

Department of Planning and Environment

Our ref: DOC22/700418

Sender's ref: SSD-9726-Mod-1

Jennie Yuan
Planning Officer
Industry Key Sites Assessment
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

19 August 2022

Subject: Request for agency advice – Adaptive reuse of the Royal Hall of Industries - MOD 1 - staging and minor amendments (SSD-9726-Mod-1)

Dear Ms Yuan

Thank you for the email of 10 August 2022 requesting advice on the modification application for the Adaptive reuse of the Royal Hall of Industries. EHG has reviewed the modification application and has the following comments.

The Modification report states that "*the original SSD application was ... determined to not adversely impact any ... threatened species ... and their habitats*". However, EHG notes that the site provides habitat for threatened microbats, and that the Department's determination assessment report states that the "*the proposal is unlikely to result in unacceptable impacts to threatened microbats*".

The *Sydney Swans Head Quarters - 2021 Microbat Survey* (the microbat survey) confirmed the roof cavity of the site acts as an occasional roost site for microbats. The surveys also indicated the microbats may enter torpor within the cavity.

EHG notes that the Modification report proposes to retain some of the existing roof structure, rather than undertake full replacement as approved. Therefore, EHG assumes that the impacts on microbat roosts will also be less likely. However, it is not clear whether the Modification report has been prepared in the knowledge that microbats roost in the roof cavity. It is also not clear if all potential impacts have been considered. If there is any doubt about microbat impacts from the Modification, EHG recommends advice is sought from a suitably experienced ecologist.

EHG also notes the microbat survey recommended that "*the Microbat Management Plan is updated to reflect the findings of the (2021 survey) report and the revised scope of works that will no longer include a complete roof replacement. This will include retention of suitable roosting spaces that allows for Large Bent-winged Bats to continue using the site as an occasional roost once works are complete.*"

EHG recommends that the above updates to the Microbat Management Plan be undertaken to inform the assessment of the proposed modification.

Department of Planning and Environment

Provided that removal of the lift does not affect the ability of persons to safely shelter in place in any flood events, including any necessary egress to higher floors, EHG has no further flood related comments on this 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, appearing to be "DA", with a long horizontal stroke extending to the right.

Dana Alderson

A/Senior Team Leader Planning
Greater Sydney Branch
Biodiversity and Conservation