

DOC21/209251
SSI-10053

Jonathon Blackmore
Senior Planning Officer
Transport Assessments
Planning and Assessment
Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Dear Mr Blackmore,

Moorebank Avenue Realignment State Significant Infrastructure proposal (SSI-10053)

I refer to your 16 March 2021 request for Environment, Energy and Science Group (EES) advice on the Environmental Impact Statement (EIS) for the above.

EES has reviewed floodplain risk assessment in the EIS and notes, following EES's consistency review advice in December 2020, the development site would not be impacted by an 1% AEP flood event and the PMF event based on the Georges River Flood Study completed by BMT in 2019 for Liverpool City Council.

EES has also reviewed the Biodiversity Development Assessment Report (BDAR) and associated information provided to EES separately during the EIS exhibition period and provides the following comments:

- The species credit requirements are calculated with the direct and indirect impacts in a single zone for each PCT the species occurs in. This uses the "Total VI (Vegetation Integrity) Loss" (the average VI loss) for each PCT. However, the proportions of direct and indirect impacts for the species are not necessarily the same for the species as for the PCT zones. This means that the credit requirements calculated for the species may be higher or lower than those required. This is not the case for fauna as the species polygons for fauna occupy the entire areas of likely habitat (and not just 30m buffers around records, as is the case for flora). It is recommended the direct and indirect impact credit requirements for species credits for flora be recalculated separately.
- The calculation of offsets for indirect impacts is stated to be based on data collected during the biodiversity monitoring program for Snowy 2.0 Exploratory Works (EMM 2019). This report is not available to EES. The effective VI losses for these calculations vary but have a maximum of 7.5% of the existing VI. Several are less than a 2% loss of VI. These figures contrast with the assessments for the Northern Beaches Link project which applied a uniform 20% VI loss within a 20m buffer, and the M12 Motorway which had a 10-13% site value score loss within a 30m buffer. It is recommended the assessor provide a more detailed justification for the method used in calculating indirect offsets, including a presentation of the results of EMM 2019.
- An additional record for *Hibbertia fumana* within the Project Area that was not available to the assessor has been obtained by EES (GIS data attached). It is recommended this record be added to the BDAR assessment and calculations of offsets be undertaken.

- The BDAR does not include the credit classes from the credit report – this should be corrected in the BDAR.
- While the biodiversity impacts of the project alternative (upgrading the existing Moorebank Avenue alignment) have not been assessed, EES considers they are significantly less and concurs with the BDAR that *‘due to the high biodiversity value and sensitivity of the Boot Land, avoidance of the area would be the preferred outcome of investigations identifying alternative routes’*. It should be noted, however, that EES does not have the expertise to assess whether the measures to avoid and minimise the biodiversity impacts of the project in accordance with section 8 of the BAM against the relative road traffic, safety and intermodal efficiency benefits have been justified.
- An EES assessment of the applicable matters of national environmental significance under the *Environment Protection and Biodiversity Conservation Act 1999* is attached.

Should you have any queries on this advice please contact Richard Bonner, Senior Conservation Planning Officer, on 9995 6917 or richard.bonner@environment.nsw.gov.au

Yours sincerely



23/04/21

Susan Harrison
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