

Ingrid Berzins
Senior Planning Officer
Planning and Assessment Group
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Our ref: DOC22/67611
Senders ref: SSD-17899480

Dear Ingrid,

Subject: Environmental Impact Statement - Wentworthville Northside West Clinic Extension (SSD-17899480)

Thank you for your email received 1 February 2022, requesting comments on the Environmental Impact Statement (EIS) for the subject proposal. The Environment, Energy and Science Group (EES) within the Department of Planning and Environment has undertaken a review of the EIS and provides the following comments.

Biodiversity

EES is satisfied that the Biodiversity Development Assessment Report (BDAR) prepared by EcoLogical Australia dated 15 November adequately assesses biodiversity values and impacts associated with the proposed development.

Table 9 of the BDAR recommends biodiversity mitigation and management measures to be implemented during various stages of the proposal. EES support the implementation of these measures which should be reinforced through conditions of approval for the proposal.

Given the potential for protected fauna to utilise the trees proposed for removal as habitat, an experienced and qualified ecologist is to be present during any tree removal 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).

Impacts to Trees

In addition to the biodiversity impacts considered in the BDAR, the impacts to individual trees are further considered in the Arboricultural Impact Assessment prepared by Bird Tree Consulting (the arborist report). The arborist report identifies 30 trees requiring removal which is consistent with the assessment of impacts in the BDAR. However, the following additional impacts are identified and need to be further addressed:

- Tree 47, *Eucalyptus microcorys*, is located within an adjoining property and is subject to major tree protection zone (TPZ) encroachment. The arborist report recommends root mapping be undertaken to determine the extent of impacts to existing roots from this tree within the subject site. The outcome of this investigation will determine if the tree can remain viable under the current proposal or if amendments are required to the construction footprint or landscape design to avoid any unsustainable impacts.
- Trees 41, 48 and 49 are also subject to major encroachment into their TPZ. Further root investigations have not been recommended for these trees. Australia Standards for the Protection of trees on development sites (AS4970:2009) states that the project arborist must demonstrate that trees with a major encroachment will remain viable. The arborist report has not provided adequate justification to demonstrate this. EES recommends further root investigations be undertaken for these trees in accordance with the recommendations of AS4970:2009.
- Tree 41 also requires canopy reduction of approximately 20%. The cumulative impact of proposed canopy reduction and TPZ incursions/root loss should be further addressed by the project arborist.
- The impacts of a proposed new substation within proximity to trees numbered 16, 17, 18, 20 and 53 does not appear to have been considered. The impacts to these trees from the substation should be addressed.
- Seven trees are proposed within the new landscape design, 3 of which are exotic, dwarf species. Given 30 trees are proposed for removal, the opportunity to incorporate additional tree planting into the landscape design should be investigated.

Flooding

The following comments are provided in relation to flooding and the flood impact statement prepared by ACOR consultants:

- The flood assessment should be amended to consider the flood risk from the full range of floods up to the probable maximum flood for both mainstream and overland flooding.
- Shelter in place has been put forward as a solution in times of rare flooding. However, this is a matter for the NSW SES as the responsible flood combat agency. This strategy should be referred to the NSW SES for comment. Flood education, awareness and emergency management plans for occupiers and visitors should also be prepared and referred to the NSW SES for comment.
- EES recommends using the 0.5% and 0.2% AEP year flood events as proxies for assessing sensitivity to an increase in rainfall intensity of flood producing rainfall events due to climate change.
- The Flood Impact Study refers to the carparks and proposed safeguards to mitigate the 1% AEP flood, however, the increased flood risk from climate change and rare to extreme flooding is not clear and may pose a risk to life and property.

If you have any queries please contact Shaun Hunt, Senior Conservation Planning Officer at shaun.hunt@environment.nsw.gov.au or 02 8275 1617.

Yours sincerely



21/02/22

Susan Harrison
Senior Team Leader Planning
Greater Sydney Branch
ENVIRONMENT, ENERGY AND SCIENCE