



Department of Planning and Environment

Our ref: DOC22/43452
Senders ref: SSD-16928008

Isaac Clayton
Social and Infrastructure Assessments
Infrastructure Assessments,
Planning Group, DPE
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Mr Clayton

Subject: Exhibition – Nepean Hospital Redevelopment Project - Stage 2 (SSD-16928008)

Thank you for your email received 20 January 2022 requesting comments on the above proposal.

Environment, Energy and Science Group (EES) has reviewed the provided environmental impacts statement. Please see **Attachment A** for ESS' comments on the proposal.

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

A handwritten signature in black ink that reads 'S. Harrison'.

16/02/22

Susan Harrison

Senior Team Leader Planning
Greater Sydney Branch
Biodiversity and Conservation

Attachment A – EES comments on the Nepean Hospital Redevelopment Project - Stage 2 (SSD-16928008)

Biodiversity considerations

EES notes that this review was undertaken without access to the assessment in the BAM calculator as the case has not been submitted. The assessor must 'submit to consent authority' where the consent authority is 'Greater Sydney – Compliance & Regulation'.

EES also notes that this review has been undertaken without access to GIS files, as these have not been provided to EES. While a photo of BAM Plot 1 has been provided, the location should be plotted on a map. No map of plot locations has been provided.

Table 4-1 includes candidate ecosystem credits species and table 4-2 candidate species credit species. The tables do not include the results of background searches, namely BioNet Atlas searches. In this regard, from a 10km BioNet Atlas search the following species were absent from the lists of Predicted Ecosystem Credit Species and Species Credit Species for assessment. The following species are to be included in table 4-1 and 4-2.

- Freckled Duck (*Stictonetta naevosa*)
- Black-necked Stork (*Ephippiorhynchus asiaticus*)
- Australasian Bittern (*Botaurus poiciloptilus*)
- Black Bittern (*Ixobrychus flavicollis*)
- Little Eagle (*Hieraaetus morphnoides*)
- Square-tailed Kite (*Lophoictinia isura*)
- Bush Stone-curlew (*Burhinus grallarius*)
- Glossy Black-Cockatoo (*Calyptorhynchus lathami*)
- Powerful Owl (*Ninox strenua*)
- Masked Owl (*Tyto novaehollandiae*)
- Sooty Owl (*Tyto tenebricosa*)
- Varied Sittella (*Daphoenositta chrysoptera*)
- Yellow-bellied Sheath-tail-bat (*Saccolaimus flaviventris*)
- Large-eared Pied Bat (*Chalinolobus dwyeri*)
- Eastern False Pipistrelle (*Falsistrellus tasmaniensis*)
- Greater Broad-nosed Bat (*Scoteanax rueppellii*)
- *Pultenaea parviflora*
- *Syzygium paniculatum*
- *Pterostylis saxicola*
- *Persoonia nutans*

There is some potential for microbats to be using the buildings that are present, but no surveys for microbat roosting have been undertaken. As stated in DPIE's BDAR waiver guidance (<https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Animals-and-plants/Biodiversity/apply-biodiversity-development-assessment-report-waiver-190593.pdf>), human-made structures may provide habitat for threatened species, particularly microbats.

Therefore, if the proposed development includes demolition of buildings and/or impacts to other human-made structures, the BDAR should include the details of potential habitat in human-made structures and demonstrate how surveys have been conducted for the presence of threatened species. There is no description in the BDAR of any surveys being undertaken of human-made structures to determine the presence of microbats.

Therefore, further surveys should be conducted to determine their presence or otherwise, i.e. daytime roost searches should be carried out. A search is to be undertaken by looking for bats or signs of bats in suitable roost habitat during the daytime. All roost searches should use a torch to shine in holes, cracks and crevices, and carry a handheld bat detector to locate bats that may call. If bats are detected, observers must confirm the identity of the species and determine if the roost is a maternity roost. The BDAR should then be updated which includes a description of the searches undertaken and any results included in the impact assessment and offset requirement.

Table 6-1 of the BDAR outlines mitigation and management measures required to be undertaken. We support the mitigation measures from the BDAR and if the application is approved, we recommend these measures are written into the conditions of consent.

Given the potential for the presence of protected fauna utilising trees for habitat, the following preclearance survey condition could be included in the consent.

Tree Removal and Fauna Protection

Pre-clearance survey: Within one week prior to any removal of vegetation a pre-clearance survey is required to be undertaken by a qualified ecologist to identify, number and flag hollow-bearing trees and other habitat features such as nests or hollow logs proposed to be removed.

The results of the pre-clearance survey shall be submitted to the project manager to inform tree clearance protocols.

Tree Removal: During any tree removal, an experienced and qualified ecologist is to be present to re-locate any displaced fauna that may be disturbed during this activity.

All non-habitat vegetation should be cleared first to allow appropriate space for the felling of habitat trees and retrieval of any fauna that may be present within habitat trees.

Trees with hollows shall be lopped in such a way that the risk of injury or mortality to fauna is minimised, such as top-down lopping, with lopped sections gently lowered to the ground, or by lowering whole trees to the ground with the “grab” attachment of a machine.

Any injured fauna is to be appropriately cared for and released on site when re-habilitated. Injured fauna is to be placed into the hands of a wildlife carer (please note only appropriately vaccinated personnel are to handle bats).

Flooding considerations

EES raises concerns around the flood modelling and information provided and has identified that some details require clarification to ensure flood risks are properly managed.

EES has reviewed the flood assessment, Stormwater and Flooding Assessment for Nepean Hospital Development Stage 2 (Meinhardt-Bonacci, November 2022) provided as part of the EIS. This assessment concludes that the site of stage 2 is not affected by flooding. This is confirmed by the College, Orth and Werrington Creeks Flood Study, which shows that the proposed Stage 2 facility is not impacted by flooding.

EES noticed that, the draft College, Orth and Werrington Creeks Floodplain Risk Management Study and Plan (FRMSP) updated mapping 2021 represents the hospital site during the construction of Stage 1 which includes isolated ponding at excavated areas within the site.

From an emergency response perspective, EES notes that, the *College, Orth and Werrington Creeks Catchment Overland Flow Flood Study (June 2017)* and the draft *College, Orth and Werrington Creeks FRMSP 2021* classify the hospital site as a ‘flood exit route rising road’. However, it is prudent to consider that the access through the Great Western Highway at the north



Department of Planning and Environment

eastern corner at the hospital will be cut in major events for a short duration. Safety signs may be required to guide the community and health services to avoid this route in major flood events.

End of Submission