

Department of Planning and Environment

Our ref: DOC23/794273
Your Ref: SSD-45024776

Judith Elijah
Planning Group
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

25 September 2023

Subject: Response to Submissions – Narwee Parklands Seniors Housing (SSD-45024776)

Dear Judith,

Thank you for your email received 1 September 2023 requesting comments from the Environment and Heritage Group (EHG) regarding the State Significant Development (SSD) Application for Narwee Parklands Seniors Housing (SSD-45024776).

EHG has reviewed the Response to Submissions report and supporting studies and provides the following comments.

Trees and Biodiversity

A revised arboricultural impact assessment (AIA) dated July 2023 and arborist statement dated 14 August 2023 prepared by Moore Trees, has been provided to address additional impacts to trees from bulk earth works and the construction of an electrical substation.

The arborist statement identifies impacts to tree 3 (*Corymbia maculata*) from a proposed substation which cannot be avoided. It is suggested that as the proposed impacts are unavoidable, root mapping can be undertaken post approval. EHG does not support this approach. The proposed impacts to tree 3 have not been quantified and it is unknown if the tree will be removed or retained.

A Biodiversity Development Assessment Report (BDAR) waiver for the subject proposal was granted on 8 November 2022. Should additional biodiversity impacts be proposed, such as the removal of tree 3, the proposed development will no longer be consistent with the impacts assessed under the BDAR waiver and a new waiver request will be required. Alternatively, the applicant may prepare and submit a BDAR.

EHG recommends the following matters be addressed to ensure consistency with the BDAR waiver:

- The impact of the proposed encroachment into the TPZ of tree 3 must be quantified via root mapping. If root mapping demonstrates that the tree can be retained this should be detailed in an addendum to the AIA.
- If root mapping is not undertaken, it should be assumed that tree 3 will need to be removed and a new BDAR waiver request should be sought. Alternatively, the applicant may prepare and submit a BDAR.
- Cumulative encroachment into TPZ of trees 1 and 2 should also be quantified. The AIA previously identified the requirement for hydro excavation within the TPZ of these trees for the installation of stormwater services. The bulk earthworks plan indicates cut within the TPZ of the trees. The impacts of this must also be addressed. The level of encroachment into the TPZ of the trees should be quantified and if necessary root mapping undertaken.

Flooding

The response from the proponent in relation to the comments from EHG is considered satisfactory for the management of flooding conditions and risks. EHG has no further comments on the flooding aspects this proposal.

If you have any queries regarding this matter, please contact Marnie Stewart, Senior Project Officer Planning via Marnie.stewart@environment.nsw.gov.au or 02 9995 6868.

Yours sincerely

A handwritten signature in black ink, appearing to be "DA", written over a faint, larger signature.

Dana Alderson
A/Senior Team Leader Planning
Greater Sydney Branch
Biodiversity and Conservation