Planning, Industry & Environment

Our ref: DOC19/1003487
Senders ref: SSD-9831

Ms Megan Fu

Planning and Assessment Group
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Fu

Subject: EES comments on Environmental Impact Statement for Western Sydney University Bankstown City Campus – SSD-9831 – 74 Rickard Road and part 375 Chapel Road Bankstown

Thank you for your email of 1 November 2019 requesting advice on the Environmental Impact Statement (EIS) for this State Significant Development (SSD).

The Environment, Energy and Science Group (EES) provides its recommendations and comments at Attachment A.

Please note that EES has not provided comments on Aboriginal cultural heritage matters. This does not represent EES support for the proposal and this matter may still need to be considered by the consent authority.

If you have any queries regarding this matter, please do not hesitate to contact Janne Grose, Senior Conservation Planning Officer on 02 8837 6017 or at janne.grose@environment.nsw.gov.au

Yours sincerely

S. Harrison 26/11/19

Susan Harrison

Senior Team Leader Planning
Greater Sydney Branch
Environment, Energy and Science

Attachment A

Subject: EES comments on Environmental Impact Statement for Western Sydney University Bankstown City Campus – SSD-9831 – 74 Rickard Road and part 375 Chapel Road Bankstown

The Environment, Energy and Science Group (EES) has reviewed the following documents:

- Environmental Impact Statement (EIS) – 24 October 2019
- Appendix E – Architectural Design Report – August 2019
- Appendix G – Landscape Plans
- Appendix I – Civil Stormwater and Flooding Report – 23 August 2019
- Appendix J – Flood Emergency Response Plan – 15 July 2019
- Appendix Z - BDAR Waiver documents

and provides the following comments.

Landscaping

The Landscape Design Report states the species to be planted (as part of the public realm) are to match existing species (page 7). EES notes tree species proposed to be planted in the public realm include:

- exotic trees such as *Zelkova serrata* and *Pyrus calleryana* (Callery Pear). *Zelkova serrata* is a deciduous species native to Japan, Korea, eastern China and Taiwan while *Pyrus calleryana* is a species of pear tree native to China and Vietnam
- *Corymbia citriodora* (a lemon-scented gum) which is from temperate and tropical north eastern Australia.

It is also noted exotic, deciduous species such as *Acer campestre* (Field maple) *and Fraxinus excelsior* 'Aurea' (Golden Ash) are proposed to be planted on the building terraces.

EES recommends the Landscape Plan use a diversity of local native provenance species from the relevant local native vegetation communities that once occurred in this location to improve biodiversity rather than exotic species and non-local native species.

Urban Tree Canopy

The number of trees proposed to be removed for this development appears to have increased, as the BDAR waiver request (dated 4 February 2019) indicated 17 trees were to be removed, whereas the EIS notes 23 existing trees will be removed on, or adjacent to the site (page 15). The RTS needs to:

- provide details on why the number of trees that are proposed to be removed has increased
- confirm the number of existing trees that are to be removed
- clarify whether the proponent proposes to replace the trees that are to be removed at ground level at a ratio of greater than 1:1.

The loss of the existing trees from the site, and the many benefits that the trees provide, takes years for a juvenile tree to grow and replace. To assist in mitigating the urban heat island effect and improving the urban tree canopy and local habitat, EES recommends that the development:

- replaces any trees removed at ground level at a ratio greater than 1:1
- replaces the trees with local provenance native plant species from the native vegetation community which once occurred in this locality to enhance local biodiversity, rather than use non-local native or exotic plants
- uses advanced and established local native trees preferably with a minimum plant container pot size of 75-100 litres, or greater for local native tree species which are commercially available. Other local native tree species which are not commercially available may be sourced as juvenile sized trees or pre-grown from provenance seed
- provides sufficient area/space to allow the trees to grow to maturity.

Sustainability and Building Design

The EIS indicates the development includes large areas of planting including trees on the terraces and green walls. EES supports the development incorporating the green terraces and green walls.

Flood
EES has reviewed the relevant flood studies and flood emergency response plan by Bonacci, 2019. All relevant flood risk management issues have been appropriately addressed for this stage of the approvals process.

Recommended conditions of consent
EES recommends that if the SSD is approved the following conditions are included:

1. Trees removed by the development shall be replaced at a ratio greater than 1:1 at ground level.

2. Sufficient area/space is provided on site to allow the trees to grow to maturity.

3. Tree planting at the site shall use advanced and established trees with a minimum plant container pot size of 75-100 litres, or greater for local native tree species which are commercially available. Other local native tree species which are not commercially available may be sourced as juvenile sized trees or pre-grown from provenance seed.

4. The landscaping at the site shall use a diversity of local native provenance trees, shrubs and groundcover species (rather than exotic species or non-local native species) from the relevant native vegetation community which once occurred in this locality.

5. The Landscape Plan shall include details on:
   a) the native vegetation community that once occurred in this locality
   b) a list of local provenance tree, shrub and groundcovers to be used in the landscaping
   c) the quantity and location of plantings
   d) the pot size of the local native trees to be planted
   e) the area/space required to allow the planted trees to grow to maturity
   f) plant maintenance regime. The planted vegetation should be regularly maintained and watered for 12 months following planting. Should any plant loss occur during the maintenance period the plants should be replaced by the same plant species

End of Submission