



Our ref: DOC19/1007923

Senders ref: SSD-9383

Mr David Glasgow

Planning and Assessment
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Glasgow

Subject: Comments on Environmental Impact Statement for mixed use towers – Site 2A and 2B – SSD 9383 – corner Murray Rose Avenue and Australia Avenue, Sydney Olympic Park

Thank you for your email of 12 November 2019 requesting advice on the Environmental Impact Statement (EIS) for this State Significant Development (SSD).

The Environment, Energy and Science Group (EES) provides its recommendations and comments at Attachment A. If the Department determines to grant approval, EES recommends that any conditions recommended in the Site 2 – Sydney Olympic Park Archaeological Report prepared by biosis dated 4 August 2019, be considered as conditions of consent.

If you have any queries regarding this matter, please do not hesitate to contact Janne Grose, Senior Conservation Planning Officer on 02 8837 6017 or at janne.grose@environment.nsw.gov.au.

Yours sincerely

S. Harrison 09/12/19

Susan Harrison

**Senior Team Leader Planning
Greater Sydney Branch
Environment, Energy and Science**

Subject: EES comments on the Environmental Impact Statement for mixed use towers – Site 2A and 2B– SSD-9383 – corner Murray Rose Avenue and Australia Avenue, Sydney Olympic Park

The Environment, Energy and Science Group (EES) has reviewed the following documents:

- Environmental Impact Statement (EIS) – 31 October 2019
- Appendix D – Architectural Design Competition Report – 10 September 2018
- Appendix N – Arboricultural Impact Assessment (AIA) - 15 August 2019
- Appendix O - Ecological Assessment (EA) – 10 October 2019
- Appendix P – BDAR waiver letter – 17 December 2018
- Appendix T – Landscape development application – October 2019
- Appendix U – Landscape Design report – August 2019
- Appendix W – Stormwater plans
- Appendix W – Stormwater Management Report – 14 August 2019

and provides the following comments.

Landscaping

Key issue (4) of the SEARs for this SSD requires the EIS to:

- *“specify that any landscaping will use a diversity of local provenance species (trees, shrubs and ground covers) from the relevant native vegetation community (or communities) that occur, or once occurred, on the site to improve biodiversity “*
- *“include details on the native vegetation community (or communities) that occur, or once occurred on the site, with a list of local provenance species (trees, shrubs and groundcovers) to be used for landscaping”.*

The EIS has not addressed these SEARs. The EIS notes the proposed development will provide landscaping with similar planted species to what currently exist on the site which is urban native/exotic vegetation (page 93). The existing plants on the site are not local natives, for example, the street trees include a mix of species native to NSW, but they are not endemic to the locality (Section 3.2, page 7 of EA).

The EIS includes a mitigation measure for biodiversity that “vegetation to be removed during construction will be replaced with new planting in landscape areas” (page 102) but it does not specify that local native plant species are to be used.

While the Sydney Olympic Park site has been developed on reclaimed land (Table 1 of EA, page 12) and the EIS indicates the landscape of the site is predominantly artificial with the original soil and landscape features no longer present (see page 93 of EIS), EES recommends:

- landscaping at the site be consistent with the SEARs and uses a diversity of local provenance native species from the native vegetation community that would have once occurred in this locality, rather than use exotic species and non-locally occurring native species
- the mitigation measure and the Planting Palette in the Landscape Development Application are amended, and a condition of consent is included which requires the SSD to use local native provenance species from the relevant local native vegetation community which once occurred in this locality
- the RTS provides information to demonstrate the developments consistency with the SEARs.

Urban tree canopy

The EIS indicates the SSD requires the removal of 15 trees on the site (page 44). To mitigate the urban heat island effect and improve the urban tree canopy and local habitat EES recommends that the development:

- replaces any removed trees at a ratio greater than 1:1
- uses advanced and established trees preferably with a minimum plant container pot size of 75-100 litres, or greater for local native tree species which are commercially available. Other local native tree species which are not commercially available may be sourced as juvenile sized trees or pre-grown from provenance seed
- provides enough area/space to allow the trees to grow to maturity.

Flood

There are no flood risk management issues arising from this proposed development. The stormwater management plan (construction/post construction) is adequate in providing for overland flow paths/drainage.

Recommended conditions of consent

EES recommends that if the SSD is approved the following conditions are included:

1. The landscaping at the site shall use a diversity of local native provenance trees, shrubs and groundcover species (rather than exotic species or non-local native species) from the relevant native vegetation community which once occurred in this locality.
2. Trees removed, shall be replaced at a ratio greater than 1:1,
3. Enough area/space is provided on site to allow the trees to grow to maturity.
4. Tree planting at the site shall use advanced and established trees with a minimum plant container pot size of 75-100 litres, or greater for local native tree species which are commercially available. Other local native tree species which are not commercially available may be sourced as juvenile sized trees or pre-grown from provenance seed.
5. The Landscape Plan shall include details on:
 - a) the native vegetation community that occur or once occurred in this locality
 - b) a list of local provenance tree, shrub and groundcovers to be used in the landscaping
 - c) the quantity and location of plantings
 - d) the pot size of the local native trees to be planted
 - e) the area/space required to allow the planted trees to grow to maturity
 - f) Plant maintenance. The planted vegetation should be regularly maintained and watered for 12 months following planting. Should any plant loss occur during the maintenance period the plants should be replaced by the same plant species.

End of Submission