

15 July 2019

Lauren Rose  
A/Senior Planning Officer  
Transport Assessments  
Department of Planning and Environment  
GPO Box 39  
**SYDNEY NSW 2305**

Dear Lauren

## **HEXHAM TRAIN SUPPORT FACILITY MODIFICATION**

I refer to your email of 25 June 2019 advising that a modification application (MP07\_0117-Modification 1) for the Hexham Train Support Facility was about to be placed on public exhibition and inviting City of Newcastle ('CN') to comment.

The modification application and supporting documentation have been reviewed by CN officers and the following advice is provided for your consideration:

### **1. Flooding and Stormwater**

#### Flooding

A flood report (BMT consulting engineers 27 May 2019) has been prepared to assess the flood impacts of the proposed modification. It is concluded that the impacts of the development are minor. This conclusion is reasonable and acceptable.

#### Stormwater

A stormwater assessment (GHD consulting engineers May 2019) of the requirements of the modification has been prepared which acknowledges an increase in impervious area and associated peak flows but demonstrates that the resultant water quantity and quality numbers are still within acceptable levels. This conclusion is reasonable and acceptable.

### **2. Onsite Wastewater System**

It is noted that part of the track extension will extend over an existing approved onsite wastewater system effluent irrigation area. No details are provided as to how the irrigation system is proposed to be modified as a result of the proposal.

Table 14 (Pg. 41) of the Detailed Environmental Assessment Report (DEAR) prepared by Ethos Urban (2019) includes the following statement:

*'The proposed modification will be managed consistently with existing management measures outlined in the site-wide Operational Environmental Management Plan. Cess drains are provided either side of the turning angle and access road alignment consistent with Condition C8(d).'*

The updated 'Drainage and Earthworks' drawing No 22-19583-C006 Issue D indicates that *'Existing effluent irrigation area to be removed and/or relocated to Aurizon requirements.'* Furthermore, the Stormwater Assessment (GHD May 2019), Detailed Environmental Assessment Report (Ethos Urban 12 June 2019) and Soil Assessment (GHD Pty Ltd March 2019) do not provide any details of how the effluent irrigation area will be modified.

Consequently, it is not clear from this application how the effluent irrigation area is proposed to be modified/relocated in respect to the modification and as such a detailed assessment cannot be undertaken.

### **3. Biodiversity**

Due to the nature of the approved development the additional encroachment into the wetland area of the proposed modification has the potential to impact threatened species in the wetland environment. This impact could include indirect impacts from noise and lighting and stormwater discharge to the wetland area along with physical impacts such as habitat removal. Therefore, CN agrees with the advice of the Office of Environment and Heritage that a Biodiversity Development Assessment Report is required for the proposed modification.

### **4. Bush Fire Risk**

The Newcastle Bush Fire Prone Land Map (2018) identifies the subject land as bush fire prone land. Subclause (b) of condition B1 of the Infrastructure Approval (Oct 2013) for the Hexham Train Support Facility requires the proponent to carry out the development generally in accordance with the Environmental Assessment (ADW Johnson Pty Ltd, November 2012). Appendix F of the Environmental Assessment is a Bushfire Protection Assessment (Ecological Australia 11 September 2012).

Since the granting of the approval the Newcastle Bush Fire Prone Land Map has been reviewed and the extent and type of vegetation categories which affect the site have changed. Also, the works associated with the modification will traverse the 'Asset Protection Zone-Southern Section' of the site as identified in the above Bushfire Protection Assessment. These matters have not been addressed in the DEAR despite being brought to the proponent's attention in CN's letter dated 10 April 2019. Consideration of bush fire risk is particularly relevant to the modification given the DEAR indicates in its consideration of climate change risk that is anticipated in the future maximum temperatures in the Hunter Valley will increase and *'With this increase sees the projected increase in severe fire weather through summer and spring.'*

If you have any questions in relation to the various matters raise in this letter, please contact Geof Mansfield, Principal Planner (Development) on 4974 2767 or by return email.

Yours faithfully



**Michelle Bisson**

**MANAGER REGULATORY PLANNING AND ASSESSMENT**