



Ferdinando Macri
Planning Officer
Social and Infrastructure Assessments
Planning and Assessment Group
Department of Planning, Industry
and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Mr Macri

Subject: Exhibition – Concord Hospital Multi-Storey and at-grade Carpark (SSD-9036-Mod-7)

Thank you for your email received 14 December 2021 requesting comments on the above proposal. Environment, Energy and Science Group (EES) has reviewed the submitted documents and provides its recommendations and comments below.

Ecological impacts of the proposed clearing

Under section 7.17(2)(c) of the Biodiversity Conservation Act 2016, it is the authority or person determining the SDD application that must be satisfied that the modification will not increase impacts on biodiversity and therefore not require the preparation of a biodiversity development assessment report.

To assist the Planning and Assessment Group, EES notes that the site has largely been cleared of vegetation and that the 10 trees to be removed are described as a mix of urban exotic and native plantings and are not consistent with any listed plant community type. EES does not consider the removal of the 10 identified trees is likely to constitute a significant impact beyond what was considered as part of the approved project, as modified.

Replacement plantings and the use of local native provenance species

EES notes that the applicant has committed to replace these trees at a 1:1 ratio. EES recommends that trees removed by the project should be replaced at a ratio greater than 1:1 to mitigate the local urban heat island effect and improve local biodiversity over time. It is proposed to address the removal of the trees in the Revised Landscape Plans prepared by Site Image.

EES notes that the consolidated consent for SSD 9036 includes condition D26 Tree Replacement which stipulates:

The site is to accommodate a minimum of 13 replacement trees, to be planted prior to occupation. Trees are to be a minimum pot size of 75 litres and selected in consultation with Council. A minimum of three of these trees shall be interspersed along the eastern side of the entry /exit driveway of the Stage 1 MSCP and may require the removal of some on-grade car parking spaces located adjacent to the driveway. the number of trees to be conditions.

EES recommends that the applicant in the Response to Submission (RtS) proposes an amended condition which accounts for the additional trees to be removed by Mod 7, or a new similar condition specifically for MSCP and that the ratio for replacement be greater than 1:1. EES agrees with the requirement that the minimum pot size be 75 litres.

EES usually recommends that the landscape planting uses a diversity of local provenance native species from the relevant native vegetation community or communities that occur, or once occurred on the site rather than use exotic species or non-local native species. However, given the built-up character of the site and the existing conditions of consent relating to landscaping, EES would agree to other species being used in consultation with the Council. EES recommends that the RtS confirm that none of the species proposed for landscaping at the site have the potential to become weeds.

If you have any queries please contact David Way, Senior Conservation Officer via David.Way@planning.nsw.gov.au or 02 8275 1324.

Yours sincerely



21/12/21

Susan Harrison

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