

**ANGEL PLACE  
LEVEL 8, 123 PITT STREET  
SYDNEY NSW 2000**

URBIS.COM.AU  
Urbis Pty Ltd  
ABN 50 105 256 228

13 November 2020

Mr Mark Wisely  
NSW Department of Planning, Industry and Environment

Email: mark.wisely@planning.nsw.gov.au

Dear Mark,

## **RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION: ALEXANDRIA PARK COMMUNITY SCHOOL REDEVELOPMENT-MOD-2 (SSD-8373-MOD-1)**

This letter is prepared on behalf of School Infrastructure NSW (SINSW) to respond to NSW Department of Planning, Industry and Environment's (DPIE) request for additional information for SSD-8373-MOD 2 of 7 September 2020.

The matters raised by DPIE are in relation to:

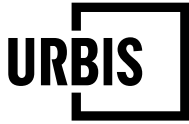
- Clarification on the proposed tree planting locations in the site.
- Clarification on the discrepancy between the tree loss assessed in the AIM and the EAR.
- Opportunities for increasing the tree canopy across the site and adjacent Alexandria Park to compensate for the loss of tree canopy at the site.
- Alignment of the project with key State and Local Government strategies to increase tree canopy coverage in Greater Sydney.
- Clarification that the increased biodiversity impact does not require a biodiversity development assessment report under section 7.17 of the *Biodiversity Conservation Act 2016* (BC Act).

Overall, the proposed development (including this modification) will remove 88 trees: 80 within the project boundary and 8 outside, of varying heights and canopy coverage. Overall, 146 trees are proposed to be planted as part of the development.

A response to each matter is provided in the sections below.

### **1. PROPOSED TREE PLANTING LOCATION**

The Alexandria Park Community School project (original SSD and MOD 2) removes 80 trees within the site boundary and 11 trees outside the boundary. MOD 2 will require existing trees 104,105,106,107,108, 112, 113 and 114 to be removed. The trees to be removed are shown in Appendix A.



Within the site, 13 trees can be replaced. City of Sydney Council are proposing 7 trees along Park Road.

## 2. TREE LOSS IN THE AIM AND EAR

Tree removal has been clarified in the Tree Retention & Removal Plan at Appendix A. Tree replacement is clarified in the Proposed Trees Plan at Appendix B. The Arboricultural Impact Assessment has been amended to align with the tree plans and is attached at Appendix C.

Previously, Tree 109 was accidentally deleted from the base data Architectural set so it was not evident as being in the way of the field or the stairs. Considering feedback from the community and following consultation with City of Sydney Council, the project team confirms that Tree 109 is now to be retained. The Architectural Plans and Landscape Plans have been further modified to retain the tree and reconfigure the stairs. Amended Architectural Plans are provided at Appendix D and the relevant amended Landscape Plans are attached at Appendix E.

The retention of Tree 109 will provide shade and lighting protection to the residents on Buckland Street, addressing the key matters raised in public submissions received during exhibition. The trees that are to be retained at the corner of the field and interface with the park will provide screening to Buckland Street residents and preserve the character of the park.

## 3. OPPORTUNITIES FOR INCREASING TREE CANOPY

The Proposed Tree Plan at Figure 1 and Appendix B shows the potential location for 13 proposed additional trees along the Buckland Street frontage and within the site, and 7 trees to be planted by Council along the now closed Park Road. These 20 trees are in addition to the 126 trees proposed under the original SSD.

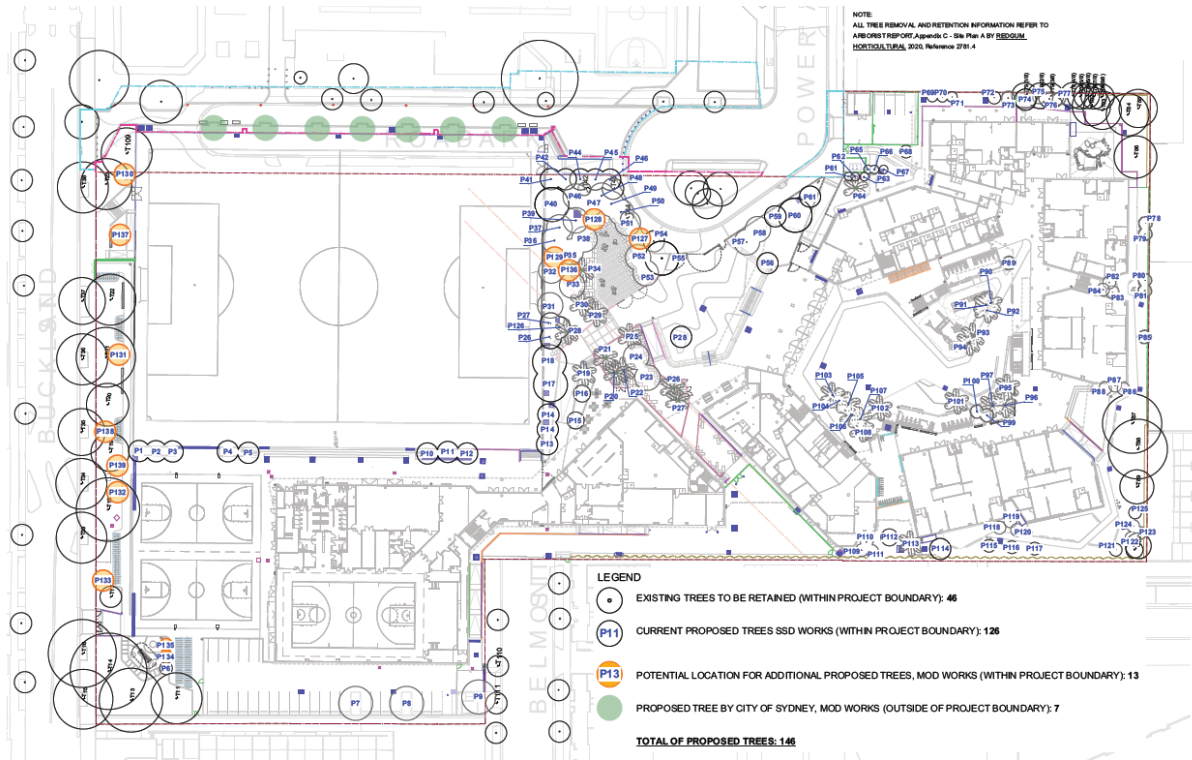
The replacement trees along Buckland Street will provide a secondary canopy layer by using smaller tree species. This will reinforce the screening provided by the existing canopy by creating a secondary layer of screening. The intention is that the replacement trees will be provide mid canopy cover, as per the information provided in Table 1 below and the species schedule in Appendix F.

