

DOC16/358201 SSD 7534

> Mr David Gibson Team Leader, Social Infrastructure Assessments NSW Department of Planning and Environment GPO Box 39 SYDNEY NSW 2001

Attention: Peter McManus

Dear Mr Gibson

Western Sydney Stadium Concept Proposal and Stage 1 Demolition (SSD 7534)

I refer to your letter received 20 July 2016, seeking comments from the Office of Environment and Heritage (OEH) on Western Sydney Stadium Concept Proposal and Stage 1 Demolition.

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

OEH has serious concerns about potential impacts from the construction and operation of the stadium on the adjacent Grey-headed Flying-fox (GHFF) camp in Parramatta, possibly leading to the dispersal of the camp.

OEH would be pleased to further discuss the Western Sydney Stadium Concept Proposal. If you or your staff have any further questions or would like to meet on this matter, please contact Marnie Stewart, Senior Operations Officer on 9995 6868 or at marnie.stewart@environment.nsw.gov.au.

Yours sincerely

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Regional Team Leader Planning

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ATTACHMENT 1

OEH comments on Western Sydney Stadium Concept Proposal and Stage 1 Demolition (SSD 7534)

1. Background

OEH understands that the proposal involves a concept proposal for the new stadium and related indoor recreation/community facilities, as well as Stage 1 Approval for demolition of the Stadium and Parramatta Pool and related subdivision. OEH further understands that a future application will be lodged for construction and operation of the Western Sydney Stadium.

2. Biodiversity

OEH has reviewed the Western Sydney Stadium, Parramatta Biodiversity Assessment prepared by Eco Logical dated 30 June 2016 (Biodiversity Assessment).

OEH has serious concerns about potential impacts from the construction and operation of the stadium on the adjacent Grey-headed Flying-fox (GHFF) camp in Parramatta. Such impacts have the potential to disperse the camp, as is thought to have happened at Kurnell from construction of the Desalination Plant. If the camp were to disperse, it would likely increase numbers, and conflicts, at other nearby camps, a number of which are already highly contentious. OEH considers that all efforts should be made to maintain any existing camp in situ and that developments near camps must be designed to minimise future conflicts.

If approval is to be granted, a number of mitigation measures will need to be applied to this proposal to reduce impacts from noise, lighting, vibrations and other disturbances. OEH notes that there are a number of mitigation measures recommended in the Biodiversity Assessment, in sections 6.1 and 6.2 The Biodiversity Assessment also states there will not be any lighting directed at the GHFF camp or regular flight paths. OEH endorses the inclusion of all such measures as consent conditions.

OEH notes that the pedestrian link shown in Concept Proposal Drawing DA03 passes through the camp. Given the increased capacity of the stadium, an increased use of this pedestrian access would also be expected. There is no discussion in the Biodiversity Assessment of potential noise and light impacts on GHFF from the increased use of this pedestrian footbridge, nor any mitigation measures recommended. OEH considers that any lighting along the walkway should be directed away from the camp. Planting of shrubs and trees to shield the camp from lights and noise may also be appropriate.

The Biodiversity Assessment states that the GHFF flight paths did not traverse the site, however the assessment acknowledges that these paths can change over time depending on a range of factors including direction of travel to seasonally fluctuating food resources. Given this, OEH recommends that covers are provided over the car parking area, particularly in the north of the site given its proximity to the camp.

The Biodiversity Assessment states that there is potential for the camp to shift south over time, which would increase conflicts, and that deterrents, such as sonic disturbance, olfactory signals and physical obstruction, could be used to prevent this happening. OEH notes that such deterrents would require a licence from OEH and may not be approved.

Despite the proposed mitigation measures, OEH considers there is still a high risk that the construction and operation of the stadium will lead to the dispersal of the GHFF camp. However, this risk could be reduced by improving the Parramatta GHFF roosting habitat in areas further away from the proposed stadium. OEH notes that the current roosting area of the GHFF camp includes Cumberland Hospital and Parramatta Park. Given the proposed development of the Cumberland Hospital site, the Parramatta Park site would be a suitable site for habitat to be improved. OEH considers it would be appropriate for the proponent to provide the resources to augment this roosting

habitat, as a contingency measure against potential dispersal. OEH requests a meeting to discuss this proposed contingency measure further.

3. Floodplain Risk Management

OEH has reviewed the Western Sydney Stadium - Water Cycle Management and Flooding Working Paper prepared by AECOM (July 2016), advises that there is an existing overland flowpath through the entrance to the site which after construction will divert flow down O'Connell Street. The report states 'Any increase in the flow down this road due to preventing inflow into the site is likely to be negligible and will not increase the flood risk to properties along O'Connell Street'.

OEH has recently commented on the New O'Connell Street Primary School proposal (SSD 7500) which is to be located in the old Kings School site opposite the proposed Stadium. The applicant should ensure that the increased flood flow down O'Connell Street does not impact on the proposed school.

OEH has no further comments on the flood hazard at this site.