

Our ref: DOC21/206653

Senders ref: MP10_0118 MOD 10

Mr Andrew Watson
Planning and Assessment Group
Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Attention: Emily Dickson

Dear Mr Watson

Subject: EES comments on Request for SEARs – Edmondson Park South Concept Plan –
Precinct 3 - MP10_0118 MOD 10

Thank you for your email of 12 March 2021 requesting advice in relation to the Request for Secretary's Environmental Assessment Requirements (SEARs) for this modification application. The Environment, Energy and Science Group (EES) has reviewed the draft SEARs and reports and provides the following comments and recommendations in Attachment A.

Flood

The proposed modification location of the Concept Plan, where an increase in dwellings from 250 to 600 is sought, is located in the upper reach of Maxwells Creek, which is a tributary of Cabramatta Creek. The flood modelling work undertaken in the Cabramatta Creek Catchment indicate that the proposed site is located above the creek mainstream PMF level (source: Cabramatta Creek Flood Study and Basin Strategy Review, report prepared by Bewsher Consulting for Liverpool City Council, Sept 2011). However, the site may be impacted by overland flow. The SEARs should require an assessment of any potential overland flooding and a flood investigation to determine the flood behaviour and impacts associated with the development for the full range of events up to the probable maximum flood.

Biodiversity

EES notes the site is identified as 'Existing Certified Land' in the 'South West Growth Centre – Biodiversity Certification' map under s.43 of the Biodiversity Conservation (Savings and Transition) Regulation 2017. The effect of biodiversity certification is that consideration of the likely impacts of the development on biodiversity values is not required (under s.8.4 of the *Biodiversity Conservation Act 2016*).

Development adjacent to NPWS lands

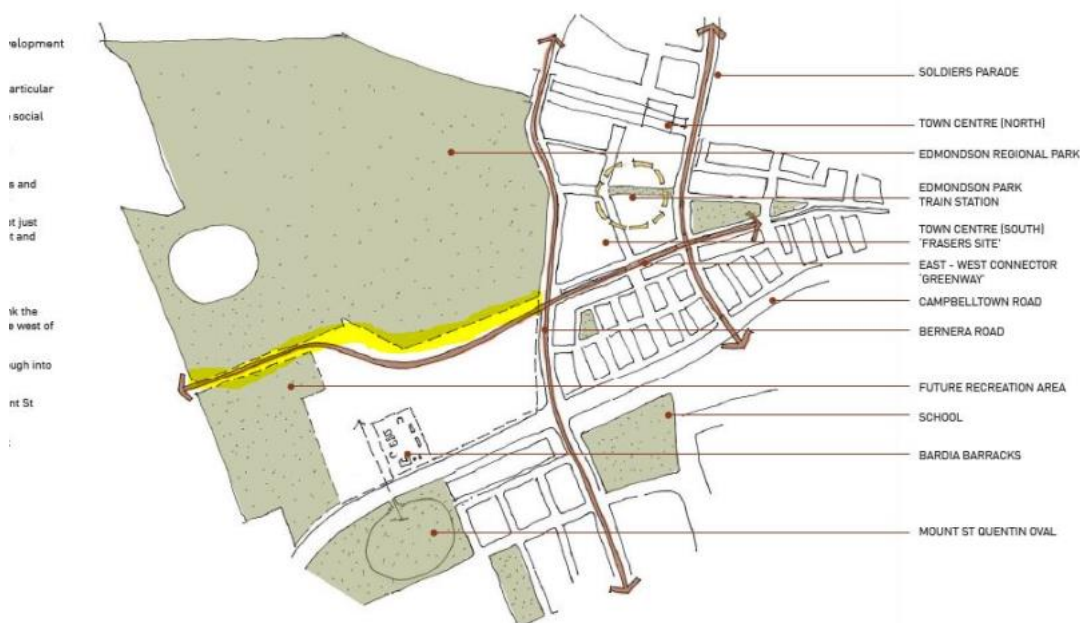
EES notes the Edmondson Park Design Review includes a key theme and development principle (6) to create connections to open space, including create physical connections to the regional park along the perimeter of the site (page 5). The EA needs to provide details on all proposed connections/pathways into the Regional Park. The EA should address whether the proposed pathways will allow native fauna from the Regional Park to access the East-West Connector road "Greenway" and therefore risk the threat of vehicle strike.

The Masterplan in the Edmondson Park Design Review (page 7) appears to show a walking path from Precinct 3 into the Regional Park (see marked copy of Masterplan below). NPWS has not yet completed masterplanning for Edmondson Regional Park and is unable to confirm a pedestrian access point at this location - initial plans have not included public access here, rather a soft boundary (i.e. stock fence or similar).

NPWS would like to confirm if there is a pedestrian or vehicular walking track or road proposed along the northern boundary of Precinct 3 backing onto the Regional Park (see marked copy of Connections from the Edmondson Park Design Review below). It is unclear if there is a walking path between the precinct and the road. The EA should provide details on this.



Masterplan - Source: Edmondson Park Design Review



Connections - Source: Edmondson Park Design Review

As Precinct 3 adjoins the Edmondson Park Regional Park, the EA should:

- Assess the direct and indirect impact of the proposal on the adjoining Regional Park. The relevant guidelines are NPWS (2020) *Developments adjacent to NPWS lands: Guidelines for consent and planning authorities*, National Parks and Wildlife Service, Department of Planning Industry and Environment, Sydney, NSW at the following link: <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Parks-reserves-and-protected-areas/Development-guidelines/developments-adjacent-npws-lands-200362.pdf>
- provide details on the estimated maximum population associated with the MOD 10 proposal and the cumulative impact of increasing the number of dwellings/population in relation to impacts on the nearby Regional Park. The proposal should assess the impact of increased numbers of people potentially using the Regional Park as increased numbers of people are likely to place additional pressure on the Regional Park and impact native flora and fauna.