Table 1 Replacement Tree Details

Tree Number	Tree Species	Common Name	Size	Height
127-129, 136	Angophora costata	Smoth barked apple	12m	15-20m
134,135,137	Flindersia australis	Crow's Ash	6m	8-12m
130,133	Alloxylon flammeum	Tree Waratah	10m	10-15m
131-132, 138-139	Randia fitzalanii syn. Atractocarpus fitzalanii	Native Gardenia	6m	5-10m

There are no further opportunities for tree planting within the remainder of the site is needed for learning and play spaces. The total proposed trees are 146, this is 1.6 for every tree that is being removed for the whole project.

Figure 1 Proposed additional trees



Source: Context

#### 4. ALIGNMENT WITH KEY STATE AND LOCAL GOVERNMENT STRATEGIES

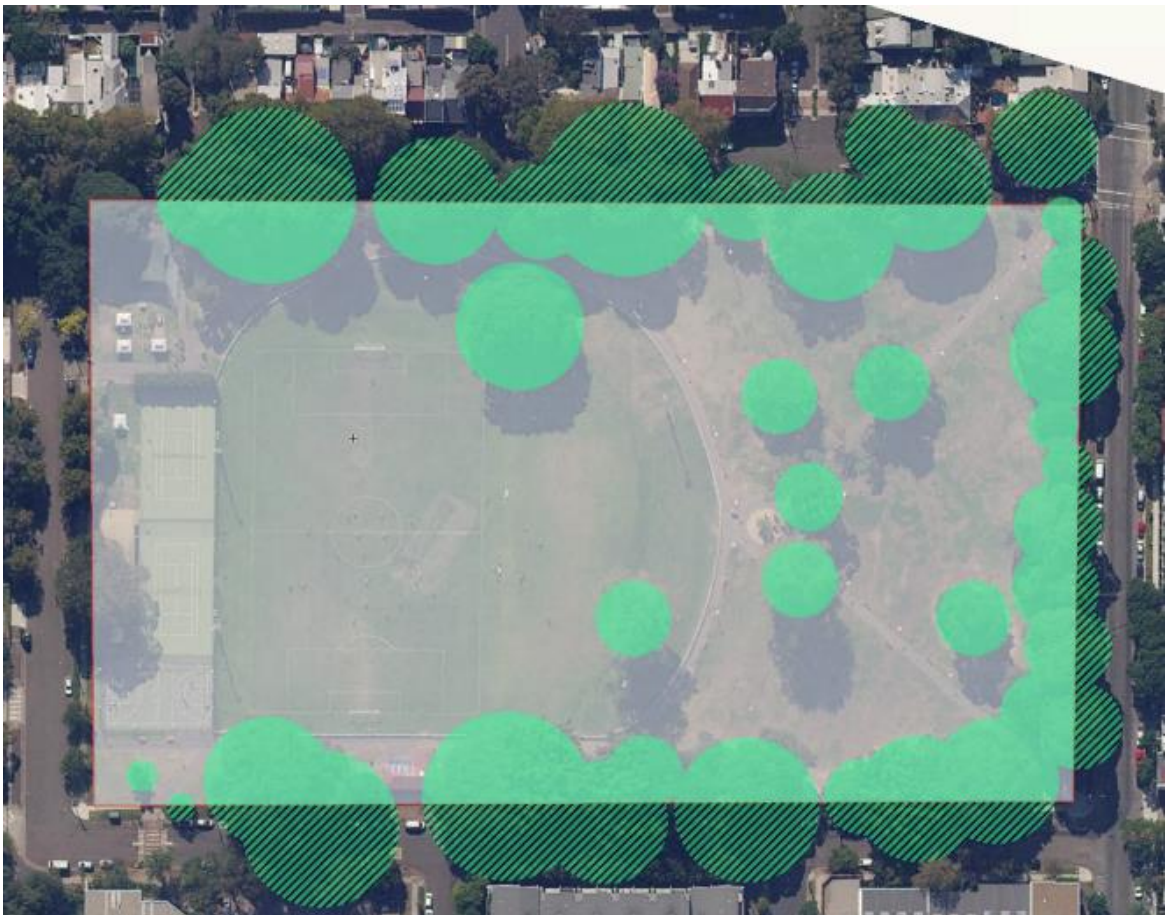
The percentage of canopy cover for Alexandria Park Community School is 13%. This is below the 40% canopy target outlined in the NSW Government’s Premier’s Priority: Greening Our City and the *Draft Greener Places Design Guide, 2020* prepared by GANSW.

