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Senders ref: SSD-8996

Aditi Coomar
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Planning and Assessment Group
NSW Department of Planning, Infrastructure
and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Coomar

Subject: Exhibition of Loreto Normanhurst School Redevelopment (Concept Proposal and Stage 1) (SSD-8996)

Thank you for your letter received by the former Office of Environment and Heritage (OEH) on 24 June 2019, requesting comment on the Environmental Impact Statement (EIS) exhibition for the above proposal. Please note that OEH's responsibilities and functions have been transferred to the Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment.

I apologise for the delay in replying. EES provides its comments at Attachment A.

Please note that EES is unable to provide comments on Aboriginal cultural heritage at this time. This does not constitute EES support for the proposal and the matter may still need to be considered by the consent authority.

Should you have any queries regarding this matter, please contact Dana Alderson, Senior Project Officer Planning on 8837 6304 or Dana.Alderson@environment.nsw.gov.au.

Yours sincerely

S. Harrison 13/08/19

Susan Harrison

**Senior Team Leader Planning
Greater Sydney Branch
Climate Change and Sustainability**

Attachment A – EES group comments on Exhibition of Loreto Normanhurst School Redevelopment (Concept Proposal and Stage 1) (SSD-8996)

EES Group has reviewed the Environmental Impact Statement (EIS) prepared by Ethos Urban (dated 18 June 2019) and Biodiversity Development Assessment Report (BDAR) prepared by Eco Logical Australia (dated 14 January 2019) and provides the following comments.

Biodiversity Development Assessment Report

Assessment of impacts

The SEARs for the proposal issued 12 January 2018 require that the biodiversity impacts of the Concept Plan including Stage 1 works are considered in a BDAR. Whilst the BDAR assesses the biodiversity impacts of Stage 1, it does not assess the impacts of the Concept Plan works with respect to Building Envelope 10.

The EIS (page 33) proposes the following in Building Envelope 10: reinstatement of the creek and construction of a bridge, elevated walkways, adventure sports facilities, and re-purposing of the Principal's residence. However, the BDAR only assesses impacts of the installation of an outdoor seating area in Building Envelope 10 (i.e. the 'bush chapel'). In addition, the Concept Proposal (Figure 13 in the EIS) shows pathways through the vegetation to the chapel and it is unclear whether these are existing. The direct and indirect impacts from the full list of works associated with Building Envelope 10 have not been considered in the BDAR.

EES recommends that the BDAR be revised to include impacts from the Building Envelope 10 works as described on page 33 of the EIS.

Assessment of planted threatened species

The BDAR states that three threatened species were located on site (*Grevillea juniperina*, *Eucalyptus scoparia*, and *Syzygium paniculatum*). The BDAR also states that because these species are outside of their natural range of distribution and/or outside of their natural habitat and the fact these species have been planted due to the landscaped setting, no additional considerations are required for these three species under the *Biodiversity Conservation Act 2016* (BC Act). However, this is incorrect, as threatened species are protected under the BC Act, whether they are planted or not. As such, the assessment of impacts on biodiversity values in the BDAR should be amended to include an assessment of the proposed impact on these three species.

Floristic analysis

Section 2.4.2.1 of the BDAR states that floristic analysis was undertaken to confirm the plant community types on the site. The BDAR should be amended to include a copy of this analysis.

Credits classes and credit profile

The BDAR does not include a table of credit classes and matching credit profile, as is required by Table 26 of the Biodiversity Assessment Method. The BDAR should be amended to include this information.

(END OF SUBMISSION)