



**Office of
Environment
& Heritage**

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SSD-9391

Ms Prity Cleary
School Infrastructure Assessments
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Scott Hay

Dear Ms Cleary

**Kyeemagh Public School Redevelopment (SSD-9391) – Corner of Jacobson Avenue and
Beehag Street Kyeemagh - Environmental Impact Statement**

Thank you for your letter of 11 February 2019 received by the Office of Environment and Heritage (OEH) requesting comments on the Environmental Impact Statement (EIS) for the above State Significant Development. OEH appreciates the Department providing it with an extension in which to provide its comments.

OEH has reviewed the relevant documents and provides recommendations and comment in Attachment A.

If you have any queries regarding this matter, please contact Janne Grose on 8837 6017 or janne.grose@environment.nsw.gov.au

Yours sincerely

MARNIE STEWART
A/Senior Team Leader Planning
Greater Sydney
Communities and Greater Sydney Division

Attachment A

Kyeemagh Public School Redevelopment (SSD-9391) – Corner of Jacobson Avenue and Beehag Street Kyeemagh - Environmental Impact Statement

Office of Environment and Heritage (OEH) has reviewed the following documents:

- Environmental Impact Statement (EIS) – January 2018
- Initial Assessment of Biodiversity – 11 January 2018
- Flora and Fauna Assessment (FFA) – January 2019
- Landscape Plan – 16 January 2019
- ESD Report – 25 February 2019
- Arboricultural Impact Assessment (AIA) – 8 January 2018

and provides the following comments.

Biodiversity

As the Department is aware, OEH approved a request for a Biodiversity Development Assessment Report waiver on 13 February 2019.

Landscaping

The EIS notes the development will require the removal of 20 trees and that 24 new plantings are proposed with 17 new on-site plantings and 7 new street trees (pages 44 and 87). It is noted that only 1 tree is required to be removed within the council verge but 7 trees are proposed to be planted within the verge (page 53). It is suggested that where possible more than 17 trees are planted on the site to replace the 19 trees on site that are required to be removed. In terms of mitigating the urban heat island effect, improving biodiversity, habitat etc at the site it is recommended the trees that are to be removed are replaced at a ratio greater than 1:1.

The Greater Sydney Region Plan - A Metropolis of Three Cities includes an objective (30) that urban tree canopy cover is increased and The Eastern City District Plan includes Planning Priority E17 (increasing urban tree canopy cover and delivering Green Grid connections). The Eastern City District Plan notes that urban renewal and transformation projects (such as the redevelopment of the school) will be critical to increasing urban tree canopy cover.

The Plans note that the NSW Government has set a target to increase tree canopy cover across Greater Sydney to 40 per cent. Kyeemagh Public School is encouraged to increase the urban tree canopy cover.

The AIA recommends planting advanced size trees (75-100 litre containers) to replace the trees proposed to be removed (page 10). OEH supports the planting of advanced local native tree species, as the removal of the existing trees and the benefits they provide, can take decades for a juvenile tree to replace. If the project is approved, it is recommended advanced size trees - as a minimum 75-100 litre containers, or greater are used.

The EIS notes the proposal is intending to use local species as part of the landscaping (page 53). OEH supports the use of local native plant species in the landscaping. The Landscape Plan includes a list of proposed plant species but it is unclear if these are from the local native vegetation community that once occurred on the site. The RTS needs to confirm this.

The Aboriginal Cultural Heritage Assessment report notes the site is likely to have been vegetated by dry sclerophyll tall open- woodland or forest and indicates:

- dominant tree species would have included smooth- barked apple (*Angophora costata*), Sydney pepper-mint (*Eucalyptus piperita*) and old man banksia (*Banksia aemula*)
- the understory would have contained numerous species including bracken fern (*Pteridium esculentu*), Christmas bush (*Ceratopetalum gummiferum*), woody pear (*Xylomelum pyriforme*) and prickly moses (*Acacia ulicifolia*) (Section 4.2, page 9)

OEH recommends the plant species are selected from the local native vegetation community, or communities that once occurred on the site.

