

## Department of Planning and Environment

Our ref: DOC22/342815

Your Ref: SSD-6236

Sally Munk  
Principle Planning Officer  
Energy, Resource, and Industry Assessment  
Department of Planning and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

6 June 2022

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### Subject: Request for Advice: Eastern Creek Energy from Waste Facility (SSD - 6236)

Dear Ms Munk

Thank you for your email received 11 April 2022 seeking comments on the above project. Environment and Heritage Group (EHG) has reviewed the environmental impact statement for this project and provides the following comments.

EHG notes that the current exhibition was to allow for the review of addendum information in response to concerns raised as part of the refusal of the project by the Independent Planning Commission in July 2018.

EHG notes that a significant period has passed since the ecological survey and biodiversity assessment for this project were conducted. The biodiversity survey work was carried out in April and May 2014 and February 2015.

The vegetation mapping in the *Flora and fauna assessment report for Honeycomb Drive, Eastern Creek Lots 2 and 3, DP 1145808 Proposed Energy from Waste Facility, Eastern Creek (SSD 6236)* dated April 2015 (flora and fauna assessment) and the survey effort is not clear.

Given the time since surveys were undertaken, it is possible that additional species may be relevant to the site and/or that the site now contains some of the originally targeted species. The most recent imagery in Nearmap suggests that scattered trees and/or patches of vegetation may not have been mapped, and that additional habitat values may be on-site for example human made structures.

The survey and assessment methods that were employed are not considered current best practice. For example, BioNet identifies that surveys for the Large-eared Pied Bat should be undertaken in November, December, and January, compared to the April, May and February survey work conducted. The vegetation mapping also appears quite coarse, and the survey effort is not clear in the flora and fauna assessment report, in particular the assessment does not show where targeted flora surveys were carried out

A standardised, repeatable, and reliable method for ecological assessment now exists in the Biodiversity Assessment Method (BAM 2020). The ecological offset strategy does not use a standardised approach. The credit liability produced by the ecological offset strategy and BAM 2020 are likely to be different.

## Department of Planning and Environment

EHG considers its previous biodiversity comments from 12 December 2018 (document reference: DOC18/27013) are not appropriate for the amended project and are no longer relevant. EHG recommends BAM 2020 is used, as required for the assessment of the Eastern Creek Energy from Waste Facility (SSD-8477614), to assess the biodiversity values of the site and the proposed impacts, along with any offset requirements.

EHG has no further comments regarding flood related aspects of the project.

Please note, this advice did not consider the potential for impact to indigenous cultural or archaeological heritage. A separate response may be made by Heritage NSW, EHG.

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

Yours sincerely,

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

Susan Harrison

Senior Teams Leader

**Greater Sydney Branch**

**Biodiversity and Conservation**

