



Our ref: DOC19/1014695

Senders ref: SSD 10354

Karl Fetterplace
Senior Planning Officer
Key Sites Assessments
NSW Department of Planning and Environment
GPO BOX 39
SYDNEY NSW 2001

Dear Mr Fetterplace,

Subject: Exhibition of EIS – Cricket NSW Centre of Excellence, 6 Herb Elliott Avenue, Sydney Olympic Park (SSD-10354) (Parramatta City)

I refer to your e-mail dated 14 November 2019 requesting comments from the Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment on the exhibition of the EIS for Cricket NSW Centre of Excellence, 6 Herb Elliott Avenue, Sydney Olympic Park (SSD-10354) (Parramatta City).

EES have reviewed the relevant documentation and provides the following comments.

Aboriginal Cultural Heritage

If the Department determines to grant approval, EES recommends that any conditions recommended by the Aboriginal Cultural Heritage Assessment prepared by Eco Logical dated 6 November 2019 be included as conditions of consent.

Biodiversity

EES has reviewed the Biodiversity Development Assessment Report (BDAR) and does not consider it to be adequate, for the following reasons:

- There was no consideration of *Wilsonia backhousei* in the list of targeted species, despite many recent records <500m away. Section 2.1 states that BioNet was consulted, but the absence of this species suggests this search was not conducted.
- Table 12 states that there will not be any breeding habitat on site for the Large Bent-wing Bats (LBWB) because there are no caves. However, LBWB also use stormwater tunnels, buildings and other man-made structures as breeding habitat.
- Surveys for Green and Golden Bell Frog (GGBF): while it is acknowledged that GGBF have been presumed to be present on the Development Site (Development Site comprises both the construction footprint and the operational footprint of the project), a greater survey effort may have provided more specific information on how the species uses the site.
 - For example, while the survey effort met the minimum requirements set out in the Working Draft for Surveying Threatened Frog Species (DEC 2004), a greater survey effort (e.g. four nights, such that the Commonwealth guidelines for surveying threatened frogs could be met) would have provided more certainty about whether GGBFs were in the Development Site.
 - A focus on the eastern side of the Development Site would also have provided more certainty about whether GGBFs were present in the Development Site. This is because GGBFs are known to inhabit the wetland along the eastern side of the Subject Property (the subject property comprises a single allotment of land that is

bounded by the Parramatta River to the north, Silverwater Correctional Complex to the east, a busway and industrial lands to the south and Silverwater Road to the west) and could easily move into the Development Site from the wetland as they use the terrestrial corridor running north-south from the wetland along the eastern side of the Subject Property (and east to Blaxland Riverside Park).

- The extent of the species polygon for GGBF is not considered adequate as it does not include other areas on site that GGBF would use, such as areas of exotic grass areas in between treed areas.
- Buffers for GGBF: the BDAR includes a 100m buffer around the wetlands in the north east of the Subject Property as the area of GGBF habitat impacted and part of the species polygon that offsets would be calculated against. However, EES considers a greater buffer should have been applied, to be in accordance with the Commonwealth Significant impact guidelines, which state that removal of terrestrial habitat within 200m would be considered a significant impact, and that terrestrial corridors then require a 100m buffer. As such, a 300m buffer should be applied, but only to the wetland located along the eastern side of the Subject Property, as it is recognised that the other wetlands are too saline. This will impact the offset requirement.

Please note that EES supports the avoidance of existing planted trees along the eastern boundary, which protects GGBF foraging habitat and retention of habitat connectivity to the north east (into Blaxland Riverside Park).

Flooding

EES have reviewed the relevant Flood Impact Assessment Report by Cox Architecture dated 31 October 2019 and advise that there are no flood risk management issues outstanding. All flood risk management issues including adequate consideration of Climate Change have been appropriately taken into account.

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

Susan Harrison

**Senior Team Leader Planning
Greater Sydney Branch
Climate Change and Sustainability**