



Our ref: DOC19/909510

Senders ref: SSD 9809 (Blacktown)

Jason Maslen
Team Leader
Social Other Infrastructure Assessments
NSW Department of Planning and Environment
GPO BOX 39
SYDNEY NSW 2001

Dear Mr Maslen,

Subject: Request for Advice – New Marsden Park Public School, Blacktown (SSD 9809) (Blacktown)

I refer to your e-mail dated 18 October 2019 requesting comments from the Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment on the exhibition of the EIS for the New Marsden Park Public School, Blacktown (SSD 9809).

EES have reviewed the relevant documentation and provides the following comments.

Aboriginal Cultural Heritage

If the Department determines to grant approval, EES recommends that any conditions recommended by the Aboriginal Cultural Heritage Assessment Report prepared by Amac Archaeological, Version 5, dated September 2019 be included as conditions of consent.

Biodiversity

EES concurs with the results of the Biodiversity Statement, including the conclusion that Shale Gravel Transition Forest (SGTF) is likely to have been present within the study area.

However, EES recommends that, the density of plantings should reflect the typical structure of the community, i.e. an open forest with sparse shrub stratum, and *Acacia pubescens* not be included in the list of species for landscaping as this is a threatened species.

It should be noted that the following species are not listed as characteristic species in the principal descriptions of SGTF (e.g. description of NSW Scientific Committee, Tozer *et al.* 2010, Tozer *et al.* 2003), and therefore these should not be used unless they are known to occur in SGTF remnants in the locality: *Dodonaea viscosa* ssp. *cuneata*, *Indigofera australis*, *Olearia microphylla*, *Asperula conferta*, *Centella asiatica*, *Clematis glycinoides*, *Commelina cynaea*, *Geranium solanderi*, *Plectranthus parviflorus*, *Pultenaea microphylla*.

Flooding

The Environmental Impact Statement does not include an adequate flood impact assessment for the proposed development.

Rather, the Stormwater Management Plan prepared by Wood and Grieve, dated July 2019 includes a section titled 'Flood Impact Assessment', which briefly states '*Wood and Grieve have reviewed Council flood maps, Development Control Plan (DCP) and the Marsden Park Precinct DCP and have determined that the site is located outside flood planning areas. The proposed development is not impacted 100-year ARI flooding*'.

The above statement shows a lack of understanding of the floodplain risk management issues associated with the full range of flooding up to the probable maximum flood. For example, the relevant site is within the Hawkesbury-Nepean regional flood extent and the proposed development is a sensitive land use as its users are vulnerable to flooding and have difficulties in responding to an emergency. The statement also shows a lack of understanding of the Secretary's Environmental Assessment Requirements as outlined in Section 18 of the SEARs.

EES strongly recommends that an adequate Flood Impact Assessment (FIA) be undertaken by an engineering consultancy specialising in flood modelling to address floodplain risk management aspects as outlined by the SEARs. The FIA should be referred to EES for review.

Please be advised that a separate response may be provided on historic heritage matters by the Heritage Division of Department of Premier and Cabinet as delegate of the Heritage Council of NSW.

Should you have any queries regarding this matter, please contact Bronwyn Smith, Senior Conservation Planning Officer on 9873 8604 or Bronwyn.smith@environment.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads "S. Harrison" followed by the date "12/11/19". The signature is written in a cursive, slightly slanted style.

Susan Harrison

**Senior Team Leader Planning
Greater Sydney Branch
Climate Change and Sustainability**