El Caballo Blanco, Gledswood Hills, Lakeside Recreation and Residential Development

Annual Compliance Report 2025-2026 Raby Road, Gledswood Hills NSW (EPBC 2013/6979)

SH Camden Lakeside Pty Ltd

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Abbreviations

Abbreviation	Description
CPW	Cumberland Plain Woodland
DA	Development Application
DCCEEW	Department of Climate Change, Environment, Energy and Water
DotEE	Department of the Environment and Energy
ECBGL	El Caballo Blanco, Gledswood Hills, Lakeside
ELA	Eco Logical Australia Pty Ltd
EPBC Act	*Environment Protection and Biodiversity Conservation Act* 1999
NEPA	National Environmental Protection Agency
WoNS	Weed of National Significance

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1. Introduction

1.1. Project background

El Caballo Blanco, Gledswood, Lakeside (ECBGL; the site) is an urban and recreational development within the south-western Sydney region of NSW. The site (incorporating both development and conservation areas) has an area of approximately 144.6 ha.

The project was originally approved by the then Department of the Environment and Energy (DotEE), now the National Environmental Protection Agency (NEPA)formerly Department of Climate Chance, Environment Energy and Water (DCCEEW), on 13 July 2016 with conditions and subsequently amended on 25 May 2017, 3 April 2018 and 30 November 2020.

The development comprises residential precincts set within a remodelled Camden Lakeside golf course and residential precinct set within a new 9-hole golf course, public parks and areas set aside for riparian and woodland conservation. Most of the development areas are cleared of vegetation, having been previously used as a golf course, tourist attractions, rural and cattle grazing purposes, with some stands of the EPBC listed critically endangered ecological community Cumberland Plain Woodland and Shale Gravel Transition Forest (herein referred to as CPW) remaining.

Eco Logical Australia (ELA) has prepared this Compliance Report on behalf of the Approval Holder, SH Camden Lakeside Pty Limited, to assess compliance with the conditions for the period 1 July 2025 – 30 June 2026 as set out in the approved action 'Construction of a residential and recreational development on Raby Road, Gledswood Hills, NSW (*Environment Protection and Biodiversity Conservation Act 1999* (EPBC) 2013/6979) approval signed 13 July 2016 (the Approval) and variation of conditions attached to approval (dated 30 November 2020).

1.2. Project status

1.2.1. Condition 3 Credit retirement

All 243 biobanking credits were secured and retired in June 2018 under the then NSW BioBanking scheme (Table 1) (Appendix A and Appendix B).

1.2.2. Commencement of works

The project commenced with Stage 0 – Golf Course on 14 July 2016 (Figure 1). Works in Stage 3 and 4 are in progress (Table 1).

Table 1: Staging and offsets at ECBGL

Stage	Impact (ha)	Noorumba offset liability (ha)	Alternative BioBanking site offset liability (credits)	Status in October 2026
0*	0.0	0.0	0	Complete
1	2.1	4.92	49	Civil Subdivision works complete, revegetation complete, ongoing vegetation maintenance
2	4.4	10.22	102	Civil Subdivision works complete
3	1.3	3.13	32	Bulk earthworks completed, Civil Subdivision works completed, sewer works completed completed; Basins and park yet to be constructed.
4	1.2	2.82	28	Civil Subdivision works completed

Stage	Impact (ha)	Noorumba offset liability (ha)	Alternative BioBanking site offset liability (credits)	Status in October 2026
5	1.4	3.16	32	Civil works completed.
6	0.6	-	7	The additional 7 credits required by the variation to this condition were retired on 26 May 2021 (Appendix E)
Total	10.7	24.3	250	-

*Golf course

1.2.3. Implementation of on-site works

The following works have been completed within the CPW retention areas Figure 1:

- exclusion of livestock
- installation of fencing
- primary weed control
- maintenance weed control
- grassland weed control
- follow up weed control
- reintroduction of woody debris
- hand direct seeding
- hand planting to supplement natural regeneration of native grasses
- spreading recovered topsoil
- brush matting.

These undertakings were guided by the site-specific vegetation management plan under a Voluntary Planning Agreement with Council.

