



Our ref: DOC19/813399-13

Your ref: SSD 9439

Dimitri Gotsis

Senior Planning Officer, Social and Other Infrastructure Assessments
Planning and Assessment Division
Department of Planning Industry and Environment
dimitri.gotsis@planning.nsw.gov.au

Dear Mr Gotsis

Biodiversity and Conservation Division Review of Environmental Impact Statement – New Warnervale Public School (SSD 9439)

I refer to your correspondence to Biodiversity and Conservation Division (BCD) of the Department of Planning, Industry and Environment, dated 17 September 2019, inviting comments on the Environmental Impact Statement for New Warnervale Public School (SSD 9439).

BCD has reviewed the Environmental Impact Statement, including relevant appendices, annexures, attachments and parts of the document titled '*Environmental Impact Statement, The New Primary School at Warnervale*' (prepared by Creative Planning Solutions and dated August 2019) in relation to impacts on biodiversity, flooding and flood risk.

Please note that no comments on Aboriginal cultural heritage have been provided at this time. Aboriginal cultural heritage matters may still need to be considered by the consent authority.

Biodiversity, flooding and flood risk recommendations are provided in **Attachment A** and detailed comments are provided in **Attachment B**.

If you require any further information regarding this matter, please contact Brendan Mee, A/ Senior Team Leader Planning, on 4904 2730 or via email at rog.hcc@environment.nsw.gov.au

Yours sincerely

16/10/2019

KATRINE O'FLAHERTY
A/ Director Hunter Central Coast
Biodiversity and Conservation Division

Enclosure: Attachments A and B

BCD's recommendations

New Warnervale Public School– Environmental Impact Statement

1. BCD recommends that justification is provided demonstrating why PCT 1590 does not form part of the LHSGIB TEC.
2. BCD recommends that the proponent provides further information on the occurrence of squirrel glider onsite.
3. BCD recommends that the proponent demonstrates that the risks of isolation by floodwaters can be appropriately managed.
4. BCD recommends that the proponent work with Central Coast Council to improve the flood immunity of Warnervale Road prior to the school opening.

BCD's detailed comments

New Warnervale Public School - Environmental Impact Statement

Biodiversity

1. Clarification is sought regarding Plant Community Type 1590 on site to determine if it forms part of the Lower Hunter Spotted Gum Ironbark Forest in the Sydney Basin and NSW North Coast Bioregions Threatened Ecological Community

The Biodiversity Development Assessment Report (BDAR) maps Plant Community Type (PCT) 1590 spotted gum- broad-leaved mahogany- red ironbark shrubby open forest across the site. The PCT 1590 on site occurs on Triassic Narrabeen geology and contains flora species characteristic of Lower Hunter Spotted Gum Ironbark Forest in the Sydney Basin and NSW North Coast Bioregions (LHSGIB), which is a Threatened Ecological Community (TEC) listed on Schedule 2 of the Biodiversity Conservation Act (BC Act). Clarification is sought to determine if PCT 1590 on site forms part of the LHSGIB TEC. Any justification provided should reference the NSW Scientific Committee Final Determination for LHSGIB TEC (31/05/2019). If PCT 1590 on site forms part of LHSGIB TEC, the relevant sections of the BDAR should be updated to reflect this.

Recommendation 1

BCD recommends that justification is provided demonstrating why PCT 1590 does not form part of the LHSGIB TEC.

2. Clarification is sought regarding the occurrence of squirrel glider on site

There are numerous recent records of squirrel glider (*Petaurus norfolcensis*) within the locality of the subject site. The squirrel glider is listed as vulnerable on Schedule 1 of the BC Act. The common sugar glider is not threatened and was recorded on site, as is listed in Appendix 2 of the BDAR. It can be difficult to differentiate between sugar glider and squirrel glider without trapping and using length/weight data to determine which species occurs. No justification is given in the BDAR to outline the methods for determining the species present and provide confidence that the species recorded is the sugar glider and not the squirrel glider. The occurrence of squirrel glider on site would generate species credits and require biodiversity offsets to be re-calculated.

Recommendation 2

BCD recommends that the proponent provides further information on the occurrence of squirrel glider on site.

Flooding and flood risk

3. The proponent needs to demonstrate that the risks of isolation by floodwaters can be appropriately managed

BCD recommends that the proponent undertake an assessment to identify the risks of isolation by floodwaters and determine if they can be appropriately managed. The Porters Creek Floodplain Risk Management Study (Cardno, 2011), identifies that the site is located outside of the Probable Maximum Flood (PMF) and is not subject to inundation. However, there are still flood risks that need to be managed. The site becomes isolated in a 5% Annual Exceedance Probability (AEP) flood event as the Warnervale Road crossing to the east of Virginia Road is cut by floodwaters. The relatively fast response times (2 hours) for catchment

flooding in Porters Creek mean that evacuation may not be feasible. As such, it is likely that school children, teachers and staff will need to remain on school grounds till floodwaters recede. An assessment is required to determine the frequency and duration of isolation. It should also identify the risks that will need to be managed, such as medical emergencies and concerned members of the community driving through flood waters attempting to collect children. Finally, the assessment should develop appropriate management strategies.

Recommendation 3

BCD recommends that the proponent demonstrates that the risks of isolation by floodwaters can be appropriately managed.

4. The proponent should work with Central Coast Council to improve the flood immunity of Warnervale Road

The risk of isolation by flood waters can be reduced by improving the flood immunity of Warnervale Road. The Porters Creek Floodplain Risk Management Study recommended that Council improve the serviceability of Warnervale Road by doubling the existing culvert capacity and by raising the road crown level to the level of the 100 year Average Recurrence Interval (ARI) at two locations; east of the railway and adjacent to Virginia Road. BCD recommends that the proponent work with Central Coast Council to undertake these works prior to the school opening.

Recommendation 4

BCD recommends that the proponent work with Central Coast Council to improve the flood immunity of Warnervale Road prior to the school opening.