Planning, Industry & Environment

Our ref: DOC19/722863
Senders ref: SSD-10154

Mr William Hodgkinson

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

Dear Mr Hodgkinson

Subject: EES comments on Response to Submissions for Qantas Flight Training Centre – SSD-10154 – 297 King Street, Mascot

Thank you for your email of 16 August 2019 requesting advice on the Response to Submissions (RTS) for this State Significant Development (SSD). Please note, OEH responsibilities and functions have been transferred to the Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment.

EES has reviewed the RTS and provides its recommendations and comments at Attachment A.

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

Yours sincerely

S. Harrison 05/09/19

Susan Harrison

Senior Team Leader Planning
Greater Sydney Branch
Environment, Energy and Science

Attachment A

Subject: EES comments on Response to Submissions – Qantas Flight Training Centre – SSD-10154 – 297 King Street Mascot

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

- Response to Submissions (RTS) - August 2019
- Amended Civil Drawings
- Amended Civil Design report
- Appendix C - Architectural Design Statement
- Appendix D - Public Domain and Landscape Design Report
- Appendix D - Landscape Architectural Plans
- Appendix E - Landscape and Visual Impact
- Appendix F - Arboricultural Impact Assessment
- Appendix N - Microbat Survey
- Appendix O - Flood Impact Assessment – August 2019

and provides the following comments.

Biodiversity

Microbats

EES in its submission on the EIS advised the BDAR had not considered the presence and possible value of habitats afforded by the existing artificial/built structures and that more information was required to assist confirm the absence of roosting habitat for threatened microbats within the existing buildings. The RTS includes a microbat survey carried out in response to this. While EES is satisfied with the type and amount of survey undertaken and the findings of the microbat survey that it is unlikely that any threatened microbats are using either of the buildings as roosting sites (page 3-61), EES is concerned about the quality of "*desktop searches of the BioNet and Atlas of Living Australia databases were undertaken on 23 July 2019 to identify threatened microbats that are known to, or have the potential to occur, within 10 kilometres of the subject* land" (page 2).

An EES search for the same area of fauna records held in Bionet at 23 July identified 13, not four, records of Large-footed Myotis *Myotis macropus*, since 2000; and 90 records of Large Bent-winged Bat *Miniopterus orianae oceanensis* (formerly *M. schreibersii*), of which 45 have been recorded since 2005, a species which the report failed to identify at all. EES would appreciate an explanation of these discrepancies and why *M. orianae oceanensis* was not identified or considered for survey, as it is a species that is known to use older buildings, culverts and other structures for roosting. EES also notes that since 23 July further, very recent, records of *M. orianae oceanensis* within two kilometres of the site (Sydney Park, 2015; Mill Stream, 2018; Tempe, 2018). have also been added to Bionet.

If this SSD is approved, EES agrees with the RTS that as a safeguard measure a condition of consent is included which requires:

- a pre-clearance survey by a suitably qualified ecologist must be undertaken for native fauna immediately prior to the demolition of the buildings (see page 3-61)
- any native fauna found in the buildings should be appropriately captured prior to demolition commencing by a licensed wildlife carer and released in appropriate habitat locations.

Urban Tree Canopy and Landscaping

EES previously recommended that to assist mitigation of the urban heat island effect at the site and to improve the urban tree canopy and local habitat that the development:

- first avoids removing the trees where possible, particularly local native species
- replaces any removed trees at a ratio greater than 1:1
- the trees are replaced with local provenance native plant species from the local native vegetation communities that occurred in the local area to enhance local biodiversity (rather than use non-local native or non-native plants).

In relation to the first recommendation above that the development first avoids removing the existing trees, it is noted the proposed number of trees to be removed has increased by an additional tree from the removal of 85 trees in the EIS to the removal of 86 trees in the RTS.

In relation to the second recommendation above that any removed trees are replaced at a ratio greater than 1:1, the RTS confirms the landscape plans have been amended to increase the number of replacement trees from 68 trees to 92 trees with a replacement rate of over 1:1 ratio (see pages 2-10, 3-23 and 3-61).

