

Department of Planning and Environment

Ingrid Berzins
Planning Group
Department of Planning and Environment
4 Parramatta Square,
Parramatta NSW 2150

Our ref: DOC22/774311
Your ref: SSD 17899480

Subject: Response to Submissions - Wentworthville Northside West Clinic Extension (SSD-17899480)

Dear Ms Berzins,

Thank you for your email received 26 August 2022 requesting comments from Environment and Heritage Group (EHG) on the Response to Submissions for the Wentworthville Northside West Clinic Extension (SSD-17899480). EHG has undertaken a review of the additional information and provides further comments below.

Biodiversity, trees and landscaping

EHG has reviewed the letter prepared by Ecological Australia dated 28 July 2022 relating to the removal of the five additional trees and is satisfied that the additional tree removal will not affect the outcomes of the Biodiversity Development Assessment Report, dated 15 November 2021.

In relation trees on site, EHG notes the following.

- An additional six trees have been incorporated into proposed landscaping for a total of 13 new tree plantings on site. Of the 13 trees proposed, five are dwarf species.
- Based on the additional information provided and communication with Cumberland City Council, EHG has confirmed that tree 47, located within the Council reserve, has been approved by council for removal.
- EHG previously noted that trees 41, 48 and 49 will be subject to major encroachment into their tree protection zone (TPZ) from the proposed development. Australian Standard 4970:2009 Protection of Trees on Development Sites provides a range of actions that should be undertaken in this scenario, the first of which is to determine the location and distribution of the roots through non-destructive investigation methods. This investigation is the first step in determining if the subject trees will remain viable post development. This has not been undertaken. EHG recommends the previously requested information in relation to trees 41, 48 and 49 be provided.

With the above noted, EHG provides the following recommended conditions should the proposal proceed to an approval.

- *Mitigation of Biodiversity Impacts as identified in BDAR*
To mitigate potential impacts to remaining biodiversity values on site, all mitigation and management measures identified in Table 9 of the Biodiversity Development Assessment Report (prepared by EcoLogical Australia dated 15 November 2021) are to be implemented.
- *Retention of trees*
All trees not specifically identified on the approved plans for removal are to be retained and protected throughout the life of the development. Retained trees are to be protected in accordance with the recommendations of the Arboricultural Impacts Assessment prepared by Birds Tree Consultancy (dated 22 June 2022) and Australian Standard 4970:2009 – Protection of Trees on Development Sites. Tree protection zone fencing, and all other tree

protection measure are to be in place prior any works commencing on site. A diploma qualified arborist (AQF 5) must be on site to supervise any works within the Tree Protection Zone of any trees to be retained.

- *Tree removal works and Fauna Protection*

Trees approved for removal must be lopped to minimise the risk of injury or mortality to fauna, such as top-down lopping, with lopped sections gently lowered to the ground, and/or by lowering whole trees to the ground with the “grab” attachment of a machine.

During tree removal, an experienced wildlife handler is to be present to re-locate any displaced fauna that may be disturbed during this activity. Any injured fauna is to be appropriately cared for and released on site or an appropriate nearby location when re-habilitated.

- *Trenching or excavation within tree protection zones*

Trenching or excavation within the tree protection zone of trees to be retained should be undertaken under the supervisions of a Diploma qualified (AQF 5) Arborist using minimally destructive techniques such as hand-digging, compressed air or water-jetting. Where root pruning is necessary, all cuts should be clean cuts using sharp tools such as secateurs, pruners, handsaws, chainsaws or specialised root pruning equipment. Roots greater than 50mm diameter must not be severed.

Flooding

EHG’s previous advice to consult with the NSW Sate Emergency Service still applies. The proponent has proposed a shelter in place strategy in rare flooding events, however, this is a matter for the NSW SES as the responsible flood combat agency. Proposed shelter in place strategy and a specific site emergency management plan should be referred to the NSW SES.

No further referral to EHG is required in relation to flooding.

Should you have any queries regarding this matter, please contact Shaun Hunt, Senior Conservation Planning Officer via [REDACTED] or [REDACTED]

Yours sincerely



13/09/22

Susan Harrison
Senior Team Leader Planning
Greater Sydney Branch
Biodiversity and Conservation