

Our ref: DOC20/825597

Senders ref: SSD 9483

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

Dear Ms Alexander,

Response to Submissions – Chatswood Education Precinct, 5 and 24 Centennial Avenue, Chatswood (SSD9483)

Thank you for your email of 8 October 2020, requesting input from Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment (DPIE) on the Response to Submissions (RtS) for Chatswood Education Precinct, 5 and 24 Centennial Avenue, Chatswood.

EES have reviewed the RtS table prepared by DFP planning consultants dated October 2020 and makes the following comments.

Aboriginal Cultural Heritage

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

Biodiversity

EES has reviewed version 5 of the biodiversity development assessment report (BDAR) against the Table of Detailed Responses (the Table) prepared by DFP Planning and dated 20 October 2020. The following matters remain outstanding. While EES has been able to note some updates from the Table it could not be verified that the changes have been made in the BAM Calculator since access by EES to BAM Calculator has not been enabled by the accredited assessor.

Finalisation of Report

EES previously advised the BAM Calculator output included in the BDAR should be from the finalised assessment calculation, prior to an approval being granted. BOAMS administrator has advised that the two BAM Calculator assessments have not been finalised and the parent case has not been submitted in BOAMS, meaning the data cannot be checked. Appendix E of BDAR also still shows the BAM Calculator output of cases that are yet "To be finalised".

Introduction to the biodiversity assessment

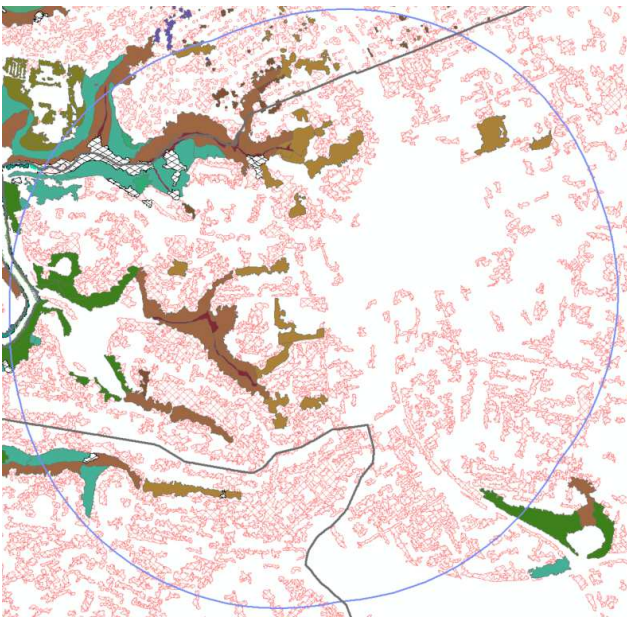
It is noted that updates to the development footprint have been made in response to matters raised by EES and that this has resulted in a larger development footprint area and a requirement for an additional 3 ecosystem credits for the proposed works. This is reflected in output from BAM Calculator in Appendix E; however, it is recommended that the consent authority ensure that this remains the case in the finalised BAM Calculator case.

Identification of landscape features

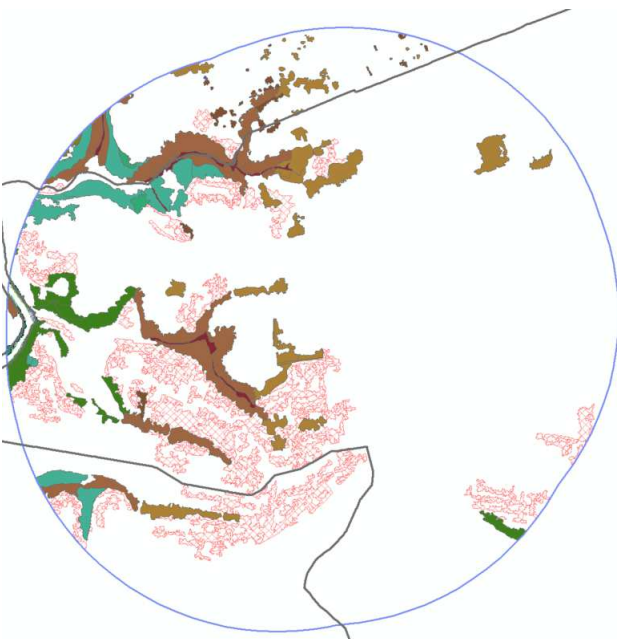
Based on previous comments by EES the landscape features in the calculator and in Figure 2 of the BDAR have been updated. However, Figure 2 now has a thick light blue line that isn't identified in legend.

