



Our ref: DOC19/1004584
Senders ref: SSD-10285

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

Dear Mr Roppolo

Subject: EES comments on Environmental Impact Statement for Royal Randwick Racecourse – Leger lawn Development– SSD-10285

Thank you for your email of 13 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. 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

A handwritten signature in black ink that reads 'S. Harrison' followed by the date '27/11/19'.

Susan Harrison

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

Subject: EES comments on the Environmental Impact Statement for Royal Randwick Racecourse – Leger Lawn Development– SSD-10285

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

- Environmental Impact Statement (EIS) – October 2019
- Appendix B – Architectural Design Report – 31 October 2019
- Appendix C – Landscape Plans
- Appendix I - Ecological Assessment and BDAR Waiver request – 23 May 2019
- Appendix J – Arboricultural Impact Assessment (AIA) – 30 October 2019
- Appendix K – BDAR waiver– 5 June 2019
- Appendix O – Civil Design Report – 29 October 2019

and provides the following comments.

Landscaping

The EIS notes the landscape areas are to incorporate native species as per the Landscape Plan (page 104). The Indicative Planting Schedule also incorporates an invasive exotic species (Indian Hawthorn - *Rhaphiolepis indica*) and exotic species, such as:

- Red Hot Poker - *Kniphofia uvaria* 'Flamenco'
- Japanese Box – *Buxus japonica*
- 'Magnifica' Gardenia - *Gardenia augusta*.

In relation to Indian Hawthorn (*Rhaphiolepis indica*), it is suggested the Department considers information that is available relating to this species prior to approving the Landscape Plans for the site, for example the NSW Department of Primary Industries website (DPI NSW Weedwise) indicates:

- *Rhaphiolepis indica* is regarded as an environmental weed in NSW and it is mainly a problem in remnant bushland in the Sydney region. The fruit of this plant is highly desirable to birds and can be easily dispersed into the environment and can also be spread by water – see DPI Weedwise link : <https://weeds.dpi.nsw.gov.au/Weeds/IndianHawthorn>.

The Greater Sydney Regional Strategic Weed Management Plan 2017 – 2022 published by Greater Sydney Local Land Services and developed in partnership with the Greater Sydney Regional Weed Committee lists *Rhaphiolepis Indica* under Appendix 2 (other weeds of regional concern). It notes for this species one of the assets/values that is at risk is the environment.

The proponent needs to clarify if Red Hot Poker (*Kniphofia uvaria* 'Flamenco') behaves like *Kniphofia uvaria*. The seed of *Kniphofia uvaria* disperse by wind; it clumps vigorously and spreads rapidly and regrows from its rhizomes. Its dense clumping roots exclude the roots of other plants and prevents the germination of their seeds. It also favours sensitive and fragile bushland such as swamps, moist forest and creek lines (www.weedsbluemountains.org.au).

If *Kniphofia uvaria* 'Flamenco' behaves like *Kniphofia uvaria*, it is recommended it is not used in the site landscaping, nor should the invasive *Rhaphiolepis indica* be used as the site is near Centennial Park which contains Eastern Suburbs Banksia Scrub which is a critically endangered ecological community under the *Biodiversity Conservation Act 2016*.

The Indicative Planting Schedule also proposes to use native species which are not locally occurring such as the Firewheel tree (*Stenocarpus sinuatus*) which is an Australian rainforest tree. Its natural distribution is from the Nambucca River in New South Wales to the Atherton Tableland in tropical Queensland.

EES recommends:

- the landscaping at the site uses a diversity of native trees, shrubs and groundcover species from the relevant local native vegetation communities (local provenance material) that once occurred in this locality to improve biodiversity (rather than use exotic species and non-locally occurring native species)
- the landscape plans are amended, and a condition of consent is included which requires this SSD to use local native provenance species from the relevant local native vegetation communities which once occurred in this locality.

Urban Tree Canopy

The EIS notes three exotic trees are to be removed. To mitigate the urban heat island effect and improve the urban tree canopy and local habitat, EES recommends that the development:

- replaces any removed trees 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
- 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 enough area/space to allow the trees to grow to maturity.

Recommended conditions of consent

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

1. Invasive exotic species are removed from the Landscape Plan and replaced by 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.
2. Trees removed, shall be replaced at a ratio greater than 1:1.
3. Enough area/space is provided on site to allow the trees to grow to maturity.
4. 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.
5. The Landscape Plan shall include details on:
 - a) the native vegetation community that occur or 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

