



Our ref: DOC19/980520

Senders ref: SSD-9726

Mr David Glasgow

Planning and assessment Group
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Glasgow

Subject: EES comments on Response to Submissions for Adaptive reuse of the Royal Hall of Industries – SSD-9726 – 1 Driver Avenue, Moore Park

Thank you for your email of 8 November 2019 requesting advice on the Response for Submissions (RTS) for this State Significant Development (SSD).

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

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

A handwritten signature in black ink that reads 'S. Harrison' followed by the date '21/11/19'.

Susan Harrison

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

Subject: EES comments on the Response to Submissions for adaptive reuse of the Royal hall of Industries – SSD-9726 – 1 Driver Avenue, Moore Park

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

- Response to Submissions (RTS) – November 2019
- Swans Head Quarters Masterplan
- Microbat Survey Report
- Arborist Addendum – 18 October 2019
- Revised public domain and landscaping plan
- Flood Management Strategy – 13 September 2019

and provides the following comments.

Biodiversity

Microbats

The RTS notes microbat surveys detected, among other species, the vulnerable eastern (large) bent-winged bat (*Miniopterus orianae oceanensis*). The RTS suggests that the species is roosting nearby and it is possible that individuals or small numbers are roosting in the Royal Hall of Industries. In accordance with this finding, a Biodiversity Development Assessment Report (BDAR) is currently being prepared and will be submitted to Planning and Assessment Group for referral to EES upon completion (page 21). Once the BDAR is provided EES will provide comments, if required.

Tree removal

The RTS notes the number of trees proposed to be removed has reduced from seven trees to four Spotted Gums (*Corymbia maculata*) and that the impact of removing four trees will be mitigated through the planting of 23 additional trees on ground level and 3 trees of level 1 (page 19). EES supports the proponent reducing the number of trees to be removed and increasing the number of trees to be planted.

Site Landscaping

The Swans HQ Masterplan shows deciduous trees are proposed to be planted in addition to native species. EES repeats its previous recommendations that:

- the site landscaping/planting schedule uses a diversity of local native provenance trees, shrubs and groundcover species from the native vegetation community that once occurred in this locality rather than plant exotic or non-local natives and if the project is approved, a condition of consent is included to this effect
- the landscape plan demonstrates that the plant species list comprises a diversity of local provenance native plant species.

Flood

The Flood Management Strategy report adequately addresses the flood risk management issues for the proposed development. EES supports all the risk management measures detailed.

Recommended conditions of consent

EES recommends the following conditions are included in the consent:

1. 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 that once occurred in this locality.

2. Tree planting at the site shall use advanced and established local native provenance trees with a minimum plant container pot size of 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.
3. Enough area/space must be provided to allow the planted trees to grow to maturity.

End of Submission