NSW GOVERNMENT | Planning, Industry & Environment

Ms Joanna Bakopanos

Team Leader, Industry Assessments
NSW Department of Planning, Industry & Environment
SYDNEY NSW 2001

Our ref: DOC19/478896

Your ref: SSD10154

5 July 2019

Dear Ms Bakopanos

Subject: Notice of Exhibition – Qantas Flight Training Centre – SSD 10154

Thank you for your letter of 3 June 2019 received by the Environment, Energy and Science group (EES) requesting comments on Environmental Impact Statement (EIS) for the above State Significant Development.

EES provides its recommendations and comments at Attachment A.

Please note, in relation to Aboriginal Cultural Heritage, EES has decided not to provide comments on Aboriginal cultural heritage matters at this time. This does not represent EES support for the proposal and this matter may still need to be considered by the consent authority.

If you have any queries regarding this matter, please contact Janne Grose on 8837 6017 or janne.grose@environment.nsw.gov.au

Yours sincerely,

S. Harrison 05/07/19

SUSAN HARRISON
Senior Team Leader Planning
Climate Change & Sustainability

Planning, Industry & Environment

Attachment A

EES comments on Notice of Exhibition – Qantas Flight Training Centre – SSD 10154

Environment, Energy & Science group (EES) has reviewed the following reports for State Significant Development (SSD 10154):

- Environmental Impact Statement (EIS) – May 2019
- Biodiversity Development Assessment Report (BDAR) Rev. B – 12 April 2019
- Arboricultural Impact Assessment (AIA) – 14 April 2018
- Public Domain and Landscape Report – 12 April 2019
- Landscape & Visual Impact Assessment (L&VIA) – 12 April 2019
- Landscape Plans – 12 April 2019
- Stormwater Management and Civil Design Report – April 2019
- Greenhouse Gas, Energy Efficiency and Ecologically Sustainable Development (GGEE&ESD) – 12 April 2019

and provides the following comments below.

Biodiversity

Microbats

EES notes the proposal includes the demolition of the existing warehouse storage building and disused gatehouse. The EIS (section 7.4, page 97) and BDAR (section 9.3.2, page 38) note that no human made structures have been identified within the site that would provide a suitable habitat for any threatened species, but no further details are provided to support this. The BDAR has not considered the presence and possible value of habitats afforded by the existing artificial/built structures, for example the existing warehouse storage building and disused gatehouse. Several microchiropteran bat species, some threatened, are capable of roosting in a variety of natural and constructed sites, so it is possible that they might utilise the built features on this site.

More information is required to confirm the absence of roosting habitat for threatened microbats within the existing buildings. A search for evidence of microbat roosts should be undertaken using appropriate methods, such as those described on page 9 of the "'Species credit' threatened bats and their habitats NSW survey guide for the Biodiversity Assessment Method (OEH 2018)". Attention should be given to inspecting cracks or seams in the roofs and a handheld bat detector of ultrasonic calls can assist in alerting the searcher to the presence of bats. Searches must be undertaken by someone with appropriate experience, as described on page 5 of that guide. If bats or signs of bats are observed, the bats may need to be captured to identify species and breeding status using traps, nets or other methods. The information provided should include photographs of any holes, cracks or crevices that were searched; any associated observations about bats and/or signs of bats; and any results from a bat call detector.

Urban Tree Canopy

The EIS notes the project requires the removal of 85 trees (section 3.2.9, page 31). It recommends replacing as many of these trees as possible (section 7.5, page 100) and proposes to plant 68 new trees (section 3.2.9, page 31). While the EIS notes most of the vegetation to be removed comprises exotic plants or planted non-indigenous native species (see section 7.4, page 97), EES recommends that to assist mitigation of the urban heat island effect at the site and to improve the urban tree canopy and local habitat that the development:

- first avoids removing the trees where possible, particularly local native species
- replaces any removed trees at a ratio greater than 1:1

- replaces trees with local provenance native plant species from the local native vegetation communities that occurred in the local area to enhance local biodiversity, rather than use non-local native or non-native plants.

