

Frensham School: Information Sessions Report

1 October 2021

Thank you to the 200+ people who were able to attend our Information Sessions on Frensham's proposal to expand its environmental education and credentials with the Student Accommodation Project, located in the Lower Holt.

On 15 and 16 September 2021, we held three Information Sessions for parents, alumnae (Old Girls) and the broader community. As noted previously, we had wanted to hold these sessions face-to-face to promote discussion, but ultimately due to lockdown it became more important to share correct information than it did to wait until we were able to meet in person.

Whilst there are limits to interacting over Zoom, the number of participants submitted nearly 300 associated questions.

For those who attended and for those who were unable to join, this report provides answers to the questions asked and reflects the fact there is a full spectrum of views on our proposal - from support and volunteering to assist, through to questioning our choice of location or objecting to the project in its entirety.

As a number of the questions were seeking the same answer, we have grouped questions into categories and repeated some of the questions in each category in order to provide a flavour.

These Information Sessions were the first step in more expansive communication from the School and we look forward to continuing to provide information as this matter progresses.

Themes and Questions

1. Purpose of the Lower Holt Development

Examples of Questions Received:

- What is the rationale for why this project is needed at all?
- Isn't Frensham already set up to do this – why do you need cabins?
- What year groups will be accommodated in the huts?
- Doesn't the development go against the philosophy of Winifred West in terms of environmental stewardship?
- Why can't the students immerse themselves in the environment by walking there? Why not camp?
- Why is there no master plan on the website anymore?
- Is this a soft build to then build the equestrian arena?
- Is this about increasing the number of enrolments at the School?

Frensham is renowned for its environmental education programmes, linked to character education and student wellbeing.

Our founder, Winifred West believed very strongly in environmental conservation, living gently on the land, and also of the power of the natural environment to help shape young girls into women.

Since her time, generations of girls, including our current students, have contributed to the surrounding environment and in the process have learned to love and respect the environment and to become advocates on its behalf.

One of the school's most popular programmes is the Jamieson Programme, made possible with a bequest from past student Hilda Jamieson 35 years ago. Her funds initially purchased camping equipment for Year 7 students to spend weekends camping in the Holt. This later developed into a series of one-off activities for small groups and has been refined further over subsequent years.

The programme is built on the belief that exposure to challenges in a secure environment can awaken in young people the confidence and belief in themselves that will stay with them throughout their lives. The Jamieson Programme challenges adolescent girls to push the boundaries and take calculated risks in an isolated environment which is free from social disruption but still connected to the school campus.

Our vision for the Lower Holt is to build on the environmental legacy of our past. We want to provide an opportunity for a year group to be relocated for extended periods of time for residential environmental education programmes, and to enjoy an adventure within the bushland on our own campus. The girls would learn about caring for local flora and fauna and would have shared responsibility for ongoing rehabilitation.

This project is not about making way for an equestrian arena or other facility in this location, nor is it about increasing enrolment numbers. It will free up beds in the boarding house for the increasing number of day girls to be part of a residential experience, but this is not linked to any plan to increase student numbers.

The [Master Plan](#) page of our website is updated regularly to provide relevant information to our community and the general public.

2. Location

Examples of Questions Received:

- Did you investigate other ways such as a partnership with other schools?
- Why not enter an agreement with the Girl Guides – they have huts in the Upper Holt which are empty most of the time.
- Will students from other local schools be able to use these facilities?
- Why would the school choose to build in this area, which will require more than \$300,000 in offsets for the environmental damage – when they could build the cabins in already cleared land.
- Have you considered other locations – this is right in the middle of the forest and would leave the forest highly fragmented and subject to edge effects?
- Why not use the land around Linden Turner or behind Kennedy and not touch the Holt area?
- How could the School support the wildlife rehabilitation in the Lower Holt in 2017, whilst simultaneously drafting plans to build cabins directly over the site of the wombat burrows?

