



Sally Munk
Principle Planning Officer
Level 29
320 Pitt Street NSW 2000

Our ref: DOC19/867630-7

Your ref: SSD 9143

22 October 2019

Dear Ms Munk

Subject: Goulburn Poultry Processing Mixed use development – SSD 9143 – Comments on EIS and recommendations for biodiversity Conditions of Consent

I refer to your request for advice on the Goulburn Poultry Mixed Use Development Environmental Impact Statement (EIS). The Biodiversity & Conservation Division (BCD) have provided comments regarding biodiversity and Aboriginal Cultural Heritage matters only.

Biodiversity:

BCD is satisfied with the 5-Part test and justifications for the impacts to the biodiversity on site, however we do have concerns about the removal of any hollow bearing trees (HBT), the EIS's references that there are 3 HBT on the development area with at least 1 being proposed to be removed. We recommend these be avoided as they are essential habitat for many species. Please see attachment 1 for further comments and recommendations on the conditions of consent.

Aboriginal Cultural Heritage:

An unredacted version of the Aboriginal Cultural Heritage Assessment Report (ACHAR) has been reviewed by a male staff member due to the potential for men's business sites to be present within the project area. We can confirm that there is no mention of a gender specific site in the project area within the unredacted document.

We note that three Aboriginal sites (GMUPA-3, GMPUA-PAD1 and GMUPH-1) within the impact area will be harmed to varying degrees. We support the finding by Navin Officer Heritage Consultants (NOHC) that the scientific significance of Aboriginal sites GMUPA-3 and GMUPA-PAD1 can only be assessed through subsurface testing. We recommend that the archaeological test excavations be undertaken prior to approval as there is not currently enough information to determine the level of impact of the development on Aboriginal cultural heritage and avoidance of these sites is not feasible. We can provide advice on the recommended conditions of consent once the subsurface testing results are known.

If you have any questions regarding the contents of this letter, please contact Nicola Hargraves (02 6229 7195) for matters regarding biodiversity and Sarah Robertson (02 6229 7088) for Aboriginal Cultural Heritage matters.

Yours sincerely,

MICHAEL SAXON
DIRECTOR
South East, Biodiversity and Conservation

Attachment 1 – Further comments

Biodiversity:

We recommend the following conditions of consent for the determining authority to consider:

- Limit the removal to just one HBT, if avoidance is not possible. If required to be removed, the hollow should be salvaged and reinstalled within the retained area. A monitoring program should also be included within this program,
- During construction the vegetation should be clearly marked and fenced off to reduce the risk of removal,
- We support the statement within the Statement of Environmental Impacts report, 6.10.4 Impacts, that all removed tree's will be replaced, for example the *Eucalyptus rossii* (inland scribbly gum) and the *Eucalyptus mannifera* (brittle gum) as well as the proposed supplementary tree planting to be undertaken in the area of remnant woodland,
- Monitoring of the supplementary tree planning as well as the remnant vegetation to ensure that the quality is being maintained, or improved with a key focus on weed management,
- We support the strategies proposed within the EARs, 8.0 Avoid and Minimise along with 13.0 Recommendations.

Aboriginal Cultural Heritage

Five Aboriginal sites were identified during the archaeological assessment:

- Site GMUPA02 is 20m outside the impact area and will not be harmed.
- Culturally significant scarred tree GMUPA-1 is 80m outside the construction impacts and will not be harmed.
- GMUPA-3, GMUPA-PAD1 and GMUPH-1 are all within the impact area.
- We support the statement by NOHC that the scientific significance of Aboriginal sites GMUPA-3 and GMUPA-PAD1 can only be assessed through subsurface testing, but disagree with the suggested post-approval timing. Subsurface testing of sites GMUPA-3 and GMUPA-PAD1 is needed prior to approval because the significance of the sites is unknown and they will be extensively disturbed by the proposal:
 - GMUPA-3 (Artefact Scatter and PAD) is situated in an area designated for truck parking and will be subject to considerable subsurface impacts in the form of excavation, levelling, compaction, and capping with asphalt.
 - GMUPA-PAD1 (Potential Archaeological Deposit) is situated in an area designated for factory staff parking as well as a wastewater treatment plant and associated infrastructure. Subsurface impacts in this location would include excavation, levelling, compaction, installation of building footings, and capping with asphalt.