara*, *Rytidosperma racemosum*, and *Entolasia marginata* (Bordered Panic). Native forbs are common and include *Solanum prinophyllum* (Forest Nightshade), *Polygala japonica* (Dwarf Milkwort), and *Lagenophora stipitata* (Blue-bottle Daisy). Also present are the twiners *Glycine microphylla* and *Glycine tabacina*, and the fern *Cheilanthes sieberi* (Poison Rock Fern).

Exotic weeds are present, though generally uncommon and not dominant and include the grasses *Ehrharta erecta* (Panic Veldtgrass) and *Paspalum dilatatum*, and the forbs *Linum trigynum* (French Flax) and *Lysimachia arvensis* (Scarlet Pimpernel).

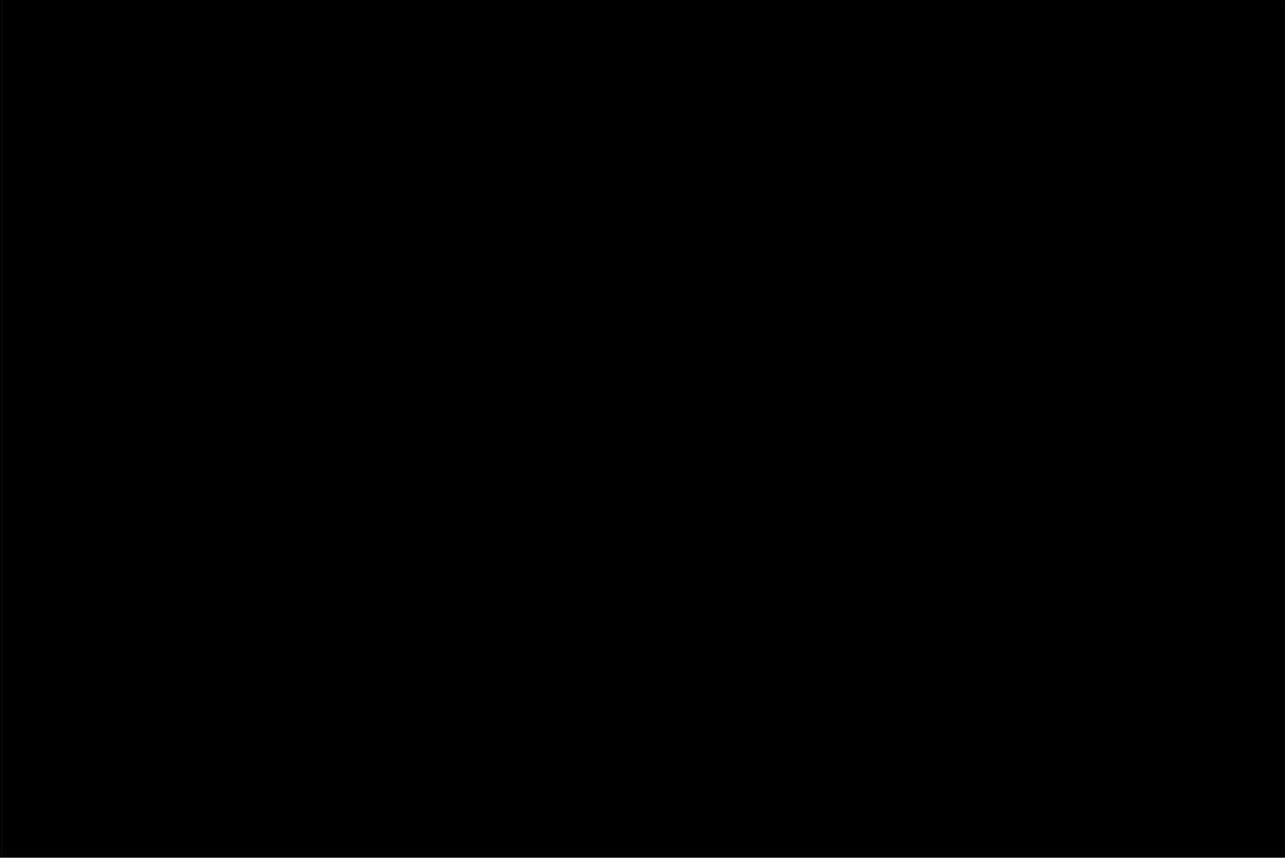
A.i. Intact Condition Class

This condition class of the community contains native species in all vegetation strata and does not appear to be maintained, occurring in a natural mostly undisturbed state, despite a general lack of large, old trees indicating, similar to most forests in NSW, historical logging.

