

Dave Auster
Department of Planning, Industry & Environment
dave.auster@dpie.nsw.gov.au

30 January 2023

Attention: Dave Auster

Dear Mr Auster,

Response to Submissions – 554-562 Reservoir Road, Prospect (SSD-9577613)

This letter, in relation to Americold Prospect South Expansion (SSD-9577613), details the response to submission following the conclusion of the exhibition period for the application on 8 December 2022 and responds to the Further Issues Letter received from the Department of Planning and Environment, dated 21 December 2022.

This response to submissions is prepared in accordance with section 59(2) of the Environmental Planning and Assessment Regulation 2021 and has given regard to Section 7 and Appendix C of the State Significant Development Guidelines for responding to submissions.

Please contact the undersigned if you have any questions or matters of clarification.

Yours sincerely



Matt Brookes

Team Lead – Planning (RPIA)

on behalf of

Beca Pty Ltd

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1 Introduction

Application SSD-9577613 proposes to construct an extension to its existing temperature-controlled warehouse facility at 554-562 Reservoir Road, Prospect NSW, including a 5,140m² extension to the east of the existing southern warehouse, reconfiguration of the existing carparking and driveways to improve truck movement, access and loading arrangements within the site, and construction of ancillary buildings and plant.

Community and Stakeholder Engagement in the pre-EIS period was primarily undertaken by NGH Pty Ltd (NGH) on behalf of Americold. a targeted approach to engagement was undertaken in the pre-EIS period, informed by the NSW Government Undertaking Engagement Guidelines for State Significant Projects (November 2021) and centred around the following objectives:

- Engage to capture views and support with both wider community and targeted groups as set out in the SEARs.
- Engage proactively with targeted stakeholders by providing a range of opportunities to the local community and stakeholders to discuss key topics and offer their feedback.
- Produce clear information on the project including any potential impacts and planned mitigation measures via delivery of high-quality communications across targeted channels.
- Maintain a positive corporate image for Americold through the delivery of clear, transparent communications by managing social and reputational risks.

No issues were raised with the proposed development during the pre-EIS engagement phase. The following responses to consultation were received:

- TfNSW declined to attend an information session but advised that the TfNSW SEARs comments remain applicable.
- The NSW Environment Protection Authority (EPA) declined the invitation to attend an information session, however appreciated the invite and highlighted their support for the proposal. The EPA noted that should significant changes to the proposal occur which would otherwise warrant the need for an Environment Protection Licence, then EPA would reconsider its position when the EIS is referred to the agency during the exhibition phase. As outlined in section 4.5 of the EIS, the proposed development is not expected to trigger any of the activity thresholds in Schedule 1 of the POEO Act.
- Endeavour Energy declined to attend an information session but advised they would provide further advice and feedback when the EIS is placed on exhibition. Americold has separately engaged with Endeavour Energy's property services team and received a 'no objection' letter for works proposed within Endeavour Energy's easement subject to the implementation of certain conditions which Americold has agreed to.
- The NSW Department of Planning and Environment (Water) declined the invitation to attend an information session but advised it will assess and provide advice on the EIS once it is on exhibition.

- No comments were received from other identified sensitive receivers institutional stakeholders, or members of the wider community.

The following sections outlined submissions received during the exhibition period for the application and provides a response to those submissions. It is noted that the majority of submissions are information or condition advice only.

2 Endeavour Energy

Comments	Responses	Changes to EIS
<p>The EIS in Section 8.7 'Endeavour Energy' refers to Endeavour Energy's submission made to the Department via email on 9 October 2020 regarding the request for Secretary's Environmental Assessment Requirements (SEARs) for SSD-9577613 and addresses the key issues raised.</p> <p>For Section 8.7.3 'Network Capacity' it includes the following advice.</p> <p>8.7.3 Network Capacity</p> <p>The Endeavour Energy comments note that the availability of electrical range of factors and should not be assumed. The applicant notes that Endeavour Energy's Network Connections Branch to carry out a final assessment be undertaken at the Building Consent stage.</p> <p>Notwithstanding Endeavour Energy's submission, the SEARs issued on 23 December 2021 does not include utilities as a key issue to be addressed in the EIS. It includes in 'Engagement' to requirement to consult with 'relevant public utility providers'. As previously advised, Endeavour Energy is urging applicants /customers to engage with an Electrical Consultant / Accredited Service Provider (ASP) prior to finalising plans to in order to assess and incorporate any required electricity infrastructure. In so doing the consideration can also be given to its impact on the other aspects of the proposed development.</p>	<p>Endeavour Energy has provided additional clarification of their submission in an email to the assessing officer, Dave Auster on advised that no immediate action is required, however the future requirements have been noted.</p> <p>Americold will engage with an Electrical Consultant / Accredited Service Provider (ASP) prior to finalising plans to in order to assess and incorporate any required electricity infrastructure</p>	<p>Nil</p>

Comments	Responses	Changes to EIS
<p>For Section 8.7.4 'Proximity of Electrical Infrastructure', the applicant has provided a 'No Objection' letter received from Endeavour Energy's Easement Officer on 11 May 2022 which details the requirements for the activities / works proposed in or affecting the easements and includes the following.</p> <p>With the above in mind Endeavour Energy has No Objection to detailed in the plans supplied to this office, but subject to agreed date of this letter to the following conditions.</p> <p>There does not appear to be any indication in the EIS of the applicant has provided the agreement in writing to Endeavour Energy.</p> <p>Endeavour Energy's recommendations and comments previously provided for the request for SEARs are essentially still applicable. Subject to and based on the foregoing Endeavour Energy has no objection to the Development Application.</p>		

3 Water NSW

Comments	Responses	Changes to EIS
<p>Please note that as the subject site is located downstream and outside WaterNSW's Prospect Special Area, and as an SSD any flood works or licensing approvals will be assessed by others, the risk to water quality is considered to be low and WaterNSW has no comments or particular requirements.</p>	<p>This has been noted.</p>	<p>Nil</p>