Native vegetation cover

The revised BDAR states that "Areas mapped by OEH (2016) which include mapped vegetation communities and areas mapped as Urban native/exotic were included in the percent native vegetation." However, EES's specific query about the area of native vegetation within the 1500 metres buffer area has not been addressed. Comparison of spatial data provided by the accredited assessor from ELA and shows different areas being used by ELA in the calculation compared to the latest version 3 of the Sydney Metro vegetation mapping (VIS catalogue E_4489; OEH 2016). Under EES's analysis, the calculated total area of mapped vegetation within the assessment circle was 341.5 ha including 217.18 ha of the 'urban native/exotic' map unit (hatched pink) ...



Whereas ELA's spatial data includes only 70.5 ha of this 'urban native/exotic' map unit ...



If the larger area is used, the NVC class required to be selected in the BAM Calculator is the next highest class, which may affect (increase) the calculation biodiversity credits required. It is recommended that this be checked and reviewed.

Inclusion of species occurrence by plot, cover and abundance data in new Table 39 in Appendix B of the BDAR is noted. Nevertheless, this does not meet the requirements of the BAM to provide copies of plot field data sheets and field data in MS Excel spreadsheet form.

Vegetation Integrity Assessment

EES questioned the 53 metres of fallen logs greater than 10cm in diameter recorded for plot 2 (VZ 2) as it seems extraordinarily high, especially for a patch of vegetation immediately adjacent to school buildings. EES recommended that this be confirmed. There is no response recorded in the Table.

Description of PCTs

Use of an “opportunistic species list” of native plants within an ill-defined area of VZ1 is invalid for use in the OEH Sydney metro vegetation analysis tool (referred to in Appendix C as ‘Veg analysis tool (Hager Metro)’) which must be based on species identified from a fixed 0.04 ha area.

Inclusion of species occurrence by plot, cover and abundance data in new Table 39 in Appendix B is noted. Nevertheless, this does not meet the requirements of the BAM to provide copies of plot field data sheets and field data in MS Excel spreadsheet form.

Potential species credits species

EES previously recommended that more information is provided to clearly show how *Syzygium paniculatum* (Magenta Lily Pilly) will not be impacted by the proposed development. It is noted that this recommendation has resulted in the obligation for an additional 2 species credits for this species. This is reflected in output from BAM Calculator in Appendix E; however, it is recommended that approval authority ensure that this remains the case in the finalised BAM Calculator case.

Table of habitats or habitat components and their sensitivity

EES previously stated that Tables 10 and 11 provide Sensitivity to gain class but not the biodiversity risk weighting. The response in the Table was “No action required”. However, BAM requires that the assessor report on the biodiversity risk weighting (BRW) for each ecosystem and species credit requirement generated (refer BAM Operational Manual Stage 2, section 4.2).

Assessment of impacts on prescribed biodiversity values

EES previously recommended that a condition of consent require for threatened microbat species pre-demolition physical searches in conjunction with ultrasonic call detection surveys. EES further recommends that the condition require that this work be undertaken by a suitably qualified ecologist and the pre-demolition searches be of built structures that may afford roosting habitat for the identified threatened microbat species.

Flooding

There is no further comment in relation to flooding.

If you have any queries or would like additional information regarding this matter, please do not hesitate to contact Bronwyn Smith Senior Conservation Planning Officer on 02 8973 8604 or at Bronwyn.smith@environment.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads "S. Harrison". The signature is written in a cursive, flowing style.

22/10/20

Susan Harrison
Senior Team Leader Planning
Greater Sydney Branch
Environment, Energy and Science