# **Department of Planning and Environment**



Our ref: DOC23/109607 Your Ref: SSD-45024776

Judith Elijah
Planning Group
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

7 March 2023

Subject: Exhibition - Narwee Parklands Seniors Housing (SSD-45024776)

Dear Judith,

Thank you for your email received 10 February 2023 requesting comments from the Environment and Heritage Group (EHG) in regard to the State Significant Development (SSD) Application for Narwee Parklands Seniors Housing (SSD-45024776).

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

If you have any queries regarding this matter, please contact Shaun Hunt, Senior Conservation Planning Officer via shaun.hunt@environment.nsw.gov.au or 02 8275 1617

Yours sincerely

Marnie Stewart A/Senior Team Leader Planning Greater Sydney Branch Biodiversity and Conservation

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## **Department of Planning and Environment**



## Attachment 1 – EHG comments on EIS for Narwee Parklands Seniors Housing (SSD-45024776)

### **Biodiversity**

EHG granted a Biodiversity Development Assessment Report (BDAR) waiver for the subject proposal on 8 November 2022. The proposed impacts to biodiversity and trees in the exhibited plans are consistent with that considered for the BDAR waiver. As such, EHG is satisfied that no further biodiversity assessment is required in relation to the proposal.

To ensure remaining vegetation and biodiversity values on site are retained and protected, all recommendations and tree protection measures identified in the Arboricultural Impact Assessment prepared by More Trees, dated November 2022 should be adopted (refer to Sections 4 and 5 of the report).

#### Flood Risk Management

The development site is located on the eastern side of the Salt Pan Creek Catchment along its ridgelines. The Flood Assessment Report submitted by the proponent and the flood study undertaken by the former Canterbury City Council indicate that the site does not have any flooding issues under the 1% Annual Exceedance Probability (AEP) Event. The site is likely to be impacted under the Probable Maximum Flood (PMF) Event under existing conditions due to its internal subcatchment's inflows and the overland flows from properties located in the north of the site.

The anticipated floodwater depth within the site would be in the order of 0.3m and the flooding hazard is considered to be low under the PMF Event. The overland flood study undertaken by the former Canterbury Council indicates that the site is likely to be isolated for about two hours as the adjoining low points on roads would be under floodwater with depth of around 1m, which would interrupt the traffic flows into the site under the PMF Event.

The Flood Assessment Report indicates that the flooding conditions under the PMF Event at the development site is expected to be improved due to retaining walls to be constructed along the north and south edges of the site, and the provision of drainage facilities to divert flows into the west at Karne Street. This would render the depth of floodwater at Karne Street to be in the order of 0.3m under the PMF event, which is virtually flood free under existing conditions. This location of Karne Street is adjacent to the driveway to the basement parking of the proposed development site. The entry level of basement parking should be above the PMF level to mitigate the potential risk of flooding under the PMF Event.

The proponent should ensure the performance of retaining walls (such as reliability, stability and durability) under the PMF Event in order to eliminate any flood affectation at the basement of the building. Furthermore, a site emergency management plan should be developed by engaging a qualified professional to ensure the continuity of operations given the criticality and sensitivity of the proposed facility and its receptors under major flooding events including the PMF Event.

**End of Submission**