

Department of Planning and Environment

Our ref: DOC23/332551

Your ref: SSD-14793297

Ms Sally Munk
DPE Planning
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

4 May 2023

Subject: EHG comments on Request for input into the Secretary's Environmental Assessment Requirements (SEARs) for the Blue Mountains Wildlife and Tourism Development at 10 Great Western Highway Wentworth Falls - Concept Development Application and detailed proposal for first stage - SSD-14793297

Dear Ms Munk

Thank you for your email received on 20 April 2023 seeking the Environment and Heritage Group (EHG) advice in relation to the applicant's proposal to amend the SEARs, that were issued for this SSD on 17 March 2021, to now reflect a staged development, comprising a Concept for the entire development, and a detailed proposal for the first stage of the development.

The former EES (now EHG) provided a submission (dated 4 March 2021) on the original SEARs request for this SSD (our ref: DOC21/122465). EHG considers its previous comments are still valid and need to be addressed by the applicant. In addition to EES's previous comments the following comments are provided.

EES previously recommended the development footprint is amended and that the development is in the C3 zone only and areas that have been cleared in the C2 Environmental Conservation zone are rehabilitated. It is of concern that the Request for revised SEARs indicates that the proposed new multi-storey carpark is now proposed to be located entirely on land zoned C2 Environmental Conservation and it notes it is in an area that would otherwise be cleared for asset protection zones (APZ) / inner protection areas (IPA). The original proposal sought to partly locate the car parking on C2 zoned land. EHG does not support the locating of any of the proposed development / APZ / IPA on C2 zoned land. Scaled plans for this development should clearly overlay and show the C2 and C3 zoned land and the proposed development footprint/ APZ /IPA requirements.

EES previously advised that the proposal needs to assess the impact of the proposal on the passage of native fauna through the wildlife crossing under the Great Western Highway. Despite the issued SEARs for this SSD requiring an assessment of impacts on fauna corridors including impacts on native fauna using the Boddington Hill wildlife underpass under the Great Western Highway, it is of concern that the plans provided with the amended SEARs request do not show the location of this wildlife crossing in relation to the proposed development. The impact of the proposal on the passage on native fauna through the wildlife crossing needs to be assessed. It is important that scaled plans which clearly locate the wildlife crossing under the Great Western Highway, the development footprint and site fencing are also provided as part of this assessment.

EES previously advised that the EIS should address the potential impact of the proposed water feature on the downstream receiving environment including the hanging swamp, the Blue Mountains National Park (BMNP) and the Greater Blue Mountains World Heritage Area (GBMWA). Comparing the Site Plan in the previous Scoping Report with Attachment A1 the proposed water feature (now aquatic exhibit) appears to have now increased in size/area. The proposed water feature should not impact the downstream environment and the EIS will need to demonstrate this.

Department of Planning and Environment

Attachments A1 and C5 show that the proposed walking trails are more extensive on the eastern side of the site than the previous proposed pathways. Attachment C2 shows the walking trails, the indicative zip line, the suspension bridge and maintenance track are located in, or in proximity to, and/or cross over the Blue Mountains Hanging Swamp endangered ecological community (EEC). The EIS will need to provide details on what the zip line is. Details also need to be provided on the walking trails (including the number of walking trails, proposed width of the trails, the materials used to construct the walking trails (i.e., boardwalks, gravel, asphalt, concrete, grated etc), the suspension bridge and maintenance track. The impact of these additional features on the hanging swamp needs to be addressed. EHG recommends these features are located outside the area identified as Blue Mountains Hanging Swamp EEC to avoid/minimise impacts to this EEC, native flora and fauna.

As outlined in the previous EES submission, the EIS should address the 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>

The impact that the development might have on the hydrology and subsequent effects on erosion, water quality /pollution and contamination, and pest and weed dispersal on BMNP need to be assessed. Also, the impact of light and noise spill into the national park. These threats need to be effectively mitigated to avoid undesirable impacts on BMNP and the GBMWA. The development needs to ensure any required APZ for bushfires around the development do not negatively impact on park values.

If you have any queries regarding this matter, please email rog.gsrplanning@environment.nsw.gov.au.

Yours sincerely,

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

Susan Harrison

Senior Team Leader Planning
Greater Sydney Branch,
Biodiversity and Conservation