1.3. Variations

In 2019, SH Camden Lakeside submitted Development Applications (DAs) to Camden Council for the residential development of EPBC Stages 3, 4 and 5 (SH Camden Lakeside Stages 42, 43, 44, 45 & 46), and a minor reconfiguration of the Lakeside Golf Course. Due to changes to NSW Planning requirements in relation to Planning for Bushfire Protection (residential developments are now required to comply with PBP 2018 instead of PBP 2006) and the DAs have thus had to increase the Bushfire Asset Protection Zones from 10 m (as calculated in ELA's original 2016 assessment) to 14 m. These changes, as well as minor changes to the 'batters' required to construct the connecting roads and building platforms, will result in impacts to an additional 0.276 ha of EPBC condition CPW, which includes 0.086 ha of CPW required to be retained as per Annexure B of the 3 April 2018 variation.

Accordingly, in September 2019, SH Camden Lakeside submitted a request for a minor variation to the EPBC Act Approval (EPBC 2013/6979) under Part 9 section 143 for these additional impacts. To compensate for these minor additional impacts, SH Camden Lakeside will be implementing a new Vegetation Management Plan along Riley's Creek to enhance and restore 1.99 ha of CPW to EPBC Act condition and retire an additional seven (7) CPW biobanking credits (Appendix C). The variation was approved in November 2020 (Appendix D). This approval resulted in variations to Conditions 3 and 3A, as presented in Section 2 and required the retirement of 7 additional CPW BioBanking Credits by 7 March 2021.

1.4. Reason for this report

This report has been prepared in compliance with condition 8 of the ECBGL EPBC Approval which states:

> *Within three months of every 12-month anniversary of the commencement of action, the person taking the action must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of any management plans as specified in the conditions. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of this approval must be provided to the Department at the same time as the compliance report is published.*

This compliance report is for the period 1 July 2025 – 30 June 2026.

Eco Logical Australia has prepared this compliance report on behalf of SH Camden Lakeside Pty Ltd, examining compliance of the conditions set out by DoTEE in 2018. As the works commenced July 2016, the annual reporting is accordingly due October (i.e., within 3 months of the 12-month anniversary). The following sub-sections discuss the conditions which required detail or where variations were sought and approved by DoTEE. Section 2 illustrates the compliance relative to each condition.

