



DOC21/499040
SSD 13852803 (North Sydney)

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Planning and Assessment Group
NSW Department of Planning, Industry and Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Ms Mathew,

Subject: Notice of Exhibition – Sydney Metro Crows Nest OSD Site C Stage 2, (SSD 13852803)

Thank you for your e-mail received 17 June 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 Sydney Metro Crows Nest OSD Site C Stage 2.

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

Biodiversity

A Biodiversity Development Assessment Report (BDAR) Waiver Request was approved on 26 February 2021.

Flooding

EES has reviewed the Flood and Stormwater Assessment, Detailed State Significant Development Application, Site C, Crows Nest over station development version 1 dated April 2021.

Adverse Flood Impacts on other properties

The report states that flood level impacts were not previously assessed for the OSD and shows unacceptable impacts. This is a significant departure from the Environmental Impact Statement (EIS) reporting for the Crows Nest Over Station Development, whereby no impacts were noted.

The report states that the requirement set out in "Sydney Metro – Chatswood to Sydenham SPIR REMM FH9" is for an increase in flood levels no greater than 50 mm in the 1% annual exceedance probability flood event, which is already higher than the common standard of 10 mm. The report documents several increases greater than 50 mm and therefore does not comply. Floor levels in buildings external to the project will not be raised, so the relevant criteria for external properties must remain the flood level increase and not depth increase. Depth increase may be an appropriate criterion within the footprint of the development, such as roads that will be regraded, but it is not acceptable for existing developments external to the project.

The building at 10-12 Clarke Street has commercial tenancies and a basement car park entry on Hume Street. The entries to these tenancies, including the car park entry, are at grade with the flood affected footpath.

Flooding of the basement car park may pose a significant risk to life. The development is predicted to exacerbate flooding at these tenancies and car park entry by raising flood levels 0.1 to 0.3 m. This would result in increased flood damage and potentially a greater risk to life and limb.

The development would also exacerbate flooding at Kelly's Place Children's Centre, which is considered a sensitive use. The centre caters for children 0-5 years and thus has limited evacuation capability. Modelling indicates that the outdoor play area to the north is already affected by flooding in the 1% annual exceedance probability flood event under existing conditions. These flood levels are predicted to increase by 0.02 to 0.05 m on the outdoor play area to the north of the building, and 0.05 to 0.1 m in Hume Street, to the east. Floodwater from the outdoor play area and Hume Street would likely enter the centre and necessitate evacuation. Flood levels should not be exacerbated as this would likely also lead to an increased frequency of flooding of the centre.

EES does not support the development in its current form without addressing the above issues, for example through:

- revision of design to reduce flood impacts to acceptable levels
- detailed assessment of flood level impacts at building entries, which could include local mitigation measures or compensation and
- consideration of the volumes of water entering underground car parks to determine the significance of impacts.

It would be prudent to add a similar detailed assessment for 28-34 Clarke Street, which is also noted as being adversely affected. The report notes that floor levels would not be affected but does not address the whether there is a significant reduction in freeboard nor whether service openings are affected.

The report notes that velocities are increased across large areas. Given the increases in velocity and depth, it would be prudent to assess whether there is an increase in the provisional flood hazard category (H1-H6) to ensure the risk to pedestrians and stationary and moving vehicles is not increased as a result of the project.

Flood Risk Management

The report for Site C documents two entrances that lead to underground rail infrastructure and a further entrance for the over station development. The EIS stated that station entrances would be 500 mm above 1% annual exceedance probability flood levels. However, a freeboard of 300 mm would not be unreasonable where there are low depths of flooding. The station entrances must also be above the probable maximum flood level.

Both entrances that lead to underground rail infrastructure may not have sufficient freeboard to the 1% annual exceedance probability flood levels. These levels have not been documented in the report.

For the over station development, the floor level at the water meter and gas meter room should be documented to ensure this is above the relevant 1% annual exceedance probability flood level as a minimum. The same applies for the electricity meter room, which appears to be housed in a fire stair.

Tables 3-2 and 3-3 in the report should be revised to include the additional entry points, the 1% annual exceedance probability flood levels and corresponding freeboard available at each entrance, or where relevant, the level beyond any internal step.

EES recommends that further consideration be given to the issues stated above to avoid exacerbating existing flood problems and creating new infrastructure without sufficient flood protection.

Should you have any queries regarding this matter, please contact the Greater Sydney Branch at rog.gsrplanning@environment.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S. Harrison'.

28/06/21

SUSAN HARRISON
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