

Department of Planning and Environment

Our ref: DOC22/152623

Your ref: SSD 17655146

Lara Fusco
Planning Officer
Planning and Assessment Group
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Subject: EES Response to Environmental Impact Statement - Taronga Wildlife Hospital Nutrition Centre (SSD-17655146)

Dear Lara

I refer to an email dated 24 February 2022 notifying Environment, Energy and Science Group (EES) of the exhibition of the Environmental Impact Statement for the Taronga Wildlife Hospital Nutrition Centre (SSD-17655146). EES has undertaken a review of the exhibition materials and raises the following comments.

Biodiversity

EES has reviewed the Biodiversity Development Assessment Report (BDAR) prepared by Narla Environmental dated 7 December 2021 and notes the following.

- The BDAR concludes that the following offset obligations apply to the proposed development.
 - 1 ecosystem credit for PCT 1778 - Coastal Sandstone Foreshores Forest
 - 1 species credit for the Swift Parrot (*Lathamus discolor*) and
 - 1 species credit for the Southern Myotis (*Myotis macropus*) is required to offset the development.

To offset the biodiversity impacts associated with the proposal, the above credit obligations should be satisfied by the purchase and retirement of biodiversity credits or payment into the Biodiversity Conservation Fund prior to any work commencing on site.

- Table 13 of the BDAR outlines mitigation and management measures to be undertaken during various stages of the proposal. EES supports these measures and recommends their application be included as a condition of approval.
- EES notes the GIS data files required by the Biodiversity Assessment Method (BAM) have not been reviewed as these were not provided. The proponent and the ecological consultant should be reminded of the requirement to submit all necessary data required by the BAM in the future.

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Trees and Landscaping

The Arboricultural Impact Assessment (AIA) prepared by Sydney Arbour Trees, dated 20 December 2021 identifies that the proposed development will result in the removal of six significant trees numbered 9-14.

- EES notes, except for tree 14, that the actual level of encroachment from proposed works into the tree protection zone (TPZ) of the trees proposed for removal and retention has not been identified within the report. Where works are physically occurring, on ground, within the TPZ, the level of encroachment should be calculated. Areas where root growth from the subject trees is unlikely, such as below the existing rock embankment, could reasonably be excluded from the TPZ encroachment calculation.
- Section 4.3 of the AIA identifies general development mitigation opportunities for impacts to trees. There is no further discussion regarding the suitability of these measures being applied to the subject proposal. For example, it is unclear from the assessment if the pathways proposed within the TPZ of trees 11-14 could be constructed at or above existing ground level to reduce impacts to these trees and allow for their retention.
- Section 7.5 of the AIA notes, 'Where trees are intended to be retained and potential works areas may enter the TPZ or SRZ, determining root location and therefore the impact to the trees is an important process'. Further clarification is required regarding any specific root investigations that are anticipated because of the proposed works.
- A Point Cloud analysis has been provided to demonstrate the pruning requirements of trees 9, 10, 11 and 14 however EES notes figures 7 and 10 of the report only relate to tree 9. The proposed pruning works to the subject trees contribute substantially to the recommendation for removal. Further clarity around the specific extent of impacts to the canopy of these trees should be included in the report. If any slight adjustments to the building position or height would reduce these impacts, this should be discussed.
- If further consideration of the above matters does not result in any change to the recommendation for the removal of trees 9-14, EES is satisfied with the proposed replacement planting outlined in the Landscape Design Report and Plans prepared by Eximia Design dated December 2021.

Should you have any queries regarding this matter, please contact Shaun Hunt, Senior Conservation Planning Officer via shaun.hunt@environment.nsw.gov.au or 02 8275 1617.

Yours sincerely

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

24/03/22

Susan Harrison

Senior Team Leader Planning
Greater Sydney Branch
Biodiversity and Conservation