4 Fire and Rescue NSW

Recommendations	Responses	Changes to EIS
<p>Given the size and complexity of the proposed facility, and to ensure first responders have information readily available to render safe any incident, FRNSW make the following recommendations:</p> <ol style="list-style-type: none"> 1. That safe, efficient, and effective access is provided in accordance with FRNSW fire safety guideline - Access for fire brigade vehicles and firefighters. 2. That an Emergency Response Plan (ERP) is developed for the site in accordance with HIPAP No.1.2 3. That an Emergency Services Information Package (ESIP) be prepared in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans. 	<p>Submission noted. No response required.</p>	<p>Nil</p>

5 Heritage NSW

Comments	Responses	Changes to EIS
<p>The Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared in reference to the relevant guidelines as required by the SEARs. Heritage NSW has no comments to make on the project as there is no proposed impact to Aboriginal cultural heritage. Heritage NSW would recommend the implementation of the unexpected finds protocol outlined in the ACHAR.</p>	<p>Submission noted. No response required.</p> <p>Unexpected finds protocol will be included in CEMP for the development.</p>	<p>Nil</p>
<p>As delegate of the Heritage Council of NSW, I provide the following comments:</p> <ul style="list-style-type: none"> • The proposed involves works within the SHR curtilage of the 'Former Great Western Road' to join the new access road with Reservoir Road. 	<p>Noted.</p>	<p>Nil</p>

Comments	Responses	Changes to EIS
<ul style="list-style-type: none"> The SOHI concludes that the proposed new access road is unlikely to disturb the original 1818 road fabric due to the buffer offered by the difference between the historically recorded width and the current road width. The SOHI concludes that there will be no impact to the significance of the original alignment because the proposed road works will not change the alignment. Notwithstanding, the SOHI identifies that there is the possibility for original fabric to be uncovered, and thus includes the following Recommendations: <ol style="list-style-type: none"> Any works outside of this scope may require additional assessment; Detailed design plans for the proposed new driveway connecting the project area to the SHR listed 'Former Great Western Road' should be assessed to determine the extent of the potential physical impact to the listing prior to works being undertaken; Impacts to the SHR listed 'Former Great Western Road' should be minor and involve the necessary works to join the new driveway to the existing road; In the event any heritage finds are identified relating to the original Convict Road are found, works must cease temporarily and a qualified heritage consultant should be notified for advice before any further work will be carried out around the location of the find. In the instance that such finds are uncovered refer to Appendix A. 		
Heritage NSW supports the above Recommendations including the implementation of the unexpected finds procedure. Heritage NSW recommends that prior to the determination of the application, the SOHI is updated to address the detailed design plans and potential physical impacts to the archaeology.	We request that the requirement for seeking the SOHI to be updated to address the detailed design plans and potential physical impacts to the archaeology, prior to determination, be conditioned on the approval based on the following considerations.	Nil

Comments	Responses	Changes to EIS
	<p>1.The recommendation of the SOHI being 'Detailed design plans for the proposed new driveway connecting the project area to the SHR listed 'Former Great Western Road' should be assessed to determine the extent of the potential physical impact to the listing '<u>prior to works being undertaken</u>' i.e. prior to commencement of works.</p> <p>2.This aligns with the HNSW response which states' Heritage NSW supports the above Recommendations'...</p> <p>3.Detailed plans of the driveway are not yet complete as detailed design will be undertaken by the building contractor following approval.</p> <p>4.If conditioned prior to issue of building permit – the works cannot proceed until HSNW are satisfied no impact.</p> <p>It is noted that HNSW has agreed the DPE can condition this requirement as follows:</p> <p><i>The Department can condition this information (detailed design and assessment) to be submitted prior to issue of a construction certificate, provided the following additional condition is added:</i></p> <p>HISTORICAL ARCHAEOLOGY <i>This approval does not cover the removal of any State significant archaeological relics.</i></p>	
The SOHI has also briefly assessed impacts to other SHR items in the vicinity, including 'Prospect Reservoir and surrounding area' (SHR 01370) and 'St Bartholomew's Anglican Church & Cemetery' (SHR 00037). Heritage NSW considers the proposal will not adversely impact these items as they are separated by other commercial developments or major roadways.	Noted.	Nil

6 EPA

Comments	Responses	Changes to EIS
<p>Based on the information provided, the EPA has no comment on this proposal and no further consultation is required. This is because:</p> <ul style="list-style-type: none"> the proposal does not constitute a Scheduled Activity under Schedule 1 of the Protection of the Environment Operations Act (1997) and so, will not require an Environment Protection Licence under this Act, the proposal is not being undertaken by or on behalf of a NSW Public Authority, nor are there activities for which the EPA is the appropriate regulatory authority. the site is not being regulated by the EPA under the Contaminated Land Management Act (1997). 	Submission noted. No response required.	Nil

7 Cumberland City Council

Planning

Comments	Responses	Changes to EIS
Parks/Open Space		
<p>No objections are raised by the proposed development; however, the following is noted for consideration:</p> <p>a) The closest heritage site, the Prospect Hill state heritage registered area is located approximately 500 metres to the west of the development property. The proposal is not expected to have a significant effect on the heritage site due to elevational differences and an intermediate commercial property located between the sites.</p>	<p>Submission noted.</p> <p>Comments are noted for consideration only and do not specifically require changes to EIS or the proposed development in accordance with a specific development control.</p> <p>As outlined in Appendix M – Landscape Plans, most of the existing site landscaping is proposed to be retained, and new infill planting is</p>	Nil