The shrub layer is generally tall and is mostly dominated by *Kunzea ambigua* which occurs densely in much of the community.

An example of the intact condition class of Shale Sandstone Transition Forest present in the eastern section of the subject site is shown in **Photograph 1**.

Photograph 1 Intact, remnant Shale Sandstone Transition Forest in the eastern section of the subject site



A.ii. Intact/Burnt Condition Class

This condition class of the community is comprised of intact areas of the community that are not maintained, however have evidently been burnt in recent years. The canopy is intact, so the fire is likely to have been confined to lower strata, or trees have recovered since the fire, however the shrub layer consists only of short individuals of shrub species regrowing since the fire. Trunks of non-smooth-barked Eucalypt species throughout the area are charred.

An example of the intact/burnt condition class of Shale Sandstone Transition Forest present in the eastern section of the subject site is shown in **Photograph 2**.

Photograph 2 Example of the intact/burnt condition class of Shale Sandstone Transition Forest in the eastern section of the subject site

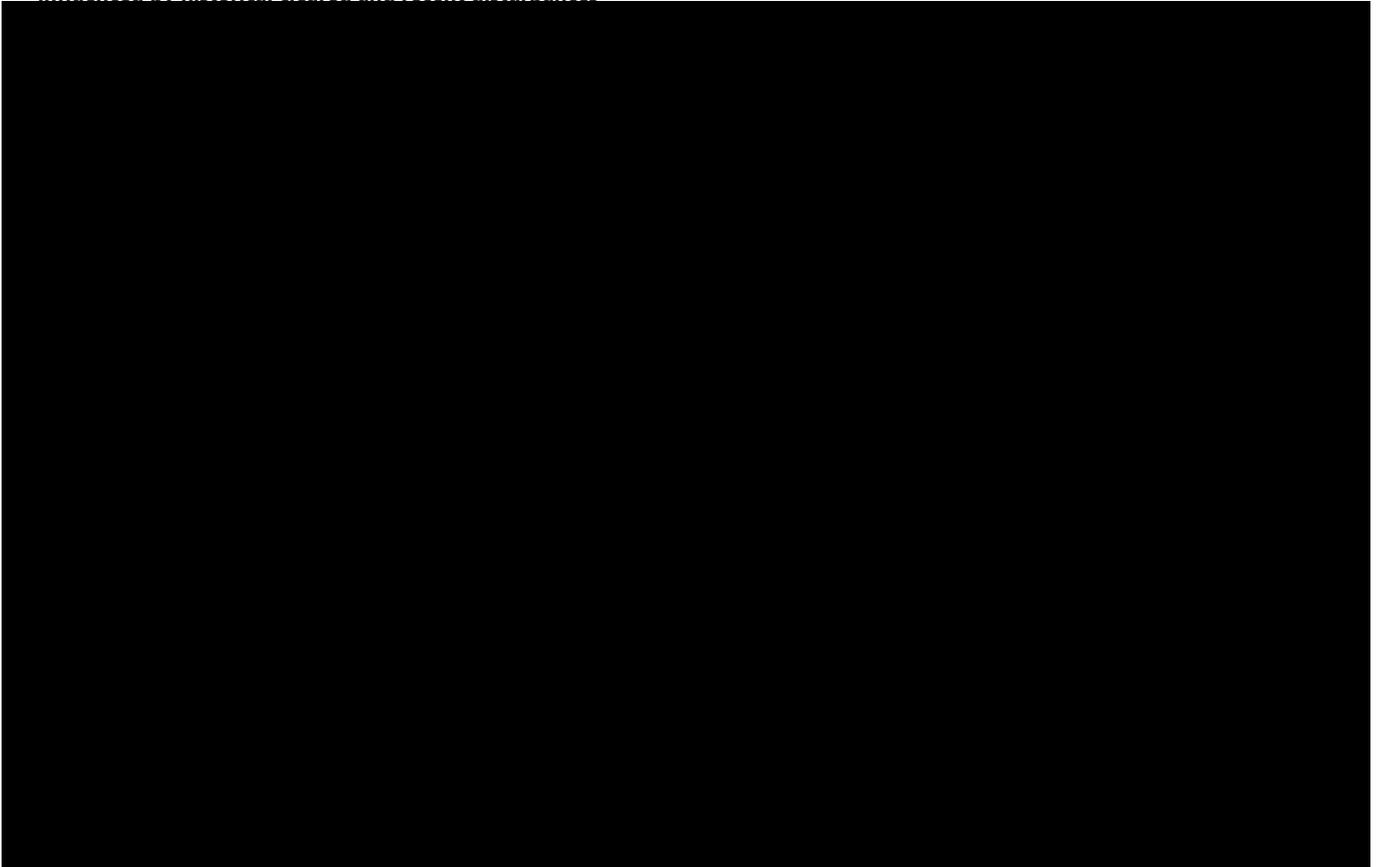


A.iii. Under-scrubbed Condition Class

This condition class of the community is influenced by the historical clearing of the western section of the subject site and more recent disturbances, with the canopy dominated by younger trees. Despite having infrequent occurrences of weed species this condition class of the community is heavily maintained. The vegetation appears to have undergone canopy thinning, with canopy trees occurring sparser than in natural forest areas. The entire area has been under-scrubbed, and is maintained by slashing, so the shrub layer is absent with the exception of rare instances of shrubs occurring close to the trunk of trees where they are protected from slashing, and the ground layer is short due to slashing and mowing.