The proponent should provide details on the native vegetation community that occurred in the local area/on the site and demonstrate to the Department that the list of plant species to be used on site are local native species from the relevant vegetation community.

Mitigation Measures

Biodiversity Impact

The EIS includes a mitigation measure for the replanting of landscape areas to incorporate native species as per the Landscape Plan and for replacement landscaping to keep in context with the existing character of the property. The former OEH in its SEARs submission recommended the site landscaping use a diversity of local provenance species (trees, shrubs and groundcovers) from the native vegetation community (or communities) that once occurred on the site rather than using exotic plant species or non-endemic native species. EES repeats this recommendation as the use of local genetic plant material has numerous environmental benefits. As the BDAR notes that multiple mature Plane Trees are scattered throughout the site (section 1.2) and that most of the vegetation to be removed for the project is not native vegetation and comprises exotic plants or planted often non-indigenous native species (section 9.1.1), it is recommended the requirement for replacement landscaping to keep in context with the existing character of the property is deleted and the mitigation measure is amended as follows:

- replanting of landscape areas to incorporate ***a diversity of local provenance*** native species ***from the native vegetation community (or communities) that once occurred in the local area*** as per Landscape Plan. ~~Replacement landscaping should keep in context with the existing character of the property.~~

EES recommends the following additional mitigation measures are also included to assist mitigate the loss of existing urban tree canopy from the site, reduce the urban heat island effect, enhance local habitat etc:

- any trees that are to be planted at the site or in the street shall use advanced and established local native species from the relevant vegetation communities which once occurred in the locality, preferably with a minimum tree height of 2-2.5 metres and /or plant container pot size of 50-75 litres to assist mitigation of the removal of trees, as the loss of existing trees from the site and the benefits that they provide takes years for a juvenile tree to grow and replace
- enough area/space is provided to allow the trees to grow to maturity.

Landscape Impact

It is recommended the mitigation measures are amended as follows

- existing ~~trees~~ ***vegetation that is*** to be ***retained/***protected ***on site is to be clearly marked with temporary fencing prior to the commencement of any*** ~~during the~~ construction works ***to ensure that there is no unnecessary removal of vegetation. The fencing must be regularly checked and maintained throughout construction*** and ***the retained vegetation*** integrated in the landscape proposals
- Proposed ***local*** native planting to buffer and supplement the existing vegetation
- ***Any*** trees ***that are to be removed from the site*** will be replaced ***at a ratio greater than 1:1*** as part of the Landscape Strategy ***to assist mitigate the loss of existing urban tree canopy and reduce the urban heat island effect.***

If consent is granted to this SSD, EES recommends conditions of consent are included which require the implementation of the above mitigation measures.

Flooding

Enstruct have modelled the site based off the Mascot, Rosebury and Eastlakes Flood Study undertaken by WMAwater in 2015. Enstruct have updated the model with new survey and show a significant change in flood levels, which Council did not accept. For this model to be taken as the existing case the difference in model results need to be explained in full and Council will need to agree to the site model.

Enstruct have shown that both the North site and the South site are flood prone. The outline of proposed buildings (both North and South sites) should be modelled within the agreed upon flood model by Council to establish that no significant flood impacts will occur on external land. The potential change in flow paths as well as any change to the open channel could have significant impacts for flooding on the surrounding properties. The results from the proposed buildings included in the model should then be compared to the existing model results for a map of the impact around the site.

No discussion on minimum floor levels was included. Floor levels should be discussed and shown to be at the 1% AEP flood level plus freeboard (0.5m).

Building design

The former OEH in its submission on the SEARs recommended the development incorporates a Green Roof, Cool Roof and/or Green Wall into the design. The GGEE&ESD notes the project has adopted the cool roof strategy to reduce the heat island effect using roof materials not exceeding 0.6 solar absorbance materials (page 2). It indicates a green roof is to be provided over the bus stop and that a green roof was also considered for the training centre but due to the highly sensitive nature of the flight simulators this was deemed to be too much of a risk (section 8.2, page 19). It is unclear why a green roof is too much of a risk for the flight simulators and the proponent should provide further details to clarify this.

(END OF SUBMISSION)