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7 May, 2012

Matthew Davies Hassell 88 Cumberland Street Sydney NSW 2000

Our Reference: 0124276_SUBMISSIONRESPONSE_L01_FINAL.DOC

Attention: Matthew Davies

Dear Matthew,

RE: RESPONSE TO SUBMISSIONS FOR PORT MACQUARIE BASE HOSPITAL EXPANSION (MP 11_0012)

I refer to the submissions received by the Department of Planning and Infrastructure (DPI) regarding the Port Macquarie Base Hospital (PMBH) Expansion MP 11_012 (the Project) during the public exhibition period. This letter provides a response to the ecological matters outlined in those submissions.

The following key issues were raised by the submissions:

1. TREE REMOVAL

The Project will result in the removal of 83 eucalypt trees comprising 62 planted eucalypt trees and 21 mature remnant trees, as stated in the ecological assessment (ERM 2012) and Arboricultural Impact Assessment (Naturally Trees 2012). Trees to be removed as part of the current proposal are identified in the figures on Sheet 3 of 3 within the Arboricultural Impact Assessment provided with the Project application (Naturally Trees Feb 2012).

2. FAUNA AND HABITAT VALUES

Regarding the fauna impacts identified in the public submission, ERM provides the following response:



Environmental Resources Management Australia Pty Ltd A.C.N. 002 773 248 A.B.N. 12 002 773 248

2.1 SQUIRREL GLIDER

No Squirrel Gliders (*Petaurus norfolcensis*) were recorded during the ecological surveys undertaken by ERM. A Sugar Glider (*Petaurus breviceps*) was recorded during the spotlighting surveys associated with the Koala Activity Assessment (ERM 2010) and a number of other records have also been recorded within the immediate environs of the PMBH (OEH 2012a). Records for the Squirrel Glider have also been identified within 0.5km of the PMBH although none were identified on the site itself.

The Squirrel Glider is known to inhabit Blackbutt-Bloodwood forest with heath understorey in coastal areas (OEH 2012b). This species requires abundant hollow-bearing trees and a mix of eucalypts, acacias and banksias (NPWS 1999a). Within a suitable vegetation community at least one flora species should flower heavily in winter and one or more of the eucalypts should be smooth-barked (NPWS 1999a).

Despite the absence of heath understorey, smooth-barked eucalypt species and banksia species; the habitat assessment identified a moderate likelihood of potential habitat for this species within the road reserve of the Oxley Highway due to the availability of suitable hollows within this area and presence of acacia species in the understorey. However, trees within the proposed development footprint were considered to have a reduced likelihood of providing potential habitat due to a lack of suitable hollows and the absence of an understorey. Consequently, an Assessment of Significance (7-part test) was not undertaken due to the low-moderate likelihood of the Squirrel Glider utilising or inhabiting vegetation within the proposed development footprint.

2.2 VARIED SITTELLA AND LITTLE LORIKEET

Both the Varied Sittella (*Daphoenositta chrysoptera*) and Little Lorikeet (*Glossopsitta pusilla*) were considered to have a low to moderate likelihood of occurrence within the Oxley Highway road reserve based on known habitat requirements.

The Varied Sittella is known to inhabit eucalypt forests and woodlands (especially those containing rough-barked species and mature smooth-barked eucalypts with dead branches), mallee and Acacia woodland (OEH 2011a). The presence of decorticating bark, dead branches and standing dead trees are common features within the preferred habitat of this species as they provide habitat for arthropod species which comprise a large part of the Varied Sittella's diet (OEH 2011a). This species also prefers areas containing a shrub and ground cover layer and the presence of logs, fallen branches and leaf litter.

Within the proposed development footprint, the likelihood for this species to occupy or utilise the area was further reduced due to the absence of an understorey and a lack of dead branches and fallen timber which is a result of the relatively young age of the planted eucalypts. This species is also adversely affected by the presence of Noisy Miners (*Manorina melanocephala*) which were observed within the grounds of the PMBH.

The Little Lorikeet predominantly occurs in dry, open eucalypt forests and woodlands where they feed primarily on profusely flowering eucalypts although also on a variety of other species including melaleucas and mistletoes (OEH 2011b).

Despite the presence of hollows within the Oxley Highway road reserve, this area was considered to have a low to moderate likelihood of providing habitat suitable for the Little Lorikeet due to its classification as moist sclerophyll forest rather than dry forest, which is the preferred habitat. Furthermore, no visible hollows were identified within the proposed footprint which further reduces the likelihood for this species to occupy or utilise the development area.

A 7-part test was not undertaken for either of these species as there was only a low to moderate likelihood of their occurrence within the Project footprint.