6. Public space

Key Issue (6) in the draft SEARs requires the EA to demonstrate how the proposed development maximises the amount, access to and quality of public spaces including open space, public facilities and streets/plazas within and surrounding the site. The modification includes over a 40% increase in the number of dwellings. While the joining regional park allows opportunities for recreation this needs to be sustainable so as not to compromise the park's natural and cultural values. The EA must address the additional demand for open space and how this is accommodated.

7. Landscaping and trees

EES recommends Key Issue (7) in the draft SEARs is amended to include the following changes in bold italics, and the SEARs specify that any landscaping should use a diversity of local species (trees, shrubs and groundcovers) from the native vegetation community (or communities) that once occurred in the locality to improve biodiversity (rather than use non-local native or exotic species), particularly as Precinct 3 adjoins the Regional Park:

The EA must include a Concept Landscape Plan, that:

- details indicative landscaping, including ***the use of a diversity of local native provenance vegetation from the relevant native vegetation community or communities and native plant species that occur or occurred on the site (rather than use exotic or non-native species)***
- demonstrates how the development proposes to protect and increase the urban tree canopy
- includes justification for any tree / vegetation removal
- demonstrates how the proposed development maximises opportunities for green infrastructure, consistent with Greener Places
- ***includes a list of local species (trees, shrubs and groundcovers) to be used in the site tree planting and landscaping***
- ***include details on the number of trees to be removed and the number of trees to be planted***
- ***use advanced sized trees and include details on the tree species, plant pot container size and the planting location***
- ***provide sufficient area/space to allow any planted trees to grow to maturity.***

Building Design

The climate change projections developed for the Sydney Metropolitan area are used to inform the building design and asset life of the project:

<https://climatechange.environment.nsw.gov.au/Climate-projections-for-NSW/Climate-projections-for-your-region/Metro-Sydney-Climate-Change-Downloads>.

If you have any questions about this advice, please do not hesitate to contact Janne Grose, Senior Conservation Planning Officer via email at janne.grose@environment.nsw.gov.au or on 8837 6017

Yours sincerely



29/03/21

Susan Harrison

Senior Team Leader Planning

Greater Sydney Branch

Biodiversity and Conservation Division

Attachment A – EES Group Standard Environmental Assessment Requirements

| Water and soils |
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| <p>1. The EIS must map the following features relevant to water and soils including:</p> <ul style="list-style-type: none"> a. Acid sulfate soils (Class 1, 2, 3 or 4 on the Acid Sulfate Soil Planning Map). b. Rivers, streams, wetlands, estuaries (as described in s4.2 of the Biodiversity Assessment Method). c. Wetlands as described in s4.2 of the Biodiversity Assessment Method. d. Groundwater. e. Groundwater dependent ecosystems f. Proposed intake and discharge locations |
| <p>2. The EIS must describe background conditions for any water resource likely to be affected by the development, including:</p> <ul style="list-style-type: none"> a. Existing surface and groundwater. b. Hydrology, including volume, frequency and quality of discharges at proposed intake and discharge locations. c. Water Quality Objectives (as endorsed by the NSW Government http://www.environment.nsw.gov.au/ieo/index.htm) including groundwater as appropriate that represent the community's uses and values for the receiving waters. d. Indicators and trigger values/criteria for the environmental values identified at (c) in accordance with the ANZECC (2000) Guidelines for Fresh and Marine Water Quality and/or local objectives, criteria or targets endorsed by the NSW Government. e. Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions http://www.environment.nsw.gov.au/research-and-publications/publications-search/risk-based-framework-for-considering-waterway-health-outcomes-in-strategic-land-use-planning |
| <p>3. The EIS must assess the impacts of the development on water quality, including:</p> <ul style="list-style-type: none"> a. The nature and degree of impact on receiving waters for both surface and groundwater, demonstrating how the development protects the Water Quality Objectives where they are currently being achieved, and contributes towards achievement of the Water Quality Objectives over time where they are currently not being achieved. This should include an assessment of the mitigating effects of proposed stormwater and wastewater management during and after construction. b. Identification of proposed monitoring of water quality. |

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| <ul style="list-style-type: none"> c. Consistency with any relevant certified Coastal Management Program (or Coastal Zone Management Plan). |
| <ul style="list-style-type: none"> 4. The EIS must assess the impact of the development on hydrology, including: <ul style="list-style-type: none"> a. Water balance including quantity, quality and source. b. Effects to downstream rivers, wetlands, estuaries, marine waters and floodplain areas. c. Effects to downstream water-dependent fauna and flora including groundwater dependent ecosystems. d. Impacts to natural processes and functions within rivers, wetlands, estuaries and floodplains that affect river system and landscape health such as nutrient flow, aquatic connectivity and access to habitat for spawning and refuge (e.g. river benches). e. Changes to environmental water availability, both regulated/licensed and unregulated/rules-based sources of such water. f. Mitigating effects of proposed stormwater and wastewater management during and after construction on hydrological attributes such as volumes, flow rates, management methods and re-use options. g. Identification of proposed monitoring of hydrological attributes. |

(END OF SUBMISSION)