



**Office of  
Environment  
& Heritage**

DOC18/894066  
SSD 9344

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SYDNEY NSW 2001

Attention: Navdeep Shergill

**Notice of Exhibition - Redevelopment of Kent Road Public School, 126 Kent Road, Marsfield - SSD 9344**

Dear Mr Beattie, *Andrew*

I refer to your letter dated 19 November 2018 requesting input from the Office of Environment and Heritage (OEH) on the exhibition of the SSD 9344 for the redevelopment of Kent Road Public School.

The application proposes to increase the student population from 750 to 1,000 and involves:

- demolition of existing buildings and refurbishment of existing school buildings into teaching spaces
- construction of three new two to three storey buildings to provide for increased student population including:
  - 34 Homebase spaces
  - canteen
  - administration and staff facilities–
  - special program/counselling rooms
  - construction of a new entry canopy
- reconfiguration of car drop off/pick up arrangements on Kent Road
- site preparation, landscaping, fencing and tree removal.

OEH has reviewed the relevant documentation and provides comments at 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](mailto:Svetlana.kotevska@environment.nsw.gov.au).

Yours sincerely

*S. Harrison 13/12/18*

**SUSAN HARRISON**  
Senior Team Leader Planning  
Greater Sydney  
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## Attachment 1 – OEH comments - Redevelopment of Kent Road Public School, 126 Kent Road, Marsfield - SSD 9344

### Biodiversity

OEH has reviewed the Biodiversity Development Assessment Report (BDAR) prepared by Eco Logical Australia Pty Ltd dated 6 November 2018 and notes that the proposal generates the need for offsets in the form of four (4) ecosystem credits. The following conditions are recommended for inclusion in the development consent.

#### 1. Like for like ecosystem credit retirement condition

1.1 Prior to carrying out development that will impact on biodiversity values, the class and number of ecosystem credits in Table 1 must be retired to offset the residual biodiversity impacts of the development.

1.2 The requirement to retire credits in condition 1.1 may be satisfied by payment to the Biodiversity Conservation Fund of an amount equivalent to the class and number of ecosystem credits, as calculated by the Biodiversity Offsets Payment Calculator<sup>[1]</sup>.

1.3 Evidence of the retirement of credits or payment to the Biodiversity Conservation Fund in satisfaction of condition 1.1 must be provided to the Secretary of the Department of Planning and Environment for approval prior to carrying out development that will impact on biodiversity values.

**Table 1 Ecosystem credits required to be retired – like for like**

Any PCT with the below TEC	Number of credits	Containing Hollow bearing trees	In the below IBRA subregions
Blue Gum High Forest in the Sydney Basin Bioregion (including PCTs 1237)	4	Yes	Cumberland, Burragorang, Pittwater, Sydney Cataract, Wollemi and Yengo Or Any IBRA subregion that is within 100 km of the outer edge of the impacted site

DPE should confirm compliance with the above condition as outlined below.

- **Retirement of credits:** proponent provides evidence to DPE in form of a credit retirement report issued by OEH confirming credit transactions. DPE confirms credit transaction corresponds to a like for like credit of the appropriate number from an appropriate location.
- **Payment to the Biodiversity Conservation Fund:** proponent provides evidence to DPE in form of a section 6.33 Statement Confirming Payment into the Biodiversity Conservation Fund issued by the Biodiversity Conservation Trust. The statement will indicate the number and class of credits that the payment corresponds to and any related development application reference. DPE confirms the payment transaction corresponds to the appropriate class and number of credits.

### Tree retention and Urban Tree Canopy Cover

The following recommendations of the Aboricultural Impact Assessment report prepared by Temporal Tree Management Pty Ltd dated 1 October 2018 are to be conditioned:

#### Tree Protection

- Trees 134 and 165 are to be aerially inspected by an ecologist prior to their removal. This inspection should investigate the presence of faunal habitats within their canopy and hollowed stems. All fauna within these trees should be safely captured and / or dispersed prior to their removal. Once evacuated all hollows should be covered to ensure they are not reoccupied prior to the trees' removal.

<sup>[1]</sup> Note that prices of credits in the Biodiversity Offsets Payment Calculator are subject to change. The amount payable to discharge an offset obligation will be determined at the time of payment.

- The northern edge of the new sports court must not be located closer than 5.5 metres from the stem of Tree 169 and no closer than 3.5m from the stem of Tree 163. This will ensure that the encroachment sustained to these trees remains minor (less than 10% of its total TPZ area).
- The group exclusion zone is to be extended in the western direction towards Tree 45. Additional signage should be added stating that 'No construction activity is permitted beyond this point. No construction activity of any kind must take place on the southern side of this fence.
- The high retention value trees within southern portion of the school are identified on the Biodiversity Values Map and are not within the tree impact zones and must therefore be protected and retained.

