

Our ref: DOC20/671159

Senders ref: SSD 9522

Bianca Thornton
Environmental Assessment Officer
Industry Assessments
Planning and Assessment Group
Department of Planning and Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Ms Thornton,

Response to Submissions – Kemps Creek Warehouse, Logistics and Industrial Facilities Hub (SSD 9522)

Thank you for your email of 12 August 2020, requesting input from Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment (DPIE) on the Response to Submissions (RtS) for Kemps Creek Warehouse, Logistics and Industrial Facilities Hub.

EES provided previous correspondence dated 23 July 2019 and EES have reviewed the RtS table prepared by Willow Tree Planning dated 6 August 2020 and makes the following comments.

Aboriginal Cultural Heritage (ACH)

Please note from 1 July 2020 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.

Biodiversity

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.

Based on the above EES addresses the response to the comments made previously:

- The BDAR now appears to be assessing the proposal.
- The assessment of SAIL is now correct.
- Flora surveys were conducted in accordance with OEH guidelines from 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 That report has been replaced by guidelines issued in April 2020 after most of the surveys for this proposal were conducted, so EES is unable to determine if they were in accordance with that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.

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.

Flooding

The report addresses flooding for the proposed development and its immediate adjacent areas, as a result, the impact of the development on flooding appears negligible for all flood events up to the PMF events. Appendix B shows the model outputs maps for developed condition, which shows that filling in the site is almost up to the PMF.

It should be noted that the planning proposal is in part of the South Creek Catchment and the whole catchment is subject to future development. The cumulative impacts due to changes in land use patterns and associated infrastructure within South Creek catchment should be considered. The development boundary proposed to be outside the 1% AEP, however the 1% AEP extent is not a static fixed line in nature, it is likely to be altered overtime due to the cumulative development within the South Creek catchment. Therefore, adopting a 1% AEP extent, which is a non-static line, as the boundary of the development will not ensure the precinct is not impacted by the 1% AEP. The South Creek Flood projects currently being undertaken under Stage 2 of South Creek Sector Review are considering the ultimate development scenario and associated developed flood behaviour which should guide decision on the next phase of planning for this State significant development (SSD 9522).

If you have any queries or would like additional information regarding this matter, please do not hesitate to contact Bronwyn Smith Senior Conservation Planning Officer on 02 8973 8604 or at Bronwyn.smith@environment.nsw.gov.au

Yours sincerely



26/08/20

Susan Harrison
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Environment, Energy and Science