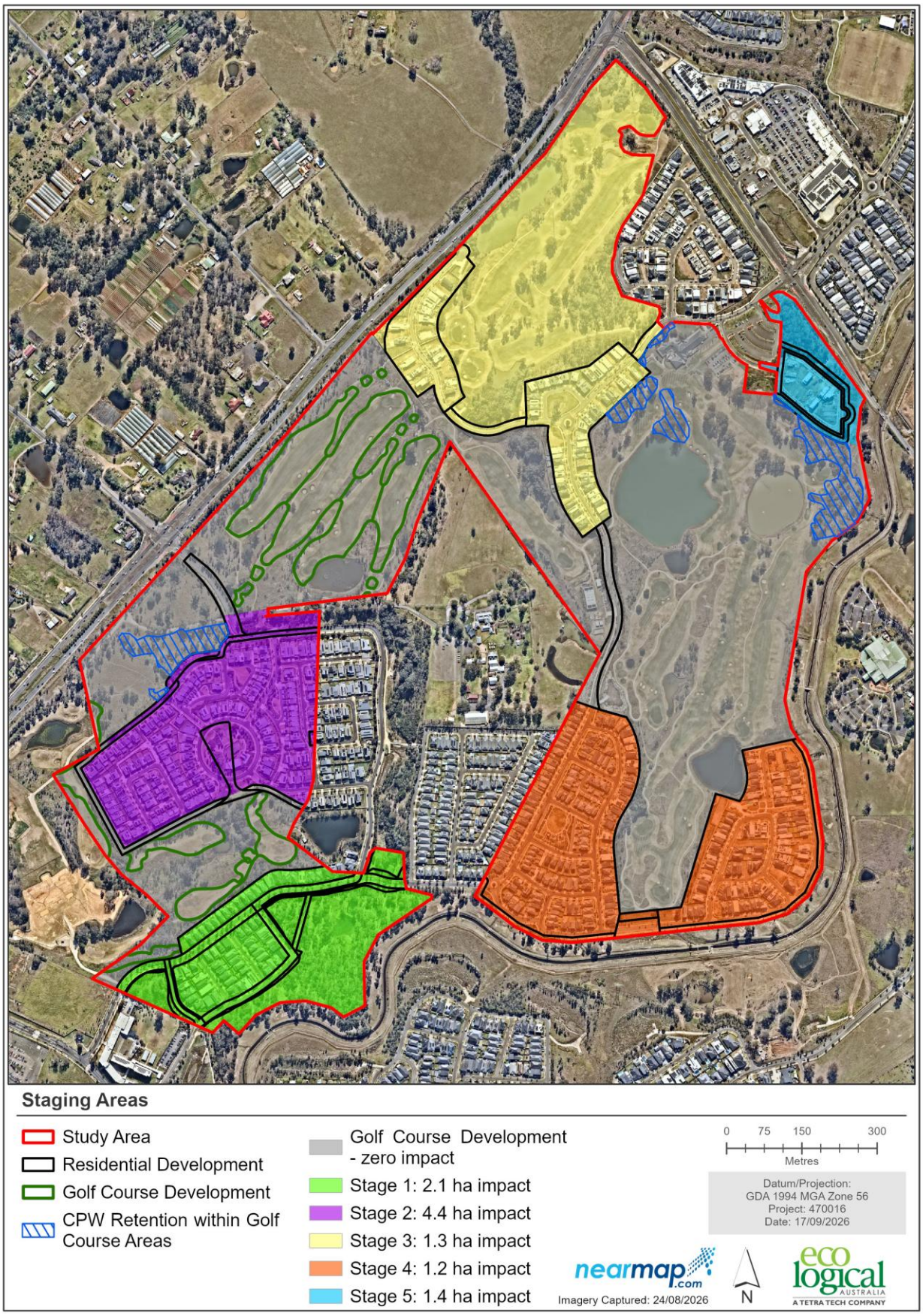


Figure 1: Staging map

2. Compliance reporting

A summary of the approved condition and their respective compliance status, outcomes achieved and whether further action is required is presented in Table 2. Additional information for some of the conditions of approval are presented in Section 3.

Table 2: Compliance with conditions of approval

Number	Condition	Compliance	Date due	Details
1	The approval holder must not impact on the Onsite Conservation Area specified in Annexure A except in accordance with plan described in condition 2.	Yes	Ongoing	All works on site undertaken as per approval
2	Prior to commencement of construction the approval holder must develop a plan for the management of the onsite conservation area specified in Annexure A, to be adopted under the Local Government Act 1993 NSW, to prevent direct and indirect impacts to vegetation.	Yes	Project duration	Management plans consist of site-specific Vegetation Management Plans approved by Council
3	*(Varied on 30 November 2020)* To compensate for the loss of 10.7 hectares (ha) of Cumberland Plain Woodland, the approval holder must retire 250 Biobanking credits by 28 February 2021. The credits must be for vegetation meeting the EPBC Act listing for Cumberland Plain Woodland. The approval holder must provide the Department with the signed BioBanking credit retirement report by 7 March 2021.	Yes	Complete	50 credits retired on 30 June 2017 (Appendix A). 193 credits retired on 21 June 2018 (Appendix B). The additional 7 credits required by the variation to this condition were retired on 26 May 2021 (Appendix E), with credit retirement reports provided to the Department on the same day. Email correspondence between Robert Humphries and Michaela Ballard on 2 June 2021 stated: *"The Department has reviewed the notification and determined that a breach of condition 3 has been substantiated. However, given the nature of the contravention and the circumstances surrounding the breach of conditions, the Department has decided to take no further compliance action regarding this matter."*
3A	*(Varied on 30 November 2020)* The approval holder must not clear more than 10.7 hectares (ha) of Cumberland Plain Woodland.	Yes	Ongoing	All works on site undertaken as per approval.

Number	Condition	Compliance	Date due	Details
				Some additional minor works relating to sewer diversion and stormwater pipes were undertaken outside of the development footprint. These additional works did not impact on any CPW or any vegetation required to be retained.
4	The approval holder must ensure that a population of at least 100 *Pimelea spicata* (Spiked Rice-flower) remains intact on the site of the action at all times.	Yes	At all times	Records from 2026 monitoring survey provided in **Section 3** indicating population of approximately 1700 individuals which is an increase from the 2025 count and more than the minimum requirement of 100.
5	Prior to commencement of construction, the approval holder must provide to the Minister a construction environmental management plan, approved by Camden Council, describing measures to be taken to protect retained vegetation.	Yes	Provided 28 June 2016	Sent to the then DoTEE 28 June 2016
6	Within 10 business days after the commencement of the action, the approval holder must advise the Department in writing of the actual date of commencement.	Yes	10 business days after commencement	Commenced with Stage 0 (Golf Course) the then DoTEE Advised August 2016
7	The approval holder must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the management plans and reports required by this approval, and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media.	Yes	Ongoing	Ongoing records kept as per standard site record keeping. Works have been carried out in line with: ● Camden Council Development Consents ● General Terms of Approval ● Environmental Management Plans ● Construction Management Plans

