

Department of Planning and Environment

Our ref: DOC22/632569

Your ref: SSD-11070211 -MOD 1

Mr Patrick Andrade
Infrastructure Assessment
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

7 August 2022

Subject: EHG flood comments on a Modification Application – New Public School in Mulgoa Rise – temporary school facilities - Glenmore Park - SSD-11070211-MOD 1

Dear Mr Andrade

Further to the Environment and Heritage Group (EHG) submission of 3 August 2022 relating to biodiversity issues for this State significant development Modification Application (MOD 1), EHG provides its flood related comments and recommendations below.

EHG appreciates the Department providing it with an extension in which to provide its comments.

Flood

The flood assessment undertaken for this modification is based on grc Hydro modelling that was undertaken as part of the flood impact assessment dated 12 August 2021 for the EIS.

The flood assessment indicates that most of the temporary buildings are located outside of the flood zone. Buildings HB5 and HB4 are partially within the 1% AEP overland flow path at their eastern boundaries. The assessment then recommends that these two buildings will be constructed on piers to allow floodwater in the 1% AEP to flow freely underneath. The habitable level will be 1% AEP plus 0.5m freeboard.

EHG highlights the following:

- The whole site of the school, including the area, which is the subject of this modification, is flood prone land i.e., within the extent of the PMF overland flooding.
- EHG requested in October 2021 and December 2021 a review of flood level contours provided in the PMF map as the contour levels are inconsistent with the flood depths shown in the map and the discussion in the report. As a result, EHG is still not sure about the PMF flood level and depth at the site of the proposed temporary facilities.
- The proposed temporary facilities will serve 230 school children ranging from kindergarten through to Year 6. Due to the vulnerability of the development, all proposed demountable facilities must be constructed to withstand overland floodwater for the full range of flooding to ensure they withstand floodwater forces including buoyancy in rarer or extreme flood events.

Department of Planning and Environment

- Emergency management including access to the school and the evacuation of the students from the site in rarer flood events should be considered. School children should not stay in the facilities during floods larger than the 1% AEP. Buildings HB5 and HB4 must evacuate to other buildings if constructed on piers as they would be subject to isolation in the 1% AEP or larger flood events.

EHG requests that it not be given a consultation role in the conditions of consent unless it agrees to the role and the condition.

If you have any queries regarding this matter, please do not hesitate to contact Janne Grose, Senior Conservation Planning Officer on 02 8837 6017 or at janne.grose@environment.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink that reads "S. Harrison".

Susan Harrison

Senior Team Leader Planning
Greater Sydney Branch
Biodiversity and Conservation