When developing our environmental education program and considering what capital works might be required, Frensham consulted with a range of other schools. What we found was that the environmental education program that we offer is already well ahead of the programs of others and because it has been onsite, is far more embedded in the ethos of the school. It is the onsite capability that changes what could be an “add-on” to education, into a superior embedded experience.

We also considered approaching the Girl Guides but didn't because their cabins cannot be available to us full-time and we do not have full control of the site. For this same reason, it would make it very difficult to make our cabins available to other schools during term time as we would be occupying them for the school year. We may consider making the cabins available to appropriate community groups during vacation periods.

The criteria for site selection, identified by the Executive and the Board were as follows:

- A. Embedded in natural setting - in the bush, not separate from it.
- B. Walking distance to campus facilities.
- C. Not visible to/from residential areas or boundary roads.
- D. Feeling of seclusion without being isolated.
- E. Proximal to native animal corridor and riparian zone.

Frensham considered a number of other potential locations for the development project, but ultimately only the chosen site minimised impact and maximised the educational and environmental potential of the project.

At the time that the School chose to become a Land for Wildlife site, this project had not been conceived. The School consulted about its future plans, prior to the submission of the DA, with the wildlife carer who remains involved in the School's rehabilitation program and regularly undertakes activities with students in the Holt. The project has been specifically designed to minimise the impact on the wildlife in this area.

3. Development Application

Examples of Questions Received:

- How many huts are you planning?
- What is the footprint of the build?
- What other Development Applications did you make at the same time?
- Can we see some artist's impressions of your plans?
- Why did Frensham take this matter to the Land and Environment Court?
- When is the hearing and what are the possible outcomes?

In 2016 and 2017, Frensham developed our Strategic Priorities for the period 2018 to 2022. As part of this we investigated how we could extend our current commitment to best practice in teaching and learning and as a result developed a master plan for new resources required.

In 2019, Frensham lodged three Development Applications simultaneously to build a number of 'envelopes'.

The first was for staffing accommodation – after being approved, detailed designs were completed and construction is currently underway.

The second was for the two-court gymnasium, and again once approved, detailed designs were developed and construction is planned to commence in 2022.

The third application is the one which is outstanding. It was a Development Application for 6 student cabins, 2 staff cabins, and a multipurpose hall containing toilets, a kitchen, a staff office and laundry facilities. It is also for an amphitheatre for outdoor learning and a central fire-pit for night-time use.

We will publish artists' impressions of our plans on our website shortly, in additions to those

After the Wingecarribee Shire Council deferred the third Development Application, and the Council was subsequently suspended, Frensham School felt it had no choice but to pursue a legal pathway in order to obtain a decision given the limited timeframe in which the School could appeal the deferral.

Currently the Court is scheduled to hold its hearings in mid-October 2021. The Court may provide consent for the Development Application or refuse to and send the Application back to the Council.

The amended Development Application is available publicly – through [this link](#) (Reference [20/0747](#)) – select eTrack for updated development information, and DA Tracker for the full documentation of the original submission.

4. Consultation

Examples of Questions Received:

- Why has it taken this long to consult?
- Did Council ask for more consultation?
- Why has the school refused to meet or consult with the wildlife carers and community members?
- What is your response to the signage around the area? What about the petition?
- Why is the consultation taking place without a representative of the community to put the views of the community?
- Could we have more notice for future Information Sessions?

It is important to remember that there was a formal consultation program as part of the Development Application process and that was undertaken late last year with the Council. The amended DA is currently open for public exhibition, and all community members have the opportunity to provide their views through this process.

The School has also heavily engaged with a range of experts including the University of Wollongong's Sustainable Buildings Research Centre and we have undertaken a range of appropriate and required ecological evaluations and investigations undertaken by independent expert consultants.

When Council deferred a decision on the Development Application, they noted that further engagement with the community would be helpful and resolved that Council would facilitate a meeting between Frensham School and community representatives.

