



Lucinda Craig
Planning Officer
Industry Key Sites
Planning and Assessment Group
Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Lucinda,

Subject: Upgrades to John Palmer Public School (SSD-23330227)

Thank you for your email received 18 October 2021 requesting comments on the above proposal. Environment, Energy and Science Group (EES) has reviewed the relevant plans and information and provides the following comments.

Biodiversity

EES has reviewed the Biodiversity Development Assessment Report (BDAR) prepared by Kleinfelder Australia Pty Ltd and raises no comments or concerns in relation to this assessment.

In relation to the impacts on trees, The EIS states '*The building has been setback approximately 8 metres from the northern property boundary and approximately 5 metres from The Ponds Boulevard to retain existing trees within these areas which are an established element in the landscape and provide screening*', however EES notes that trees numbered 1-5, 7-9,15 and 132 – 133 (as numbered in the Arboricultural Impact Assessment Report prepared by Eco Logical Australia) within The Ponds Boulevard setback are proposed for removal which is contrary to this statement.

Most of these trees have been allocated a medium retention value with fair to good health and structure. Importantly, the trees are semi mature and have established over the past 10-15 years to provide fauna habitat, landscape amenity and an increasing contribution towards mitigation of urban heat island effects on site. Given the relatively small Tree Protection Zone requirements of these trees, a minor increase to setbacks would allow their retention.

Flooding/Floodplain Risk Management

The Civil Engineering Design report (enstruct, October 2021) has not addressed the SEARs requirements as outlined in Item 15 of the SEARs, copied below.

15. Flooding

- *Identify any flood risk on-site in consultation with Council and having regard to the most recent flood studies for the development area and the potential effects of climate change, sea level rise and an increase in rainfall intensity.*
- *Assess the impacts of the development, including any changes to flood risk onsite or off-site, and detail design solutions to mitigate flood risk where required.*

Relevant Policies and Guidelines:

- *NSW Floodplain Development Manual (DIPNR, 2005).*

The consultants have referred to Blacktown City Council Online Flood Mapping platform and state in Section 5.3 ‘...*, the site is not identified as flood prone. The closest flood extent in the 1% AEP flood event is located approximately 1KM to the northwest of the site*’.

The above statement is incorrect as the SSD site is within the Second Ponds Creek catchment in The Ponds area. Blacktown City Council Online Flood Mapping platform does not include the Second Ponds Creek information in The Ponds.

The report includes other incorrect statements including ‘*The overland flow paths around the building will cater for an increase in rainfall intensity due to climate change*’. EES highlights that, the principles in the Floodplain Development Manual (2005) apply to all overland flow associated with major drainage. Also, the report references an outdated NSW Floodplain Management Manual (2001) instead of the Floodplain Development Manual (2005).

EES highlights that, a preliminary flood impact and risk assessment (FIRA) should be undertaken by a suitably qualified professional engineer to determine whether the site is impacted by The Second Ponds flooding and/or local overland flow flooding for the full range of flooding up to and including the probable maximum flood. If the site is determined to be flood affected, the FIRA should adequately address the impact of:

- flooding on the development
- development on flooding
- development on adjacent community, and
- climate change due to increase in rainfall intensities.

If you have any queries please contact Shaun Hunt, Senior Conservation Planning Officer via shaun.hunt@environment.nsw.gov.au or 02 8275 1617.

Yours sincerely



08/11/21

Susan Harrison

Senior Team Leader Planning
Greater Sydney Branch
Biodiversity and Conservation