2.3 KOALA

As stated in the ecological assessment (ERM 2012), results indicate that the PMBH grounds and surrounding vegetation support a resident population of Koala (*Phascolarctos cinereus*) with high activity recorded throughout the area, including sighting of an adult and juvenile that would indicate a viable population.

The proposal would result in the removal of approximately 83 eucalypt trees (comprising 62 planted eucalypt trees and 21 mature remnant trees), many of which are currently utilised as a foraging and sheltering resource for a viable local Koala population. Consequently, it is considered that the proposal would result in a significant loss of foraging habitat for this species although given the availability of alternative foraging resources in the local area (e.g. Lake Innes Nature Reserve), is not expected to have a significant impact on the life cycle of the Koala to the extent that it would be placed at risk of extinction.

Lake Innes Nature Reserve is located approximately 0.5km to the east and south east of the PMBH site and is important to the local Koala population. The reserve supports a healthy population of approximately 600 Koalas and forms an

important corridor linking the Port Macquarie area to the large area of State Forest located to the west and ultimately, the Great Dividing Range (NPWS 1999b).

A review of aerial photographs indicates that landscaping and retained trees within the PMBH grounds and remnant vegetation in the adjoining Oxley Highway road reserve and along the southern boundary of the site are connected through a series of narrow corridors to the Lake Innes Nature Reserve in the south east. The removal of planted and retained eucalypts as a result of the proposal is not expected to break this link or isolate areas of habitat although it is considered likely that the removal of remnant eucalypts in the south western corner of the PMBH site may reduce connectivity to some extent.

Based on a discussion with the Koala Hospital and the requirements of the Port Macquarie-Hastings Development Control Plan 2011, compensatory planting of Koala feed trees has been recommended at a minimum of 2:1 replacement ratio (ERM 2012). This ratio is considered necessary to offset impacts associated with the proposal in the long-term. With the adoption of a satisfactory offset planting program, the removal of trees as a result of the proposal is not considered to significantly impact the long-term survival of the Koala within the locality.

3. COMPENSATORY PLANTING AND OFFSETS

Due to limited land available within the PMBH site, an appropriate off-site location needs to be identified to accommodate compensatory planting that cannot be located within the confines of the PMBH site. Initial discussions with Council indicate that suitable land will be difficult to secure for the project in the Council area. Nonetheless, investigations for a suitable compensatory planting site have commenced.

The proponent is planning to undertake a BioBanking assessment of the Project to assess the number and type of credits that would be required to offset the impact of the Project using the BioBanking Offsets Scheme managed by the NSW Office of Environment and Heritage (OEH). This approach has the support of DPI and Council, as indicated during phone calls in late April.

The BioBanking Assessment report will be presented to DPI once complete, in order to progress with the compensatory planting and offset component of the Project.

If you have any additional queries in relation to the Project, please contact the ERM Project Manager Andrew Morris or ERM Ecologist Amanda Ayres on 02 6584 7155.

Yours sincerely, for Environmental Resources Management Australia Pty Ltd

Andrew Morris Project Manager

Mg At:

Murray Curtis Partner in Charge

References:

Environmental Resources Management (ERM) (2010) **Port Macquarie Base Hospital: Koala Activity Assessment.** ERM, Port Macquarie NSW.

Environmental Resources Management (ERM) (2012) **Port Macquarie Base Hospital Redevelopment: Ecological Assessment.** ERM, Port Macquarie NSW.

National Parks and Wildlife Service (NPWS) (1999a) **Threatened Species Information: Squirrel Glider** (*Petaurus norfolcensis*). NPWS, Hurstville NSW

National Parks and Wildlife Service (NPWS) (1999b) Lake Innes Nature Reserve Plan of Management. NPWS, Port Macquarie NSW.

Naturally Trees (2012) Arboricultural Impact Assessment and Method Statement: Port Macquarie Base Hospital prepared for NSW Health Infrastructure

Office of Environment and Heritage (OEH) (2011a) **Final Determination: Varied Sittella** (*Daphoenositta chrysoptera*). OEH, Hurstville NSW.

Office of Environment and Heritage (OEH) (2011b) **Final Determination: Little Lorikeet** (*Glossopsitta pusilla*). OEH, Hurstville NSW.

Office of Environment and Heritage (OEH) (2012a) Atlas of NSW Wildlife Database Search. Wildlife Data Team, Hurstville NSW.

Office of Environment and Heritage (OEH) (2012b) **Threatened Species Profiles.** www.threatenedspecies.environment.nsw.gov.au/tsprofile/index.aspx