We had wanted to hold additional Information Sessions with the community in person and were not expecting the COVID-19 lockdowns to last this long. Ultimately, the need to provide additional information and to correct some misunderstanding became more important than holding sessions face-to-face.

The online format was less than ideal for discussion, but we had more than 200 attendees across 3 sessions and over 300 questions during and after those sessions. This document seeks to group the questions for efficiency and to address them.

This was a strong turnout in terms of attendees and the appetite for additional information. We are confident that those who attended were representative of the entire community including those previously involved with the Lower Holt in many different ways.

We recognise that there is a range of views within the community more broadly, including within our alumnae group. These views are all being heard and we thank those who passed on the recent petition.

We note the question about engaging with one community spokesperson – the difficulty is that no one individual represents the diversity of views held within the community and we would rather individuals retain their voice.

As for the final question – the recent Information Sessions marked the start of an ongoing commitment to communication and we will provide additional notice for future sessions.

5. Environmental Impact

Examples of Questions Received:

- How many trees will be removed and what is the impact of that?
- How much of the site will be cleared to make way for the buildings?
- Surely the infrastructure of paths, lighting, RFS requirements etc will take out more bushland?
- What about the access roads, bridge, turning circles, parking for 15 cars, all weather surfaces?
- Are you aware of Dr Ian Wright's current investigations/studies into the local waterways?
- Is David Robertson the same ecologist who has provided environmental assessments for the Shenhua Watermark mine on the Liverpool Plains and the Maules Creek Mine?

Over the past 15 years, Frensham has invested in the rehabilitation of the Lower Holt which was previously used, among other things, to graze cattle. We have planted nearly 4,000 native trees and removed many of the radiata pine trees which are considered by environmental authorities to be weeds and detrimental to native flora and fauna.

The School is deeply connected to this area and passionate about its regeneration and preservation for the long term.

In finalising our plans for the Lower Holt area, we took a number of measures to minimise the impact on the bush, including:

- We chose a site largely dominated by pine trees which need to be removed for bushfire safety but which are also considered to be weeds.
- The site chosen does not compromise any published or identified regional corridors, flyways or other habitat connectivity features. The site chosen provides a 1.5km buffer to the nearest identified feature.
- We will ensure that any tree removal will be accompanied by regeneration.

- The proposed buildings will be located to avoid the riparian zone, and within existing site contours to accommodate trees and meet the flooding, bushfire and ecological constraints of the site.
- Existing bush tracks will be retained and where paths are needed, they will be covered with gravel to fit the bushland setting.
- We will be retaining the native bushland by not introducing any plant species or formal gardens.
- Access facilities will be sensitively undertaken.

To address the questions more specifically:

- The building footprint is 0.8-hectares out of an 18-hectare site referred to as the Lower Holt area. This is the full footprint which includes paths and turning circles.
- The proposal requires the removal of 247 trees, of which 164 are categorised as weeds and should be removed for fire hazard control. Although 85 native trees were originally proposed to be removed as they were deemed to be of 'low retention value', our amended Development Application only requires the removal of 50 native trees and the remainder are now proposed to be retained.
- The project is designed to not have any adverse impact on the Nattai creek, riparian zone and fauna in the creek and longer term it will improve the ecology of the creek due to the removal of pines.
- We were not previously aware of Dr Ian Wright's work on local waterways and have made contact with him following this suggestion.
- Dr David Robertson is a Director of Cumberland Ecology with 30 years of experience working as an ecologist including as a university lecturer, consultant and expert court witness. Since its establishment in 2003, the firm has delivered more than 5,000 environmental projects across Australia and internationally. The projects named were worked on by the firm.

6. RFS Conditions

Examples of Questions Received:

- What are the RFS conditions?
- You can no longer build in a bush environment because of bushfire regulations – this area has been rated as a 'flame zone', so don't you have to remove more vegetation in the Asset Protection Zone (APZ)?
- How can buildings and the APZ clearing not completely interrupt the wildlife corridor?