An example of the under-scrubbed condition class of Shale Sandstone Transition Forest present in the eastern section of the subject site is shown in **Photograph 3**.

Photograph 3 Under-scrubbed condition class of Shale Sandstone Transition Forest in the western section of the subject site, influenced by historical cleared and recent disturbances



A.4.1.2. Western Sandstone Gully Forest

- BC Act Status: Not Listed
- EPBC Act Status: Not listed

This community occurs on eastern facing steep, rocky, sandstone, gully slopes in the east of the site associated with Allens Creek. Although there are sparse occurrences of the *Eucalyptus eugenioides*, and the ironbarks *Eucalyptus fibrosa* and *Eucalyptus crebra*, the canopy is generally comprised of *Corymbia gummifera* (Red Bloodwood), *Eucalyptus pilularis* (Blackbutt), which is common on the lower slopes, and *Eucalyptus piperita* (Sydney Peppermint). *Allocasuarina littoralis* (Black She-oak), *Allocasuarina torulosa* (Forest She-oak), and *Elaeocarpus reticulatus* (Blueberry Ash) are present in the sub-canopy.

A rich array of species is present in the shrub layer with species such as *Persoonia linearis* (Narrow-leaved Geebung), *Dodonaea triquetra* (Hop-bush), *Leptospermum trinervium* (Flaky-barked Tea-tree), *Pimelea linifolia* (Slender Rice Flower).

The ground layer is sparse due to the frequent sandstone boulders and outcropping, and includes the species *Lomandra confertifolia*, which tends to be dominant, *Lepidosperma laterale* (Variable Sword-sedge), *Pomax umbellata*, and *Goodenia heterophylla*.

An example of the occurrence of Western Sandstone Gully Forest present along the eastern boundary of the subject site is shown in **Photograph 4**.

