



**Office of
Environment
& Heritage**

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SSD 9273

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GPO Box 39
SYDNEY NSW 2001

Attention: Jason Maslen

**Notice of Exhibition - Redevelopment of Wentworthville Public School, 70-100 Fullagar Road,
Wentworthville - SSD 9273**

Dear Mr Maslen,

I refer to your letter dated 19 November 2018 requesting input from the Office of Environment and Heritage (OEH) on the exhibition of the SSD 9273 for the redevelopment of Wentworthville Public School. The proposal will increase capacity from 600 to 1000 students and 60 to 100 staff and involves:

- construction of a new three storey building on the corner of Fullagar Road and Station Street containing 30 teaching spaces, specialist teaching spaces and a library
- demolition of Building D and removal of 12 demountable classrooms
- partial demolition of Building A and alterations to provide six home bases
- alterations and additions to the existing library (Building E) to become administration and staff facilities and the existing administration Building F to create a new special needs facility
- construction of a new hall with out-of-school-hours facility and canteen and
- removal of trees and associated works including landscaping and signage.

OEH has reviewed the relevant documentation and provides comments at Attachment 1.

Should you have any queries regarding this matter, please contact Svetlana Kotevska, Senior Conservation Planning Officer on 8837 6040 or at Svetlana.kotevska@environment.nsw.gov.au.

Yours sincerely

S. Harrison 13/12/18

SUSAN HARRISON
Senior Team Leader Planning
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Attachment 1 – OEH comments - Exhibition of Wentworthville Public School Redevelopment, 70-100 Fullagar Road, Wentworthville - SSD 9273

Biodiversity

OEH has reviewed the Biodiversity Development Assessment Report (BDAR) prepared by Travers Bushfire and Ecology dated October 2018 and advises it is satisfactory.

The proposal does not generate the need for offsets. OEH recommends the following mitigation measures are added as conditions on a development consent as outlined in section 5.4 of the BDAR.

- Replacement landscaping and landscape beds must be locally occurring native species commensurate with CPW including trees, shrubs and ground covers to encourage local fauna use, to consolidate remnant vegetation linkages and to provide 'island' refuges for native flora and fauna species within the locality. CPW vegetation is to be replaced at a minimum 2:1 ratio and maintained until maturity.
- An integrated weed management plan is to be prepared to control high threat invasive species such as Camphor Laurel, Coral Tree, African Olive and African Lovegrass observed in the study area. Control and eradication of invasive ecological weeds is to be undertaken in accordance with the NSW *Biosecurity Act* (2015) to prevent further invasion by these species.
- The retention of the Moreton Bay Fig along the northern study area boundary for ongoing seasonal foraging by Grey-headed Flying-fox.
- Hollow-bearing trees are to be clearly marked prior to clearing. Where the felling of hollow-bearing trees is required, this is to be conducted under the supervision of a fauna ecologist to ensure appropriate animal welfare procedures are taken, particularly for threatened species. Hollows of high quality or with fauna recorded residing within should be sectionally dismantled for relocation and all hollows should be inspected for occupation, signs of previous activity and potential for reuse.
- If a threatened species is found to be occupying the hollow, then the hollow section is to be reattached to a recipient tree within the nearby conservation areas as selected and directed by the fauna ecologist. The welfare and temporary holding of the residing animal(s) is at the discretion of the fauna ecologist. The hollow section should be well secured in the recipient tree in a manner that will not compromise the current or future health of that tree.
- The removal of any recorded hollows is to be mitigated with the relocation of hollow sections or their replacement with nest boxes in remaining trees within the school grounds.

Tree retention and Urban Tree Canopy Cover

The proposed building footprint of Block G along both Station Street and Fullagar Road impacts on the existing mature trees. Many of the trees proposed for removal are established trees in fair to good condition, see Arborist report photos shown below. A reasonable setback and amended building footprint could ensure their retention particularly Trees 50-55, 57 and 59 along the Fullagar Road site perimeter that should be considered for retention.

The plans show conflicting information on the extent of tree removal/retention. The arborist reports site demolition plan in Appendix A1 and Tree removal/retention plans- Appendix A2ii conflict with the landscape plans tree removal and retention plan. The arborist report plans are unreadable making it difficult to determine which trees correspond with the Tree numbers and the condition of the trees as detailed in the tables in the arborist report.

A Planning Priority C16 in the District Plan is to increase urban tree canopy cover and deliver Green Grid connections. To achieve this priority the District Plan identifies opportunities for green grid connections and sets a NSW Government target to increase tree canopy cover across Greater Sydney to 40 per cent. The proposal needs to:

- detail how much green cover is provided on site

- what canopy cover percentage is achieved on site and how it is consistent with this target. OEH recommends existing canopy trees be retained as this will improve amenity and contribute towards meeting this target.

