



Our ref: DOC19/997954

Senders ref: SSD 9653

James Groundwater
Senior Environmental Assessment Officer
Key Sites Assessments
NSW Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Groundwater,

**Subject: Exhibition of EIS - Hills Showground Station Precinct Concept Proposal (SSD 9653)
(The Hills Shire)**

Thank you for your e-mail dated 13 November 2019, inviting Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment (DPIE) to comment on the exhibited EIS for the Hills Showground Station Precinct Concept Proposal (SSD9653).

EES has reviewed the relevant documents and provide the following comments.

Biodiversity

EES has reviewed the Biodiversity Development Assessment Report (BDAR) and acknowledges that the proposal will not impact any remnant native vegetation. However, EES notes that BDAR contains a number of errors or omissions. Although these are inconsequential given the small scale of impact, feedback on the errors is provided to improve any future BDARs that are prepared by the applicant's consultant:

- section 3.5 of the BDAR should have included a description of Anabat survey methods
- the BDAR states that the Wallangarra White Gum (*Eucalyptus scoparia*) was recorded on site. This species is listed as a threatened species under the *Biodiversity Conservation Act 2016*. Although no species credits would be required in this instance to offset the loss of this species as it is planted, section 9.1.3 of the BDAR should have included a discussion that the species is present (albeit planted)
- section 9.3.2. "Prescribed Biodiversity Impacts - Human Made Structures and Non-native vegetation", should have included a discussion of prescribed impacts from the loss of non-native vegetation
- Appendix B1 should have included the Large Bent-wing Bat.

It is noted that the proposal adjoins the riparian area of Cattai Creek. The BDAR states that the vulnerable Grey-headed Flying-fox was observed flying over the creek, and that the creek may provide potential foraging habitat for the Large Bent-wing Bat. The BDAR states that impacts on the creekline will only be "minor" and "mitigation measures will be implemented to reduce the potential impacts". These measures include those outlined in the Integrated Water Cycle Management Strategy, best practise erosion and sedimentation controls in accordance with approved CMP and weed control in accordance with an approved CMP.

To avoid impacts to threatened fauna and their habitats along Cattai Creek, EES recommends these mitigation measures are required as conditions of consent.

Flooding

The relevant flood risk management report for the Concept Plan is adequate and identifies no outstanding flood risk management issues. The Concept Plan therefore is supported, with no additional requirements needed regarding flooding.

Should you have any queries regarding this matter, please contact Bronwyn Smith Senior Conservation Planning Officer on 9873 8604 or Bronwyn.smith@environment.nsw.gov.au

YOURS SINCERELY

S. Harrison 05/12/19

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