Photograph 4 Western Sandstone Gully Forest along the eastern boundary of the subject site



A.4.1.3. Derived Native Grasslands

- BC Act Status: Not Listed
- EPBC Act Status: Not listed

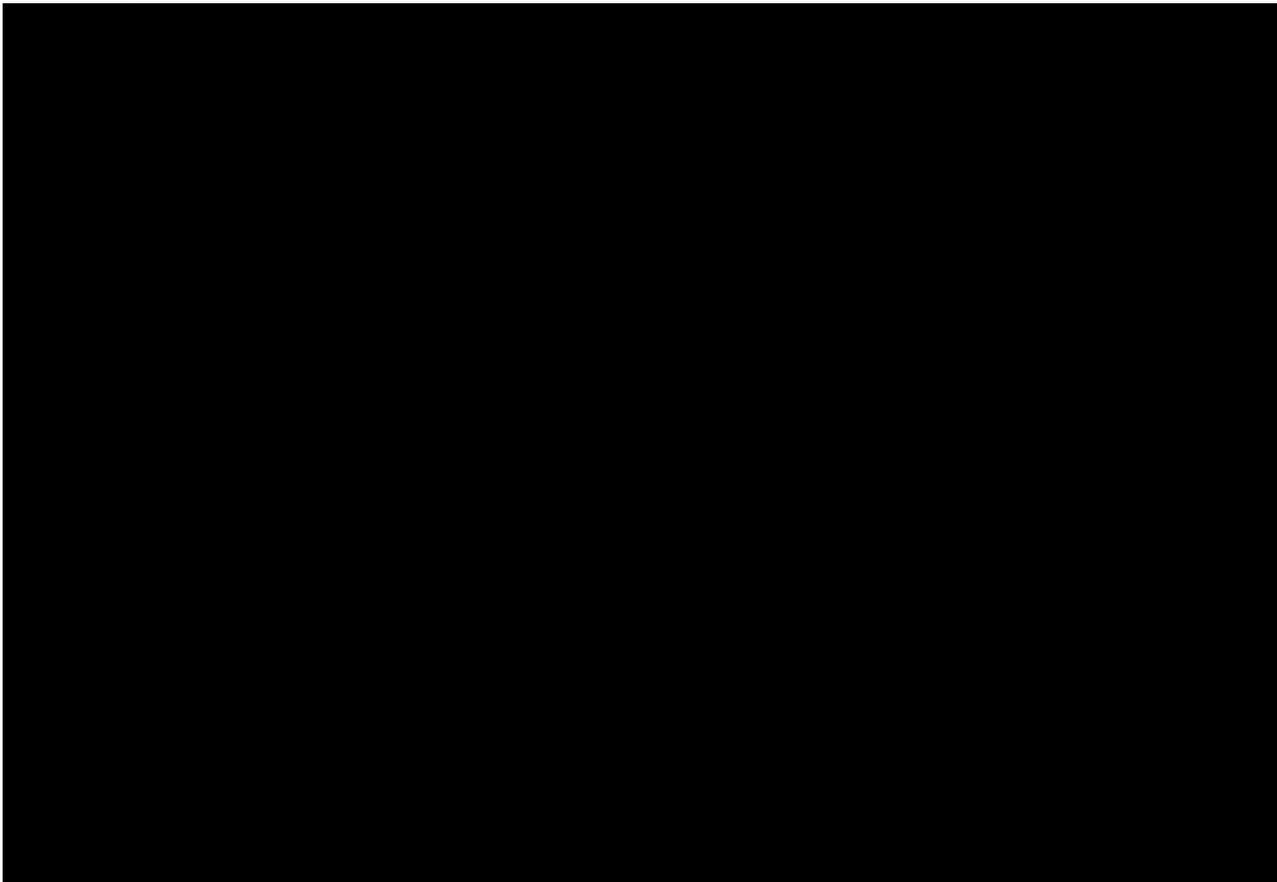
This community is present in the west of the site and is comprised of grassland areas with scattered occurrences of the small tree *Allocasuarina littoralis* (Black She-oak). The community is likely to be derived from historical clearing of the Threatened Ecological Community (TEC) Shale Sandstone Transition Forest, which is listed as Critically Endangered under the BC Act and the EPBC Act. Grassland areas derived from clearing of this ecological community are not recognised as occurrences of the TEC. A shrub layer is not present in the community within the site due to being maintained by slashing.