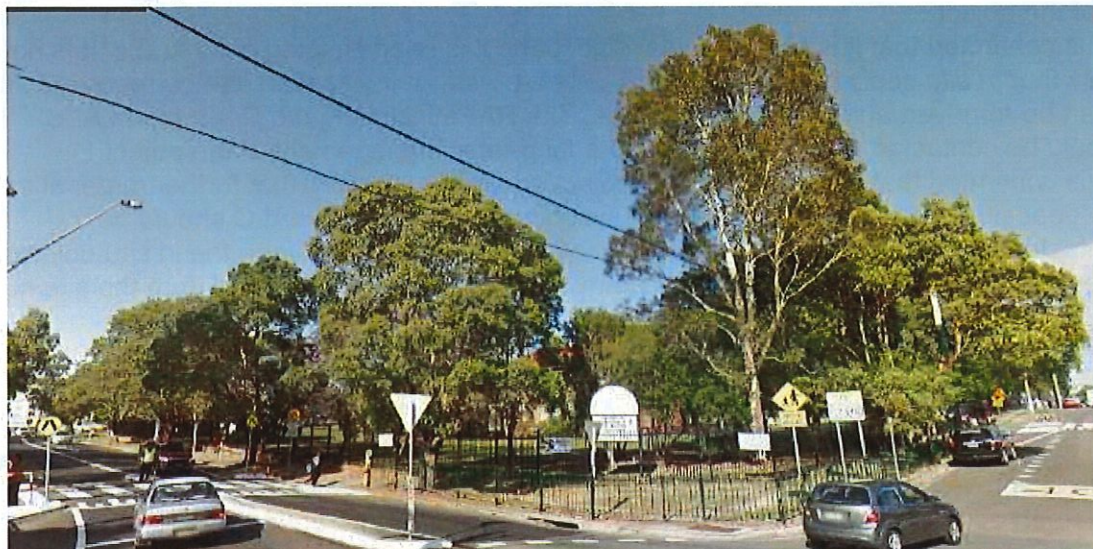


Image 8: Good canopy of trees near corner of Fullagar and Station Street



Image 5 & 6: Good canopy trees near corner of Fullagar and Station Streets

Aboriginal Cultural Heritage

The following recommendations of the Aboriginal Cultural Heritage Assessment report prepared by Cultural Heritage Connections Pty Ltd dated October 2018 must be included on any forthcoming consent:

- In the extremely unlikely event that suspected human remains are found the *Coroners Act 2009* requires that all work must cease, the site should be secured and the NSW Police and the NSW Coroner's Office should be notified. If the remains are found to be Aboriginal, OEH and the LALC should be contacted to assist in determining appropriate management.
- A protocol should be put in place to deal with any unexpected Aboriginal objects that may be located during the course of the project. This should be included in the construction management plan or equivalent documentation.
- The following unexpected finds procedure needs to be implemented over the life of the project:
 - On-site employees or contractors involved in ground surface disturbance should be made aware of the statutory obligations that apply to the discovery of Aboriginal objects prior to the commencement of works.

- If a suspected Aboriginal object is located during construction, works should cease in the vicinity of the find and a fully qualified archaeologist with experience in archaeological excavation and identifying Aboriginal objects and should be called to site to determine the nature of the object.
 - If it is confirmed that it is an Aboriginal object and it is in an isolated context (i.e. it is not likely that *in situ* deposit or further items will be present), its location can be recorded and it can be removed and the works continue. The RAPs including the Deerubbin LALC should be contacted regarding appropriate long-term management of the object.
 - If it is confirmed that it is an Aboriginal object and it is suspected that further material or in situ deposit could be present the RAPs including the Deerubbin LALC should be contacted to determine an appropriate excavation strategy to salvage the in situ objects.
- Consideration should be given to relocating any Aboriginal objects removed from the site back into a secure place within the project area.
- If the item is found to not be an Aboriginal object, works may continue.

Water Sensitive Urban Design (WSUD)

The proposal significantly increases the percentage of impervious surface coverage. In order to reduce runoff and improve the water quality discharged from the site, a variety of WSUD measures need to be implemented. OEH has reviewed the Civil Stormwater Design report prepared by Henry and Hymas dated October 2018 that provides limited detail regarding WSUD, water quality and targets for reduction in total suspended solids, gross pollutants and nutrients discharged from the site. Further, no MUSIC modelling was given. Only two OSD tanks are proposed and 17.9% of the site area bypasses the stormwater detention system and this runoff is not filtered or managed. Further, Rainwater tanks should be provided with stormwater harvesting, bio retention areas also considered which could also be a good education opportunity and a stormwater maintenance plan also prepared.

Sustainability and Building Design

OEH recommends the development incorporate green walls, green roofs and/or a cool roof into the design. The benefits of Green Roofs and Cool Roofs are outlined in the *OEH (2015) Urban Green Cover in NSW Technical Guidelines* which can be found at the following link:
<http://climatechange.environment.nsw.gov.au//Adapting-to-climate-change/Green-Cover>.

Green roofs can increase habitat and biodiversity at the site, particularly if local native plant species are used from the relevant native vegetation community. A good opportunity exists to increase the long term sustainability outcomes of the proposal, given the significant areas of new roofs proposed and impervious areas on site. Additional green cover on site will assist with reducing the urban heat island effect, local temperatures and contribute to meeting Greater Sydney's urban tree canopy target of 40 per cent consistent with the District Plan's Planning Priority.

OEH also recommends that the NSW and ACT Governments Regional Climate Modelling (NARClIM) climate change projections developed for the Sydney Metropolitan area are used to inform the building design and asset life of the project. These include over 100 climate variables, including temperature, rainfall, hot days and cold nights, severe Forest Fire Danger Index (FFDI) and are publicly available online and at fine resolution (10km and hourly intervals) for 20-year time periods: 2020–2039 near future and long- term 2060–2079.

Opportunities for Green walls exist to the external facades along:

- Garfield Street, Block E northern façade of the staff annex, Block G and Block H.

OEH supports the proposals energy efficiency measures including the solar panels as shown on the Block H roof plan.

Flooding

OEH has no concerns regarding this matter.

(END OF SUBMISSION)