



DOC20/675875

Senders ref: SSI 10048 (Blacktown)

Jonathan Kerr
Planning Officer
Transport Assessments
Planning and Assessment Group
NSW Department of Planning, Industry and Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Mr Kerr,

Subject: Notice of Exhibition – Sydney International Speedway (SSI 10048)

Thank you for your e-mail dated 19 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 Sydney International Speedway.

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

Biodiversity

EES have reviewed the Biodiversity Development Assessment Report (BDAR) prepared by Jacobs dated July 2020, and:

- the BDAR does not include a finalised credit report
- the BDAR states that spatial data was supplied but it has not been received by EES
- the BDAR does not contain a discussion of previous vegetation mapping of the site, and the description of the vegetation zones in section 4.1.1 is not consistent with the descriptions in Table 4-1
- there is no map provided of plot locations relative to PCTs, and also, it is preferable that plot locations are shown as rectangles not circles
- Table 5-1 lists a number of species that it says have been excluded from the assessment, but they are not excluded in the BAM-C: Speckled Warbler Spotted Harrier, Brown Treecreeper, Painted Honeyeater, White-bellied Sea Eagle, Hooded Robin, Black-chinned Honeyeater, Turquoise Parrot, Yellow-bellied Glider, Scarlet Robin, Flame Robin, Koala, Diamond Firetail, *Dillwynia tenuifolia* population at Kemps Creek
- Table 5-3 states that Dural Land Snail was included, but it's been excluded in BAM-C
- the BDAR contains no evidence that important area maps for Swift Parrot were consulted
- the BDAR states there are no Serious and Irreversible Impact (SAIL) entities, however Cumberland Plain Woodland (CPW) is a SAIL entity and identification of impacts on CPW in accordance with section 10.2.2 of the BAM should be provided
- the BDAR incorrectly states that zero credits are required for the Southern Myotis. The number of credits required is one. While it is acknowledged that the BAM-C has incorrectly calculated that zero credits are required, the BDAR should have noted this error and stated that one credit is required, in accordance with s 11.2.4.5 of the BAM, and the guidance in the Operational Manual in relation to proposals where the total number of credits is less than one, and

- there is no table provided of credit classes and matching credit profiles (i.e. BAM Biodiversity Credit Report (Like for Like)).

Flooding

The site is outside the mainstream flood of Eastern Creek, however, the site is impacted by overland flooding. Figure 16-2 in Chapter 16 of the EIS Volume 1, shows that a DRAINS hydrology modelling has been undertaken to assess local overland flooding up to the 1% AEP. However, the report lacks details on the modelling parameters, inputs and outcomes for both existing and developed scenarios.

It is recommended that, the report addresses the details of the local overland flood impact and risk assessment for existing condition, construction and operational phases for the full range of events including the probable maximum flood. It is acknowledged that, on-site stormwater detention basins are proposed in operational phase to attenuate the 1% AEP, however, it is prudent to assess events rarer than the 1% AEP from an emergency response perspective and to address impacts on downstream areas in these rarer events.

It should also be noted that the principles in the Floodplain Development Manual apply to all overland flow associated with major drainage. Therefore, as the site is merely impacted by local overland flooding, consistency with Council's flood policies should be addressed from a local flooding perspective based on the above flood assessment for the full range of flood.

Please note from 1 July 2020 Aboriginal Cultural Heritage (ACH) regulation, including advice regarding SSIs and SSDs, is now managed by 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



08/09/20

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