The community is dominated by the native grass *Microlaena stipoides* var. *stipoides* (Weeping Grass). The native grass *Themeda triandra* is sub-dominant and occurs both as scattered individuals and as patches in the larger grassland area, and other native grasses present include *Eragrostis leptostachya* (Paddock Lovegrass) and *Entolasia stricta* (Wiry Panic). Native forbs are common and include *Scaevola albida* (Pale Fan-flower), *Tricoryne elatior* (Yellow Autumn-lily), and *Lobelia purpurascens* (White Root).

Weeds are sparsely distributed throughout the grassland area and include the grasses *Paspalum dilatatum* (Paspalum) and *Aira caryophyllea* (Silvery Hairgrass), and the forbs *Senecio madagascariensis* (Fireweed) and *Facelis retusa* (Annual Trampweed).

An example of the Derived Native Grasslands present in the western extent of the subject site is shown in **Photograph 5**.

Photograph 5 Derived Native Grasslands in the western extent of the subject site



A.4.2. Watercourses within subject land

The desktop assessments of topographic maps and review of the ecological documentation prepared for the DCPCP indicate that the watercourse (Allens Creek) passing through the subject site is a 2nd order stream (as per the Strahler ranking) in along the southern extent of the eastern boundary before becoming a 3rd order stream in the northern extent of the eastern boundary.

The sections of Allens Creek within the subject site occurs in a natural gully dominated by sandstone outcrops with surrounding vegetation comprising of Western Sandstone Gully Forest.

An unnamed 1st order stream also passes through the south-eastern extent of the subject site, before converging into Allens Creek.

A.4.3. Fauna Habitats

Fauna habitats present on the subject site reflect the historical clearing of the site, with generally higher habitat values associated with the eastern undisturbed extent of the subject site, with less habitat values present in the western section of the site, due to the generally sparser vegetation in the west and prior and current land uses, which provide insufficient cover and diversity for foraging, for the majority of fauna. However, resources present include:

- Waterbodies, in the form of Allens Creek;
- Rocky outcrops and potential small caves, in association with the gully area of Allens Creek
- Scattered occurrences of hollow-bearing trees;
- Dead wood and logs;
- Fruiting and flowering trees and shrubs; and
- Grasslands

The habitats are suitable for a range of highly mobile species such as birds and bats, and large mammals including macropods. Common frog species would also be likely to occur, within the creek present on the eastern boundary of the subject site.

Of the species with potential to occur, several are listed as threatened under the BC Act and/or the EPBC Act including; the Koala (*Phascolarctos cinereus*), Grey-headed Flying-fox (*Pteropus poliocephalus*), Southern Myotis (also known as the Large-footed Myotis) (*Myotis macropus*), Eastern False Pipistrelle (*Falsistrellus tasmaniensis*), Varied Sittella (*Daphoenositta chrysoptera*), Squirrel Glider (*Petaurus norfolcensis*) and the Glossy Black-cockatoo (*Calyptorhynchus lathamii*). Other species with potential to occur include the Large Bent-winged Bat (*Miniopterus orianae oceanensis*) and Little Bent-winged bat (*Miniopterus australis*), with potential roosting habitat within the caves in the gully associated with Allens Creek.

A.4.4. Strategic Conservation Considerations

The field surveys have confirmed the presence of the TEC Shale Sandstone Transition Forest across large parts of the subject site, with the best quality vegetation occurring in the eastern extent of the subject site. On a local level, with the exception of the grassland areas, the vegetation identified as 'non-certified – avoided for biodiversity' and as part of the 'strategic conservation areas' has high biodiversity conservation values due to the presence of TECs, but only partly fits the DCPCP criteria for maximising conservation of high-quality remnants (for the under-scrubbed condition class).