Number	Condition	Compliance	Date due	Details
8	Within three months of every 12 month anniversary of the commencement of the action, the person taking the action must publish a report on their website addressing compliance with the conditions of this approval, including implementation of any management plans as specified in the conditions. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of this approval must be provided to the Department at the same time as the compliance report is published.	No	October 2026	2025-2026 compliance report is the subject of this report. Previous reports available online at https://www.sekisuihouse.com.au/gledswood-hills/news/
9	Non-compliance with any of the conditions of this approval must be reported to the Department within 48 hours of the approval holder becoming aware of the non-compliance.	N/A	Ongoing	There were no non-compliances in this reporting year.
10	Upon the direction of the Minister, the approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister. The independent auditor must be approved by the Minister prior to the commencement of the audit. Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.	Yes	Ongoing	No ministerial requests made for independent audit of compliance
11	Unless otherwise agreed to in writing by the Minister, the approval holder must publish all management plans and reports referred to in these conditions of approval on their website. Each management plan and report must be published on the website within 1 month of being approved by the Minister.	Yes	Ongoing	Available online at https://www.sekisuihouse.com.au/gledswood-hills/news/

3. Additional information

3.1. *Pimelea spicata* survey

Condition 4 of the approval states:

> *The approval holder must ensure that a population of at least 100 Pimelea spicata (Spiked Rice-flower) remains intact on the site of the action at all times*.

Targeted counts were conducted on 15 September 2026 by ELA ecologist Tony Chen to ensure that the population of *Pimelea spicata* remains intact and was in a healthy condition. The survey traversed the area known to contain the population and immediate remaining area within the *Pimelea* exclusion fencing (Figure 2). Some individuals were observed in flower/beginning to flower during the survey (Figure 4), however the majority of individuals had not yet commenced flowering for the season. Approximately 1700 individuals were counted, all of which were within the previously recorded extent, except for a single point that held 10 individuals to the eastern side of the fenced area. Previous counts are presented in Table 3.

The reported plant numbers are estimates based on field counts. A natural margin of error may occur between counters, meaning the actual number of plants present may be slightly higher or lower than recorded.

Table 3: *Pimelea spicata* counts

Compliance period	Survey date	Surveyors	Count
2016/2017	25 November 2016	Andrew Norvill	164
2017/2018	24 August 2018	Alex Gorey	134
2018/2019	17 June 2019	Alex Gorey Andrew Norvill	190
2019/2020	8 July 2020	Alex Gorey Carolina Mora	258
2020/2021	22 June 2021	Alex Gorey Carolina Mora	228
2021/2022	28 October 2022	Alex Gorey	Approximately 300
2022/2023	11 August 2023	Elliott Poulier Claudia Santori	Approximately 276
2023/2024	13 September 2024	Michael Gregor	Approximately 520
2024/2025	17 July 2025	Tim Finter	Approximately 600
2025/2026	15 September 2026	Tony Chen	Approximately 1700

Groundcover within the patch was largely dominated by *Themeda triandra* (Kangaroo Grass), *Microlaena stipoides* var. *stipoides* (Weeping Grass), *Glycine tabacina* and *Dichondra repens* (Kidney Weed).

The presence of *Ehrharta erecta* (panic veldt grass), *Lolium perenne* (perennial ryegrass), *Plantago lanceolata* (lamb's tongues), *Eragrostis curvula* (African lovegrass), *Bidens pilosa* var. *pilosa* (cobblers pegs), *Senecio madagascariensis* (fireweed), *Chloris gayana* (Rhodes grass), *Asparagus asparagoides* (bridal creeper), and *Araujia sericifera* (moth vine) was noted in the groundcover and especially on the edges of the population. One mature *Lycium ferocissimum* (African boxthorn) was recorded in the

northern boundary of the protected area. Previous annual reports noted an increase in these covers. The previously identified *Olea europaea* ssp. *cuspidata* (African olive) in the midstorey has continued to increase in cover and abundance and the extent where African olive is highest in the midstorey is defined in Figure 3.