Comments	Responses	Changes to EIS
<p>b) The southern boundary of the development site is a vegetated riparian corridor that forms the headwaters of Greystanes Creek. The proposed development of the site is an opportunity to undertake creek restoration including weed removal and restoration planting which derive from the conforming ecological community. The perimeter of the site is also established with indigenous plantings and should be similarly enhanced.</p> <p>c) The verge is degraded along parts of the road frontages that border the development site.</p> <p>The proposed development of the site is an opportunity to remove redundant fencing, signposts and to reinstate verge plantings and turf on road frontages adjacent to the property, including the reinstatement of missing 'Hoop Pines' at equidistant intervals along the adjacent section of the Prospect Highway median.</p>	<p>proposed, including 47 new trees. The proposed landscaping has sought to utilise a mixture of indigenous species to further enhance the biodiversity value of the site.</p>	
Environmental Health Unit (EHU)		
<p>Noise/Acoustics</p> <p>A noise and Vibration Impact assessment has been prepared by Resonate with reference S220112RP1 Revision D dated 6 October 2022 – 227401.0048.R01V02. This is considered satisfactory to the EHU. The recommendations in the report will need to be conditioned so that they are implemented.</p> <p>A construction Noise and Vibration Management plan should also be conditioned as part of the development application so that control measures can be implemented to minimise any potential impacts to sensitive receivers and the surrounding environment.</p>	<p>Submission noted. No response required.</p>	<p>Nil</p>
<p>Contamination/Remediation</p> <p>A preliminary Site investigation report has been prepared by BECA revision B dated 8 July 2022 and this is satisfactory to Council's Environmental Health Unit and no further</p>	<p>Submission noted. No response required</p>	<p>Nil</p>

Comments	Responses	Changes to EIS
<p>investigation/ works are required. The recommendations in the report will need to be conditioned so that they are implemented.</p>		
<p>Air Quality/Water Protection/General Environmental</p> <p>A waste management plan has been prepared by BECA revision A dated 27 May 2022 which is considered satisfactory to the EHU. The recommendations in the report will need to be conditioned so that they are implemented.</p> <p>An air quality review was carried out for the development and a report prepared by BECA with Reference 227401.0048.R01V02 Dated 24 October 2022. This is satisfactory to Council's Environmental Health Unit. The recommendations in the report will need to be conditions so that they are implemented.</p> <p>Sediment and erosion control measures must be implemented as part of the construction phase of the development to control potential impacts to the environment.</p> <p>Dust mitigation measures should be implemented during the construction phase of the development to reduce any potential environment impacts and impacts to the surround neighbouring properties.</p>	<p>Submission noted. No response required</p>	<p>Nil</p>
Tree Management Section		
<p>Tree Protection (TPP) and Arboricultural Impact Assessment (AIA)</p> <p>It is recommended that the applicant obtain an Arboricultural Impact Assessment and Tree Protection Plan to ensure that all vegetation proposed to be retained throughout the development phase of the project are protected as per AS490 - 2009 'Protection of Trees on Development'.</p>	<p>The proposed development has been designed to remove the minimum amount of vegetation necessary as a result of ground disturbance associated with building extensions and alteration to the site access which is outlined in Appendix N – Biodiversity Development Assessment Report.</p> <p>To ensure the biodiversity values of the site are appropriately protected the CEMP for the development will include appropriate tree protection measures as per AS490 - 2009 'Protection of Trees on Development'.</p>	<p>Nil</p>

Comments	Responses	Changes to EIS
	<p>To this end, it is considered that an Arboricultural Impact Assessment and Tree Protection Plan is not required as this assessment has already taken place.</p> <p>As outlined in Appendix M – Landscape Plans, most of the existing site landscaping is proposed to be retained, and new infill planting is proposed, including 47 new trees.</p>	
<p>Pruning works During construction or any time during the development, any pruning works should be carried out to AS4373 - 2007 Pruning of amenity trees.</p>	Comment noted. No response required.	Nil
<p>Landscape plan and associated works The landscape plan for the site should be prepared by a minimum AQF5 landscape architect and all hard and soft landscape works carried out by minimum AQF3 qualified landscapers.</p>	The landscape plans have been prepared and verified by suitably qualified landscape architects.	Nil
Development Engineering Section		
Stormwater management - On-Site Detention (OSD)		
The On-site detention (OSD) system must be designed based on the Upper Parramatta River Catchment Trust's (UPRCT) design guidelines which requires the site OSD storage requirement of 470m³/ha and limit the permissible site discharge (PSD) of 80l/s/ha. There is no indication that the required OSD parameters have been incorporated into the development and the OSD calculate summary sheet has not been noted.	The On-site Detention (OSD) system has been sized using computer modelling as per councils Part G Section 2.4 - Design - C2. which states "Alternative values for the required storage volume can be considered for larger sites greater than 3000sqm if the applicant demonstrates to Council's satisfaction using appropriate computer modelling that the relevant PSD shall be satisfied." A drains model has been provided with the report which demonstrates compliance with the PSDs developed from the UPRCT. Drainage plans and details have been updated to show a reengagement of the OSD storage and control structures to meet the requirements of Councils and UPRCTs controls.	Updated Section 7.4 with additional information to respond to Stormwater Management comments.

Comments	Responses	Changes to EIS
The stormwater drainage plan indicates that the OSD system has not been designed according to the Upper Parramatta River Catchment Trust's (UPRCT) design guidelines. All the runoff must be directed into the High Early discharge (HED) control chamber/pit for efficient functioning of the OSD system. The stormwater plan indicates that the OSD tank does not incorporate the HED chamber. Further, the lack of high early discharge will result in storage being filled earlier than needed and undermine the functionality and efficiency of the OSD system.	The OSD system has been updated to include an HED chamber. Additionally, the overall OSD system has been split into two tanks to optimise system layout and improve system efficiency.	Refer to updated Stormwater Management Plan and Drawings.
Based on the submitted plans, the development site area is noted to be over 1.3ha which includes the new trailer parking area, the associated access driveway and the landscape area. Based on this, the OSD storage requirement for the proposed development to control the site runoff/flow in accordance with the UPRCT guidelines would be approx. 625 cubic metres.	Noting the additional impervious areas added to the site a PSD has been developed according to the requirements of the UPRCT. An overall OSD volume of 450m ³ of storage has been provided with calculations (DRAINS modelling) to support this shown on DWG CA-0901 and in the Stormwater Management Plan included in the EIS. This volume has been optimised by capturing roof runoff to offset new impervious areas.	
The levels (grate levels and invert levels) of the surface collection pits the upstream and downstream side invert level of the associated pipes including ground level have not been provided. Nevertheless, the pipes must be installed in the falling gradient towards the OSD system.	Annotations showing pit name, cover level and invert level have been added to DWG CA-0701,2,3,4. All pipes have adequate gradient to an OSD or site outlet.	
For clarity and referencing, each of the pits must be numbered appropriately with the associated surface and invert levels shown adjacent to the pit. In addition, each of the drawings must have standard reduction scale shown appropriately on the drawings.	Annotations showing pit name, cover level and invert level have been added to DWG CA-0701,2,3,4. All pipes have adequate gradient to an OSD or site outlet. Relevant plan scales have been added.	
All the runoff that is directed into the OSD system must be directed into the HED control chamber/pit. The submitted plans do not demonstrate the requirements.	Refer above comment, OSD arrangement has been modified and HED control chambers have been incorporated.	