When vegetation of the subject site is considered at a strategic or landscape scale, the feasibility for long term conservation is significantly reduced when future proposed land uses on land directly west under the DCPCP are considered, as well as consideration of current land use practices under current zoning. It is noted that the western section of the site, which has been subject to historical clearing and more recent disturbances, is currently bounded by residential properties on the northern boundary and cleared land ear-marked for a proposed business park development immediate to the west, hence connectivity is limited. The eastern section

of the site however, is well-connected to what appears to have remained a largely intact undisturbed patch of forest since the 1970s, providing a large biodiversity corridor along Allens Creek

Under the DCPCP, the eastern section of the site, which contains the highest biodiversity values on site, would continue to provide a corridor throughout the subject site, linking up with protected vegetation in the north and south. Hence, the mapping of the eastern section of the site as 'non-certified - avoided for biodiversity' and as part of the Strategic Conservation Areas is considered sound and well grounded. However, as the western section of the site comprises a mix of non-listed native grasslands and a disturbed condition of Shale Sandstone Transition Forest, reflecting current and past land uses, the mapping of the entire subject site as 'non-certified – avoided for biodiversity' and as part of Strategic Conservation Areas is not considered appropriate.

The actual ground-truthed extent of the TEC Shale Sandstone Transition Forest is less than what is indicated by vegetation mapping included in the DCPCP, which has informed the identification and zoning of the 'non-certified - avoided for biodiversity' and Strategic Conservation Areas. The western extent of the subject site has been historically cleared and managed for agricultural purposes, and the current condition and extent of the native forest vegetation on site reflects this. Strategic conservation of the subject site should focus on the retention of the highest quality intact occurrences of Shale Sandstone Transition Forest in the eastern section of the subject site, as well as the occurrence of Western Sandstone Gully Forest along Allens Creek, in accordance with the avoidance principles under the Biodiversity Assessment Method, whilst still allowing for development opportunities in the future in the more disturbed western section of the site.

The inclusion of the disturbed western section of the subject site as 'non-certified - avoided for biodiversity' and in the Strategic Conservation Areas would result in the removal of key development opportunities and linkages to the proposed Wilton South East Precinct development and other developments as part of the Wilton Growth Area, in order to achieve a very limited increase in long-term conservation outcomes. This is largely inconsistent with the aim of the DCPCP to support the delivery of infrastructure, housing and jobs for Western Sydney in a planned and strategic way that also protects and maintains key biodiversity values of Western Sydney, as the proposed E2 zoning across the entire subject site prevents a key development opportunity on disturbed land directly linked to a proposed large-scale development precinct.

Based on current conditions and proposed future surrounding land uses, restoration of the western parts of the subject site for conservation is likely to require high maintenance costs which contradicts the DCPCP decision making criteria of minimising costs of delivering the biodiversity outcomes. As vegetation in the eastern parts of the subject site shows more natural resilience and is better connected to surrounding vegetation, the focus of resources to protect and enhance the vegetation in the eastern parts of the subject site is likely to provide a more viable long-term conservation outcome while minimising costs of delivering the biodiversity outcomes.

A.5. Conclusions

The areas mapped for the proposed E2 zoning comprise occurrences of the TEC Shale Sandstone Transition Forest, Western Sandstone Gully Forest and derived native grasslands. When native vegetation and riparian habitats that currently exist within the proposed E2 zone are considered at a local scale, with the exception of

