

Department of Planning and Environment

Our ref: DOC23/29896
Your Ref: SSD-31822612

Brent Devine
Planning Group
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

13 February 2023

Subject: Exhibition – Alterations and Additions to Barker College (SSD-31822612)

Dear Brent

Thank you for your email received 12 January 2023 requesting comments from the Environment and Heritage Group (EHG) in regard to the State Significant Development (SSD) Application for Alterations and Additions to Barker College (SSD-31822612) (Hornsby Shire).

EHG has reviewed the Environmental Impact Statement (EIS) and provides comments in Attachment 1.

If you have any queries please contact Marnie Stewart, Senior Project Officer Planning Officer via Marnie.stewart@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

Attachment 1 – EHG comments on EIS for Alterations and Additions to Barker College (SSD-31822612)

Biodiversity

EHG granted its Biodiversity Development Assessment Report (BDAR) waiver (dated 11 September 2022) to DPE Planning on 14 November 2022.

EHG recommends that the EIS be updated to reflect the BDAR waiver decision and include a map that depicts the location of the area covered by the BDAR waiver and the proposed development to confirm that the proposed works are located within the BDAR waiver boundary.

Flood Risk Management

EHG refers to the Hornsby Floodplain Risk Management Study and Plan 2015 (FRMSP) report which provides the following flood information at the vicinity of the site:

- the site is partially impacted by the flooding in events equal and larger than the 1% AEP
- there is an overland flow path running through the location of the proposed Recital Hall Development near the south-western corner of Unwin Road and Clarke Street. The proposed Recital Hall Development includes the proposed Co-curricular Performing Arts and Exams Centre building and the new maintenance shed and associated parking
- the proposed location for the Aquatic and Tennis Centre and Stage 1 works are outside the impact for flooding up to the probable maximum flooding (PMF)
- there is a high hazard flow along the College Crescent near the proposed drop off/pick up area, which is part of Stage 1 Works which should be considered from an emergency management perspective.

EHG highlights that the Scoping Report dated November 2021, prepared in support of SSD-31822612 to seek Secretary's Environmental Assessment Requirements (SEARs) for the preparation of the EIS, provides a clear project description that includes all proposed alterations and additions works as stated in Section 1.2 and provided below:

- Concept Proposal for the provision of new and upgraded facilities, including:
 - a Co-curricular Performing Arts and Exams Centre building and associated basement parking on the south-western corner of Unwin Road and Clarke Street (subject to a further detailed approval)
 - a new maintenance shed and associated parking to the south of the Performing Arts and Exam Centre Building (subject to a further detailed approval)
 - an Aquatic and Tennis Centre incorporating an indoor pool and roof-top tennis courts and associated basement parking on the north-western corner of Unwin Road and Clarke Street (subject to a further detailed approval)
 - Stage 1 detailed works.

Accordingly, EHG understands that the SEARs requirements are applicable to all components of the Concept Proposal.

Table 1.1 of the TTW's Civil Engineering Report states that Section 4.3 of the report addresses the SEARs requirements. EHG disagrees with this statement for the following reasons:

- Section 4.3 does not identify the flood risk on-site for the full range of flooding up to and including the probable maximum flood
- Section 4.3 does not outline the effect of climate change
- Section 4.3 does not assess the impacts of the concept development, including any changes to flood risk on-site or off-site

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- Section 4.3 does not outline any solutions and operational procedures to mitigate flood risk where required.

It should be noted that Section 4.3 of the TTW's Civil Engineering Report is limited to a brief discussion on flooding including a single figure extracted from the Hornsby FRMSP 2015 for the 1% AEP flood risk map. The section also indicates deferring the flood assessment for the Recital Hall Development to an unspecified time in the future.

The proponent is required to address Item 14 of SEARs requirements (as clarified/simplified in the above dot points) to support the EIS.

End of Submission