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Senders ref: SSD 9838218

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Via email: ingrid.berzins@planning.nsw.gov.au

24 May 2021

Dear Ms Berzins

Subject: Environmental Impact Statement for the Griffith Base Hospital Redevelopment - SSD 9838218

Thank you for your email dated 28 April 2021 seeking comments from the Biodiversity and Conservation Division (BCD) of the Department of Planning, Industry and Environment (the Department) about the Environmental Impact Statement (EIS) for the Griffith Base Hospital redevelopment.

We have reviewed the exhibited EIS against the Secretary's Environmental Assessment Requirements (SEARs) provided by the Department to the proponent on 29 October 2020.

BCD considers that the EIS **does** meet the Secretary's requirements for biodiversity and flooding, contingent on the applicant addressing issues 1 to 4 listed in **Attachment A**.

While the impact of the development on biodiversity is small, the Biodiversity Development Assessment Report lacks some detail required in the Biodiversity Assessment Method. A summary of our assessment and advice is provided in **Attachment A**. Detailed comments are in **Attachment B**.

All plans required as a Condition of Approval that relate to biodiversity or flooding should be developed in consultation and to the satisfaction of BCD, to ensure that issues identified in this submission are adequately addressed.

If you have any questions about this advice, please contact Simon Stirrat, Senior Conservation Planning Officer, via rog.southwest@environment.nsw.gov.au or 03 5021 8930.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A Fisher'.

Andrew Fisher
Senior Team Leader Planning
South West Branch
Biodiversity and Conservation Division
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ATTACHMENT A – BCD Assessment Summary for Griffith Base Hospital Redevelopment EIS (SSD 9838218)
ATTACHMENT B – Detailed comments for Griffith Base Hospital Redevelopment EIS (SSD 9838218)

**ATTACHMENT A BCD Assessment Summary for Griffith Base Hospital
Redevelopment EIS (SSD 9838218)**

Key Issues

1.	Species credit species	<p>Section 3.3.2 of the BDAR indicates that the Superb Parrot is included in the BAM assessment as a species credit species, due to breeding habitat being present on site.</p> <p>However, the BAM-C credit report in Section 9 does not show the Superb Parrot as generating credits.</p> <p>Recommended action:</p> <ul style="list-style-type: none"> • <i>Explain why the Superb Parrot is not in the output of the BAM-C.</i>
	<i>Extent and Timing</i>	Pre-determination

2.	Plant community type descriptions	<p>Figure 9 shows vegetation mapping but the legend descriptions need to be more complete.</p> <p>Recommended action:</p> <ul style="list-style-type: none"> • <i>Update Figure 9 with full PCT numbering and descriptions.</i>
	<i>Extent and Timing</i>	Pre-determination

3.	Vegetation zones	<p>The BDAR does not describe the vegetation zones according to section 5.3.1 of the BAM (2017).</p> <p>Exotic vegetation should be included in areas not requiring assessment.</p> <p>Recommended action:</p> <ul style="list-style-type: none"> • <i>Present a map of the vegetation zones in the development site consistent with the requirements of Section 5.3.1 of the BAM.</i> • <i>Include 'zone 3' as exotic vegetation in a map of areas that do not require assessment (see point 4).</i> • <i>Submit digital files of these areas.</i>
	<i>Extent and Timing</i>	Pre-determination

4.	Maps of offset areas	<p>The BDAR should provide maps showing the areas of vegetation requiring offsets, areas of vegetation not requiring offsets and areas not requiring assessment (section 3.1 of the BAM Operational Manual Stage 2).</p> <p>Recommended action:</p> <ul style="list-style-type: none"> • <i>Include figures showing areas requiring offsets, not requiring offsets and those that are not assessed.</i> • <i>Submit digital files of these areas</i>
	<i>Extent and Timing</i>	Pre-determination

ATTACHMENT B Detailed comments for Griffith Base Hospital Redevelopment EIS (SSD 9838218)

Flooding

BCD has reviewed the flooding information in Section 6.18 of the EIS and in Appendix Z.

The EIS **does** address the Secretary's requirements for flooding.

Biodiversity

The Biodiversity Development Assessment Report (BDAR) in Appendix H **does** meet the Secretary's requirements for biodiversity, but the BDAR requires minor amendments.

Specific comments on the content of the BDAR are as follows:

1. Species credit species

Section 3.3.2 states that the Superb Parrot (species credit species) was included in the assessment as a species credit species because there is potential breeding habitat on site.

A species credit species that is included in the BAM calculation should generate a credit obligation, but none is shown in Section 9 *Biodiversity Credit Report*. This species was the only species credit species for which habitat was acknowledged as present on the site.

Species credit species may be removed from assessment by survey or reasonable justification of a lack of habitat. The rationale for not including most species generated by the BAM-C was reasonable.

The Biodiversity Risk Weighting for the Superb Parrot (2.0 for breeding) should also be reported in Section 5.1.2 of the BDAR.

Recommended action:

- *Explain why the Superb Parrot is not in the output of the BAM-C.*

2. Plant community type descriptions

The BAM requires that a BDAR present vegetation information as Plant Community Types (PCT). Figure 9 correctly shows vegetation mapping in the Griffith area, but the legend should contain complete PCT descriptions including PCT number e.g. PCT 317 *Currawang very tall shrubland on siliceous rocky ridges and cliffs mainly in the NSW Western Slopes Bioregion*.

Recommended action:

- *Update Figure 9 with full PCT numbering and descriptions.*

3. Vegetation zones (Section 4.1 Figure 5)

Section 5.3.1 of the BAM requires that a BDAR contains a map of the vegetation zones in the development site with the same PCT and broad condition state.

Section 4.1 of the BDAR describes three vegetation zones; remnant vegetation, planted native vegetation and planted exotic vegetation. It is not necessary to assign planted exotic vegetation to a BAM vegetation zone as it should be mapped as an area not requiring assessment (see Table 26 *Impact summary* of the BAM).

The other two zones (Zone 1 and Zone 2) should also be labelled as such in the legend of Figure 5 of the BDAR.

Recommended actions:

- *Present a map of the vegetation zones in the development site consistent with the requirements of Section 5.3.1 of the BAM.*
- *Include 'zone 3' as exotic vegetation in a map of areas that do not require assessment.*
- *Submit digital files of these areas.*

4. Maps of areas relating to offsets

The BDAR should present maps showing the areas of vegetation requiring offsets, areas of vegetation not requiring offsets and areas not requiring assessment (section 3.1 of the BAM 2017 Operational Manual Stage 2).

The BDAR contains maps of various types of vegetation on site but it is unclear what will be cleared for the development.

Recommended actions:

- *Include figures showing areas requiring offsets, not requiring offsets and those that are not assessed.*
- *Submit digital files of these areas.*