

DOC18/253820 SSD-8669

> Mr Andrew Beattie School Infrastructure Assessment NSW Department of Planning and Environment GPO Box 39 SYDNEY NSW 2001

Attention: Scott Hay

Dear Mr Beattie Andrew

St Aloysius' College Redevelopment – 47 Upper Pitt Street, Kirribilli (SSD 8669)

Thank you for your letter of 23 April 2018 received by the Office of Environment and Heritage (OEH) requesting comments on Environmental Impact Statement (EIS) for the St Aloysius' College redevelopment.

OEH has reviewed the relevant documents and provides recommendations and comments in Attachment A.

If you have any queries regarding this matter, please contact Janne Grose on  ${\bf t}$ :8837 6017 or  ${\bf e}$ : janne.grose@environment.nsw.gov.au

Yours sincerely

**SUSAN HARRISION** 

Senior Team Leader Planning

S. Hannson 30/05/18

**Greater Sydney** 

**Regional Operations** 

#### Attachment A

#### St Aloysius' College Redevelopment – 47 Upper Pitt Street, Kirribilli (SSD 8669)

The Office of Environment and Heritage (OEH) has reviewed the following documents:

- Environmental Impact Statement April 2018
- Reissued SEARs for SSD-8669 22 November 2017
- Arboricultural Impact Assessment 11 March 2018
- Stormwater Management Report (Junior Campus) 16 March 2018
- Stormwater Management Report (Senior Campus) 16 March 2018
- Stormwater Management Report (Main Campus) 16 March 2018
- Landscape Concept Design Report March 2018

and provides the following comments.

### Biodiversity

Key Issue (17) of the Reissued SEARs requires the biodiversity impacts related to the proposal to be addressed in accordance with the requirements of the Biodiversity Conservation Act 2016 (BC Act). Section 7.9(2) of the BC Act requires SSD applications to be accompanied by a Biodiversity Development Assessment Report (BDAR) unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values. The EIS does not include a BDAR and OEH records indicate that a BDAR waiver request has not been received for this project. In the absence of a BDAR or waiver request OEH is unable to comment on biodiversity related issues for this proposal and recommends Key Issue (17) of the Reissued SEARs is addressed.

# **Building Design**

The EIS indicates the Concept Plan for the Main Campus includes a rooftop terrace (page 39) which includes a mixture of green roof and hard paved surfaces (page 56). OEH supports the development incorporating a Green Roof and/or a Cool Roof into the design. The benefits of Green Roofs and Cool Roofs are outlined in the OEH (2015) Urban Green Cover in NSW Technical Guidelines which can be found at the following link:

http://climatechange.environment.nsw.gov.au//Adapting-to-climate-change/Green-Cover

Green roofs are roof surfaces that are partially or fully vegetated. Cool roofs use reflective material to reflect and emit more solar energy than dark coloured roofs.

Green roofs and cool roofs can have a strong regulating effect on the temperature of roofs and building interiors, reducing the energy needed for cooling and the impact of the Urban Heat Island effect. The provision of an Intensive Green roof would increase habitat and biodiversity at the site, particularly if local native plant species are used from the relevant native vegetation community.

## <u>Flood</u>

The flood information for the site in the Stormwater Management Plans is acceptable for the three sites. Council does not have a Flood Planning Area for the area but the sites are subjected to minimal depths (0-0.15m) in the 1% AEP and in the PMF% on the street and no flooding within the lots. Therefore, the presented information and consideration to the flood risks are acceptable.

(END OF SUBMISSION)