



Our ref: DOC19/981988  
Senders ref: SSD-10364

Ms Katelyn Symington

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

Dear Ms Symington

**Subject:** EES comments on Environmental Impact Statement for Visy Dry Recyclables – SSD-10364 – 112-120 Euston Road, Alexandria

Thank you for your email of 5 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.

Please note that EES will not be providing comments on Aboriginal cultural heritage matters. 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 do not hesitate to contact Janne Grose, Senior Conservation Planning Officer on 02 8837 6017 or at [janne.grose@environment.nsw.gov.au](mailto:janne.grose@environment.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink that reads 'S. Harrison' followed by the date '26/11/19'.

Susan Harrison

Senior Team Leader Planning  
Greater Sydney Branch  
Climate Change and Sustainability

**Subject: EES comments on Environmental Impact Statement for Visy Dry Recyclables – SSD-10364 – 112-120 Euston Road, Alexandria**

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

- Environmental Impact Statement (EIS) – November 2019
- Appendix C – plans, including Landscape Plan (drawing No DA09.01 C)
- Appendix K – Soil water and flooding assessment – 31 October 2019
- Appendix S – BDAR Waiver documents
- Appendix T – Arboricultural Assessment (AA)– 29 October 2019

and provides the following comments.

**Landscaping**

The AA indicates the development will retain three *Celtis sinensis* (see Appendix B, page 14). Prior to approving the AA and Landscape Plan for the site, it is suggested the Department considers information that is available relating to this invasive, exotic tree, for example the NSW Department of Primary Industries website (DPI NSW Weedwise) indicates:

- *Celtis sinensis* is a large, invasive tree that has become an environmental weed, and that it rapidly colonises disturbed bushland, forms dense thickets, replaces native shrubs and trees and dominates riparian vegetation. It produces thousands of fleshy fruits which birds feed on and spread its seed. *Celtis sinensis* has been recognised and listed as a serious environmental weed by bush regeneration groups – see DPI Weedwise link : <https://weeds.dpi.nsw.gov.au/Weeds/ChineseCeltis>

The Greater Sydney Regional Strategic Weed Management Plan 2017 – 2022 published by Greater Sydney Local Land Services and developed in partnership with the Greater Sydney Regional Weed Committee lists *Celtis sinensis* under Appendix 2 (other weeds of regional concern). It notes that for this species one of the assets/values that is at risk is the environment.

The spread of seed from this invasive tree from the site is of concern, particularly as the DPI Weedwise link indicates that current infestations are largely in riparian zones and an open concrete lined stormwater channel runs along the northern boundary (BDAR waiver, page 10) in close proximity to these trees and the channel flows into Alexandria Canal, the Cooks River and Botany Bay. It is recommended:

- *Celtis sinensis* is removed from the site and replaced by local native provenance species and a condition of consent is included to this effect. Any resident fauna potentially impacted by the removal of these trees should be relocated in a sensitive manner under the supervision of a qualified ecologist/licensed wildlife handler.
- The proponent provides the Department with a revised total number of trees that are proposed to be removed from the site and trees to be planted.
- The landscape plan and mitigation measures 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 on the native vegetation community that once occurred in this locality and it demonstrates the plant species to be used in the landscaping is from this community.

**Urban Tree Canopy**

The EIS notes that 5 trees are to be removed (section 16.3 page 190), four being *Casuarina glauca* trees and that a new tree, shrubs and lawn are to compensate for their removal (Section 16.7, page 194). 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

- replaces the trees with local provenance native plant species from the native vegetation community which once occurred in this locality to enhance local biodiversity, rather than use non-local native or exotic plants
- uses advanced and established local native 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.

## **Sustainability and Building Design**

The EIS indicates the development proposes to replace the roof with light coloured metal sheet roofing and green walls. EES supports the development incorporating a cool roof.

## **Recommended conditions of consent**

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

1. Trees removed, including all *Celtis sinensis*, shall be replaced at a ratio greater than 1:1.
2. Enough area/space is provided on site to allow the trees to grow to maturity.
3. Tree planting at the site shall use advanced and established local native provenance 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.
4. 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.
5. The Landscape Plan shall include details on:
  - a) the native vegetation community that 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