The Rural Fire Service has indicated that the following conditions will be imposed on the development.

At the commencement of building works and in perpetuity the property around the development footprint shall be managed as follows:

- *North for a distance of 50 metres as an Inner Protection Area (IPA) and a further 17 metres as an Outer Protection Area (OPA);*
- *West for a distance of 33 metres as an IPA;*
- *South and east for a distance of 50 metres as an IPA and a further 10 metres as an OPA.*
- *South-west for a distance of 50 metres as an IPA and a further 20 metres as an OPA*
- *Land within Lot 1 DP 1133695 to the west of the Nattai River riparian zone as an OPA.*
- *The IPA must comprise:*
- *Minimal fine fuel at ground level;*
- *Grass mowed or grazed;*
- *Trees and shrubs retained as clumps or islands and do not take up more than 20% of the area;*
- *Trees and shrubs located far enough from buildings so that they will not ignite the building;*
- *Garden beds with flammable shrubs not located under trees or within 10 metres of any windows or doors;*
- *Minimal plant species that keep dead material or drop large quantities of ground fuel;*
- *Tree canopy cover not more than 15%;*

- *Tree canopies not located within 2 metres of the building;*
- *Trees separated by 2-5 metres and do not provide a continuous canopy from the hazard to the building;*
- *Lower limbs of trees removed up to a height of 2 metres above the ground.*
- *The outer protection area (OPA), where proposed, must comprise:*
- *Tree canopy cover not more than 30%; and,*
- *Understorey grasses and shrubs managed on an annual basis.*

The IPA, which extends from the buildings to a 34-50-metre radius, will be managed with a reduced fuel load by reducing understorey vegetation cover by 80% and tree canopy cover by 85% (which will largely be achieved by the removal of the numerous Pines). Further canopy reduction and separation will be achieved by the removal of 59 damaged, diseased, and declining native tree species assessed with a 4a SULE rating, and if necessary 17 native trees with a reduced SULE rating of 3b.

The Outer Protection Area (OPA) which extends from 34-50 to a 70-metre radius will be managed with a reduced fuel load by reducing understorey vegetation cover by 80% and tree canopy cover by 70% (which will largely be achieved by the removal of trees having 4a or 3b SULE rating).

The intent of RFS measures is to provide safe operational access for emergency services personnel in suppressing a bush fire, while residents are accessing or egressing an area. In order to achieve this, we have to make some adjustments to our current internal roads through this area. It should be noted that the project design does not include vehicles regularly using this area – these are only in the event of an emergency, to ensure safe access.

We will need to seal a portion of the existing internal road through to the Multi Use building. The required turning area is created at a natural junction in the existing trail and requires the removal of 8 pine trees and 2 dead or diseased natives.

Further RFS conditions include:

Prior to the use of the development the internal road from the intersection of Range Road to the Multi Use building shall be upgraded to comply with following requirements of section 4.2.7 of 'Planning for Bush Fire Protection 2006':

- *Internal roads are two wheel drive with a trafficable, all weather surface;*
- *Road widths shall allow for 2 way traffic in all passing locations;*
- *Incorporate a suitable turning area for a Category 1 fire appliance in the vicinity of the Multi-Purpose building;*
- *Traffic management devices are constructed to facilitate access by emergency services vehicles;*
- *A minimum vertical clearance of 4 metres to any overhanging obstructions, including tree branches, is provided;*
- *Curves have a minimum inner radius of 6 metres and are minimal in number to allow for rapid access and egress;*
- *The minimum distance between inner and outer curves is six metres. Curves have a minimum inner radius of 6 metres and are minimal in number to allow for rapid access and egress;*
- *Maximum grades do not exceed 15 degrees and average grades are not more than 10 degrees;*
- *Crossfall of the pavement is not more than 10 degrees;*
- *Roads are clearly signposted and bridges clearly indicate load ratings; and*
- *The internal road surfaces and bridges have a capacity to carry fully-loaded fire fighting vehicles.*

In terms of site access, the existing service trail which provides a loop around the development site has been assessed to be compliant with the fire trail standard in accordance with section 4.1.3(3) of Planning for Bush Fire Protection 2006 and will be maintained as required under this standard.

