



**Office of
Environment
& Heritage**

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SSD 8614

Karen Harragon
Director – Social and Other Infrastructure Assessments
NSW Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Luisa Maguire

**Exhibition of SSD 8614 – Hurlstone Agricultural High School (Hawkesbury), Richmond
Western Sydney University Campus, 2 College Street, Richmond**

Dear Ms Harragon *Karen*

I refer to your letter dated 22 January 2018 requesting input from the Office of Environment and Heritage (OEH) on the proposed State significant development application for Hurlstone Agricultural High School (Hawkesbury), Richmond (SSD 6471).

Please find attached OEH comments regarding biodiversity and flooding matters in Attachment 1. Please note that a separate response may be provided on heritage matters by the Heritage Division of OEH as delegate of the Heritage Council of NSW.

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 21/02/18

**SUSAN HARRISON
Senior Team Leader Planning
Greater Sydney
Regional Operations**

Attachment 1 – OEH comments on SSD 8614 – Hurlstone Agricultural High School (Hawkesbury), Richmond Western Sydney University Campus, 2 College Street, Richmond

Biodiversity

The Biodiversity Assessment Report (BAR) prepared by Narla Environmental Pty Ltd dated December 2017 identifies the endangered ecological community (EEC), River Flat Eucalypt Forest as being present on the site. This is shown highlighted in green in Figure 1 extracted below. Although there appear to be no direct impacts on this EEC from the school building footprint, there is no consideration in the Biodiversity Assessment Report of the impacts on this EEC from the proposed on-site detention (OSD) system and following works that are located in the vicinity of the EEC:

- proposed above ground 3,200sqm OSD system
- 2x above ground tanks
- culvert and
- 130m² bioretention system

Also, the Arborists report identifies that Trees 4 to 14 within the EEC area of River Flat Eucalypt Forest are to be retained. It is unclear whether the proposed OSD system will impact on the Tree Protection Zones. The scale of this proposal makes it likely that there will be impacts on the EEC (either directly or indirectly).

Further, the Biodiversity Assessment Report argues that as per section 9.5 of the FBA, an assessor is not required to assess areas of land on the development site without native vegetation under Chapter 4 or Chapter 5 of the FBA, unless the SEARs issued for the project require an assessment of the land. The SEARs required an assessment of the land in accordance with the FBA, and the relevant section of the SEARs is extracted below:

“8. Biodiversity

Biodiversity impacts related to the proposed development are to be assessed and documented in accordance with the Framework for Biodiversity Assessment, unless where otherwise agreed by the OEH, by a person accredited in accordance with s142B(1)(c) of the Threatened Species Conservation Act 1995”.

OEH requires that a Biodiversity Assessment Report be submitted that assesses the site and proposal in accordance with FBA. While the proponent's ecological consultants may have considered that there was no native vegetation being impacted, and therefore that the FBA does not need to be applied, OEH consider that the OSD works are likely to impact on the EEC. OEH therefore requires the preparation of a BAR that considers the impacts from the OSD and related stormwater/site works, unless it can be demonstrated there will not be any direct or indirect impacts from the site work.

