



Our ref: DOC21/1031537

Senders ref: SSD-8903-MOD3

Ms Lucinda Craig
Industry Key Sites
Planning and Assessment Group
Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Dear Ms Craig

**Subject: EES comments on Modification Application for Stage 1 of Ivanhoe Estate,
Macquarie Park - SSD-8903-MOD 3**

Thank you for your email of 17 November 2021 requesting advice on the Modification Application (MOD 3) for this State significant development. The Environment, Energy and Science Group (EES) has reviewed the MOD 3 proposal and provides its recommendations and comments at Attachment A.

EES asks that it not been assigned a consultation role in the conditions of consent for this project unless EES agrees to the role and the condition.

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

A handwritten signature in black ink that reads 'S. Harrison'.

29/11/21

Susan Harrison

**Senior Team Leader Planning
Greater Sydney Branch
Biodiversity and Conservation**

Subject: EES comments on Modification Application for Stage 1 of Ivanhoe Estate, Macquarie Park - SSD-8903-MOD 3

The Environment, Energy and Science Group (EES) has reviewed the following reports for this MOD 3 proposal:

- Impact Assessment for Tree removal – 26 October 2021
- Planning Statement by Ethos Urban – 3 November 2021
- Arboricultural Impact Assessment (AIA) - Ivanhoe Estate redevelopment -SSD-8707 – February 2020
- BDAR - Ivanhoe Estate redevelopment - SSD-8707 – September 2018

and provides the following comments.

Background

The modification seeks to remove three trees (921, 922 and 942) that were approved for retention, and retain two trees (960 and 961) that were approved for removal but they are no longer required to be removed resulting in a net loss of one (1) tree as part of the site preparation works being undertaken as Stage 1 of the Ivanhoe Estate redevelopment.

The Impact Assessment for this modification notes the removal of the three additional trees will not significantly alter the conclusions of the biodiversity assessment or the offset measures required. The trees proposed to be removed are not located within the critically endangered ecological community Sydney Turpentine Ironbark Forest along Epping Road, and are located in close proximity of the riparian zone which will be subject to revegetation and landscape works

Biodiversity

Proposed tree removal

The Impact Assessment notes two of the trees (921 and 922) proposed for removal are *Angophora costata* and the other tree (942) to be removed is *Corymbia maculata*. Table 3 of the AIA indicates the two *Angophora* trees (921 and 922) have a high retention value. This means “these trees are considered important and should be retained and protected where design allows” (see Section 2.2 of the AIA). EES notes the *Corymbia maculata* tree has been assigned low retention value (Table 3, AIA). The RtS needs to provide details on why the *Angophora* trees are considered to have a high retention value and whether any of the trees to be removed contain nests, dreys, hollows etc.

Proposed tree retention

The Impact Assessment provides no details on the two trees that are now proposed to be retained (trees 960 and 961) and neither does Table 3 in the AIA which lists the tree species as ‘unidentified’. Nor does the AIA provide details on the tree height, Diameter at Breast Height (DBH), retention value etc of these two trees. It is unclear if the two trees which are now proposed to be retained are local native species or exotic or if they have a high or low retention value. The Impact Assessment notes in retaining these two trees there is a net change of -1 trees however, details are required on the habitat value of these trees compared to the three native trees which are proposed to be removed. The RtS needs to provide details on this.

Pre-clearance fauna surveys and Relocation of native fauna

The BDAR outlines that clearing of vegetation will be undertaken via a two-stage clearing process and that clearing will not be undertaken until a pre-clearance assessment is conducted and the results communicated by qualified ecologists. It outlines that ecologists will be present for all vegetation clearing. Stage 1 of the clearing process involved marking of habitat features, and removal of all vegetation except habitat features. Stage 2 involved removal of habitat features under the supervision of ecologists to relocate resident fauna (Table 15).

EES recommends a qualified ecologist relocates any resident native fauna to an appropriate nearby location. If any hollow dependent native fauna are found using existing hollows, compensatory tree hollows should be provided prior to removing the tree hollows and prior to the release of the hollow dependent fauna unless the removed tree hollows can be relocated and installed on the same day they are removed.

EES recommends a condition of consent is included in this regard for this MOD 3 proposal should the three trees be approved for removal.

Reuse and removed trees and hollows

To enhance habitat, EES recommends the MOD 3 proposal reuses native trees that are to be removed including hollows and tree trunks (greater than approximately 25-30cm in diameter and 2-3m in length) and root balls within the riparian corridor or other areas on the Ivanhoe Estate site which are to be replanted with local native species. Please note the diameter of the log (greater than 25-30 cm in diameter) is important because it impacts thermal qualities and longevity of the material. EES recommends a condition of consent is included to this effect.

Tree replacement ratio

As the three trees were initially approved to be retained, and there is no information available in the AIA on the two trees that are now proposed to be retained, EES recommends the trees proposed to be removed are replaced at a ratio greater than 1:1 (for trees not covered by a biodiversity offset strategy) to mitigate the urban heat island effect and to enhance tree canopy and habitat on the site. The loss of existing trees and the benefits that they provide can take years for a juvenile tree to grow and replace.

The replacement trees should consist of local native provenance species from the relevant native vegetation communities that occur or once occurred on the site (rather than use non-local native Australian or exotic species). EES recommends the RtS provides details on this and a condition of consent is included to this effect.

End of Submission