

Our ref: DOC21/122900  
Senders ref: SSD (8996)

Aditi Coomar  
Team Leader  
Infrastructure Assessments  
Department of Planning, Industry and Environment  
4 Parramatta Square  
12 Darcy Street  
PARRAMATTA NSW 2150

Dear Ms Coomar,

**Response to Submissions – Loreto Normanhurst School Redevelopment (Concept Proposal & Stage 1), 91-93 Pennant Hills Road, Normanhurst (SSD 8996)**

Thank you for your email of 4 February 2021, requesting input from Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment (DPIE) on the Response to Submission (RtS) for Loreto Normanhurst School Redevelopment (Concept Proposal & Stage 1), 91-93 Pennant Hills Road, Normanhurst.

EES has reviewed the RtS table prepared by Ethos Urban dated 11 February 2021 makes the following comments;

**Biodiversity**

EES considers that all biodiversity matters raised in its previous submission dated 13 August 2019 (Ref Doc19/580448) have been adequately addressed in the RtS report.

**Flooding**

EES notes that Item 17 of the Secretary's Environmental Assessment Requirements issued for the project on 12 January 2018, requires the proponent to *'assess any flood risk on site (detailing the most recent flood studies for the project area) and consideration of any relevant provisions of the NSW Floodplain Development Manual (2005), including the potential effects of climate change, sea level rise and an increase in rainfall intensity'*.

However, the Civil Engineering Report prepared by TTW refers to Hornsby Council's DCP 2013 and concludes that the proposed concept design does not appear to propose any obstruction to natural overland flow paths through the site. Therefore, no flood assessment has been undertaken.

Whilst, EES's previous response didn't contain flooding comments, it is EES due diligence to raise the following floodplain risk management issues associated with this proposal:

- the latest flood studies and floodplain risk management study and plan undertaken by Hornsby Shire Council (Council) identify the site as impacted by overland flow flooding.
- the principles of the Floodplain Development Manual (2005) apply to urban lands affected by overland flow.
- the development is classified as vulnerable development considering its users' vulnerability and response during flood events.
- Consistency with Section 1 C3.2 of the amended Council DCP (2013), which was approved on 10 February 2021, is prudent.

## EES flood recommendations

The proponent should:

- prepare a flood impact and risk assessment utilising Council's existing flood information to outline the base case overland flow behaviour for the full range of flooding up to the probable maximum flood (PMF).
- address developed scenario and assess the impact of the development on overland flow flooding and the impact of flooding on the development for the full range of flooding up to the PMF.
- identify management options required to mitigate any adverse impacts from the development and identify development controls required in accordance to 1 C3.2 of the amended Council DCP (2013).
- prepare an emergency response plan, including safety signs, at the school site near the flow path. The preparation and implementation of an emergency response plan will help ensure the safety of students, teachers, parents, carers and other members of the school community during rarer flood events for the full range of flooding.

If you have any queries or would like additional information regarding this matter, please do not hesitate to contact Bronwyn Smith Senior Conservation Planning Officer on 02 9873 8604 or at [Bronwyn.smith@environment.nsw.gov.au](mailto:Bronwyn.smith@environment.nsw.gov.au)

Yours sincerely



12/3/2021

**Marnie Stewart**  
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