



Office of
Environment
& Heritage

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SSD-8640

Andrew Beattie
Social and Other Infrastructure Assessment
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Adam O'Connor

Dear Mr Beattie *Andrew*

Redevelopment of Picton High School – 480 Argyle Street Picton (SSD-8640) - Environmental Impact Statement

Thank you for your letter of 7 May 2018 received by the Office of Environment and Heritage (OEH) requesting comments on Environmental Impact Statement (EIS) for the redevelopment of Picton High School project.

OEH has reviewed the relevant documents and provides recommendations and comment in Attachment A.

If you have any queries regarding this matter, please contact Janne Grose on t :8837 6017 or e: janne.grose@environment.nsw.gov.au

Yours sincerely

S. Harrison 20/06/18

SUSAN HARRISON
Senior Team Leader Planning
Greater Sydney
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Attachment A

Redevelopment of Picton High School – 480 Argyle Street Picton (SSD-8640) - Environmental Impact Statement

Office of Environment and Heritage (OEH) has reviewed the following documents:

- Environmental Impact Statement – 4 April 2018
- Secretary's Environmental Assessment Requirements (SEARs) – 17 August 2017
- Reissued SEARs – 29 September 2017
- Arboricultural Assessment and Tree Management (AATM)– 12 February 2017
- Landscape Schematic Design Report – February 2018
- Civil Design Report
- Concept Stormwater Management Plan

and provides the following comments.

Biodiversity

Reference is made to the OEH emails of 15, 17 and 23 of May 2018 to the Department, seeking advice in relation to the appropriate biodiversity assessment for the SSD project. SEARs for the project were issued on 17 August 2017 and revised SEARs were issued on 29 September 2017. Both the original and revised SEARs require biodiversity impacts to be assessed in accordance with the Framework for Biodiversity Assessment (FBA). OEH sought advice on this from the Department, as the Biodiversity Conservation (BC) Act 2016 commenced on the 25 August 2017 and Section 7.9(2) of the BC Act requires SSD applications to be accompanied by a biodiversity development assessment report (BDAR). OEH notes the Department's email reply of 25 May 2018, advises that because the Secretary issued the SEARs prior to 25 August 2017, these projects are 'pending planning applications' and therefore the BC Act does not apply.

Please note, OEH has not been able to assess the Biodiversity Assessment Report (BAR) – Framework for Biodiversity Assessment (FBA) of 11 April 2018. An inconsistency has been noted however between the EIS and the BAR in relation to the impacts on native vegetation. The EIS indicates the proposal will result in the removal of approximately 0.07 ha of Grey Box- Forest Red Gum Grassy woodland on flats of the Cumberland Plain vegetation along the southern and south-eastern boundary (page 50), while the BAR notes 0.16 ha will be removed (pages 2 and 31). The proponent needs to clarify whether 0.07 ha or 0.16 ha of native vegetation is to be removed.

Landscaping

The EIS notes the development will modify/partially clear native vegetation in the northeast of the site for the use of an educational trail, playing fields and Agricultural Plot and that approximately 0.46 ha of native vegetation would be modified through the loss of native groundcover (page 50-51). To assist avoid disturbing remnant native groundcover, it is recommended the proposed education trail is in existing cleared areas or non-native vegetation and the area surrounding the trail is rehabilitated with local native plants. Locating the trail in cleared/non-native areas would have educational benefits in terms of teaching the students about the importance of protecting remnant vegetation and rehabilitating native vegetation.

The EIS also indicates future management of the remaining native vegetation within the subject site is likely to be consistent with current management activities of grazing and/or mowing (page 51). Where possible it is recommended mowing is discontinued and the remnant areas to be retained are rehabilitated with a diversity of local provenance native trees, shrubs and groundcover species.

OEH recommends the landscaping replaces the loss of the existing trees from the site with local native trees. The AATM recommends using advanced plants in the landscaping and planting species indigenous to the area (page 64). OEH supports these recommendations as the removal of the existing trees and the benefits they provide, can take decades for a juvenile tree to replace.

There are numerous benefits and educational value in the landscaping using a diversity of local native plants at the school site including:

- preservation of the biodiversity values of the local area
- provision of the most suitable food and habitat for local native fauna including nectar for pollinators (moths, butterflies, bees etc) which provide a food source for local native birds.
- a stepping stone for more mobile native fauna to move across the landscape, and
- once established local provenance vegetation would require less maintenance/watering than exotic plants. The use of local native vegetation also has added benefits in reducing the need for fertiliser application which reduces fertiliser laden runoff entering the local waterways and will assist to improve instream health, water quality, reduce algal blooms etc.

It recommended the landscaping at the site includes the following:

- native vegetation that is to be retained on the site is clearly identified on the ground to ensure these areas are protected during construction
- trees removed from the site are replaced by advanced, local provenance species from the relevant native vegetation community
- native trees to be removed from the site are salvaged including tree hollows and tree trunks (greater than approximately 25-30cm in diameter and 3 m in length) and used to enhance habitat in remnant areas
- the proposed landscaped areas are planted with a diversity of local provenance species (trees, shrubs and groundcovers) from the relevant native vegetation community
- an ongoing weed control and maintenance program is implemented to maintain the remnant native vegetation and the planted native vegetation areas and
- the site's habitat is enhanced by installing artificial nest boxes which are suitable to native fauna likely to use the site.

Flood

Appendix D – Tahmoor Coal – Flood Impact Assessment investigates Redbank and Matthews Creek flooding, though it is limited to the 1% AEP flood. The outcomes of the assessment indicate the following:

- the vicinity of the school is not impacted by the 1% AEP as shown in Appendix C of the report and
- no information has been provided for events larger than the 1% AEP.

OEH highlights the need for the flood assessment to provide a sound understanding of flood behaviour for the full range of flood events including up to the probable maximum flood, so that any potential flood risk on the project, which is considered a vulnerable land use, can be understood and managed.

(END OF SUBMISSION)