The wildlife corridor has both a length and a width – in order to prevent impact, our project is designed not to sever the corridor, and our buildings will not be fenced in so wildlife can also pass through. There will be additional planting which will enhance other parts of the corridor.

7. Bushland Flora and Fauna

Examples of Questions Received:

- How can buildings and the APZ clearing not completely interrupt the wildlife corridor?
- How do you plan to move the wombats out from under the bush huts?
- What happens with all the possums and sugar gliders?
- Is there a comprehensive specialised bird survey to establish the ornithological standards?
- The pine trees are still habitat and would need to be removed over years not to disrupt the ecology – how long will this project take?
- Are the pines currently providing habitat to any animals or insects?
- Will this affect Frensham's 'Land for Wildlife' status?

It would be a condition of any planning approval that a Fauna Management Plan would need to be developed before any work could begin on the site. This plan would examine measures for risk minimisation and safe relocation and would be a detailed study. We have commenced this plan but it is not yet finalised.

In particular, the plan will address a number of questions asked above about particular species:

- Wombats - detailed surveying is currently underway to help inform our management plan. The School is intending to engage with relevant experts to minimise the impact appropriately.
- Possums and sugar gliders will be protected by the Fauna Management Plan and their environment will be enhanced for the long-term.
- Under NSW law the approach taken is to develop an impact assessment drawing on bird data from the bionet database and based on vegetation and vegetation conditions. This system then makes a prediction about impact. That is the legal methodology required in this State and is the process we have followed.

The pine trees at the construction footprint will be removed first so that work can begin, but the remaining trees that require removal will be scheduled as part of the longer-term vegetation plan. These trees are providing a habitat to some animals – but the habitat is not as superior as that provided by native trees.

And finally, we do not believe this project impacts the Land for Wildlife Status of the School.

8. Biodiversity Off-Set Credits

Examples of Questions Received:

- How do the credits work – who receives the money and what are they required to do?
- There are no biodiversity offset credits for critically endangered Southern Highlands Shale Woodlands – where will you get these offset credits from?
- 40% of the woodlands will be cleared – how can you offset this loss with 70 purchased credits when all remaining Southern Highlands Shale Woodland is under existential threat?
- Will Frensham claim back its own credits for the Upper Holt?
- There is a large site of endangered Southern Highlands Shale Woodland under threat on the other side of Mount Gibraltar – will the school consider buying and protecting that site as part of their offset given that there is not much such forest left in the State?

Under NSW law, when an ecological impact assessment is undertaken, it measures the quality of vegetation and the quality of habitat that that vegetation provides. This is fed into a standard formula which then advises how many credits are required to offset the impact of the project. There are two types of credits – plant community types (PCTs) and for some threatened species there might be additional species credits required.

The money for the purchase of the credits goes to other areas working on the protection of similar ecology or to the Biodiversity Conservation Trust which allocates the funds to like situations.

It is correct to say that there are no biodiversity offset credits available for endangered Southern Highlands Shale Woodlands, as credit availability is limited. In NSW, where credits are not immediately available, it is possible to pay the equivalent sum of money into the trust and the Trust will seek the credits when they become available or will distribute the funds.

We will address the vegetation loss in two ways – through the Fauna Management Plan and through the NSW Government's biodiversity credit scheme which is designed to increase biodiversity outcomes.

On a final note, it is too early to determine whether Frensham will claim back its own credits for the Upper Holt, and at this stage, the School has no plan to purchase land on the other side of Mount Gibraltar.

Additional Information

For additional information or to be placed on our updates list please visit the [Master Plan page](#) of our website, register your interest by clicking [here](#) or contact feedback@frensham.nsw.edu.au.