



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

Dear Patrick,

Subject: Glenwood High School Upgrade (SSD 23512960)

Thank you for your email received 17 November 2021 requesting comments on the Environmental Impact Statement (EIS) for the subject proposal. The Environment, Energy and Science Group (EES) has undertaken a review of the EIS and related information and provides the following comments.

Biodiversity

A Biodiversity Development Assessment Report prepared by Kleinfelder dated 10 November 2021 has been submitted with the proposal. EES has identified from the credit reports (Appendix F) that the BDAR has not been finalised. While it is acknowledged that the credit reports indicate there is no credit requirement, it is a requirement of the *Biodiversity Conservation Act 2016* that when BDARs are submitted, the reports must be certified as finalised.

The BDAR identifies that no native vegetation that is consistent with plant communities within the locality is proposed to be removed. This statement is inaccurate with one Cumberland Plain Woodland (CPW) tree species requiring removal under the subject proposal and further tree removal required under other approvals for works required to facilitate the development.

Nonetheless, the BDAR proposes suitable avoidance and mitigation measures to reduce the impacts of the proposal which EES supports. This includes measures to protect and restore the patch of CPW on site including:

- additional plantings to be undertaken with CPW species within this area,
- logs and limbs from trees identified for removal are proposed to be salvaged and carefully placed within this area to improve fauna habitat values, and
- the preparation of a Biodiversity Management Plan for the restoration and ongoing management of the Cumberland Plain Woodland on site.

Trees and Landscaping

The Arboricultural Impact Assessment prepared by Ecological Australia dated 2 November 2021 outlines impacts to existing trees within the site from the following activities associated with delivery of the SSD proposal:

- A proposed Review of Environmental Factors for the removal of existing demountables and services connections (excluding footings).
- A Development Application (currently under assessment) for early works consisting of cut and fill.

- Construction activities associated with the subject SSD.

EES raises the following comments in relation to the impacts identified.

- The report states that *'one high retention value tree (Tree 73) will be subject to high Impact from SSD works. There may be possibility for design changes which could allow for the retention of this tree however the current design does not allow this tree to be retained.'* EES notes that the actual level of encroachment into the tree protection zone (TPZ) of the tree has not been documented in the report, however if there is potential for this tree to be retained and protected, this should be further explored.
- A major encroachment into the TPZ of Tree 72 is also proposed under the subject SSD. The exact extent of encroachment is unclear however the report notes the tree may be retained subject to specific construction methodologies and timing of works. Further clarity should be provided regarding the actual measures required to retain and protect this tree.
- In relation to the Early Works Development Application (DA), the report identifies trees numbered 118 and 120 will be impacted by major encroachment into their TPZ and should be subject to further root investigations. The trees are not documented for removal however given the recommendations of the BDAR to protect and restore the patch of CPW where the trees are located, further certainty should be provided for their retention. Based on the information provided, the only works within the TPZ of these trees is batter. The extent of batter should be refined so that it does not encroach in the TPZ of the trees. This requirement should be reflected in the Arboricultural Impact Assessment.

Flooding

Blacktown City Council's letter to the proponent dated September 2021 indicates that there are no flood planning controls that apply to this property. It also explains that a property that is not identified with flood related controls does not mean that there are no flood issues. It is the responsibility of the proponent to ensure that the subject property is not affected by local stormwater overland flows that might affect existing or future development on this land.

Blacktown City Council is currently undertaking an overland flood study for the existing urban areas of Blacktown City which covers the site of Glenwood High School. The Study is being undertaken with technical and financial support under the NSW Floodplain Management Program. The results of the flood modelling which is being undertaken by Catchment Simulation Solutions show the school site is affected by overland flooding during the 10% annual exceedance probability up to the probable maximum flood. Council has a duty of care to assist the proponent in addressing overland flow at the vicinity of the development by providing relevant information from the flood modelling.

The flood assessment (enstruct, November 2021) has not addressed overland flow flooding as it is limited to the main drainage channels. EES recommends overland flooding be addressed utilising the latest information from Council's overland flow flood modelling in consultation with Blacktown City Council.

If you have any queries please contact Shaun Hunt, Senior Conservation Planning Officer at shaun.hunt@environment.nsw.gov.au or 02 8275 1617.

Yours sincerely



14/12/21

Susan Harrison
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Biodiversity and Conservation