NSW GOVERNMENT | Office of Environment & Heritage

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SSD 8790

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Attention: Aditi Coomar

**Exhibition of Alterations and Additions to Parramatta West Public School - Auburn and Young Street, Parramatta (SSD 8790)**

Dear Mrs Coomar,

I refer to your letter dated 18 September 2018 requesting input from the Office of Environment and Heritage (OEH) on the exhibition of the SSD 8790 for the redevelopment of Parramatta West Public School. The proposal will accommodate 961 students (107 additional) and eight additional staff and comprises:

- the construction of an L-shaped two-storey building on the existing playground on the northern side of the site to accommodate a multi-purpose hall, administration facilities, canteen, homebase classrooms and associated facilities with signage;
- alterations and additions to the existing school buildings, staff areas and multi-purpose hall to accommodate additional homebase and satellite administration areas;
- tree removal and landscaping works with outdoor learning areas; and
- retention of part of the existing outdoor play area.

OEH has reviewed the relevant documentation and provides comments at Attachment 1.

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

23/10/2018

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**Attachment 1 – OEH comments on Exhibition of Alterations and Additions to Parramatta West Public School at Auburn and Young Street, Parramatta (SSD 8790)**

***Flooding***

OEH has reviewed the report titled "Parramatta West Public School Flooding Investigation (Lyall and Associates, June 2018). This Report is based on the Holroyd City LGA Overland Flood Study, 2017 (Lyall and Associates 2017) using both DRAINS and TUFLOW modelling. OEH concurs with the conclusion that based on the findings of the investigation, flooding does not pose a constraint on the proposed alterations and additions to the school as the new building is located on land which lies outside the extent of the PMF event. There are no other flood issues outstanding.

**Biodiversity and Tree retention**

The Arborist reports recommends the Eucalyptus nicholii trees No 2, 10, 20 and 23 (street tree) to be retained and protected. However, the Tree Protection zone of Tree 23 may be impacted by the proposal given the preferred vehicular access road encroaches into the TPZ as shown on the Tree Protection Plan by Urban Arbor P/L. A comparison of the landscape and architectural plans with the Arborist report reveals that the proposed building works are unlikely to impact on the (Tree Nos 2, 10, 20). These trees have been identified as threatened species and OEH previously advised in its letter dated 4 September 2018 in agreeing to a Biodiversity Development Assessment Report waiver (BDAR) that "if the footprint of this project changes such that the three trees of the threatened species, Narrow-leaved Black Peppermint (*Eucalyptus nicholii*) which occur on the northern and western boundaries of the site are impacted, an assessment of significance in accordance with section 7.3 of the *Biodiversity Conservation Act 2016* should be undertaken prior to approval. The outcome of this assessment may affect this decision to waive the requirement for a BDAR."

Given the above,it is recommended that a condition be included on any forthcoming consent that states:

- In accordance with the recommendations of the Arborist report, the Eucalyptus nicholii Trees No 2, 10, 20 and 23 that are threatened species are to be retained and protected.

With reference to the Plant Schedule - Shrubs and Groundcovers - Sheet 1, OEH recommends that native plant species are used throughout the site. For the Parramatta LGA, research has identified the following weed species as having suitable habitat in the LGA and as problematic given the threat to threatened species under both current and future climate change conditions http://weedfutures.net/map.php#.

**Aboriginal Cultural Heritage**

OEH notes that the SEARs did not require the preparation of an Aboriginal Cultural Heritage Assessment (ACHAR) or consultation as required by OEH guidelines. It is noted that the proposed new buildings on the northern side of Railway Street on Burra Reserve involve excavation into the natural ground level as shown on *Figure 26: Proposed east elevation of the new school building.* Burra Reserve which is part of the project site is currently grassed. The Statement of Heritage Impact prepared by Conrad Gargett dated June 2018 includes aerial photography from 1943 (Figure 1 below) that show the site as being vacant of structures. Given this, the site may contain the presence of Aboriginal Cultural Heritage, however no assessment has been undertaken of the site.

Without any archaeological testing it is not possible to exclude the presence of sub-surface artefacts across the site, including under existing buildings where no basement exists. OEH notes that the proposal requires excavation that may impact on sub-surface Aboriginal objects if present. As such OEH preference is for the preparation of an Aboriginal Cultural Heritage Assessment Report (ACHAR). The ACHAR is to identify, describe and document the Aboriginal cultural heritage values that exist across the whole area that will be affected by the development. This may include the need for surface survey and test excavation. The identification of cultural heritage values must be conducted in accordance with the Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW (OEH 2010), and be guided by the *Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW* (DECCW, 2011).

Further, consultation with Aboriginal people must be undertaken and documented in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW). The significance of cultural heritage values for Aboriginal people who have a cultural association with the land must be documented in the ACHAR.