Comments	Responses	Changes to EIS
The Top Water Level (TWL) of RL55.53 within the OSD tank as shown on the cross-sectional drawing is not achievable as the top water level is controlled by the spillway level of the Overflow Weir which is lower than nominated TWL. The actual water level cannot rise above this i.e., RL 55.40m AHD. Hence, the volume calculation for the provided OSD storage volume appears to be overestimated.	<p>The on-site detention system has been revised to incorporate the above comments and is detailed on the updated drawing set.</p> <p>All relevant control levels, weirs and outlet orifices are detailed in the updated drawing set.</p>	Nil
Stormwater Management - Water Sensitive Urban Design (WSUD) measures		
<p>The submitted stormwater plans do not appear to incorporate the WSUD measures nor demonstrate how the pollutants removal targets, objectives and control as outlined in section 2.5 and 2.7 Part G4 of Cumberland DCP 2021 are met. The stormwater drainage plan shall be amended to incorporate the water sensitive urban design (WSUD) measure in accordance with the Section 2.5 (Water Quality objective and control) under Part G4 of Cumberland DCP 2021 including water quality improvement and water reuse measures. In this regard, the following matters shall be addressed:</p> <p>i.) Detail drawings demonstrating the Water sensitive Urban design measures (Water quality treatment/ improvement measures) consistent with the council's policy shall be provided.</p> <p>ii.) The surface runoff from the impervious area such as the roof, car parking area, driveway and roads shall be directed to the water quality treatment systems. In this regard, appropriate measures to collect and treat the runoff to remove pollutants shall be implemented. The printout of the MUSIC Model layout noted in the submitted documents. However, drawings/plans showing the incorporation of the layout and details of the water quality treatment systems have not been noted/provided.</p>	<p>WSUD elements have been revised and detailed to show compliance with G4 of the Cumberland DCP.</p> <p>The drawings have been updated to include:</p> <p>i) Details of Ocean Protect treatment devices.</p> <p>ii) Details and layout of the treatment devices has been added to the plans to allow treatment of all new hardstand areas. Updated MUSIC modelling and description of the system has also been incorporated into the Stormwater report.</p> <p>iii) Catchment areas are detailed on DWG CA-0901.</p> <p>iv) Treatment measures within OSDs have been designed in consultation with Ocean Protect to ensure that the system meets common practice and standards used in Cumberland.</p> <p>Details showing quality devices and their incorporation into the Stormwater System have been added to the drawing set. These have been developed with Ocean Protect to ensure that their products have been incorporated such that treatment trains are optimised and function in coordination with the stormwater pipe network and OSDs. This design incorporates the items raised and experience from other Cumberland approvals to meet WSUD objectives.</p>	<p>Updated Section 7.4 with additional information to respond to Stormwater Management comments.</p> <p>Refer to updated Stormwater Management Plan and Drawings.</p>

Comments	Responses	Changes to EIS
<p>iii.) The layout/printout of the MUSIC model showing each type of the land-use components do not show catchment area for each of the land-use area that generate the runoff.</p> <p>iv.) It is noted that the runoff from the proposed development (all land-use including car parks areas and roof) is directed to OSD system prior to being treated for water quality improvement purposed. However, this will result in the initial runoff containing high concentration of pollutants being mixed up with subsequent runoff that are generally have diluted concentration pollutants or fairly minimal concentration which may not require treatment. Thus, the treatment system does appear to have maximised its efficiency. Any overflow from the treatment system will result in the pollutants being escaped with the overflow without being treated, thus undermining the efficiency of the treatment system unless specific provisions are made to eliminate the overflows from the treatment devices.</p> <p>To prevent this, appropriate arrangement must be made to collect and separate the first flush, i.e., the initial flow that contains high concentration of pollutants such as the initial flow equivalent to approximately 1 in 3 month's flow from each catchment, to be collected (separated) and treated fully without being escaped untreated. In this regard, a device known as high flow bypass chamber (also termed as high flow diversion chamber) must be employed to separate the initial flow (first flush) which is allowed to pass through a low level flow outlet into the water quality treatment / filtration system. The flow exceeding that rate shall be discharged through the high level overflow or outlet pipe into the OSD system. The following shall be taken into account:</p> <ul style="list-style-type: none"> • The flow must be controlled by appropriate mechanism such as orifice/ opening to allow the first flush flow through 		

