



Your ref: SSD-71774469
Our ref: DOC24/519058

Ms Catriona Shirley
Team Leader, Industry Assessments
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 21 Darcy Street
PARRAMATTA NSW 2150

12 July 2024

Subject: Coward Street Multi Level Warehouse Facility (SSD-71774469)

Dear Ms Shirley,

I refer to your 4 July 2024 email requesting input from the Biodiversity, Conservation and Science Group (BCS) of the Department of Climate Change, Energy, the Environment and Water on the Planning Secretary's environmental assessment requirements (SEARs) for the above project.

BCS has reviewed the Scoping Report prepared by Urbis Ltd dated 31 May 2024 and recommends the proponent address the attached requirements.

In relation to point 4 of the recommended biodiversity environmental assessment requirements, please note the minimum information and spatial data requirements are in Tables 24 and 25 of the [Biodiversity Assessment Method 2020 \(BAM\)](#). Other requirements, such as those relating to the BAM Calculator and Biodiversity Offset Assessment Management System, are detailed in the [guides, tools and databases](#) webpage.

Should a waiver to the requirement for a BDAR be sought, it must be clearly demonstrated that the proposed development is not likely to have any significant impact on biodiversity values. Development that requires clearing of native vegetation or additional biodiversity impacts as prescribed by clause 6.1 of the *Biodiversity Conservation Regulation 2017* is likely to require a BDAR.

Any request for a BDAR waiver must include the information requirements set out in Tables 1 and 2 of the DPIE guidelines on [How to apply for a biodiversity development assessment report waiver for a Major Project Application](#). The proponent can find further information on the BDAR waiver process on the [Biodiversity development assessment report waiver](#) webpage.

Please contact Greater Sydney Planning team at rog.gsrplanning@environment.nsw.gov.au should you have any queries regarding this advice.

Yours sincerely

Susan Harrison
A/Director, Greater Sydney Branch
Regional Delivery
Biodiversity, Conservation and Science Group

**BCS Environmental Assessment Requirements - Coward Street Multi Level Warehouse
Facility (SSD-71774469)**

Biodiversity
1. Biodiversity impacts related to the proposed development are to be assessed in accordance with Section 7.9 of the <i>Biodiversity Conservation Act 2016</i> (BC Act), the Biodiversity Assessment Method 2020 (BAM) and documented in a Biodiversity Development Assessment Report (BDAR). The BDAR must include information in the form detailed in the BC Act (s.6.12), <i>Biodiversity Conservation Regulation 2017</i> (s.6.8) and the BAM, including an assessment of the impacts of the proposal (including an assessment of impacts prescribed by the regulations). 2. The BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the BAM. 3. The BDAR must include details of the measures proposed to address the offset obligation as follows: • The total number and classes of biodiversity credits required to be retired for the development/project. • The number and classes of like-for-like biodiversity credits proposed to be retired. • The number and classes of biodiversity credits proposed to be retired in accordance with the variation rules. • Any proposal to fund a biodiversity conservation action. • Any proposal to make a payment to the Biodiversity Conservation Fund. If seeking approval to use the variation rules, the BDAR must contain details of the reasonable steps that have been taken to obtain requisite like-for-like biodiversity credits. 4. The BDAR must be submitted with all spatial data associated with the survey and assessment as per the BAM. 5. The BDAR must be prepared by a person accredited in accordance with the Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017 under s.6.10 of the BC Act.
Flooding
6. The EIS shall include a flood impact and risk assessment (FIRA) prepared in accordance with the NSW Flood Risk Management (FRM) Manual (2023). The FIRA should be undertaken by an appropriately certified professional engineer with good working knowledge of FRM practices and guidance in New South Wales. As a minimum the FIRA must: • Consider the relevant provisions of the FRM Manual and associated guides, and existing council and government studies, other existing information and requirements. • Include analyses of key flood characteristics, including conveyance, hazard, flood storage and flood levels based on a series of floods, for pre and post development conditions, using suitable techniques outlined in the specified version of Australian Rainfall and Runoff for the full range of flooding up to the PMF. • Use the 0.5% and 0.2% AEP year flood events as proxies for assessing sensitivity to an increase in rainfall intensity of flood producing rainfall events and reduced drainage implications because of Sea Level Rise under Climate Change, in accordance with the guidelines. • Document the flood behaviour in both the existing and developed scenarios to identify the impacts of the proposed development on the flood hazard, flood function and flood risk to the existing and future communities. • Include maps showing the residual impacts (flood afflux) of the project on and off the site for the full range of modelled flood events. • Include key details of the final proposal including any changing run off characteristics as well as any proposed modifications to drainage infrastructure and floodplain landform. • Include an understanding flood hazard categorisation for the full range of events to assist in the effective planning and design of infrastructure capable of withstanding flood events. • Document changes in hazards and evacuation routes on public roads as it relates to emergency management. Notes: <u>Flood behaviour</u> includes flood volume, extent, depth, level, velocity, duration, rate of rise, flood function and hazard. <u>Impacts of flooding</u> include changes to flood behaviour and risks to the community including emergency management response for the community.

Water and soils

7. The EIS must map the following features relevant to water and soils including:
 - Acid sulfate soils (Class 1, 2, 3 or 4 on the Acid Sulfate Soil Planning Map).
 - Rivers, streams, wetlands, estuaries (as described in s.4.2 of the BAM).
 - Wetlands as described in s.4.2 of the BAM.
 - Groundwater.
 - Groundwater dependent ecosystems.
 - Proposed intake and discharge locations.
8. The EIS must describe background conditions for any water resource likely to be affected by the development, including:
 - Existing surface and groundwater.
 - Hydrology, including volume, frequency and quality of discharges at proposed intake and discharge locations.
 - [Water Quality Objectives](#) (as endorsed by the NSW Government) including groundwater as appropriate that represent the community's uses and values for the receiving waters.
 - Indicators and trigger values/criteria for the environmental values identified above in accordance with the *ANZECC (2000) Guidelines for Fresh and Marine Water Quality* and/or local objectives, criteria or targets endorsed by the NSW Government.
 - [Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions](#).
9. The EIS must assess the impact of the development on hydrology, including:
 - Water balance including quantity, quality and source.
 - Effects to downstream rivers, wetlands, estuaries, marine waters and floodplain areas.
 - Effects to downstream water-dependent fauna and flora including groundwater dependent ecosystems.
 - Impacts to natural processes and functions within rivers, wetlands, estuaries and floodplains that affect river system and landscape health such as nutrient flow, aquatic connectivity and access to habitat for spawning and refuge (e.g. river benches).
 - Changes to environmental water availability, both regulated/licensed and unregulated/rules-based sources of such water.
 - Mitigating effects of proposed stormwater and wastewater management during and after construction on hydrological attributes such as volumes, flow rates, management methods and re-use options.
 - Identification of proposed monitoring of hydrological attributes.

End of Submission