Problematic weed incursion has increased throughout the remaining area within the *Pimelea spicata* exclusion fencing. Weed-infested areas are shown in Figure 3 and include the exotic species identified above. Within the CPW retention area, problematic weed incursion includes increased midstorey cover of mature *Olea europaea* subsp. *cuspidata* (African Olive) (Figure 6) and one occurrence of immature *Opuntia stricta* (common pear) (Figure 7).

Common pear is a cactus that can grow to approximately 0.7 m in height and is listed as a Weed of National Significance (WoNS), as is bridal creeper (Figure 8). It can form dense infestations that outcompete pasture grasses and native plants and restrict the movement of people and animals. Immediate control of both the common pear and bridal creeper occurrence is recommended.

Rabbit scats were recorded within the *Pimelea spicata* exclusion area during the most recent field survey. Their presence indicates ongoing rabbit activity, which may contribute to grazing pressure, soil disturbance and further competition for *P. spicata* habitat (Figure 9).

3.2. Management actions required

During the most recent field survey, it was observed that the extent of African Olive in the midstorey is increasing. As advised in previous years, weed control by suitably qualified and experienced bush regenerators must be undertaken to reduce overall weed cover within the exclusion area. Although *Pimelea spicata* counts have progressively increased during annual surveys, the extent of problematic weeds and African Olive midstorey has also increased significantly each year. Although it can take a while for woody weeds such as African Olive to completely dominate the upper midstorey, once they do, they will inevitably shade and crowd out *Pimelea spicata* towards the margins of the exclusion area. In addition, the larger the African Olive, the more work it will take to remove it.

Given that the exclusion zone is a small, fenced conservation area and is required to retain at least 100 *Pimelea spicata* individuals to remain compliant, urgent weed removal is required. Without timely intervention, the weeds may progressively displace *Pimelea spicata* habitat and compromise the available area needed to maintain the required population within the exclusion zone. It is unclear whether the weed removal identified in previous reports has been undertaken, but these works remain necessary to prevent further deterioration of the conservation area and potential non-compliance with the EPBC approval conditions.

The current absence of weed-control activities represents a management deficiency requiring corrective action. Given the extent of weed overgrowth within the protected area, failure to implement timely weed management may compromise the objective of preventing indirect impacts to retained vegetation under Condition 2 and may place at risk the requirement under Condition 4 that at least 100 *Pimelea spicata* individuals remain intact on the site at all times. The existing management plan should therefore be implemented promptly, including the relevant weed-management measures, with priority given to areas supporting or adjoining *Pimelea spicata* within the protection area. Records of the weed-control works and their outcomes should be maintained as evidence of implementation of the management measures relevant to the EPBC approval (Appendix F).

Fencing and signage was erected around the *Pimelea spicata* population on 20 August 2020 to minimise any direct or indirect impacts from golf course operations. The location of the fence reflects the known

extent of the population to be protected, rather than the area of CPW that needs to be retained. The entire patch of CPW, including areas outside of the *Pimelea spicata* fencing, will be retained and as of this years site inspection, the fencing and signage remained in place.

Finally, the presence of rabbits is a threat to the *Pimelea spicata* and rabbit control actions must be undertaken. The first action to manage rabbits will be by removing shrubby vegetation such as African Olive which may be used as harbour. Subsequently camera monitoring should be undertaken and direct rabbit control (e.g. shooting) undertaken if rabbits have potential to impact on the *Pimelea spicata.*

