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SSD 8873789 (City of Parramatta)

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Planning and Assessment Group
NSW Department of Planning, Industry and Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Sir/Madam,

Subject: Notice of Exhibition – New Epping South Primary School (Concept & Stage 1), located at 86 Chelmsford Avenue, Epping (SSD 8873789)

Thank you for your e-mail received 31 May 2021, inviting Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment to comment on the Notice of Exhibition for New Epping South Primary School (Concept & Stage 1), located at 86 Chelmsford Avenue, Epping.

EES has reviewed the relevant documentation and provides the following comments.

Biodiversity

EES notes that Table 12 of the Biodiversity Development Assessment Report (BDAR) states that 95% of Blue Gum High Forest (BGHF) was avoided, however Section 5.1.1 states that 48% was avoided. EES assumes, based on Figures in the BDAR that 48% is the correct figure. The statement in Table 18, that the development footprint has avoided 'most' of the BGHF, is incorrect as 52% is to be impacted.

EES considers that detailed justification is required on why further avoidance of impacts was not possible, in accordance with section 8.1.2 of the BAM and the BAM Stage 2 Operational Manual that states that *'all measures evaluated, even those not selected for implementation, must be documented in the BDAR'*. From the Site Plan in the Environmental Impact Statement, it appears that the BGHF on site is to be impacted to allow construction of a car park and playground. It is noted that immediately to the west of the larger patch of BGHF is a cleared area which is not within the development footprint. It is unclear why the car park and playground could not be reconfigured to impact this cleared area and so avoid all or more BGHF. In addition, it is not clear why the car park and playground could not be reduced in size to avoid all or more BGHF.

Table 18 states that impacts to BGHF were minimised *'following extensive discussion with consultants'*. The BDAR should document these alternative options that were considered unfeasible. While it is acknowledged that the area of BGHF to be impacted is small, and that the BGHF on site is degraded, all efforts should be made to avoid impacts on critically endangered ecological communities.

Flooding

EES advises that there are no flood risk management issues outstanding for this proposal.

Should you have any queries regarding this matter, please contact Bronwyn Smith Senior Conservation Planning Officer on 9873 8604 or Bronwyn.smith@environment.nsw.gov.au.

Yours sincerely



18/6/2021

MARNIE STEWART
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