Comments	Responses	Changes to EIS
<p>the lower outlet (the flow exceeding that equivalent flow must be directed into to the OSD system).</p> <ul style="list-style-type: none"> • Appropriate number of devices or capacity must be provided sufficient treatment rate equivalent to the flow rate of the separated flow containing concentrated pollutants, or the treatment system must have sufficient holding capacity to retain the separated first flush until it is passed through the treatment system and ensure that no flow escapes or bypass the treatment system. • The required provision must be shown on the drawing. In this regard, cross sectional details of the treatment system with the respective levels of other components must be prepared to ensure that the HGL from the treatment system is consistent and at a higher level, and that there is no backflow into the treatment system. • If the outflow from the treatment system, is not connected back into the OSD system then, the site permissible discharge rate must be reduced by the flow equivalent to the outflow from the treatment system, and the orifice size be adjusted accordingly. 		
<p>The pollution removal targets must be demonstrated with the supporting documents including the MUSIC mode (electronic copy), with the input parameters and output results. Further, the removal efficiency parameters input in the model must be consistent with the manufacturer's pollutant removal efficiency.</p>	<p>MUSIC modelling developed in consultation with Ocean Protect has been included with the updated designs and is described in the Stormwater Management Plan report.</p>	<p>Nil</p>
<p>Electronic copy of the MUSIC models must be submitted accompanying the input and output parameters/ results.</p>	<p>Noted.</p>	<p>Nil</p>
<p>The submitted plan does not provide sufficient information in detail and demonstrate compliance with the council's requirements. In this regard, the proposed stormwater plan cannot be considered sufficient and acceptable.</p>	<p>Based on the above resolutions, it is considered that the updated Stormwater Plan and modelling demonstrates compliance with the council's requirements.</p>	
Traffic and parking		

Comments	Responses	Changes to EIS
<p>As per the submitted Traffic Impact Assessment report, the parking provision made appears to satisfy the requirement. However, the following comments are made:</p> <ul style="list-style-type: none"> Each of the parking spaces must be appropriately numbered and dimensioned. The existing 21 visitor's car spaces that is proposed to be deleted must be made available from the new car parking area/provision and clearly marked and signposted. 	<p>Comment noted.</p> <p>All carparking will be constructed to the appropriate standard including dimensions, marking and signage.</p>	Nil
Planning		
<p>There are no building height controls for the subject site under Cumberland LEP 2021. Further, Pursuant to Clause 2.10 of the Planning Systems SEPP, the Cumberland Development Control Plan (Cumberland DCP) does not apply to the proposed development. Notwithstanding, a general commentary is provided on the proposed development as below:</p> <p><u>Cumberland DCP 2021</u></p> <ul style="list-style-type: none"> - Part D Development in Industrial zones - Part F3- Industrial Site Specific <p>Given the proposed building (south cold storage expansion) proposes a significant height as compared to the existing building, the structure shall incorporate articulation in building facades and variety in building materials and finishes to minimise the overall visual impact of the proposed structures as viewed from the street and be sympathetic to the existing heritage site – the Prospect Hill State Heritage Registered area.</p> <p>The overall design shall be compatible with the existing built form and streetscape in terms of façade treatment, building materials and finishes.</p>	<p>As noted by Council pursuant to Clause 2.10 of the Planning Systems SEPP, the Cumberland Development Control Plan (Cumberland DCP) does not apply to the proposed development.</p> <p>Despite this, the proposed development has been designed to be compatible with the existing built form and streetscape in terms of façade treatment, building materials and finishes, in keeping with the industrial nature of the site and location and is responsive to the environmental features nearby resulting in limited amenity impacts.</p> <p>Further to this, to enhance urban design outcomes, enhanced site landscaping is proposed to provide suitable screening sympathetic to the surrounding area and features.</p>	Nil

Comments	Responses	Changes to EIS
The proposed development shall comply with all the relevant development standards and provisions/guidelines applicable at the time of development application lodgement.		
Cumberland Local Infrastructure Contributions Plan 2020		
The development would require the payment of contributions in accordance with Cumberland Local Infrastructure Contributions Plan 2020. Given no Appendix B (QS report) provided, 7.12 contributions will be applied at 1% of the cost of works.	<p>Comment noted.</p> <p>Appendix B was submitted as part of the application and therefore should have been made available for review.</p>	Nil

8 Department of Planning and Environment: Water

Comments	Responses	Changes to EIS
DPE Water has reviewed the EIS and has no further comment on the proposal.	Comment noted. No response required.	Nil

9 Sydney Water

Comments	Responses	Changes to EIS
<p>Sydney Water has provided the following comments to assist in planning the servicing needs of the proposed development:</p> <ul style="list-style-type: none"> The water and wastewater system should have adequate capacity to service the proposed development. 	Noted. Further updates with regard to water requirements to be provided through Section 73 application. No action required now.	Nil

Comments	Responses	Changes to EIS
<ul style="list-style-type: none"> Amplifications, adjustments, and/or minor extensions may be required. <p>Detailed requirements, including any potential extensions or amplifications, will be provided once the development is referred to Sydney Water for a Section 73 application.</p>		
<p>Section 73 Compliance Certificate</p> <p>A Section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained from Sydney Water.</p> <p>The proponent is advised to make an early application for the certificate, as there may be water and wastewater pipes to be built that can take some time. This can also impact on other services and buildings, driveways or landscape designs.</p>	Noted.	Nil
<p>Building Plan Approval</p> <p>The approved plans must be submitted to the Sydney Water Tap in™ online service to determine whether the development will affect any Sydney Water sewer or water main, stormwater drains and/or easement, and if further requirements need to be met.</p> <p>Sydney Water recommends developers apply for Building Plan approval early as in some instances the initial assessment will identify that an Out of Scope Building Plan Approval will be required.</p>	Noted.	Nil
<p>Out of Scope Building Plan Approval</p> <p>Sydney Water will need to undertake a detailed review of building plans:</p> <ol style="list-style-type: none"> That affect or are likely to affect any of the following: <ul style="list-style-type: none"> Wastewater pipes larger than 300mm in size Pressure wastewater pipes Drinking water or recycled water pipes Our property boundary An easement in our favour 	Noted.	Nil

