



Office of
Environment
& Heritage

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

Attention: Adam O'Connor

Dear Ms Harragon

Karen

Notice of Exhibition - Alexandria Park Community School Redevelopment, Park Road, Alexandria

I refer to your letter received 12 December 2017 to the Office of Environment and Heritage (OEH) requesting comments on the Alexandria Park Community School Redevelopment.

OEH understands that the proposal involves the redevelopment of the school to accommodate up to 1,000 primary and 1,200 secondary school students. OEH has reviewed the documentation provided and provides comments in relation to biodiversity, Aboriginal cultural heritage and floodplain risk management at Attachment 1.

If you have any queries regarding this matter, please contact Dana Alderson on 8837 6304 or dana.alderon@environment.nsw.gov.au.

Yours sincerely

S. Harrison 01/02/18

SUSAN HARRISON
Senior Team Leader Planning
Greater Sydney

ATTACHMENT 1 – Office of Environment and Heritage (OEH) comments on Alexandria Park Community School Redevelopment, Park Road, Alexandria

1. Biodiversity

OEH notes that a Flora & Fauna Survey was prepared by UBM Ecological Consultants and dated 6 December 2017 (F&F Survey), however it was not prepared in accordance with the *Framework for Biodiversity Assessment* (FBA), pursuant to the SEARs issued 27 April 2017. OEH has not received a request that the proponent ~~not~~ have to complete an assessment using the FBA, so it is unclear why it was not undertaken and OEH considers that an FBA assessment by an accredited assessor is therefore required. There is provision in sections 3.3.1.3 and 5.3.1.5 of the FBA that if a vegetation zone is found not to contain native vegetation further assessment of native vegetation within that zone is not required beyond section 5.3.3 and assessment of habitat according to sections 6.2 and 6.3 for threatened species that can be predicted by native vegetation (i.e. for ecosystem credit species) is not required.

Regardless of this, section 5.3.1.5 of the FBA requires that an assessment must still be carried for threatened species that cannot be predicted by native vegetation (i.e. for species credit species), in accordance with sections 6.4, 6.5 and, if necessary, 6.6.

In relation to the Long-nosed Bandicoot, the F&F Survey notes:

NPWS detected one individual by camera trap in Alexandria Park Community Garden in 2011, and an injured juvenile was found in the neighbouring Alexandria Park in 2012 (Urban Ecology Strategic Action Plan). No characteristic diggings were observed during the current survey and there have been no further reports of this species in the Locality (pers. comm. school and community garden staff). It is likely that those individuals previously recorded in the Locality represent unsuccessful juvenile dispersals to an area of poor quality habitat. It is noted that the adjacent Alexandria Park is a permanent off-leash area for domestic dogs, which may predate Bandicoots in the Locality. Given the above points, the Proposal is not expected to significantly impact this species.

Based on these previous confirmed records on the subject site the list of candidate species must include this species, consistent with FBA section 6.5.1.2(d). These records are relatively recent and are the only records of this species in decades in inner central/eastern Sydney.

OEH also notes that the F&F Survey states that a single night's Anabat ultrasonic detection survey for microchiropteran bats was undertaken during winter in low temperatures and conditions which were "windy and rainy for the duration of the survey". Such conditions are completely unsuitable for deploying Anabat equipment because microbats are generally less active in cooler temperatures and wind and rain interfere with ultrasound collection, which is most likely the reason for the survey's result of 264 unidentifiable Anabat "call" recordings. A single night of such survey is also considered insufficient, even in suitable conditions. Therefore, OEH does not consider that the survey undertaken was adequate or sufficient for the purpose of excluding the presence of these fauna from further consideration.

OEH considers that the proponent should take advantage of the opportunity of the redevelopment to provide structurally complex, ground-level habitat with diverse native plantings and other habitat features for Long-nosed Bandicoot and other native species, as well as green-space for its students. This is consistent with the location of the site within potential habitat linkages identified in the City of Sydney Urban Ecology Strategic Action Plan (p.77) and would help to mitigate any potential impacts from the development.

2. Aboriginal cultural heritage

OEH has reviewed the Preliminary Aboriginal Archaeological Assessment (preliminary assessment) and Aboriginal Heritage Due Diligence Assessment prepared by Extent dated 8 December 2017. OEH notes that the preliminary assessment has identified that the proposal may impact Aboriginal objects/deposits on the site, however (Extent, 2017, p.2):

It does not fulfil the project SEARs with respect to its Aboriginal cultural heritage assessment requirements...Further assessment of Aboriginal cultural heritage is recommended in the form of an Aboriginal Cultural Heritage Assessment Report (ACHAR), with formal Aboriginal community consultation and a staged program of archaeological test excavations, to inform the development and satisfy the project SEARs.

From the information provided it is unclear why the full ACHAR was not prepared prior to the exhibition of the proposal and OEH recommends that this be completed ahead of determination of the application, not in the post-approval phase.

3. Floodplain risk management

OEH has reviewed the Flood Risk Assessment Report for Alexandria Park Community School prepared by Woolacotts Consulting Engineers dated 7 December 2017 (flood risk report).

The site is flood prone and is subject to minimum floor level requirements of 13.83m AHD (1% AEP + 500mm). The flood risk report states that this will be achieved and that this level is also higher than the PMF.

The site has evacuation issues and a flood evacuation plan for shelter in place has been produced, though it is not specific in the details of flood evacuation routes and flood free areas around the school. As the site is in an urban catchment with a short critical duration, shelter in place is appropriate as the buildings will be built to higher than the PMF level.

The flood risk report does not provide any details as to the location of the new development on site plans. If the new buildings on the site are within the flood extent, OEH recommends that a flood impact assessment be undertaken. If significant landscaping and regrading of the site is also proposed, this should be included in the flood impact assessment.

To assist with the assessment, it is recommended that the following aspects be adequately addressed:

- the assessment should adequately address both existing and post development conditions overland flow behaviour for the full range of events up to the probable maximum flood (PMF).
- the impact of the proposed development on overland flow behaviour (i.e. levels, velocities and duration of flooding) and on adjacent areas should be identified. Post-development condition should have no adverse impact on flood behaviour or on downstream areas and should not increase the peak discharged runoff than existing conditions.
- appropriate management strategies, if required, to manage any adverse impact of flooding due to the proposed development and to manage any potential risk to people and property within the catchment.

It should be advised that the above identified issues need to be addressed at detailed design stages of the development, as per ARR2016.

(END OF SUBMISSION)

