

Chris Eldred
 Senior Planning Officer
 Department of Planning and Environment
 4 Parramatta Square, 12 Darcy Street
 Parramatta NSW 2150
 via email: Christopher.eldred@planning.nsw.gov.au

31 May 2023

Dear Chris

Hadley Park Homestead Works – Additional Request for Information DA – 23/907

Tract on behalf of NSW Department of Planning and Environment (DPE), provides this summary in support of the assessment of the Hadley Park Homestead Works – DA 23/907.

In response to specific issues and matters identified within your further request for additional information (RFI) letter dated 16 May 2023, the project team has prepared the below response.

The key points of the RFI are summarised below:

- RFI Point 1 – Aboriginal Heritage
 - The Department is understood to be satisfied with the review of the proposed works against the NSW Due Diligence Code of practice for the Protection of Aboriginal Objects in New South Wales. It is however noted that a report from a suitably qualified person is to be prepared which outlines the due diligence process undertaken.
- RFI Point 2 – Stormwater Drainage
 - It was noted that the previous RFI response did not satisfactorily address issues relating to stormwater previously raised by the Department. The Department have requested a response prepared by a suitably qualified person that:
 - Outlines any changes to the method of stormwater discharge proposed and support the amendments with revised plans and technical specifications.
 - Outlines how the development complies with Penrith City Council Stormwater Drainage Policy, particularly section 5.3 Rural Dwellings, Additions and Outbuildings, including the requirement of the NSW Office of Water. Where the development doesn't comply with the standards, suitable justification must be provided.
- RFI Point 3 – Structural Adequacy
 - The Department has requested that a statement from the Structural Engineer be provided that outlines that the proposed works would result in the building being structurally improved.
- RFI 4 – Vegetation Clearing
 - The Department requested that a suitably qualified person be engaged and outline any and all vegetation removal required for the works. The Department has also requested that a suitably qualified Arborist provide further details on any trees which may be impacted.

For further information regarding each item raised in the RFI, please refer to the below RFI #3 Response Table.

In addition to the above, please also find attached the following additional documents as requested by the Department:

- Supplementary Appendix Q – Aboriginal Heritage Due Diligence Report prepared by JPA&D
- Supplementary Appendix R – Stormwater Engineering Statement and associated drawings prepared by VOS Group Engineers
- Supplementary Appendix S – Structural Design Statement from Ducros Design Engineers
- Supplementary Appendix T – Statement from Taylor Brammer Landscape Architects.

Accordingly, we consider that this letter and accompanying table adequately responds to each of the items raised within the RFI letter and supports the Hadley Park Homestead Remediation works listed within DA23/907.

Kindly contact our office should you require any additional information.

Yours sincerely



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Tract
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RFI #3 Response Table

| Issue | RFI Issue | RFI Responsibility | Comments |
|---------------------|--|-----------------------|--|
| Aboriginal Heritage | <p>1. As noted in the Department's Request for Information (RFI) letter dated 6 April 2023, Hadley Park is part of a broader Aboriginal cultural landscape and as earthworks are proposed (in conjunction with the stormwater works), the Department requested the development to be considered against the NSW Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales.</p> <p>The RFI response dated 2 May 2023 highlights that the NSW Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales was reviewed by JPA&D, however not documentary evidence of this was provided. The Department requires a report from a suitably qualified person to be prepared that outlines the due diligence process that is undertaken.</p> | JPA&D Architecture | <p>Dr Jennifer Preston from JPA&D Architecture has provided a detailed report in response to DPE's RFI request dated 16 May 2023.</p> <p>Attached as Supplementary Appendix Q is a report on the due Diligence process undertaken and methodology used regarding Aboriginal Heritage at Hadley Park and includes a CV for Dr Jennifer Preston, who has prepared the documentation.</p> <p>Following on from details provided in our RFI #2 dated 02 May 2023, the attached report has been prepared to highlight the steps taken to ensure the proposed works have been reviewed in accordance with the NSW Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales.</p> <p>The report concludes that an AHIP (Aboriginal Heritage Impact Permit) application is not required. The following procedures will be followed on site:</p> <ul style="list-style-type: none"> · An archaeologist will be on site during the excavation works. · Works will proceed with caution. · If any Aboriginal objects are found, work will stop and DECCW will be notified. · If European objects are found, work will stop pending the advice of the archaeologist. · If human remains are found, work will stop, the site will be secured and Police and DECCW notified. |