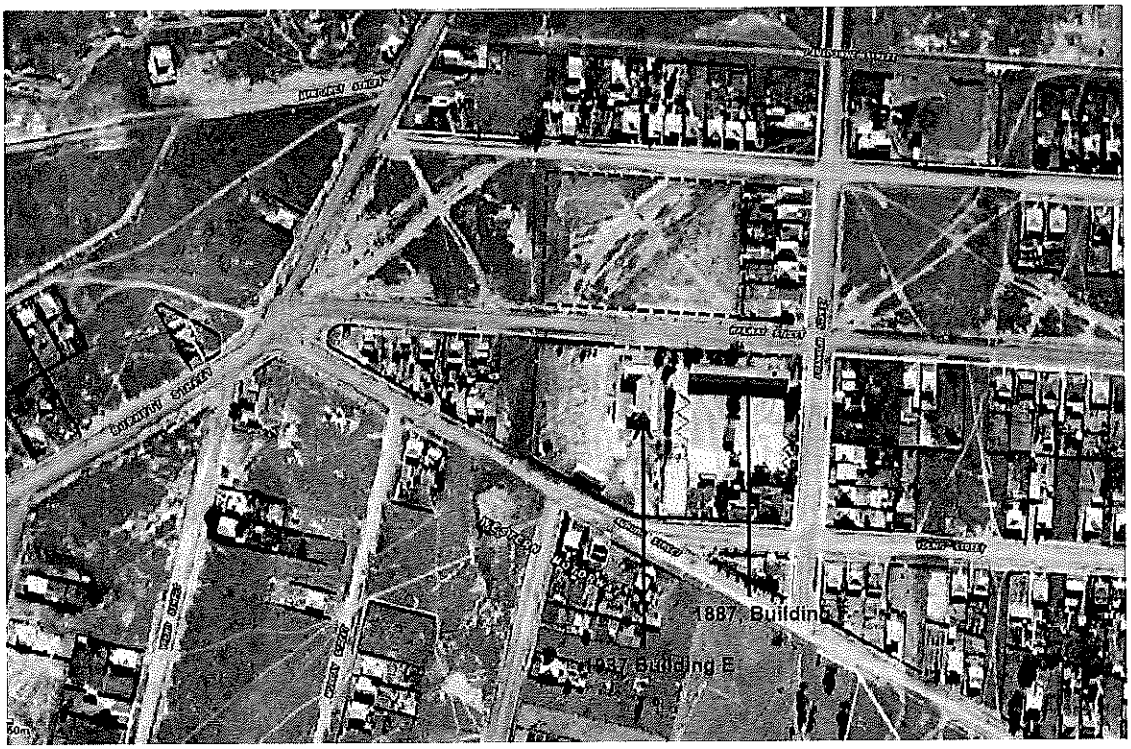


**Figure 1:** 1943 aerial photograph of the subject site (with heavy outline) and its surrounding context. Note that building E (administration) and building F (general learning) are visible. (**Source:** NSW Gov.)

**Water Sensitive Urban Design (WSUD)**

The proposal significantly increases the percentage of impervious surface coverage. In order to reduce runoff and improve the water quality discharged from the site, a variety of WSUD measures need to be implemented. OEH has reviewed the Stormwater Management Plan prepared by Adams Consulting Engineers dated July 2018 that states the proposed water quality treatment train can reduce the total volume of pollutants discharged from the site and meet the Council's requirements of:

- Total suspended Solids (TSS) Reduction: 85%
- Total Phosphorus (TP) Reduction: 60%
- Total Nitrogen (TN) Reduction: 40%

The following water quality treatment measures are proposed which OEH supports and these need to be conditioned on any forthcoming consent as follows:

- To meet water quality targets and reduce pollutants entering waterways, the proposal must comply with the Stormwater Management Plan prepared by Adams Consulting Engineers and include the following water quality treatment measures:
  - 16x Stormwater360 Psorb (MMC) Stormfilter Cartridges
  - 8x Trash Screens/ Stormwater360 Enviropod 200 inserts
  - 2x 5kL Rainwater Tank
  - A regular maintenance program for the above must be documented and implemented.

**Sustainability and Building Design**

OEH recommends the development incorporate green walls, green roofs and/or a cool roof into the design. The benefits of Green Roofs and Cool Roofs are outlined in the *OEH (2015) Urban Green Cover in NSW Technical Guidelines* which can be found at the following link: http://climatechange.environment.nsw.gov.au//Adapting-to-climate-change/Green-Cover.

Green roofs can increase habitat and biodiversity at the site, particularly if local native plant species are used from the relevant native vegetation community. A good opportunity exists to increase the long term sustainability outcomes of the proposal, given the significant areas of flat roofs proposed and impervious areas on site and to offset the loss of grassed open space through green roofs/walls etc. Additional green cover on site will assist with reducing the urban heat island effect, local temperatures and contribute to meeting Greater Sydney's urban tree canopy target of 40 per cent consistent with the District Plan's Planning Priority.

OEH also recommends that the NSW and ACT Governments Regional Climate Modelling (NARCliM) climate change projections developed for the Sydney Metropolitan area are used to inform the building design and asset life of the project. These include over 100 climate variables, including temperature, rainfall, hot days and cold nights, severe Forest Fire Danger Index (FFDI) and are publicly available online and at fine resolution (10km and hourly intervals) for 20-year time periods: 2020–2039 near future and long- term 2060–2079.

(END OF SUBMISSION)