

Our ref: DOC19/922279

Senders ref: SSD 9343

Jason Maslen
A/Team Leader
School Infrastructure Assessments
NSW Department of Planning and Environment
GPO BOX 39
SYDNEY NSW 2001

Dear Mr Maslen,

Subject: New Request for Advice – Meadowbank Education and Employment Precinct Schools Project (SSD 9343) (City of Ryde) located at No. 2 Rhodes Street, Meadowbank

I refer to your e-mail dated 18 October 2019 requesting comments from the Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment on the Request for Advice for Meadowbank Education and Employment Precinct Schools Project (SSD 9343) (City of Ryde) located at No. 2 Rhodes Street, Meadowbank.

EES have reviewed the relevant documentation and provides the following comments:

Aboriginal Cultural Heritage

If the Department determines to grant approval, EES recommends that any conditions recommended by the Aboriginal Cultural Heritage Assessment Report prepared by Urbis dated October 2019 be included as conditions of consent.

Biodiversity

EES has reviewed the Biodiversity Development Assessment Report (BDAR) and makes the following comments:

- the maps should include the location of streams and stream order
- the BDAR states that individuals of the threatened species, *Eucalyptus nicholii* (Narrow-leaved Peppermint) and *Syzygium paniculatum* (Magenta Lilly Pilly) were found within and in close proximity to the development site. The BDAR also states that these species are not considered to represent the species as listed under the BC Act. However, these species are protected under the BC Act, even though it is acknowledged they are likely to be planted.
- in the assessment of impacts (section 2.2.4) it is stated that the development does not have any prescribed biodiversity impacts, however Table 17 lists one prescribed biodiversity impact
- Table 26 of the Biodiversity Assessment Method requires that a table of credit classes and matching credit profile be provided.

Flooding

The site contains the main floodway of the Charity Creek catchment. The site is partially inundated in frequent flooding such as 20% AEP with flood depth up to 2m. The probable maximum flood (PMF) peak flood depth is illustrated in the Ryde Sub-Catchments Flood Study and Floodplain Risk Management Plan (SKM 2015). Sheet 2 of 2 of the Charity Creek Catchment section of the Report shows that, in such a rare event, the site is completely inundated with deep depth >2m and all access around the site is cut-off by flood depths greater than 2m. The catchment is susceptible to

flash flooding which is characterised by a short duration with no warning time and high flow velocity which can result in significant risk to life. The Civil Report has also outlined the site's existing flooding characteristics.

The proposed school can be classed as a special uses' facility due to the vulnerability of its users (i.e. the students). Therefore, it is prudent to adequately address flood risk for the full range of flood up to the PMF, particularly risk to life. The Civil Report outlines the flood characteristics; however, it does not address the associated flood risk due to the exposure to flooding with these characteristics.

From a floodplain risk perspective, the flood assessment should not be limited to addressing existing flood behaviour, impacts of proposed development on existing condition and flood planning level. It should also address the following floodplain risk management aspects:

- whether the development will expose its potential users to an unacceptable level of flood risk due to exposure to flooding for the full range of flood;
- whether the development will increase the requirement for emergency services to plan and implement flood emergency management measures for future users of the development, particularly if the development is of vulnerable nature, due to exposure to flooding for the full range of flood.

The above floodplain risk management aspects are essential to be addressed in this stage of planning to guide decision-making. Moreover, this information should also be utilised to prepare a detailed floodplain risk management assessment that addresses emergency response measures in consultation with the State Emergency Service (SES) to ensure risk to life is adequately addressed.

Should you have any queries regarding this matter, please contact Bronwyn Smith, Senior Conservation Planning Officer on 9873 8604 or Bronwyn.smith@environment.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads "S. Harrison" followed by the date "28/11/19". The signature is written in a cursive, flowing style.

Susan Harrison

**Senior Team Leader Planning
Greater Sydney Branch
Climate Change and Sustainability**