



Our ref: DOC21/1039608
Senders ref: SSD-11070211

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

Dear Mr Kerr

Subject: EES comments on Response to Submissions for New Public School in Mulgoa Rise – 1-23 Forestwood Drive, Glenmore Park – SSD-110702211

Thank you for your email of 18 November 2021 requesting advice on the Response to Submissions (RtS) for this State significant development.

The Environment, Energy and Science Group (EES) appreciates the Planning and Assessment Group giving it an extension in which to provide its comments. EES has reviewed the RtS and provides its recommendations and comments at Attachment A. Please note, as discussed yesterday EES has not been able to provide its flood comments yet but EES will forward these separately as soon as possible.

As advised in its submission on the EIS, EES requests that it not be assigned a role in the conditions of consent unless it has been agreed to by EES.

If you have any queries regarding this matter, please do not hesitate to contact Janne Grose, Senior Conservation Planning Officer on 02 8837 6017 or at janne.grose@environment.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads 'S. Harrison'.

08/12/21

Susan Harrison

**Senior Team Leader Planning
Greater Sydney Branch
Biodiversity and Conservation**

Subject: EES comments on Response to Submissions for New Public School in Mulgoa Rise – 1-23 Forestwood Drive, Glenmore Park – SSD-110702211

The Environment, Energy and Science Group (EES) has reviewed the following reports for this SSD:

- Response to Submissions Report – 17 November 2021
- Appendix C – Updated Landscape Plans
- Appendix D – Landscape Design Report – Addendum 01 – 11 Nov 2021

and provides the following comments.

Site Landscaping /Habitat Improvement

Use of local native provenance species

In its submission on the EIS, EES recommended the SSD uses a diversity of local provenance native species from the relevant native vegetation community (or communities) that once occurred on the site/locality, rather than use exotic species or non-local native species. EES recommended this particularly as the site is located near the Mulgoa Nature Reserve and Surveyors Creek Nature Reserve, both of which are mapped as containing biodiversity values. The EIS notes Mulgoa Nature Reserve contains good quality Cumberland Plain Woodland, which is listed as a critically endangered ecological community under the *Biodiversity Conservation Act 2016* (BC Act), while Surveyor's Creek Reserve contains River Flat Eucalypt Forest, which is an endangered ecological community.

EES also recommended in its submission on the EIS:

- The RtS and Landscape Design Report should identify the native vegetation community that once occurred on the site, or in the locality.
- The Landscape Design Report should provide a list of local native species from the relevant vegetation community to be planted and demonstrate that the plant species to be used are of local provenance.
- the Planting Palette and Planting Schedule in the Landscape Design Drawings are amended to use local native provenance species and identifies which species are local native provenance species and any non-local native or exotic species.

In response, the RtS states “where possible species from the local plant communities have been included in the design (subject to availability & EFSG requirements). To supplement these species local natives or robust native species have been selected to suit the site conditions”. The RtS does not specifically identify which native vegetation community once occurred on the site, or in the locality and it is unclear why the local native species need to be supplemented by other ‘robust native species’.

EES notes in the RtS that Council recommended alternative tree species be identified that are more consistent with Shale Plains woodland. It is noted the Planting Schedule in Appendix C identifies plant species that are from Cumberland Plain Shale Woodlands and the Shale-Gravel Transition Forest Community but the Planting Schedule also includes numerous species that are not identified from these communities.

EES repeats its recommendation that a condition of consent is included for any planting / landscaping associated with the SSD to use a diversity of local provenance native trees, shrubs and groundcover species (rather than exotic species or non-local native species) from the relevant native vegetation community that once occurred in this locality (see below). EES recommends an appropriately qualified bush regenerator is engaged by the proponent to provide advice on appropriate local native species that can be used on the site and to revise the Planting Schedule.

Installation of Habitat Features

EES recommended the school installs habitat features such as logs, a range of artificial nest boxes which are suitable for native fauna likely to utilise the site such as mobile birds and bats and bee hotels. The RtS notes reclaimed logs, boulders and the use of native trees have been included to provide habitable spaces, and that other habitat features will be considered where appropriate.

EES recommends the installation of habitat features on the site is included as a condition of consent.

Urban Heat Island Effect

EES recommended the development incorporate green roofs and/or a cool roof and green walls into the design. The EIS and the Landscape Design Report indicated the design will include a light-coloured roof and the RtS confirms that the proposed design includes light coloured roofs to minimise heat absorption. EES recommends a condition of consent is included for the development to use a light-coloured roof.

Recommended Conditions

EES recommends the following conditions of consent are included:

- ***Any planting/ landscaping associated with the SSD shall use a diversity of local provenance native trees, shrubs and groundcover species (rather than exotic species or non-local native species) from the relevant native vegetation community that once occurred in this locality.***
- ***Tree planting shall use advanced and established native trees with a minimum plant container pot size of 100 litres, or greater for native tree species which are commercially available. Other native tree species which are not commercially available may be sourced as juvenile sized trees or pre-grown from provenance seed.***
- ***A Landscape Plan is to be prepared and implemented by an appropriately qualified bush regenerator and include details on:***
 - a. the type, species, size, quantity and location of trees***
 - b. the species, quantity and location of shrubs and groundcover plantings***
 - c. the native vegetation community (or communities) that once occurred in this area and the plan demonstrates that the plant species consist of local provenance***
 - d. a list of local provenance species to be used***
 - e. the quantity and location of plantings***
 - f. the pot size of the trees to be planted***
 - g. the area/space required to allow the planted trees to grow to maturity***
 - h. plant maintenance regime. The planted vegetation must 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.***
- ***Habitat features shall be installed at the site to improve biodiversity such as logs, bee hotels and a range of artificial nest boxes suitable for native fauna likely to use the site.***
- ***The development shall incorporate cool roofs into the design.***

End of Submission