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Senders ref: SSD 10473 (North Sydney)

Rita Hatem  
Student Para Planner  
Infrastructure Assessments  
Planning and Assessment Group  
NSW Department of Planning, Industry and Environment  
4 Parramatta Square  
12 Darcy Street  
PARRAMATTA NSW 2150

Dear Ms Hatem,

**Subject: Notice of Exhibition – Marist Catholic College North Shore, 270 Miller Street, North Sydney (SSD10473)**

Thank you for your e-mail dated 24 February 2021, inviting Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment (DPIE) to comment on the Notice of Exhibition for Marist Catholic College North Shore, 270 Miller Street, North Sydney.

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

#### *Biodiversity*

- Several microbats may utilise buildings as roosting habitat, whether intermittently or for over-wintering. Potential species found in the locality include Large Bent-winged Bat (*Miniopterus orianae oceanensis*), Little Bent-winged Bat (*Miniopterus australis*), Eastern Coastal Free-tailed Bat (*Micronomus norfolkensis*), Eastern False Pipistrelle (*Falsistrellus tasmaniensis*) and Yellow-bellied Sheath-tail-bat (*Saccolaimus flaviventris*). The potential for microbats to utilise buildings on site has not been discussed as a potential prescribed impact.

To address this, firstly a candidate list of threatened species should be prepared, in accordance with section 6.7.1.3 of the biodiversity assessment method (BAM). Then, daytime roost searches should be carried out for these species. All roost searches should use a torch to shine in holes, cracks and crevices, and carry a handheld bat detector to locate bats that may call. If bats are detected, observers must confirm the identity of the species and determine if the roost is a maternity roost. The biodiversity development assessment report (BDAR) should be updated to include a description of the searches undertaken and Table 9 of the BDAR will also need to be revised. In addition, if any microbats are detected, an assessment of impacts on prescribed biodiversity values will need to be included in the BDAR, to address section 9.2.1.3 of the BAM. Also, additional measures to be implemented prior to and during construction, to minimise impacts on microbats, will also need to be included in the BDAR.

- The information provided to address section 8 of the BAM (avoiding impacts) is very brief. While it is acknowledged that there is minimal scope to avoid impacts, the BAM requires documentation of the efforts taken to avoid impacts through location or design. If no efforts were made, this should be documented.
- It is noted that Table 6 states credits are required for the Large Bent-wing Bat, it is assumed this is an error.

## *Flooding*

The brief flood impact assessment prepared by GRC Hydro dated December 2020 is considered inadequate in addressing SEARs requirements. The report does not adequately address the impacts of the proposed development on flood behaviour and the impact of flooding on the development and its users for the full range of flooding. The report also does not provide mitigation solutions to address these impacts. Rather, the report provides a brief description on existing flood behaviour for the 1% AEP and PMF based on Council's flood study and a brief discussion on the developed condition.

The following issues should be addressed:

- The flood impact assessment determines that the proposed development will worsen flood affectation within the school site in the 1% AEP as shown in Figure 3. This impact must be addressed and mitigated.
- Mapping is limited to 1% AEP Flood depth. There are no maps to show the impacts of the development on flood hazard in the 1% AEP. This information is required to guide decisions on the proposed works and on any mitigation options.
- The report does not provide maps to show the impact of the development on flood behaviour for the PMF event. This information is required to ensure emergency management response on the site is adequately considered. The proposed development is an education facility which is classified as vulnerable development. Flood risk for the full range of flooding should be adequately addressed and documented. An emergency response plan should be prepared to ensure the safety of students, teachers and members of the school community.

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](mailto:Bronwyn.smith@environment.nsw.gov.au).

Yours sincerely



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**SUSAN HARRISON**  
**Senior Team Leader Planning**  
**Greater Sydney**  
**Biodiversity and Conservation Division**