



DOC19/910196
SSI 8583

Ms May Patterson
Team Leader
Planning and Assessment
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2000

Dear Ms Paterson,

Re: Request for advice on Powering Sydney's Future State Significant Infrastructure project (SSI 8583)

I refer to the 11 October 2019 request for advice from the Environment, Energy and Science (EES) Group on the Environmental Impact Statement for the above proposal.

The EES Group has reviewed the Biodiversity Development Assessment Report (BDAR) and provides the following advice. Please note that as spatial data was only provided for vegetation areas, consistency of the BDAR with any other spatial layers could not be examined.

1.3.4 Wetlands

- The BDAR states: *'The project area does not contain any natural wetlands. A waterbody is situated within the project area in Sydney Park, but this is a constructed waterbody which is not listed in the Directory of Important Wetlands of Australia (DIWA) or the Coastal Management SEPP. The waterbody also does not conform to a Plant Community Type identified in the NSW BioNet Vegetation Classification System and has therefore not been included in wetland mapping for the project area.'*
- According to the Biodiversity Assessment Method (BAM) Operational Manual, however, *'the assessor must identify the subject land in relation to all important and local wetlands on the Site Map'* (p. 7, Biodiversity Assessment Method (BAM) Operational Manual – Stage 1 (Office of Environment and Heritage [OEH], 2018). *'Local wetlands refer to all other wetlands including but not restricted to, those listed or mapped in regional planning or conservation strategies. The Biodiversity Assessment Report [which includes BDARs] must reference the document describing a local wetland.'* (p.8, BAM Operational Manual).
- As the BAM Operational Manual provides for no exclusion of constructed and/or artificial wetlands, it is recommended further information be provided detailing whether there is vegetation associated with the Sydney Park waterbody, and if so, how it does not conform to a Plant Community Type (PCT).

1.4 Native vegetation

- It is noted that one location within project area (along the freight rail infrastructure on the south side of Muir Road, Chullora) overlaps with a native vegetation community mapped by Office of Environment and Heritage (OEH - Native vegetation of the Sydney metropolitan area, version 3.0, 2016). This vegetation community is mapped as 'Castlereagh Ironbark Forest' which is consistent with the 'Cooks River/Castlereagh Ironbark Forest' endangered ecological community (listed under the *Biodiversity Conservation Act, 2016* [BC Act]). The Arboricultural Impact Assessment (Appendix O to the EIS) [AIA] only identifies two trees (#54, #55) at this location. However, recent aerial images (including that used in Tree Retention Values Map 1 of the AIA [page 14]) and Figure 12: Validated vegetation map 1 of the BDAR (p.24) shows the project area encompasses more vegetation than two trees. Appendix B Tabulated results of the arboricultural impact assessment in the AIA (p. 47) indicates trees #54 and #55 are moderately sized *Eucalyptus fibrosa* in good health. The BDAR indicates the vegetation shown in Figure 12: Validated vegetation map 1 is 'Urban Exotic/Native', however evidence to support the difference in classification to the mapped vegetation is not provided.
- It is recommended the extent and classification of vegetation and the number of trees within the project area as documented in the BDAR and AIA be clarified.

1.4.1.2 PCT 1281 Sydney Turpentine-Grey Ironbark Open Forest on shale in the lower Blue Mountains and Sydney Basin Bioregion (unvalidated)

- The BDAR identifies an area of native vegetation within the project area at Johnson Park within the Dulwich Hill light railway (DHLR) corridor. It is noted that this vegetation is the result of 19 years of bushcare work by the Inner West Environment Group to revegetate the site using '*over 100 different native plant species found in Sydney Turpentine-Ironbark Forest (STIF)*' critically endangered ecological community (www.greenway.org.au/biodiversity/bushcare/bushcare-sites). While this vegetation is assigned to PCT 1281 'Sydney Turpentine-Grey Ironbark Open Forest on shale in the lower Blue Mountains and Sydney Basin Bioregion (unvalidated)' as a best fit PCT, the BDAR considers it unlikely '*that (the) vegetation ... would meet the TEC STIF criteria, as the vegetation consists of planted rather than remnant vegetation and lacks a canopy*' (BDAR, p.21). It is noted the assessment of this area was '*based on distant visual assessment and on a desktop review of plant listings of the Johnson Park Bushcare site*' as '*no quantitative survey was undertaken*' because the site '*could not be accessed during the survey due to its location within the DHLR corridor*' (BDAR, p.20). This is despite more than 18 months between the first vegetation surveys and finalisation of the BDAR.
- EES Group is not aware of any criteria that would preclude such vegetation being classified as a TEC and does not concur with the rationale for not assigning this area of PCT 1281 vegetation as a threatened ecological community.
- Table 18 advises '*the project will avoid clearing at the Johnson Park Bushcare site (which has been planted with native vegetation) by underboring under the light rail corridor in Dulwich Hill*' (DBAR, p.65). The BDAR identifies this PCT vegetation as '*vegetation not requiring assessment*' (DBAR, figure 54, p.86). However, details of the proposed underboring are not described, nor are any indirect impacts considered in the assessment. It is recommended the potential impacts of the proposed underboring on this PCT vegetation be further assessed.

Appendix C: Assessment of Significance

- The BDAR advises that 9.9 hectares of 'urban exotic/native' vegetation and an additional 0.76 hectares of 'mangrove forest' vegetation within the project area are considered foraging resource for Grey-headed Flying-fox (*Pteropus poliocephalus*). While noting the loss of all vegetation is considered '*a worst-case scenario, based on the current project area*' (BDAR, p.143), EES considers planted street trees are an important foraging habitat because of the range of species and diversity in timing of flowering, especially of winter-flowering species. These trees also provide foraging resources and/or roosting habitat for threatened migrating birds (e.g. Swift Parrots and Regent Honeyeater) and microbats (e.g. Eastern Bentwing-bat) and their insectivorous prey.

Should you have any queries regarding this matter, please contact Richard Bonner, Senior Conservation Planning Officer on 9995 6917 or richard.bonner@environment.nsw.gov.au

Yours sincerely



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