Comments	Responses	Changes to EIS
<ul style="list-style-type: none"> Stormwater infrastructure within 10m of the property boundary. <p>2. Where the building plan includes:</p> <ul style="list-style-type: none"> Construction of a retaining wall over, or within the zone of influence of our assets Excavation of a basement or building over, or adjacent to, one of our assets Dewatering – removing water from solid material or soil. <p>3. The detailed review is to ensure that:</p> <ul style="list-style-type: none"> our assets will not be damaged during, or because of the construction of the development we can access our assets for operation and maintenance your building will be protected if we need to work on our assets in the future. <p>The developer will be required to pay Sydney Water for the costs associated with the detailed review.</p>		
<p>Tree Planting</p> <p>Certain tree species placed in close proximity to Sydney Water's underground assets have the potential to inflict damage through invasive root penetration and soil destabilisation. Sydney Water requires that all proposed or removed trees and vegetation included within the proposal adhere to the specifications and requirements within Section 46 of the Sydney Water Act (1994) and Diagram 5 – Planting Trees within our Technical guidelines – Building over and adjacent to pipe assets. Please note these guidelines include more examples of potential activities impacting our assets which may also apply to your development.</p> <p>If any tree planting proposed breaches our policy, Sydney Water may need to issue an order to remove every tree</p>	Noted.	Nil

Comments	Responses	Changes to EIS
breaching the act, or directly remove every tree breaching the Act and bill the developer or Council for their removal.		
<p>Trade Wastewater Requirements</p> <p>If this development is going to generate trade wastewater, the property owner must submit an application requesting permission to discharge trade wastewater to Sydney Water's sewerage system. You must obtain Sydney Water approval for this permit before any business activities can commence. It is illegal to discharge Trade Wastewater into the Sydney Water sewerage system without permission.</p> <p>The permit application should be emailed to Sydney Water's Business Customer Services at businesscustomers@sydneywater.com.au</p> <p>A Boundary Trap is required for all developments that discharge trade wastewater where arrestors and special units are installed for trade wastewater pre-treatment.</p> <p>If the property development is for Industrial operations, the wastewater may discharge into a sewerage area that is subject to wastewater reuse. Find out from Business Customer Services if this is applicable to your development.</p>	Noted.	Nil
<p>Backflow Prevention Requirements</p> <p>Backflow is when there is unintentional flow of water in the wrong direction from a potentially polluted source into the drinking water supply.</p> <p>All properties connected to Sydney Water's supply must install a testable Backflow Prevention Containment Device appropriate to the property's hazard rating. Property with a high or medium hazard rating must have the backflow prevention containment device tested annually. Properties identified as having a low hazard rating must install a non-testable device, as a minimum.</p>	Noted.	Nil

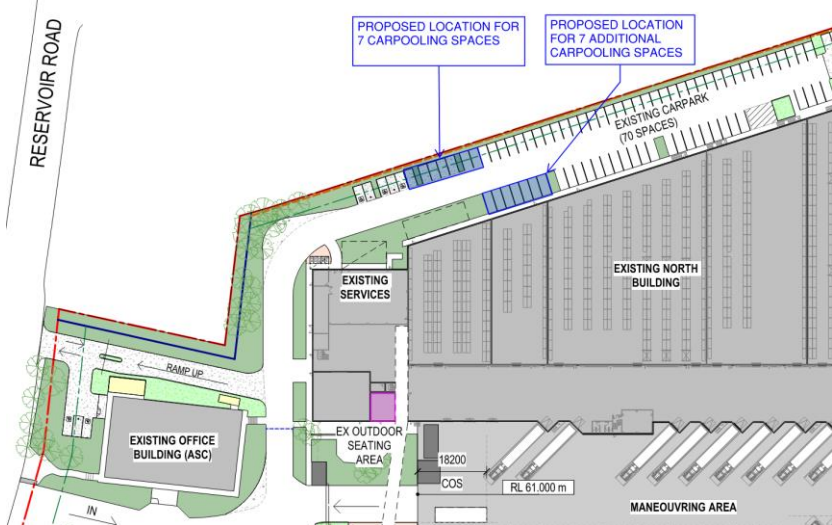
Comments	Responses	Changes to EIS
<p>Separate hydrant and sprinkler fire services on non-residential properties, require the installation of a testable double check detector assembly. The device is to be located at the boundary of the property.</p> <p>Before you install a backflow prevention device:</p> <ol style="list-style-type: none"> 1. Get your hydraulic consultant or plumber to check the available water pressure versus the property's required pressure and flow requirements. 2. Conduct a site assessment to confirm the hazard rating of the property and its services. Contact PIAS at NSW Fair Trading on 1300 889 099. 		
<p>Water Efficiency Recommendations</p> <p>Water is our most precious resource and every customer can play a role in its conservation. By working together with Sydney Water, business customers are able to reduce their water consumption. This will help your business save money, improve productivity and protect the environment.</p>	Noted.	Nil
<p>Contingency Plan Recommendations</p> <p>Under Sydney Water's customer contract Sydney Water aims to provide Business Customers with a continuous supply of clean water at a minimum pressure of 15meters head at the main tap. This is equivalent to 146.8kpa or 21.29psi to meet reasonable business usage needs.</p> <p>Sometimes Sydney Water may need to interrupt, postpone or limit the supply of water services to your property for maintenance or other reasons. These interruptions can be planned or unplanned.</p>	Noted.	Nil