In accordance with the recommended conditions in the BDAR prepared by Eco Logical Australia Pty Ltd, the following conditions must be included on the consent:

#### **Flora and Fauna Protection**

- Pre-clearance survey of trees to be removed and identification/location of habitat trees by a suitably qualified ecologist. Supervision by a qualified ecologist/licensed wildlife handler during tree removal in accordance with best practise methods to ensure relocation of fauna in a sensitive manner.
- Timing of construction works should be planned to occur outside of the spring breeding season for microbat species and nesting birds. In this regard, clearing works should be avoided in late winter/spring during breeding/nesting period for birds
- Any trees removed that have hollows/hollow trunks/fissures should be retained as ground fauna habitat and/or used as replacement hollows and attached to trees within the Development Site/Subject Site. If it is impractical to use salvaged hollows as replacement tree hollows, compensatory nest boxes should be installed within vegetation to be retained.
- Vehicles, machinery and building refuse should remain only within the Development Footprint Site and not impinge on the areas of retained native vegetation.
- A weed management plan must be prepared.
- All staff working on the development are to undertake an environmental induction as part of their site familiarisation. This induction will include items such as Importance of No Go zones in the area identified on the Biodiversity Values map/high retention value trees within the southern portion of the school that comprises the Blue Gum High Forest critically endangered Ecological community.
- Landscaping in the Development Site is to use locality derived native species and those found within the PCTs present. The replacement planting must be locally occurring Blue Gum High Forest, Turpentine-Ironbark Forest and Shale – Sandstone Transitional Forest species.

In addition, OEH requires the installation of roost boxes specifically targeting threatened hollow-dependent microbats recorded in the region. This should be undertaken by a qualified ecologist and/or arborist in order to mitigate the loss of any hollow-bearing trees from the area.

A Planning Priority in the District Plan is to increase urban tree canopy cover and deliver Green Grid connections. To achieve this priority the District Plan identifies opportunities for green grid connections and sets a NSW Government target to increase tree canopy cover across Greater Sydney to 40 per cent. The proposal needs to:

- detail how much green cover is provided on site
- what canopy cover percentage is achieved on site and how it is consistent with this target.
- ensure that trees removed as a consequence of the proposal must be replaced, in accordance with Section 6 of the Urban Forest Technical Manual (Tree Management Technical Manual, City of Ryde 2012) to effectively maintain the Urban Forest canopy.





**Figure 4. Position of Trees 165 and 134 adjacent to the existing infants toilet block.**

### **Aboriginal Cultural Heritage**

An Aboriginal Archaeological Survey Report (ASR) dated 9 November 2018 was prepared by RPS. In the RPS letter dated 15 October 2018 it states “RPS has advised Gardner Wetherill & Associates that the SEARs conditions regarding preparation of an ACHAR and consultation with the Aboriginal community are not required for this project.” However, the EIS contradicts this and states “for completeness an ACHAR is currently being prepared and will be provided as part of future stages of the SSD process.” Until an ACHAR is submitted, it is considered that the proposal is inconsistent with the project SEARs. It is also inconsistent with the approach on similar education major project applications such as Wentworthville Public School redevelopment SSD 9273 where a full Aboriginal Cultural Heritage Assessment Report (ACHAR) was completed and submitted.

### **Water Sensitive Urban Design (WSUD)**

The development aims to capture unfiltered runoff and treat it on site which will improve water quality discharged from the site. This will be achieved through a variety of WSUD measures. OEH supports and recommends the following measures are included as conditions in the consent:

The development must be in accordance with the Integrated Water Management Plan prepared by Taylor Thomson Whitting dated 6th November 2018 that requires the following WSUD measures to be implemented to achieve the proposals runoff reduction and water quality targets:-

- installation of gross pollutant traps such as Stormwater360 Enviropods
- vegetated swales along the play area known as “raingardens”
- installation of a rainwater tank
- on-site rainwater harvest to offset for irrigation demand & toilet flushing
- and a stormwater maintenance plan must be prepared.



### Sustainability and Building Design

OEH recommends the development incorporate green walls, green roofs and/or a cool roof into the design. The benefits of Green Roofs and Cool Roofs are outlined in the *OEH (2015) Urban Green Cover in NSW Technical Guidelines* which can be found at the following link:

<http://climatechange.environment.nsw.gov.au//Adapting-to-climate-change/Green-Cover>.

Green roofs can increase habitat and biodiversity at the site, particularly if local native plant species are used from the relevant native vegetation community. A good opportunity exists to increase the long-term sustainability outcomes of the proposal, and provide green roofs and also to decrease the extensive impervious areas proposed as part of the redevelopment on site. Additional green cover on site will assist with reducing the urban heat island effect, local temperatures and contribute to meeting Greater Sydney's urban tree canopy target of 40 per cent consistent with the District Plan's Planning Priority.



**Figure 20** Photomontage of the proposal (looking north-east)

Source: GWA

OEH also recommends that the NSW and ACT Governments Regional Climate Modelling (NARClIM) climate change projections developed for the Sydney Metropolitan area are used to inform the building design and asset life of the project. These include over 100 climate variables, including temperature, rainfall, hot days and cold nights, severe Forest Fire Danger Index (FFDI) and are publicly available online and at fine resolution (10km and hourly intervals) for 20-year time periods: 2020–2039 near future and long-term 2060–2079.

### Flooding

To be provided under separate cover.

(END OF SUBMISSION)

