NSW GOVERNMENT | Office of Environment & Heritage

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SSD 8740

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School Infrastructure Assessments
NSW Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Scott Hay

Exhibition of Schofields Public School redevelopment, 60 St Albans Road, Schofields (SSD 8740)

Dear Mr Beattie,

Reference is made to your letter dated 23 April 2018, to the Office of Environment and Heritage (OEH) regarding the redevelopment of Schofields Public School located at 60 St Albans Road, Schofields.

Please find attached OEH comments in relation to biodiversity and Aboriginal Cultural Heritage in Attachment 1.

Should you have any queries regarding this matter, please contact Svetlana Kotevska, Senior Conservation Planning Officer on 8837 6040 or at Svetlana.kotevska@environment.nsw.gov.au.

Yours sincerely

S. Harrison 24/05/18

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Attachment 1 – Office of Environment and Heritage (OEH) comments redevelopment of Schofields Public School 60 St Albans Road, Schofields (SSD 8740)

Biodiversity

It is noted that 46 trees on site will require removal as part of the school redevelopment and the tree species are assumed to form part of the Critically Endangered Ecological Community (CEEC) known as *Cumberland Shale Plains Woodland* (CSPW). The Flora and Fauna Assessment and site surveys undertaken by UBM Ecological Consultants P/L found 43 native plants species (39% of all plant species on site) indigenous to the LGA and the vegetation on site is both a local food resource for a variety of fauna species for foraging and roosting habitat with two nests found on the eastern boundary and two hollow bearing trees and one tree with crevices. Also, 43 fauna species were found on site or adjacent to the study area with 39 native fauna species including:

- 4 frogs
- 2 reptiles
- 22 birds
- 15 mammals including 12 microbats (the latter have been recorded numerous times during site surveys and within a 1-5km of the site during the last three years)
- 7 of which are listed as threatened species under both the *Environmental Protection Biodiversity Conservation Act and*/or *Biodiversity Conservation Act 2016.*

Given that land is biodiversity certified, no further biodiversity assessment is to be undertaken.

It is noted that the landscape plans include a vision to create a green spine and natural setting with an aim that states "reinforce the natural bush setting through retention of existing trees and introduction of new tree species which fit within the context". The recommendations below particularly the replanting of supplementary trees to replace the 46 trees removed would be consistent with this vision. In this regard, OEH suggests a significant increase in the number of new trees proposed on site, as it is noted that only 36 proposed trees are shown on the landscape masterplan while 46 trees are to be removed. As a minimum trees should be replaced at a ratio of at least 1:1, while higher ratios may also be required. For trees on private land for example, Blacktown City Council (refer to link 'Trees on private land' page) requires two replacement trees for each tree removed. Furthermore, using a higher ratio than what is currently proposed will support the vision for the landscape plan.

Six target weed species have been identified on the site including African Olive and Ground Asparagus, the latter being a Weed of National Significance (WoNS). The consultant's report states that these should be controlled as they have potential to disperse and degrade bushland in the locality, and are subject to a general biosecurity duty in accordance with Section 22 of Part 3 of the *Biosecurity Act 2015.* Given this, a weed management plan should also be conditioned on the consent to prevent spread of weeds into the woodland patch in the adjoining Schofields Park.

Please note that most of the proposed species listed on the indicative planting schedule landscape plan are inappropriate. The indicative planting schedule contains some cultivars and exotic species. Only local provenance species and no exotic species, should be used. The following documents should be used to develop a revised species list:

- Tozer et al. (2010) Native vegetation of southeast NSW: a revised classification and map for the coast and eastern tablelands. Cunninghamia 11(3): 359 – 406.

- Tozer (2003) The native vegetation of the Cumberland Plain, western Sydney: systematic classification and field identification of communities. Cunninghamia 8(1): 1 – 75.

- OEH (2013) The Native Vegetation of the Sydney Metropolitan Area. Volume 1: Technical Report. Version 2.0. Office of Environment and Heritage, Department of Premier and Cabinet, Sydney and

- OEH (2013) The Native Vegetation of the Sydney Metropolitan Area. Volume 2: Vegetation Community Profiles. Version 2.0. NSW Office of Environment and Heritage, Sydney.

