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Senders ref: SSD 10382 (City of Sydney)

Rodger Roppolo
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Key Sites Assessments
Planning and Assessment Group
NSW Department of Planning, Industry and Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Mr Roppolo,

Subject: Notice of Exhibition – Student Accommodation, at 90-102 Regent Street, Redfern (SSD 10382)

Thank you for your e-mail dated 17 November 2020, inviting Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment (DPIE) to comment on the Notice of Exhibition for Student Accommodation, at 90-102 Regent Street, Redfern.

EES has reviewed the relevant documentation and make the following comments;

Biodiversity

A Biodiversity Development Assessment Report Waiver (BDAR) was approved on 26 October 2020.

Flooding

The SEARs Requirements states 'An assessment of any flood risk in accordance with the guideline contained in the NSW Floodplain Development Manual (DIPNR, 2005) including potential effects of climate change and an increase in rainfall intensity. The sites frontage to William Lane is subject to flooding and as such any proposed access to a basement area needs to be above the probable maximum flood level. The ground floor retail space needs to be at or above the 1% annual exceedance probability flood level'.

EES recommends that a suitably qualified and experienced flood consultant be engaged to undertake the assessment of flood risk to fulfill the requirements of the SEARs, the consultant should be experienced in flood modelling and floodplain risk management.

Flood Modelling

The flood modelling contains several issues and errors, some of which are serious and due to which the modelling and report should not be relied upon:

1. A catchment plan has not been provided and the catchment of 3.41 ha has not been defined in any way.
2. The critical durations and selected temporal patterns can therefore also not be assumed to be appropriate for analysis at the subject site.
3. The study has used HEC-RAS 2D without including any pits or pipes. This would not allow for a proper impact assessment and result in conservative flood levels at the subject site.
4. ARR 2019 IFD data used without checking validity per DPIE guidelines.
5. PMF is not 1 in 2000-year ARI flood, as the report incorrectly states. A PMP calculation is required to derive the PMF.

Flood Impacts

The proposal appears to rely upon a flood mitigation measure proposed for a neighbouring site. However, the measure can be expected to have an unacceptable adverse impact on adjacent properties. No evidence has been provided that this measure has been approved. Hence, the post development flood modelling cannot be used for assessment at this point. Further relevant discussion and evidence may be appropriate. It would be preferable to ignore this mitigation measure for the assessment of the subject site. It is not anticipated that the development itself would have any adverse flood impacts.

Flood Risk for development

Flood planning levels have been provided, but it is unclear whether these are based on pre or post development modelling. Clarification is required. As stated above, the post development flood information cannot be used at this point. The proposed building includes a basement for bicycle storage, which requires all entry points to be above the 1% AEP flood level plus 500 mm freeboard and the PMF level. The PMF levels have not been calculated and are required for this assessment. EES notes that this requirement has not been met.

Please note from 1 July 2020 Aboriginal cultural heritage regulation, including advice regarding SSIs and SSDs, is now managed Heritage NSW. The new contact for the ACH regulation team is heritagemailbox@environment.nsw.gov.au.

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



24/11/20

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