Enough area needs to be provided for on the site to allow the planted trees to grow to full maturity.

If the project is approved, it is recommended conditions of consent are included to address the above issues (please see recommended conditions of consent below).

Habitat Improvement

The FFA notes no significant logs or hollow bearing trees were recorded at the site but two trees contain artificial nest boxes (page 8). The FFA does not confirm if the nest boxes are currently being used by native fauna or if the trees containing the nest boxes are proposed to be removed (page 12). It is suggested the RTS confirms if the artificial nest boxes are currently being used by native fauna and whether the trees containing the nest boxes are proposed to be removed.

OEH supports the recommendation in the FFA that the trees with the nest boxes are retained where possible and if this is not possible that a suitably experienced ecologist is engaged to relocate or replace the nest boxes prior to the nest boxes being removed.

The FFA also notes striped marsh frogs (*Limnodynastes peronii*) have been heard calling from an existing pond on the site (page 8) and it recommends retaining the existing small pond (page 12). The RTS should confirm if the existing pond is proposed to be retained as part of the development. If the development requires the pond to be removed it is suggested it is replaced by another one nearby prior to the existing pond being removed.

To further improve native fauna habitat, it is recommended the school:

- installs a range of artificial nest boxes which are suitable for native fauna likely to utilise the site and bee hotels
- salvages tree trunks (greater than approximately 25-30cm in diameter and 3 m in length) from the trees to be removed and uses these in the landscaped areas on the site

It is suggested the nest boxes are monitored on an ongoing basis to determine if they are being used by native fauna. The installation of the nest boxes and the monitoring of them provides a great educational opportunity.

If the project is approved, it is recommended conditions of consent are included to address the above.

Building Design

OEH in its submission on the SEARs recommended that the proposed development incorporates a Green Roof or Cool Roof into the building design. The ESD report confirms that the roof tops will contribute to cooler microclimate through the use of light coloured materials (section 4.1.7, page 12).

Aboriginal Cultural Heritage

Please note that OEH has decided not to provide comments on Aboriginal cultural heritage matters at this time. This does not represent OEH support for the proposal and this matter may still need to be considered by the consent authority.

Recommended Conditions of Consent

If the SSD is approved OEH recommends the following conditions are included as conditions of consent:

Landscaping

- 1) Landscaping /street planting shall use a diversity of local provenance species (trees, shrubs and groundcovers) from the local native vegetation community or communities that once occurred on the site to improve biodiversity (rather than use exotic plant species or non-endemic native species). A Landscape Plan should be prepared for the site and include details on:
 - a. the native vegetation community (or communities) that once occurred on the site
 - b. a list of local provenance tree, shrub and groundcovers to be used in the landscaping, the quantity and location
 - c. the pot size of the local native trees to be planted
 - d. The planting area for trees. Sufficient area needs to be provided to allow the trees to grow to full maturity
 - e. Plant maintenance. The planted vegetation should be regularly maintained and watered for 12 months following planting. Should any plant loss occur during the maintenance period the plants should be replaced by the same plant species.
- 2) Trees to be removed are replaced at a ratio greater than 1:1.
- 3) Tree planting at the site shall use advanced and established local native trees with a minimum plant container pot size of 75-100 litres, or greater.

Biodiversity

- (1) Habitat features such as nest boxes and bee hotels shall be installed at the site to improve biodiversity
- (2) tree trunks (greater than approximately 25-30cm in diameter and 3 m in length) from the trees to be removed shall where possible be salvaged and used in the landscaped areas on the site to improve habitat
- (3) the existing frog pond is replaced by another pond if it is to be removed by the development

Green Roofs and Cool Roofs

- 1) The proposal shall incorporate green roofs and/or cool roofs into the design.

(END OF SUBMISSION)