



Our ref: DOC21/285794

Senders ref: SSD 10437 (City of Sydney)

Russell Hand  
Principal Planning Officer  
Industry Key Sites Assessment  
Planning and Assessment Group  
Department of Planning, Industry and Environment  
4 Parramatta Square  
12 Darcy Street  
PARRAMATTA NSW 2150

Dear Mr Hand,

**Response to Submissions – Waterloo Metro Quarter OSD Southern Precinct Detailed Design SSDA (SSD 10437)**

Thank you for your email of 10 March 2021, requesting input from Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment (DPIE) on the Response to Submission (RtS) for Waterloo Metro Quarter OSD Southern Precinct Detailed Design SSDA.

EES has reviewed the RtS table prepared by Urbis dated 9 April 2021 makes the following comments.

*Biodiversity*

A Biodiversity Development Assessment Report (BDAR) Waiver request was approved on 24 July 2020.

*Flooding*

EES originally recommended that the proponent engage a suitably qualified and experienced professional to develop an appropriate strategy for flood emergency management. Neither a flood emergency management plan nor detailed emergency management procedures is required for this stage. However, a strategy is required to demonstrate that the current design allows risk to life to be managed. This includes calculation of persons and risk and consideration of suitable shelter in place. If the proponent does not investigate emergency management at this stage, the continuous flood risk may not be able to be properly managed later.

EES concurs with the consultant's assertion that the industry standard approach is to set finished floor levels using the critical storm duration for each flood event. However, in flood emergency response management, the industry standard approach is to consider also other storm durations. For example, shorter duration storm events may be needed to calculate effective warning time and longer durations to understand the duration of isolation. EES repeats its original comment that the discussion regarding timing of flooding in relation to evacuation has not demonstrated an understanding of the principals involved in flood emergency response management. Further, the RtS now also claims that only short duration storms are relevant, because the site is at the top of the catchment.

However, the site conjoins a low-lying area, which appears to act as a bathtub in flood events. At such trapped low points, the relevant storm durations are typically longer than in the surrounding areas. Hence, investigation of a range of storm durations is needed to inform flood emergency response management.

If you have any queries or would like additional information regarding this matter, please do not hesitate to contact Bronwyn Smith Senior Conservation Planning Officer on 02 8973 8604 or at [Bronwyn.smith@environment.nsw.gov.au](mailto:Bronwyn.smith@environment.nsw.gov.au)

Yours sincerely



22/04/21

**Susan Harrison**  
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**Biodiversity and Conservation**