The proposed tree canopy coverage is considered appropriate because:

- The 13% tree canopy is deliberate to allow maximum area for learning and play within the school site and to accommodate Council’s sporting facility that will have broad public benefit.
- The 13% tree canopy is within the Alexandria canopy range of 10-15%. Although this is short of *City of Sydney’s Urban Forest Strategy, 2013* target, the project is a joint venture between SINSW and City of Sydney. City of Sydney have driven the project and support the tree removal given that on balance it delivers significant public benefit:
  - It creates a unified community sport precinct.
  - It provides an improved public domain and pedestrian friendly zone at the key public interface and entry to the school.

- The new high-quality sports field addresses community need and provides the school with a facility that will enhance the educational outcomes for its students.
- Re-planting is 1.6 trees for every tree being removed, more than a typical 1:1 replacement.
- The landscaping intent of the replacement trees along Buckland Street is to provide a secondary canopy layer by using smaller tree species. This will reinforce the screening provided by the existing canopy by creating a secondary layer of screening.
- The canopy cover can be offset in Council’s parks and reserves, including Alexandria Park. Alexandria Park and bordering streets have a canopy coverage of 48%, which exceeds the 40% target.

Figure 2 – Alexandria Park tree canopy



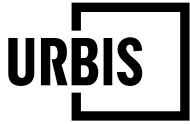
Source: Context

- The proposal is consistent with the GANSW's Design Guide for Schools as:
  - Other than Alexandria Park, there is minimal natural environment in proximity to the site given the dense residential and industrial context. The proposal is responding to the current context.
  - The proposal includes tree planting and other planting that enhances opportunities for play and learning.
  - The proposal ensures landscaping improves the amenity within the school grounds.
  - The proposal integrates landscape, planting and Water Sensitive Urban Design (WSUD) principles to enhance amenity.
- The *Landscape Review Project* document that has been prepared by Gallagher Studio for the NSW Department of Education dated 3 June 2019 talks to the Urban Tree Canopy Guide (2018) and its relevance to the design of school landscapes. It acknowledges that the aim is to address urban heat and reduce local temperatures. Given that the aim of the urban tree canopy target is to reduce local temperatures and urban heat, the local context of the site needs to be considered. The tree strategy needs to be considered with respect to the trees in the immediate context of the site i.e. Alexandria Park.
- The *Landscape Review Project* surveyed 10 recently upgraded education projects and identified tree canopy coverage ranging between 14% and 26%. The only site that had proposed 40% tree canopy cover was Ballina High, which we note has a very different site context.
- The principles and recommendations made in the *Landscape Review Project* also state that the purpose of shade is to:
  - Increase shade provision in student landscape spaces
  - Improve student health by cooling local microclimates and protecting from sun exposure
  - Provide an appropriate proportion of summer shade and winter sun
  - Based on the level of shade the project provides these principles are being achieved without 40% canopy cover.
- Species selected have been conscious of maximising deep soil opportunities and canopy cover to allow for the necessary shade and greening requirements for the school environment. A full species list is provided at Appendix F.
- The tree configuration between the school and the park is more deliberate to allow better connectivity and more passive surveillance.

## **5. NEED FOR A BIODIVERSITY DEVELOPMENT ASSESSMENT REPORT**

A Statement of Validity of BDAR Waiver has been prepared by UBM Ecological and is attached at Appendix G. The Statement confirms:

- A BDAR waiver was granted for the original SSD because it was concluded that there was no biodiversity on the site that would be impacted.
- The additional 9 trees to be removed are all planted exotic specimens.
- Given the above, and the species are not local natives, further assessment under a BDAR is not required.



- MOD 2's increased biodiversity impact does not require assessment in a BDAR in accordance with section 7.17 of the *Biodiversity Conservation Act 2016*.

## **6. CONCLUSION**

We trust the information in this letter addresses DPIE's request for additional information and the assessment of the application can contribute to determination.

Please do not hesitate to contact me if you require any further information.

Kind regards,

A handwritten signature in blue ink that reads "Alaine Roff".

Alaine Roff  
Associate Director  
+61 2 8233 9927  
aroff@urbis.com.au