NSW GOVERNMENT | Office of Environment & Heritage

DOC16/637597
SSD 7628

Ms Karen Harragon
Director
Social and Other Infrastructure Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Alix Carpenter

Dear Ms Harragon

Moorebank Precinct East - Stage 2 Application SSD 7628

I refer to your letter received 12 December 2016, seeking comments from the Office of Environment and Heritage (OEH) on the exhibited Environmental Impact Assessment (EIS) for the above.

OEH has reviewed the documentation and provides comments on biodiversity and floodplain risk management at Attachment 1.

If you have any further questions, please contact please contact Richard Bonner on 9995 6917.

Yours sincerely

S. Harrison 24/02/17

SUSAN HARRISON
Senior Team Leader Planning
Regional Operations

Contact officer: RICHARD BONNER
9995 6917

PO Box 644 Parramatta NSW 2124
Level 6, 10 Valentine Ave Parramatta NSW 2150
Tel: (02) 9995 5000 Fax: (02) 9995 6900
ABN 30 841 387 271
www.environment.nsw.gov.au

ATTACHMENT 1: Office of Environment and Heritage (OEH) comments on Moorebank Precinct East Moorebank Precinct East - Stage 2 Application SSD 7628

1. Biodiversity

OEH has reviewed the Biodiversity Assessment Report (BAR), calculator file and datasets supplied and note the following issues:

- Surveys for Green and Golden Bell Frog (GGBF) were conducted at the wrong time of the year. However, the GGBF habitat has mosquito fish (Gambusia) infestation so presence is considered highly unlikely. In addition, only 0.01 ha of GGBF habitat will be impacted by the proposal which is less than 2% of the total area of 0.67 ha.
- The assessment circles are centred on the development, not the impacted vegetation. This may mean some entries in the calculator (before and after native vegetation cover within the assessment circles) are incorrect but it is considered unlikely erroneous credit calculations would result.
- No floristic plot data was provided, however, the identified Plant Community Types are consistent with other mapping and the assessment of the SIMTA Stage 1 proposal.
- The data for Vegetation Zone area in the calculator are different to the provided GIS data (i.e. areas for VZ1, VZ2 and VZ3 are respectively 0.10 ha, 0.05 ha and 0.01 ha in the calculator but 0.11 ha, 0.03 ha and 0.01 ha in the GIS data). However, it is considered unlikely any meaningful changes to credit calculations would result as they are rounded to the nearest whole numbers.
- There is no biodiversity offset strategy provided. However, the offsets required are small and considered likely to be provided through the offset package being developed for Moorebank Precinct East Stage 1 (and associated rail link) and the Moorebank Precinct West proposals.

OEH considers these issues to be minor and the assessment of direct impacts of the proposal on biodiversity to be adequate.

In relation to indirect impacts, OEH is concerned about the adequacy of assessment on the high biodiversity values of the adjoining Boot land to east and south as a result of the proposed earthworks and landscaping. Achieving the intended finished surface levels will require the importing of up to 680,000 m^3 of fill with cut and fill depths up to 1.5m and 2.5m respectively along the Boot land boundary. The BAR acknowledges the potential impacts of increased sedimentation, risk of weed invasion and changes to hydrology on threatened flora populations in the adjacent Boot land, however, these concerns appear to be restricted to locations of *Persoonia nutans* known when the BAR was prepared. Given the threatened species found during more recent flora surveys of the Boot land south of Anzac Creek (e.g. *Hibbertia puberula* and *Hibbertia fumana*), OEH recommends additional flora surveys be undertaken along the eastern and southern boundary at least 30m into the Boot land. Measures to avoid, mitigate or offset unavoidable indirect impacts should be assessed if additional threatened flora species are found.

2. Floodplain Risk Management

OEH has reviewed the methodology applied in Stormwater and Flooding Report and notes a set of flood models has been developed to address local and mainstream flooding.

The models outcomes indicate that, there is no increase in flood levels in the100 year ARI for nine hour critical duration. However, the proposal could potentially increase flood depth by 0.3 m in the vicinity of the north east neighbouring area in the PMF event. Where the proposed flood mitigation measures are unable to mitigate the adverse impacts, the impacted properties may need to be appropriately compensated.

Section 4.4 indicates that Flood Emergency Response Plans (FERPs) would be prepared for the construction and operational stages of the proposal. OEH highlights that FERPs should be prepared in consultation with the State Emergency Service to ensure their integration to existing emergency management plans within the broader catchment.

OEH considers the assessment detailed in the Stormwater and Flooding Report is reasonable and appears to follow accepted floodplain risk management practice.

(END OF SUBMISSION)