



Emma Barnet
Planning and Assessment Group
Department of Planning, Industry and
Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Ms Barnet

Subject: Response to Submissions – Kings Park Metal Recovery and Recycling Facility Expansion (SSD-10396) (Blacktown)

Thank you for your email received 5 August 2021 requesting comments on the above proposal.

Environment, Energy and Science Group (EES) has reviewed the relevant documents and provides the following comments regarding flood risk management.

Flood Risk Management

The Response to Submissions (RtS) report dated 2 August 2021 has not addressed the following EES comments previously provided during the public exhibition of the application:

1. EES highlights that, the flood impact and risk assessment should adequately outline existing flood behaviour for the full range of flooding up to the Probable Maximum Flood (PMF). ARCADIS's assessment is limited to the 1% AEP.

The RtS states '*it is very unlikely that the PMF flood regime would be sensitive to the additional flood model refinement undertaken for the EIS assessment*'.

The RtS response has not addressed the above comment. The flood assessment should provide a sound understanding of the flood behaviour for the full range of flooding up to and including the PMF. Addressing the full range of flooding is prudent to guide decisions on this proposal.

2. The Eastern Creek Hydraulic Assessment (CSS, 2014) shows the site is largely inundated in the PMF event and classified high hazard. Accordingly, consideration should be given to the emergency management of the site during rarer events up to the PMF to ensure the safety of the workers and users of the site.

The RtS states in Section 6 '*Flood response on the Proposal Site will be undertaken in accordance with the Early Warning Flood Readiness Plan (as part of the Emergency Response Plan)*'.



EES acknowledges the RtS response. However, EES highlights that consultation with the State Emergency Service (SES) is essential to ensure that the proposed Early Warning Flood Readiness Plan is adequate and feasible to implement to ensure the safety of the workers and users of the site. Moreover, ARCADIS's assessment should include adequate information related to the flood constraints and the emergency response for events larger than the design flood event (i.e. for the full range of flooding up to and including the PMF). This is to ensure that the proposal will not adversely impact the emergency management response of the existing community.

If you have any queries please contact Marnie Stewart, Senior Project Officer Planning via Marnie.Stewart@environment.nsw.gov.au or 02 9995 6868.

Yours sincerely

A handwritten signature in black ink that reads 'S. Harrison'.

18/08/21

Susan Harrison

Senior Team Leader Planning
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Biodiversity and Conservation