



DOC20/671282

Senders ref: SSD10401 (Canterbury – Bankstown)

Susan Fox
Senior Environmental Assessment Officer
Industry Assessments
Planning and Assessment Group
NSW Department of Planning, Industry and Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Ms Fox,

Subject: Notice of Exhibition - Chullora Materials Recovery Facility, 21 Muir Road, Chullora (SSD 10401)

Thank you for your e-mail dated 13 August 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 Chullora Materials Recovery Facility (MRF) at 21 Muir Road, Chullora.

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

Biodiversity

EES is unable to comment on this application because the characteristics of site depend on DA366/202, which is currently being assessed by Canterbury-Bankstown Council. The DA includes, amongst other things, the removal of trees and other vegetation and bulk earthworks.

Flooding

EES has reviewed the following reports:

- Chullora Materials Recycling Facility Amended Scoping Report prepared by ARCADIS for Suez dated April 2020, and
- Rookwood Road Catchment Flood Study Report prepared by BMT WBM for Bankstown City Council dated July 2010.

The proposed MRF is located adjacent to the Cooks River in its headwater region. The flood study completed in 2010 by the former Bankstown City Council in the Rookwood Road Catchment indicates that the site is subject to flood affectation during the 5% AEP Flood Event and under the events with higher recurrence intervals. The flooding impacts are high at the southern portion of the site, which is located adjacent to the Cooks River and is channelized.

The proposed site would be inundated during the PMF Event and the floodwater depth would vary from 3m at the southern portion of the site to 1.5m at the northern portion. The flooding risk at the development site would predominantly be medium whilst the southern portion of the site would be exposed to high risk due to topography and the proximity to the Cooks River.

The access road to the MRF will be cut off during the PMF Event. This would pose risk to workers as the MRF will be operating 24/7. The risk during the PMF may be manageable by adopting an appropriate shelter-in-place strategy as the duration of flooding would be in the order of three hours.

Nevertheless, the proponent will need to consult with the NSW SES and the City of Canterbury-Bankstown for the development of an appropriate emergency management plan to manage the potential flooding risks to workers of the MRF during major and rarer flood events.

EES notes that the scoping report prepared by the proponent recognises the flooding risk at the development site and indicates the requirements for the development of an appropriate flood risk management plan. The scoping report outlines the layout of site facilities, filling and regrading works at the site and the flood detention basin. The scoping report indicates that the flood modelling works will be undertaken for the assessment of flooding conditions under the construction and operational stages of the MRF.

EES input into the SEARs on 5 December 2020, recommended that a comprehensive flood assessment be undertaken. This assessment has not been done and EES does not support its deferment to a future time. The assessment should be done to evaluate the flooding conditions at the development site and adjoining areas in this current planning stage as per EES's recommendations. The modelled flooding conditions and hazards will need to be considered in the development of an appropriate flood risk management plan to address and mitigate the local and cumulative flooding risks under the construction and operational stages of the MRF.

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



03/09/20

SUSAN HARRISON
Senior Team Leader Planning
Greater Sydney
Climate Change and Sustainability