



Ms Alaine Roff
Planner
c/o
DEPARTMENT OF EDUCATION
Level 8, 123 Pitt Street
SYDNEY NSW 2000
07/09/2020

Dear Ms Roff

Alexandria Park Community School Redevelopment-Mod-2 (SSD-8373-Mod-2)
Request for Additional Information

I refer to Assessment for the Alexandria Park Community School Redevelopment-Mod-2 (SSD-8373-Mod-2). After careful consideration, the Department is requesting that you provide additional information.

You are requested to submit additional information that effectively addresses the issues identified in Attachment 1.

You are requested to provide the information, or notification that the information will not be provided, to the Department by Thu 24 September 2020. If you are unable to provide the requested information within this timeframe, you are requested to provide, and commit to, a timeframe detailing the provision of this information.

If you have any questions, please contact Mark Wisely, who can be contacted on 9873 8526 at Mark.Wisely@planning.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'KH' followed by a flourish.

Karen Harragon
Director, Social And Infrastructure Assessments
Social & Infrastructure Assessments

Enclosed: Appendix 1

Appendix 1

The Modification proposes the removal of an additional 6 trees from the site, adding to the 69 planned for removal in the Original Consent. The additional trees to be removed are a mixture of London Plane Trees and a Curtain Fig. All trees are recommended to be removed and replaced within the site with new planting of advanced species.

The Department notes a discrepancy between the submitted Environment Assessment Report (EAR) and *Arboricultural Impact Assessment and Tree Management Plan (Redgum, 2020)* (AIM) with the EAR identifying an extra tree for removal – a mature curtain fig (tree 109).

The Department is concerned the Modification's additional tree removal constitutes a significant increase in tree canopy loss at the site, particularly along the eastern boundary and interface with Alexandria Park. Identified as trees 104-109 on the AIM, these species are an important part of the urban canopy that connects the site with species that bound Alexandria Park Tennis and Basketball Courts. Their removal is considered to significantly reduce the tree canopy in this area, reducing shade for future users and spectators of the new sports field and users of the Park Road shared pedestrian zone. The AIM states:

'To offset the impact of these trees being removed five new trees will need to be planted somewhere around the site, to be determined by the landscape architect.'

The Department is concerned that the tree loss will pose significant interim and potentially permanent amenity impacts for users of the new sports field and Alexandria Park in this area. Further, it is considered the net reduction in tree canopy does not align with current state and local government strategies that aim to protect and increase canopy coverage across Greater Sydney.

These include:

- The NSW Government's Premier's Priority: Greening Our City which seeks to increase the tree canopy and green cover across Greater Sydney by one million trees by 2022 with the aim of achieving a 40% urban tree canopy cover by 2056.
- NSW Government Architect's *Draft Greener Places Design Guide, 2020* which develops a consistent method for planning green infrastructure including establishing minimum urban tree canopy targets for NSW State significant projects.
- The *City of Sydney's Urban Forest Strategy, 2013* seeks an increase of 50% canopy cover by 2030 across the City of Sydney LGA to reach an overall LGA canopy cover of 27.13% by 2050. The Strategy identifies the suburb of Alexandria as currently having a tree canopy coverage of between 10-15% where the site is located. A key goal of the strategy prioritising the maintenance and protection of existing trees in streets, parks and private property in order to maximise their continuing benefits.

The Department also seeks further advice from you that the removal of the trees would not require a biodiversity development assessment report under section 7.17 of the *Biodiversity Conservation Act 2016* (BC Act). In this regard, we seek your advice that the removal of the trees would not constitute an increase in the impacts on biodiversity values above that assessed in the original approval.

The Department requests that the applicant clarify:

- proposed tree planting locations in the site.
- the discrepancy between the tree loss assessed in the AIM and the EAR.
- opportunities for increasing the tree canopy across the site and adjacent Alexandria Park to compensate for the loss of tree canopy at the site.
- alignment of the project with key State and Local Government strategies to increase tree canopy coverage in Greater Sydney.
- the modification's increased biodiversity impact does not require assessment in a biodiversity development assessment report under section 7.17 of the BC Act.