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Senders ref: SSD 9914 (City of Sydney)

Nicholas Gunn  
Social Other Infrastructure  
Planning and Assessment Group  
NSW Department of Planning, Industry and Environment  
4 Parramatta Square  
12 Darcy Street  
PARRAMATTA NSW 2150

Dear Mr Gunn,

**Subject: Notice of Exhibition – Darlington Public School Redevelopment, Golden Grove Street, Darlington**

Thank you for your e-mail dated 11 June 2020, inviting Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment (DPIE) to comment on the Notice of Exhibition for Darlington Public School Redevelopment, Golden Grove Street, Darlington.

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

**Biodiversity**

Plant community types and threatened ecological communities

EES supports the assessment by Eco Logical Australia that the vegetation on the development site has been planted sometime since 1943, and most probably since 1975 when the site was cleared of previous buildings to construct the school. EES notes that, in line with guidance in the *Biodiversity Assessment Method Operational Manual Stage 1* (OEH May 2018) relating to treatment of planted 'native vegetation', a 'best matching' plant community type (PCT) has been selected for this vegetation, being PCT 1281 'Turpentine Grey Ironbark open forest on shale in the lower Blue Mountains, Sydney Basin Bioregion'.

It is not clear as to why PCT 1647 'Red Bloodwood–Smooth-barked Apple heathy woodland on the Central and lower North Coast south-east' was included as one of the four candidates for 'best matching' PCTs. Section 1.4.2.1 of the BDAR cites the Office of Environment and Heritage's 2013 publication of *The Native Vegetation of the Sydney Metropolitan Area* (OEH 2013) as mapping this PCT 3.5km to the south-east of the development site. However, this PCT was not mapped or documented as occurring anywhere within the Sydney metropolitan study area by OEH 2013.

EES notes that in section 1.4.2.2 of the BDAR it is stated that "The BioNet Vegetation Classification lists PCT 1281 as a component of Sydney Turpentine Ironbark Forest which is listed as a critically endangered ecological community (CEEC) under the BC Act and EPBC Act." This statement is only correct with respect to the listing of this CEEC under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). With respect to its listing under the NSW Biodiversity Conservation Act 2016 (BC Act), the BioNet Vegetation Classification states that PCT 1281 is equivalent to the CEEC 'Sydney Turpentine-Ironbark Forest in the Sydney Basin Bioregion' as determined under the BC Act.

EES accepts that the assessment that the vegetation within the development site does not form part of the 'Sydney Turpentine Ironbark Forest' CEEC as determined under either the BC Act or EPBC Act because the vegetation present in the development site has been established through plantings; the vegetation exists as a mix of planted eucalypt and exotic canopy species and horticultural varieties of native ground cover or shrubs; there is no evidence of remnant vegetation within the development site or surrounding lands; and the soil profile has been substantially modified and does not represent original profile.

#### Microbat habitat and prescribed impacts assessment

EES notes that Section 2.1.3 *Prescribed biodiversity impacts* of the BDAR records that visual surveys of the existing buildings within the development site did not identify any small gaps which may contain potential roost sites for microbats. The BDAR also states that most of the buildings are multi-storey with a corrugated iron flat roof which are not particularly suitable for microbats.

However, section 2.2.4 *Prescribed biodiversity impacts* assesses that there remains a level of uncertainty about whether the buildings contain suitable gaps in the roof cavity, such that the presence of roof-roosting microbats within the development footprint cannot be completely disregarded. There is potential that the removal of the buildings may impact upon roosting resources for microbats, such as the two bent-winged bat species, migrating to breeding or non-breeding habitats.

Given that, the measures in Table 21 *Measures proposed to mitigate and manage impacts* should be revised to consider the possibility that microbats might be encountered. EES recommends that measures such as inclusion of pre-clearing surveys, daily surveys and staged clearing, and the presence of a trained ecological or licensed microbat wildlife handler during clearing events, should apply to demolition of existing structures, not just to clearing of trees, as is currently proposed.

#### **Flooding**

EES have no further flooding comments.

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](mailto:Bronwyn.smith@environment.nsw.gov.au).

Yours sincerely



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