

Travis Lythall  
 Senior Town Planner  
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 Suite 4, Level 7, 100 Walker St  
 North Sydney, NSW  
*Supplied by email*



3 September 2020

**Re: SSD 9522 - Response to Submissions, Kemps Creek Warehouse and Logistics Hub – Mamre South Precinct (SSD 9522), Kemps Creek, NSW.**

Dear Travis,

This letter addresses the submission from EES Group in relation to SSD 9522. Submissions were provided in an email from Travis Lythall (Senior Town Planner, Willow Tree Planning), dated 2 September 2020. The submissions and Ecoplanning’s responses to these submissions are provided in **Table 1**.

**Table 1: Ecoplanning response to EES Submissions.**

EES submission	Ecoplanning response
<p>EES was not provided with updated shapefiles nor access to the calculator file in BOAMS, so EES comments are based purely on the new BDAR and RtS table. EES has been unable to verify that the inconsistencies between the data in the BDAR, the shapefiles and the calculator have been rectified. EES is also unable to determine if the data has been entered correctly into the calculator. It should be noted that Table 25 of the BAM (Appendix 10), for example, clearly states that the shapefiles and spatial data are required to be provided.</p> <ol style="list-style-type: none"> <li>1) Based on the above EES addresses the response to the comments made previously:</li> <li>2) The BDAR now appears to be assessing the proposal.</li> <li>3) The assessment of SAIL is now correct.</li> <li>4) Flora surveys were conducted in accordance with OEH guidelines from</li> </ol>	<p>Shapefiles have been provided with the email that this letter has been attached to. They were not able to be uploaded to BOAMs as it does not accept the ‘.zip’ file format. The BAM-C and BOAMs case have now been submitted through the tool.</p> <p>BOAMS case number: 00010965          BAM Calculator ID:          00010965/BAAS17012/18/00010966</p> <ol style="list-style-type: none"> <li>1) Noted.</li> <li>2) Noted.</li> <li>3) Noted.</li> <li>4) The targeted flora surveys followed the published guidelines at the time the surveys were undertaken. As noted, the April 2020 guidelines were released following DA submission and thus, the survey could not adhere to such guidelines. Nonetheless, Ecoplanning has reviewed the updated survey guidelines.</li> </ol>

<p>2016. That report has been replaced by guidelines issued in April 2020 after most of the surveys for this proposal were conducted, so EES is unable to determine if they were in accordance with that document. The apparent 50m+ distance between survey traverses shown in Fig. 4.1 would make it difficult to detect the less visible species. As most of the site is exotic pasture, this is only problematic in the mapped native vegetation within the subject land. It is noted, however, that there is a low likelihood of the presence of any of the identified candidate flora species.</p>	<p>The vegetation within the study area is not considered suitable habitat under Section 3.3 of the 2020 guidelines. Consequently, the methodology and intensity of the survey is considered adequate.</p>
<p>The only critical matter is the identification of PCTs as misidentification of PCT 849 as PCT 835 will result in both lower credit requirements and lower credit prices. The tabulated data in Appendix C of the BDAR is difficult to review as it is not in excel format, as required by the BAM.</p>	<p>The tabulated data presented in Appendix C of the BDAR has been provided with the email that this letter has been attached to. It has also been uploaded to BOAMs.</p>

If you would like to discuss any of the above responses and recommendations further, please contact me on the below details.

Yours sincerely,

Lucas McKinnon

Director | Principal Ecologist | Accredited and BAM Assessor (#17012)

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