In relation to the third recommendation above that the trees removed are replaced with local provenance plant species, the RTS advises that the native vegetation community on the site is identified as the Eastern Suburbs Banksia Scrub (ESBS) in the Sydney Bioregion, which is a critically endangered ecological community. Details are required on what is the basis/source for this assumption in the RTS. This is not posited, nor is there any evidence presented to support it, in either the BDAR or the Public Domain and Landscape Report. While it may have been the case that ESBS occurred on this location, it is completely changed now and the nearest extant remnant is very disconnected, about 2 km distant. In terms of EES recommending the trees are replaced with local provenance species, the RTS and the accompanying reports are inconsistent with this advice, for example:

- The RTS states "*the landscape proposal shall use locally indigenous plant species and the tree shall be planted in advanced form…*" and the "*landscaping solution for the site proposes endemic plant species where possible*" and that "*proposed endemic trees include Banksia integrefolia* [sic] *and Banksia serrata*" (page 3-29).
- The RTS notes the selected landscape species and replacement trees are predominantly native with "*some endemic plant species*" (page 3-61).
- The RTS explains that due to the project time frames and required minimum plant installation sizes required by Council the plant stock will need to be sourced from commercial nurseries with existing stock available and "*the inclusion of the majority of local provenance plant stock will not be possible*" due to growing times required (pages 3-61 and 3-62).
- The Public Domain and Landscape report notes "all proposed trees shall be native and/or endemic where possible" (section 3.4, page 31).
- The Planting Strategy in the Public Domain and Landscape report states "*the planting provides a diverse palette of native species selected from those which would have been found around the site naturally as well as those identified in Part 10 of Council's Landscaping Guidelines for Development sites …*" (page 34) but the statement that the planting provides "a diverse palette of native species selected from those which would have been found around the site naturally" is not consistent with the plant species which occur in the ESBS community. When comparing the plant species that are proposed to be planted at the site with plant species from the ESBS community, only two of the 11 tree species that are proposed to be planted are from the ESBS. Only 3 of the 12 species of shrubs that are proposed to be planted are from ESBS and only 1 of the 12 species of climbers, grasses and ground covers are from the ESBS (see page 34 of Public Domain and Landscape report and the NSW Threatened Species Scientific Committee final determination for ESBS:**www.environment.nsw.gov.au/resources/threatenedspecies/determinations/FDESBSCEEC.pdf**).
- The RTS notes four *Eucalyptus haemastoma* are proposed to be planted along King street (page 3.34) but the NSW Threatened Species Scientific Committee final determination for ESBS does not list *Eucalyptus haemastoma* as occurring in the ESBS ecological community. Tree species which occur in the ESBS community that could be planted as an alternative include *Angophora costata* and *Corymbia gummifera.*

As the RTS indicates that ESBS once occurred on the site, EES encourages a greater use of ESBS plant species where available. The NSW Threatened Species Scientific Committee final determination for this critically endangered ecological community includes a list of ESBS species: **www.environment.nsw.gov.au/resources/threatenedspecies/determinations/FDESBSCEEC.pdf**).

EES concurs with the RTS that should local provenance stock at the required sizes be found to be available it should be used in preference to other stock (page 3.62). EES suggests the proponent contacts Randwick Council's nursery or other local native nurseries to determine if the nursery can grow and provide ESBS and other local plant community species. EES recommends that if the SSD is approved the following condition of consent is included:

- all replacement trees and landscape species will consist of a diversity of local provenance plant species from the Eastern Suburbs Banksia Scrub in the Sydney Bioregion where available.

To assist mitigate the loss of existing urban tree canopy from the site, reduce the urban heat island effect, enhance local habitat etc, EES recommended that any trees to be planted shall use advanced and established local native species from the relevant vegetation communities which once occurred in the locality, preferably with a minimum tree height of 2-2.5 metres and /or plant container pot size of 50-75 litres and that sufficient area/space is provided to allow the trees to grow to maturity. The RTS confirms all proposed trees will have a minimum pot size of 200 litres and will be endemic native species where available (page 3.62). As ESBS is a form of heathland with sparse tree cover, in terms of reducing the urban heat island effect, it is suggested *Angophora costata* is used from the ESBS plant species list.

Aboriginal Cultural Heritage

The RTS notes DPIE advised that "an ACHAR has been provided on 15 July 2019. This has been forwarded to EES and a response to their submission will need to be provided if required". In response the RTS states "*the EES did not raise any matters in relation to the provided ACHAR, it is noted this may be issued under separate cover* "(page 3.24). EES was unable to review the ACHAR, and advised in its submission on the EIS that while EES has decided not to provide comments on Aboriginal cultural heritage matters at this time and that this does not represent EES support for the proposal and this matter may still need to be considered by the consent authority. EES repeats that Aboriginal cultural heritage may still need to be considered by the consent authority.

Building design

EES notes the response provided in the RTS in relation to the EES, DPIE and Council recommendation to incorporate green roofs and green walls into the design (pages 3.15-3.17; 3.30-3.32 and 3.63).

End of Submission