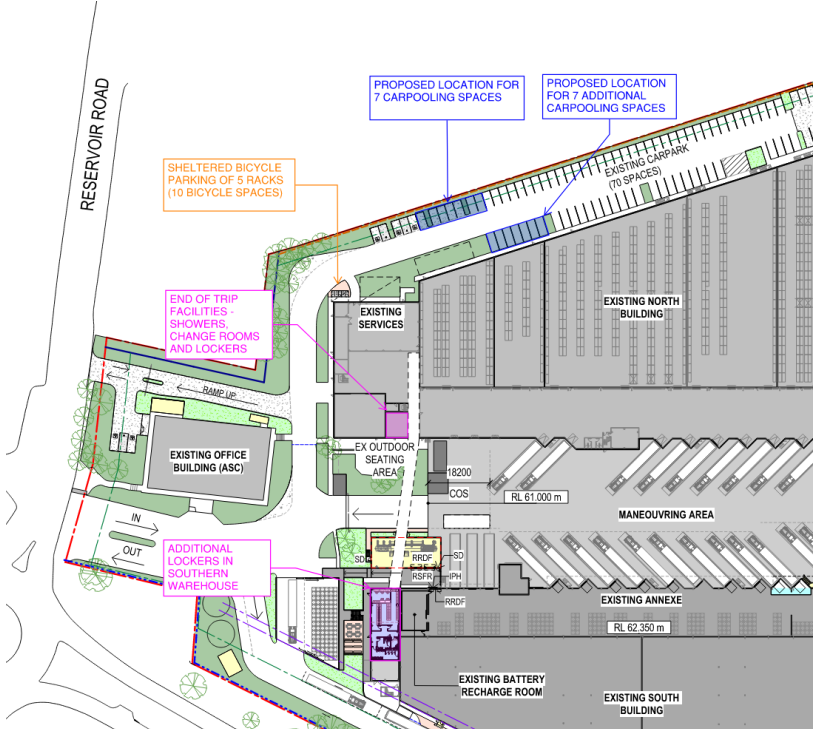
10 Transport for NSW

Comments	Responses	Changes to EIS
<p>Road Safety</p> <p>TfNSW has reviewed the submitted documentation and raised significant concerns to road safety in regard to the close proximity of the existing driveway to Prospect Highway. We recognise that issues in relation to access are experienced due to the existing arrangement as well as the expectation of this increasing due to increased development trips and the future intersection upgrade to traffic signals. Any queue greater than 6 metres on Reservoir Road East on approach to Prospect Highway restricts the right turn into the site from the opposing direction. This is unsatisfactory in regard to traffic signal control where queues through the intersection are expected to occur.</p> <p>Due to road safety grounds, TfNSW objects to any further increase in traffic generation. Therefore, an alternative access arrangement to the site requires further investigation.</p>	<p>In the existing conditions, there is currently no queueing present outside of the site driveway which would restrict the right turn onto the site, and anecdotally would only happen in very rare circumstances. In these rare instances, two scenarios would occur:</p> <ol style="list-style-type: none"> 1. Staff or delivery vehicles would wait in the middle of the road to continue the right turn. There is sufficient road width for other vehicles to overtake the waiting vehicle in both existing conditions and with the future Prospect Highway Upgrade of the intersection. 2. Alternatively travel along Reservoir Road and U turn in the cul-de-sac to circulate back into the site. <p>To reduce the Road Safety concern in future years, a number of mitigations as part of the alternative access arrangement may be actioned as follows:</p> <p>Separated Light-Vehicle Driveway</p> <p>As part of the upgraded design, a new driveway will be constructed ~60m west of the Prospect Highway & Reservoir Road intersection. This alternative access for light vehicles will remove their right turn movement close to the intersection present in existing conditions. This will improve road safety when accessing & circulating the site and prevent queueing through the Prospect Highway intersection. Furthermore, the shift changeover times of the employees are timed outside of the typical traffic peak hours.</p> <p>Demand Management</p> <p>Timing the entrance and exit of delivery vehicles to outside of peak hours (7-9am, 4-6pm) will reduce the likelihood of a queue being present to block the right-turn movement into the site driveway.</p>	<p>Nil.</p> <p>Refer to updated Green Travel Plan and Appendices.</p>

Comments	Responses	Changes to EIS
	<p>Presently, operations are planned to schedule of loads to avoid peak periods and this action will continue into the future.</p> <p>Keep Clear Zone A Keep Clear zone may be proposed in front of the site access driveway to always allow for the right turn into the site access driveway if a queue occurs. This is expected to manage the risk of light-vehicles queuing along reservoir road and blocking the site access driveway. However, heavy-vehicles longer than 14m that are arriving from east of the site may potentially still queue across the clear-way zone to reach the stop line, blocking the keep clear zone. This solution will need to be accepted by TfNSW's network operations team as well as the TfNSW team responsible for the Prospect Highway upgrade's detailed design. We have contacted TfNSW for in-principle agreement to this solution.</p>	
<p>Green Travel Plan TfNSW's Travel Demand Management (TDM) team have reviewed the Americold Green Travel Plan (GTP) prepared by Beca (September 2022) and can provide the following comments. TfNSW understand that this is an industrial site in a more rural location, but appreciates that some TDM options are still viable, particularly with planned future upgrades for cycling and walking (to/from bus stops). The application of TDM is one of the key actions in the Future Transport Strategy (Future Transport (nsw.gov.au)).</p>	<p>It is understood that TfNSW's Prospect Highway upgrade includes an upgrade and extension to the western Prospect Highway shared path, and new bus stops located at the Prospect Highway & Reservoir Road intersection. However, the upgrades are limited as the shared path does not extend south of the site, and currently only the 812 bus route would service the new bus stop. For staff with access to these new services, they will be encouraged to take advantage and utilise these new forms of sustainable travel, but it is not expected to provide a significant improvement from the current mode-share behaviour of the site. GTP Section 4.5 has been updated and explicitly summarises TDM options to support the modal shift of staff away from private vehicles where possible including:</p>	Nil

Comments	Responses	Changes to EIS
	<ul style="list-style-type: none"> • Cycling is encouraged by the provision of on-site bicycle parking and End of Trip facilities, since the western shared path along Prospect Highway will be upgraded and extended northward. • End of Trip facilities on-site are advertised to facilitate active transport uptake. • New Bus Stops outside of the site makes public transit a more attractive option (although it will only be serviced by the 812 for now). Staff with access to this bus route will be encouraged to utilize it, as well as any future additional bus routes servicing this stop scheduled by TfNSW. • New signalized intersection will give safe access to the upgraded shared path cycleway and bus stops. • Further uptake in active and public transport will be encouraged as these infrastructure improvements, and any additional future upgrades, are to be advertised to employees via internal communications and notice boards. • Carpooling encouraged to relieve congestion and create more sustainable travel. Carpooling car parking spaces designated at convenient locations to incentivise this. • A formal carpooling scheme and database may also be established to guarantee rides to and from work and keep staff updated with carpooling availability. <p>Further actions to encourage alternate modes of travel are described in Section 5 of the GTP.</p>	
<p>Parking Management</p> <p>TfNSW appreciates that carpooling is being encouraged (and is already happening) but recommend that the car parking be managed to further encourage carpooling as an option, with dedicated spaces for carpooling – or the most convenient car parking reserved for carpooling.</p>	<p>The management of car parking marking is a site management responsibility and there is no statutory requirement to provide reserved car parking for carpooling.</p> <p>However, it is acknowledged that 36% of surveyed staff indicated a willingness to consider carpool, compared to a 0% willingness to utilise</p>	<p>Nil</p>