LOCATION OF PROPOSED OSD AREA AND TANKS

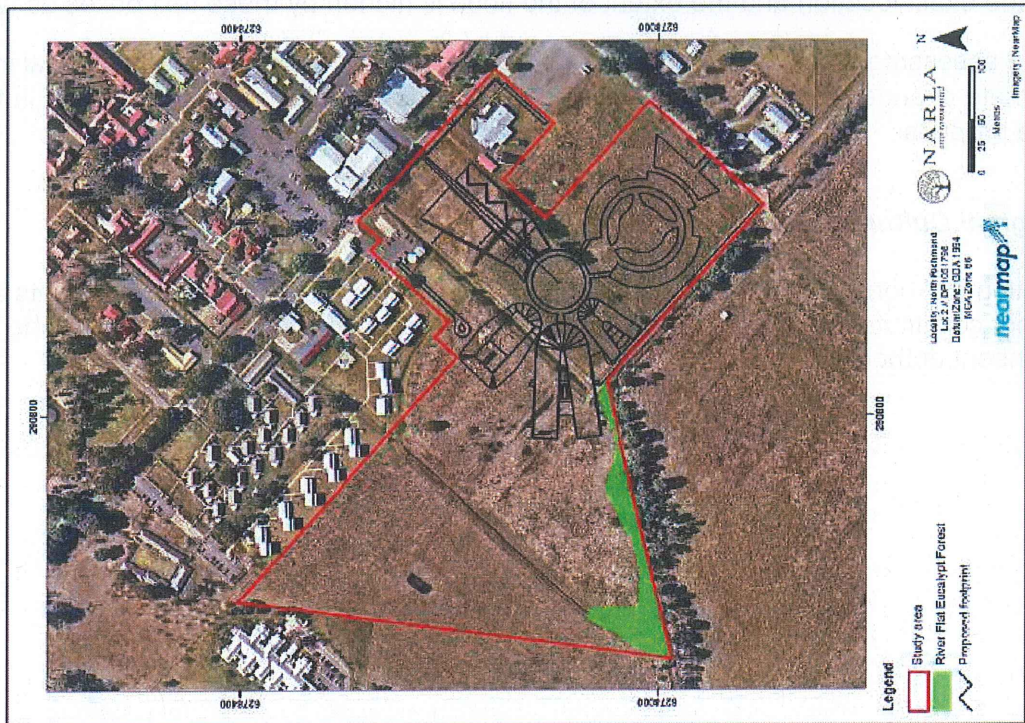
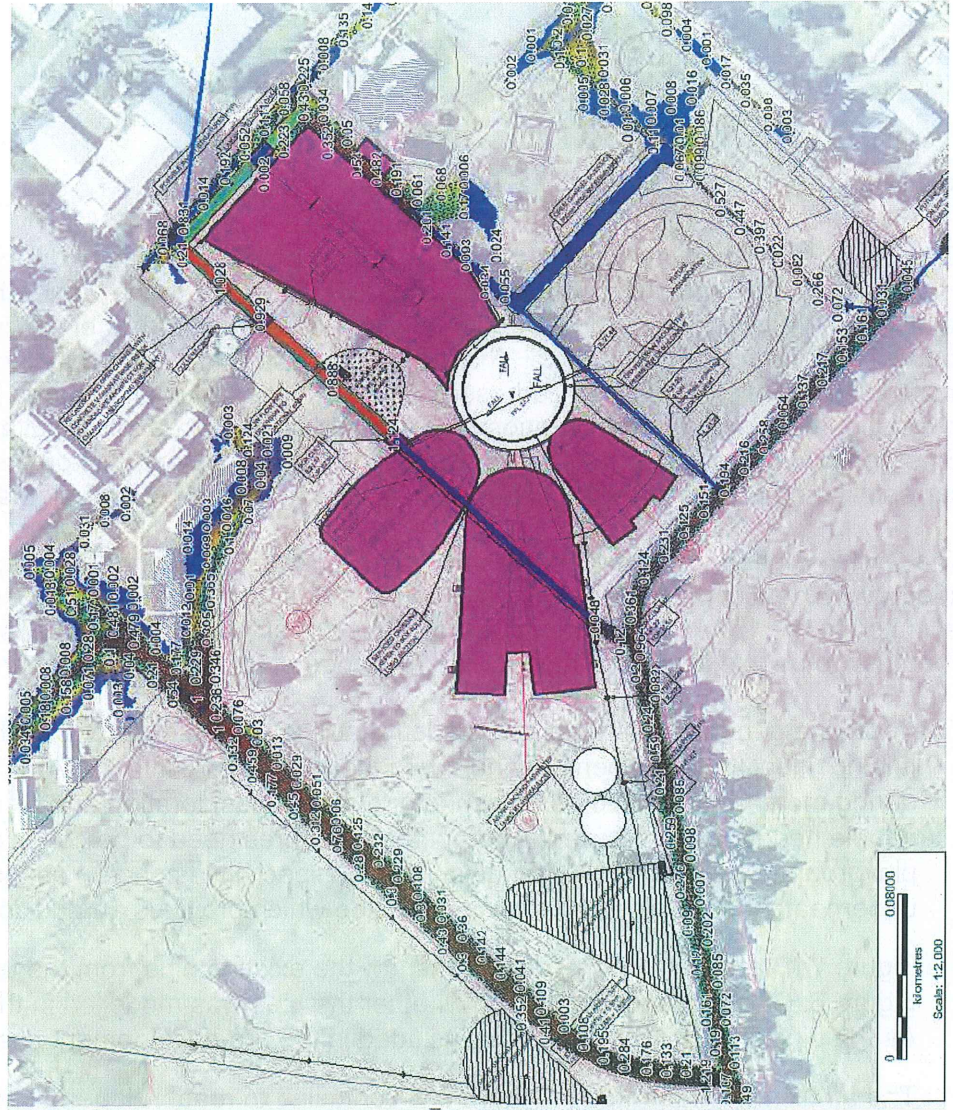


Figure 1. Proposed development footprint and mapped PCTs within the Subject Site

Flooding

The site is within the Hawkesbury-Nepean floodplain and within the extent of the PMF event. The proposed school can be classed as special uses facility due to the vulnerability of its users (the students). Therefore, it is prudent to adequately address flood risk for the full range of floods (i.e. up to the PMF) particularly risk to life. This can be achieved through a detailed floodplain risk management assessment that addresses emergency response measures including evacuation plans in a regional context. The evacuation plans should be prepared in consultation with the State Emergency Service (SES) in order to assess the cumulative impacts on the evacuation model that is currently being prepared by the Hawkesbury-Nepean Valley Flood Risk Management Directorate.

The Civil Engineering Report and Stormwater Management Plan (TTW September 2017) does not adequately identify the above floodplain risk management issues, as the Assessment in Chapter 11 is limited to the 1% AEP flood event which does not provide a comprehensive understanding of the flood risk to people and properties for the full range of floods for existing and future conditions.

The following general comments are made regarding the assessment in Chapter 11:

- It is not ideal to have open channels with the high hazard in a 1% AEP event and possibly also during more frequent events on school grounds. Consideration and discussion on the flood risk to people needs to be provided. Appropriate measures need to be considered to separate the playgrounds with the open channels. This is especially a concern as the channels are piped underneath the buildings on the western side which provides an additional hazard.
- Figure 7 (Pre-development) does not show the existing pipe from the university as shown in Figure 6. Clarification is sought on whether the pipe was modelled in the pre-development case. As the pipe is existing it should be included in the pre-development case.
- The afflux map presented in Figure 9 is confusing to read. A legend should be on the figure as well as a simplification of how the afflux is presented. The text boxes with impact are confusing as to the exact location and the extent of the flood is hidden by these text boxes as well.
- The assessment should provide a sensitivity analyses to determine the potential impacts from climate change on flooding behaviour, as per the flooding requirements issued in the SEARS for the proposal.

Aboriginal Cultural Heritage

In relation to Aboriginal cultural heritage, OEH has decided not to provide comments at this time. This does not constitute OEH support for the proposal and this matter may still need to be considered by the consent authority.

(END OF SUBMISSION)