



Our ref: DOC20/526659
Senders ref: SSD 10291

David Way
Senior Planning Officer
Social and Other Infrastructure Assessments
Planning and Assessment Group
NSW Department of Planning, Industry and Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Mr Way,

Subject: Notice of Exhibition – St Luke’s Grammar School Senior School Campus, 210 and 224 Headland Road and 800 Pittwater Road, North Curl Curl (SSD 10291)

Thank you for your e-mail dated 3 July 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 St Luke’s Grammar School Senior School Campus, 210 and 224 Headland Road and 800 Pittwater Road, North Curl Curl.

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

Aboriginal Cultural Heritage

Please note from 1 July 2020 ACH regulation, including advice regarding SSIs and SSDs, is now managed by Heritage NSW. The new contact for the ACH regulation team is heritagemailbox@environment.nsw.gov.au.

Biodiversity

EES has reviewed the BDAR and notes that the BDAR states that “*The development site comprises three parcels within the Northern Beaches local government area (LGA):*

- 800 Pittwater Road, Dee Why (Lot 6 DP523299)
- 210 Headland Road, North Curl Curl (Lot 2112 DP752038)
- 224 Headland Road, North Curl Curl (SP45082)”

but that the development *footprint* is restricted to the first and third of these properties.

BDAR section 1.6 *Species Credit Species* states

No threatened fauna species were recorded during the field survey. Additionally, important habitat features such as hollow bearing trees, intact native vegetation or important breeding/foraging resources were not recorded within the development area. The field survey identified that the existing buildings contain flat, metal roofing which does not contain suitable habitat for threatened microbat species. The roof cavities did not contain suitable small crevices and not white-wash or other indications of microbat use was observed around the existing rooves.

It is appreciated that an assessment of the buildings as potential habitat for microbat species has been undertaken without having to be specifically requested. However, the assessment should have been carried also out for the purpose of assessing possible prescribed impacts on all possible

microbat species, not just possible species credit species, as well as on the structures other than buildings.

Part of the SSD is at 224 Headland Road, on which existing structures consist of a large concrete platform on which is situated a multi-storey commercial building, oriented north-south, and an open carpark. On its eastern side the platform is supported on an elevated sandstone outcrop, but its western side and northern end extends out from and above the outcrop supported by large columns. This configuration situation provides for an area with numerous cavities and crevices of varying size, in parts sheltered by vegetation. The southern two-thirds is also sheltered by the closely proximate commercial building to the west. These features are illustrated by photographs in Figures 51, 52, 58 and 59 of the Heritage Impact Statement (City Plan Heritage).

Such areas could be used for roosting by microbat species, including the following threatened species, for which there are recent records within five kilometres of the development site:

- *Miniopterus orianae oceanensis*, Large Bentwinged Bat
- *Miniopterus australis*, Little Bent-winged Bat. There are numerous recent records of these species and known over-wintering roosts in Dee Why.
- *Micronomus norfolkensis*, Eastern Coastal Free-tailed Bat. There is one recent record of this species within five kilometres.
- *Saccolaimus flaviventris*, Yellow-bellied Sheath-tail-bat

The measures in Table 21 titled “*Measures proposed to mitigate and manage impacts*” should be revised to consider the possibility that microbats might be encountered in such structures, not just in trees.

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

The northern portion of the development site is in the upper reaches of the Dee Why South Catchment whilst the southern portion is located in the upper reaches of the Greendale Creek Catchment. The flood study reports indicate that the northern portion of the development site is subject to low hazard under the PMF event. EES notes that the onsite detention storage will be included to limit the stormwater discharge from the site under pre-development stage in accordance with the requirements of Northern Beaches Council.

EES does not have any specific comments in relation to flooding and this development 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



28/07/20

SUSAN HARRISON
Senior Team Leader Planning
Greater Sydney Branch
Climate Change and Sustainability