| Issue | RFI Issue | RFI Responsibility | Comments |
|--------------------|---|--------------------------------|---|
| Stormwater Quality | <p>2. The RFI response dated 2 May 2023 has not addressed the issues raised by the Department and appears to amend the method of discharge of stormwater from what was originally proposed. This change is not outlined in any supporting documentation. The Department requires a response prepared by a suitably qualified person that:</p> <ul style="list-style-type: none"> ◦ outline any changes to the method of stormwater discharge proposed and support the amendments with revised plans and technical specifications. ◦ outlines how the development complies with Penrith City Council Stormwater Drainage Policy, particularly section 5.3 Rural Dwellings, Additions and Outbuildings, including the requirement of the NSW Office of Water. Where the development doesn't comply with the standards, suitable justification must be provided. | VOS Group Consulting Engineers | <p>VOS Groups Senior Hydraulic Engineer, Kevin Albertyn has provided a response to the Departments queries identified within the RFI request dated 2 May 2023.</p> <p>VOS has provided a detailed response to each item listed by DPE and provides additional supporting documentation as per DPE's request, including markups on the following plan/diagrams:</p> <ul style="list-style-type: none"> · Site Plan – Hydraulic Services · Ground and First Floor – Stormwater Drainage Plan · Ground and First Floor – Hydraulic Services · Ground and First Floor – Trench Drainage. <p>It is noted that works involving the provision for the creation of a Natural Outlet Structure are maintained within the Department of Planning and Environment – <i>Controlled Activities Guideline for Outlet Structure on Waterfront Land at the Stormwater Discharge at Point</i>. The proposed works are further noted as being consistent with provision outlined within DPE's established controls.</p> <p>The statement concludes that based on the listed compliance works requirements been implemented on the submitted drawings, the requirements of the Penrith City Council. 5.3 Guidelines are satisfied.</p> <p>Please refer to supplementary Appendix R for attached documentation and associated plans to review which has been prepared by a suitably qualified person.</p> |

| Issue | RFI Issue | RFI Responsibility | Comments |
|---------------------|---|--|--|
| Structural Adequacy | <p>3. The Statement of Environmental Effects notes that the application seeks to undertake structural works to the various buildings on the site due to their current poor state. The application was supported by drawings prepared by a Structural Engineer detailing the structural works to be undertaken. These works and drawings would have been prepared by the Structural Engineer based on certain methodology or standards to provide increased structural stability to the buildings in support of the purpose of the application.</p> <p>As previously requested in the Department's letter dated 6 April 2023, provide a statement from the Structural Engineer that outlines that the proposed works would result in the building being structurally improved.</p> | Ducros Design Structural & Civil Consulting Engineers | <p>Ducros Design Engineers - Director Mark du Cros has provided a design statement, attached as supplementary Appendix S.</p> <p>The statement confirms that the structural design of the proposed works has been prepared by a Practising Structural Engineer from Ducros Design in accordance with normal engineering practice.</p> <p>The intent of the design is to remediate the major structural deficiencies in the buildings and restore basic safety, without adversely affecting the heritage issues of the buildings.</p> <p>The structural design is based on requirements of the Section B of the BCA - 2019 and the relevant Australian Standards.</p> |

| Issue | RFI Issue | RFI Responsibility | Comments |
|---------------------|---|---|--|
| Vegetation Cleaning | <p>4. The Department notes that the RFI response has stated that no native or mature vegetation would be removed, however the response also states, "Before pruning or lopping Trees or significant vegetation, obtain advice from a heritage landscape consultant and arborist". This suggests that there will be vegetation removed as part of the works. All vegetation removal and pruning on this site requires development consent or a permit to be in place prior to removal.</p> <p>The Department requires confirmation from a suitably qualified person that outlines any and all vegetation removal required for the works. Where any trees are impacted, a report from a suitability qualified Arborist must be provided identifying details of the impacted tree (including its significance and retention value) and a recommendation of whether it is acceptable to remove and/or prune the tree.</p> | <p>Taylor Brammer Landscape Architects</p> | <p>Taylor Brammer has provided a statement regarding their experience as a suitably qualified and experienced Heritage Landscape Consultancy. The statement is attached as supplementary Appendix T.</p> <p>Some addition documentation and plans for initial maintenance work for the site's vegetation have also been provided. A detailed description of trees and vegetation is provided and mapped accordingly.</p> <p>As per our previous RFI response letter, the only vegetation that is to be removed is grass, weeds, vines or self-seeded saplings that are growing into the bricks or other elements of the buildings or on the floor inside a building. No native vegetation and/or mature trees are being removed.</p> <p>Note that a landscape plan prepared by a Heritage Landscape Architect for the CMP is being followed.</p> |