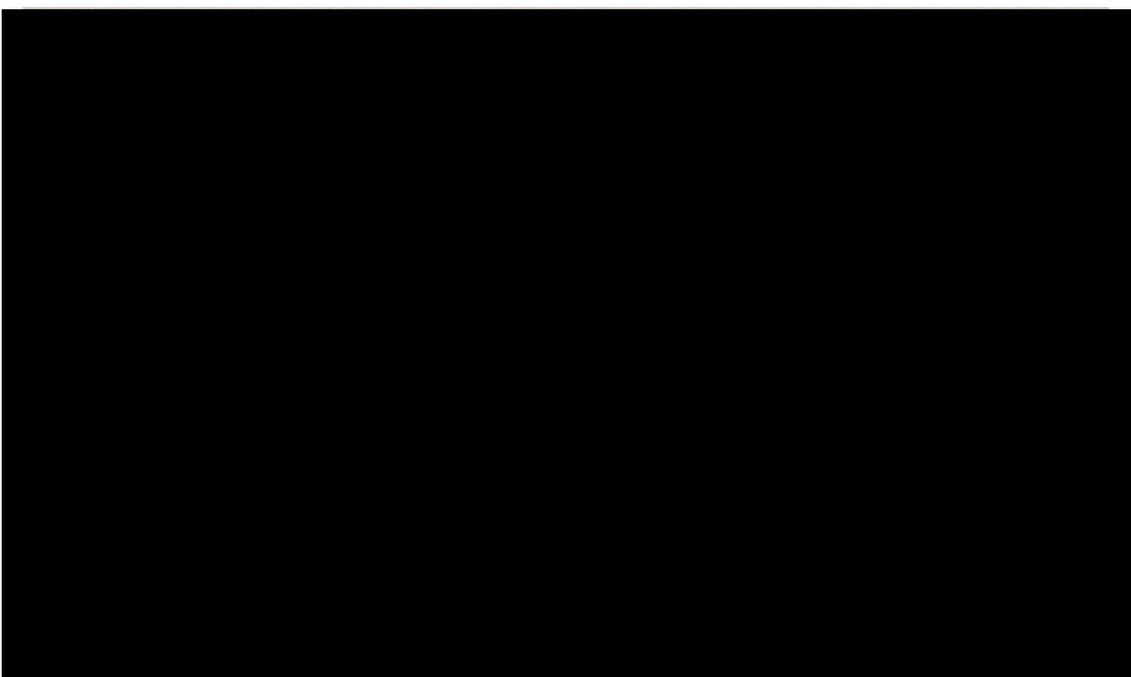
the grassland areas, the vegetation identified as 'non-certified – avoided for biodiversity' and as part of the Strategic Conservation Areas' has high biodiversity conservation values due to the presence of TECs, but only partly fits the DCPCP criteria for maximising conservation of high-quality remnants (for the under-scrubbed condition class).

However, when vegetation of the subject site is considered at a strategic or landscape scale, the feasibility for long term conservation is significantly reduced when future proposed land uses on land directly west under the DCPCP are considered, as well as consideration of the current condition of the vegetation in the western extent of the subject site with the influence of historical clearing and more recent disturbances.

The inclusion of the disturbed western section of the subject site as 'non-certified - avoided for biodiversity' and in the Strategic Conservation Areas would result in the removal of key development opportunities and linkages to the proposed Wilton South East Precinct development in order to achieve a very limited increase in long-term conservation outcomes. This is largely inconsistent with the aim of the DCPCP to support the delivery of infrastructure, housing and jobs for Western Sydney in a planned and strategic way that also protects and maintains key biodiversity values of Western Sydney, as the proposed E2 zoning across the entire subject site prevents a key development opportunity on disturbed land directly linked to a proposed large-scale development precinct.

The mapping of the entire subject site as 'non-certified – avoided for biodiversity' and as part of Strategic Conservation Areas is therefore not considered appropriate and should be limited to the remnant intact occurrence of the TEC Shale Sandstone Transition Forest in the eastern section of the site and the riparian corridor associated with Allens Creek, as shown in **Figure 8** (also included below), to reflect the land uses and their value for biodiversity.

Figure 8. Recommended amendments to the Land Category and Land Use Zone mapping of the DCPCP (red line indicates the subject site)



A.6. References

EES. 2020a. BioNet Atlas. Environment, Energy and Science.

EES. 2020b. BioNet Vegetation Classification. Environment, Energy and Science.

NSW Government 2020. Spatial Collaboration Portal. Historical Imagery Viewer.

OEH. 2013. Remnant Vegetation of the western Cumberland subregion, 2013 Update. VIS_ID 4207 Office of Environment and Heritage, Hustville.

FIGURES



