

## Department of Planning and Environment

Our ref: DOC22/342243

Your ref: SSD 24452965

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Planning and Assessment Group  
Department of Planning and Environment  
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### **Subject: EHG comments on Environmental Impact Statement - Eels Centre of Excellence (CoE) and Community Sports Hub (SSD-24452965) (The Hills Shire)**

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I refer to your email dated 29 April 2022 requesting comment from Environment and Heritage Group (EHG) on the Environmental Impact Statement for the proposed Eels Centre of Excellence and Community Sports Hub. EHG has reviewed the EIS and supporting documentation and provides the following comments on biodiversity and trees.

A biodiversity development assessment report (BDAR) has been prepared by Cumberland Ecology dated 5<sup>th</sup> April 2022. A review of this report has been undertaken and EHG raises the following matters.

The biodiversity assessment method requires consideration of threatened species records contained within NSW Bionet. The list of species considered in the BDAR has not included nearby threatened species records. EHG recommends all threatened species records within 5km of the subject land be addressed in Table 9 as ecosystem species credits and/or Table 10 as species credit species in the BDAR. Based on a review of Bionet these records include the following species:

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|-------------------------------|--|
| ○ Red-crowned Toadlet         | ○ Hibbertia superans                     |
| ○ Green and Golden Bell Frog  | ○ Tetratheca glandulosa                  |
| ○ Giant Burrowing Frog        | ○ Epacris purpurescens var. purpurescens |
| ○ Fork-tailed Swift           | ○ Leucopogon fletcheri subsp. fletcheri  |
| ○ Black Bittern               | ○ Acacia bynoeana                        |
| ○ Glossy Black-Cockatoo       | ○ Acacia pubescens                       |
| ○ Superb Parrot               | ○ Callistemon linearifolius              |
| ○ Pink Robin                  | ○ Darwinia biflora                       |
| ○ Yellow-bellied Glider       | ○ Eucalyptus sp. Cattai                  |
| ○ Eastern False Pipistrelle   | ○ Syzygium paniculatum                   |
| ○ Southern Myotis             | ○ Grevillea juniperina subsp. juniperina |
| ○ Greater Broad-nosed Bat     | ○ Macadamia integrifolia                 |
| ○ Eastern Cave Bat            | ○ Persoonia hirsute                      |
| ○ Cumberland Plain Land Snail | ○ Pimelea curviflora var. curviflora     |
| ○ Dural Land Snail            |  |

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Ecosystem credits have been provided in the credit report, however, it cannot be confirmed that the number of credits is adequate until the above species have been assessed. The credit reports are to be revised after the subject species have been assessed to ensure the correct number of credits are reported.

The BDAR is to include all outputs from the BAM-C which indicate classes of credits to be offset.

Table 16 of the BDAR outlines mitigation and management measures to be undertaken. The mitigation measures from the BDAR are supported. If the application is approved, EHG recommends these measures are included as conditions of approval.

Further to the mitigation measures outlined in the BDAR, the following should be considered to improve tree canopy cover and connectivity of the site.

- Opportunities for increased canopy cover should be explored. For example, opportunities may exist to the north of the proposed CoE in the setback from Memorial Avenue. In addition, the proposed turf area to the north of the new car park could be consolidated into the replanting area to increase canopy cover.
- The Landscape Report prepared by Iscape Landscape Architecture (dated 18 March 2022) states that trees within the 'tree replacement planting area' are proposed to be planted in 25L pot sizes. Trees within 'general areas' areas are proposed to be planted in a range of pot sizes from 25L up to 200L. For the proposed 'tree replacement planting areas', all tree pot sizes should be increased to be a minimum of 45L. All tree pot sizes within 'general areas' should be increased to be a minimum of 100L.
- Additional space for planting existing within and adjacent to the proposed stage 2 footprint. This could include replacing areas of turf adjoining the proposed new carpark with tree planting. Turf areas between the CoE and Memorial Avenue may also represent an opportunity for further planting of canopy trees.
- Consideration should be given to the reuse of native trees that are to be removed as part of the proposal to enhance habitat within the proposed replanting/regeneration area. This should include tree trunks (greater than 25-30 centimetres in diameter and 2-3 metres in length) and root balls.

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

Yours sincerely

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

23/05/22

Susan Harrison  
Senior Team Leader Planning  
Greater Sydney Branch  
Biodiversity and Conservation