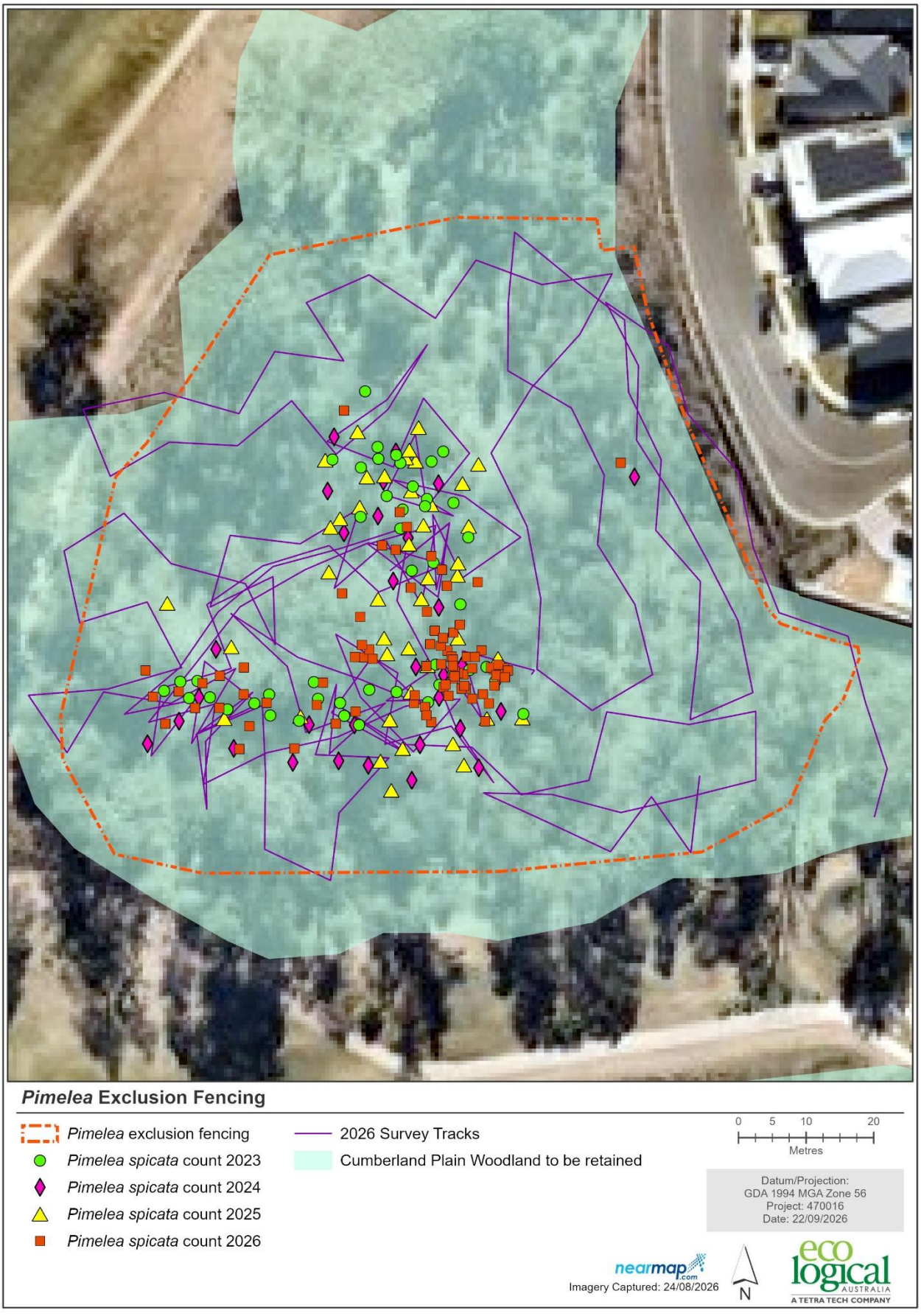


Figure 2: *Pimelea spicata* survey effort mapping

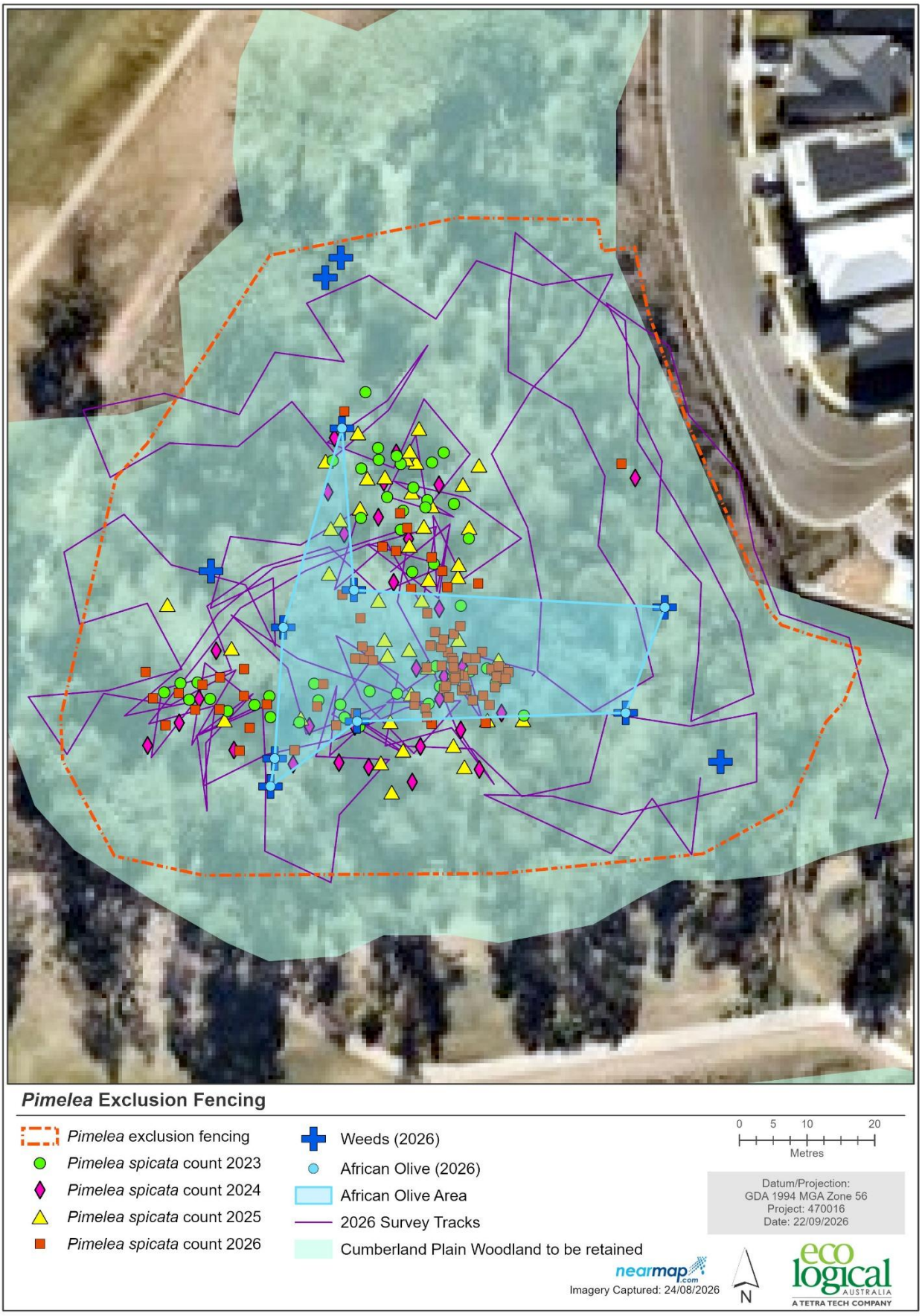


Figure 3: Weed mapping within *Pimelea spicata* fenced zone



Figure 4: *Pimelea spicata* in flower 2026



Figure 5: African olive dominating the midstorey of the *Pimelea spicata* protection area



Figure 6: Understorey of juvenile African olive within the protected area



Figure 7: *Opuntia sp.* Common pear within the *Pimelea spicata* protected area



Figure 8: Bridal creeper *Asparagus asparagoides* within the *Pimelea spicata* protected area



Figure 9: Scat of feral rabbits (*Oryctolagus cuniculus*) within the *Pimelea spicata* protected area

4. Conclusion

On behalf of SH Camden Lakeside Pty Limited, ELA has prepared this Compliance Report to fulfil condition 8, and in doing so, all conditions of the Approval (EPBC 2013/6979). Since the commencement of the action there have been no non-compliances, including in this past year. The population of *Pimelea spicata* was found to be in good condition and contained approximately 1700 individuals at the time of survey. Since the 2022 survey there has been a significant increase in the cover of exotic vegetation species across the area. As noted in previous reports and in this report, weed removal must be undertaken within the *Pimelea spicata* exclusion area to control dominant exotic species identified in Section 3.

Appendix A BioBanking credit retirement report (June 2017)

Appendix B - BioBanking credit retirement report (June 2018)

Appendix C – Request for s143 Variation to Approval Conditions (September 2019)

Appendix D – Post-approvals Variation of Conditions (November 2020)

Appendix E - BioBanking credit retirement reports (May 2021)

Appendix F – EPBC (2013/6979) Final Approval Conditions