While a range of species occurs in Shale Plains Woodland, preference should be given to the positive diagnostic species listed in the above-mentioned documents. Further, the following species listed on the indicative planting schedule do not form part of Shale Plains Woodland and should not be used:

- *Banksia integrifolia*
- *Banksia spinulosa*
- *Banksia spinulosa*
- *Callistemon linearifolius*
- *Carex appressa*
- *Casuarina glauca*
- *Dianella caerulea*
- *Grevillea* Bronze Rambler
- *Grevillea* Royal Mantle
- *Grevillea poorinda* Royal Mantle
- *Hakea sericea*
- *Kunzea ambigua*
- *Liriope muscari* Evergreen Giant
- *Lomandra longifolia* Tanika
- *Lomandra longifolia* Verday
- *Melaleuca linariifolia*
- *Melaleuca nodosa*
- *Syzygium smithii* (now called *Acmena smithii*)
- *Trachelospermum jasminoides*
- *Viola hederacea*
- *Westringia fruticosa* Grey Box

The recommendations of the Flora and Fauna Assessment should be conditioned on any forthcoming consent to minimise the impacts on native flora and fauna species found on site or known to utilise the resources of the School. These recommendations are outlined below and contained in UBM Ecological Consultants P/L report titled *Ecology Report: Flora & Fauna Surveys for the Proposed Redevelopment of Schofields Public School, Schofields dated 19 January 2018.*

- Wherever possible, mature canopy trees and plantings in good health and occurring near the development footprint, should be retained, and where feasible, incorporated into the final project design.

- Appropriate tree protection measures should be in place prior to construction works commencing for all trees identified for retention (e.g. wooden tree guards, exclusion fencing).

- Where trees are unavoidably impacted, supplementary trees and shrubs should be planted post construction (*e.g.* site landscaping). Preferably use species characteristic of the local ecological community, Cumberland Shale Plains Woodland, for landscaping.

- Fauna habitat variety should be maintained and enhanced where possible. Increasing floristic diversity through plantings of shrub and tree species around the School would be highly beneficial, especially locally occurring native plants that produce nectar, pollen and fruits, including winter-flowering canopy trees, and patches of dense vegetation cover.

- Immediately prior to the removal of vegetation and debris, a pre-clearance survey should be undertaken by a qualified Fauna Spotter/Catcher to identify and relocate fauna that may be disturbed, injured or killed during clearing (e.g. nesting birds).

- Use a slow-drop method for the removal of identified habitat trees (*i.e.* those containing nests, dreys and hollows) and have a qualified Ecologist or member of WIRES present during clearing to ensure that any fauna encountered are removed to a carer or relocated to a nearby safe site.

Aboriginal Cultural Heritage

OEH has reviewed the Aboriginal Archaeological Assessment prepared by Comber Consultants dated February 2018. This assessment does not fulfil the project SEARs with respect to its Aboriginal cultural heritage assessment requirements. Further assessment of Aboriginal cultural heritage is recommended in the form of an Aboriginal Cultural Heritage Assessment Report (ACHAR), with formal Aboriginal community consultation and a staged program of archaeological test excavations (as per Comber Consultants own report recommendations contained in the Executive Summary), to inform the development and satisfy the project SEARs issued on the 22 November 2017.

From the information provided it is unclear why the full ACHAR was not prepared prior to the exhibition of the proposal. It is understood from Comber Consultants report that an ACHAR is currently being prepared. OEH requires that this be completed ahead of determination of the application.

Comber Consultants report identified 22 sites within 1km of the study area that indicates surface artefacts are located where areas have been disturbed. "The undertaking of excavations in the region has revealed medium to large densities of artefacts" (pg 36). Further, the report states "it could be predicted that the study area contains high archaeological potential. The site types that could be expected would be:

1. *Artefact scatters:* These sites are characterised by surface or sub-surface scatters of stone artefacts or artefacts embedded in deposits.

2. *Isolated finds:* Single artefacts which may be the result of tool loss, abandonment or maintenance may be found. They may also be indicators of otherwise buried sites or the only remains of heavily disturbed sites" (pg 37).

The consultant's report also states "This site contains a large concentration of ochre and a possible artefact. These items are important to Aboriginal people as they demonstrate the lifestyle and subsistence activities of their ancestors and provide a continuing link to the past...The site has the potential to yield further information, through archaeological investigation that will yield information that will contribute to an understanding of the cultural history of Schofields and New South Wales. Archaeological excavation has the potential to reveal information about the precontact Aboriginal occupation of the area" (pg 43).

Given the sites high archaeological potential and possible artefacts, OEH requires an extensive salvage program that must be detailed in the ACHAR.

(END OF SUBMISSION)