Comments	Responses	Changes to EIS
	<p>the existing public transport network, and is the most favourable way to promote sustainable travel. Currently, 8% of surveyed staff carpool to work. Americold have indicated designated carpooling parking spaces can be marked on site to further incentivise carpooling, IF required. 14 car-parking locations (7 short-term with option to expand to 7 more in the long-term) closest to the accessible spaces have been identified as possible locations for designated carpooling parking.</p>  <p>Actions to incentivise carpooling are outlined in Section 5 of the GTP.</p>	
<p>Bicycle Parking and End of Trip (EoT)</p> <p>TfNSW appreciates there is some, albeit limited, parking for bicycles at the northern of the site. TfNSW recommend that the bicycle parking be increased, to encourage more cycling use, particularly as the cycling infrastructure is improved in the future. TfNSW notes that no end of trip (EoT) are provided and recommend that EoT are provided – including showers and lockers to further encourage cycling as a viable</p>	<p>The nature of use and location of the site means that cycling to work is not the safest mode of transport to and from the facility. Furthermore, the cycleway upgrade only takes place north of the site, leaving the southern cycling connectivity to be restricted to cyclists mixing with mixed traffic along the planned 70km/h Prospect Highway. Despite the industrial location, the GTP specifies a target of 5% cycling mode share for staff. At most 110 staff are scheduled at one particular</p>	<p>Nil</p>

Comments	Responses	Changes to EIS
<p>mode of transport. This could include providing incentives for e-bikes for longer distances, and well as emerging micro mobility options. TfNSW recommend that this bicycle parking and any EoT be monitored over time to ensure sufficient supply to encourage active transport both to/from the site, for employees and visitors. Investigation into other possible bicycle parking locations around the site is also recommended – these should be located at convenient locations, be safe, secured and under cover. Some further guidance on bicycle parking and end of trip facilities can be found in the cycleway design toolkit.</p>	<p>shift and the designed 10 spaces would accommodate a 9% mode share which well exceeds this target.</p> <p>As currently less than 1% of staff cycle to work, Americold will monitor bicycle parking and demand for additional EoT facilities over time to ensure sufficient supply and to encourage active transport both to/from the site, for employees and visitors when the planned infrastructure is realised.</p> <p>End of Trip facilities are located within the northern warehouse in the form of 4 showers and 58 lockers shown in section 2.3.4 of the Green Travel plan. 70 additional locker spaces are also present in the southern warehouse.</p> 	

Comments	Responses	Changes to EIS
<p>Shuttle buses</p> <p>TfNSW asks that consideration be given to provision of a shuttle bus service to access the site from convenient locations (based on the employee travel survey data) and timed for the start and end of the shift patterns. This would be another option in order to move the employees more sustainably.</p>	<p>Shuttle buses have been considered by site operations however due to the several shift times and employee home locations, this is currently deemed unviable.</p> <p>Staff survey has indicated that employees had a more favourable response to carpooling rather than buses, and due to the several shift times and variable employee home locations, carpooling is considered as a more flexible and viable solution to sustainable travel.</p> <p>Americold will continue to monitor the possibility of a shuttle bus over time.</p>	Nil
<p>Travel Access Guide</p> <p>TfNSW asks that a Travel Access Guide (TAG) be developed and should be included as an appendix in the GTP. The TAG should include separate route maps of all modes of transport; buses (private and public), shuttle buses, and cycling routes (particularly when these are improved. The TAG should also:</p> <ul style="list-style-type: none"> • Provide information advising employees and visitors about service routes and timetables for buses is available • on the Trip Planner at transportnsw.info/ • Provide information advising employees and visitors that additional information about current cycling routes is • available on the Trip Planner at transportnsw.info/ • Location of End of Trip facilities (bike racks, showers, lockers, change rooms) and locate on map. • Provide times and stop locations for buses and information regarding shuttle buses (if considered viable). <p>The updated GTP should be submitted to TfNSW for review prior to occupation.</p>	<p>A Transport Access Guide (TAG) has been developed and included as Appendix B in the GTP.</p>	Nil

11 Department of Planning, Industry & Environment

Comments	Responses	Changes to EIS
Noise		
<p>1. The Noise and Vibration Impact Assessment (NVIA) notes a number of noise exceedances are expected and provides recommendations to ensure noise impacts are minimised. The report states that the exceedances are in large part caused by truck engine compression braking and air braking. The recommendations state that truck engine braking should not be permitted within the facility, and that all trucks should be encouraged to be fitted with an exhaust silencer. Given that this element causes the most noise impacts, the Department requires further information regarding how these measures will be enforced and encouraged. If this recommendation cannot be adequately controlled, other physical noise mitigation may be required.</p>	<p>Americold's operating procedures include driver site orientation and induction training for all truck drivers that will enter and operate within the site.</p> <p>In addition to erecting signage throughout the facility to inform drivers of braking restrictions, as part of the orientation and induction, each truck driver is required to complete a competency assessment prior to being given approval to operate on site. A copy of the current competency assessment is attached to this response and point 14 address the requirement that truck engine braking is not permitted within the site.</p> <p>Americold's Prospect site Health and Safety rep has also committed to updating the traffic management plan and ensuing gate house are aware of this requirement of no engine braking to further enforce this requirement.</p>	<p>Nil</p> <p>Updated Section 8.2 of the NVIA.</p>
<p>2. The NVIA classifies the residential properties surrounding the site as Urban. Further justification is required for this classification given the zoning of the surrounding sites, noting that the land to the north (including 566 Reservoir Road) is zoned RU4, and the land to the west (including residential properties along Reservoir Road) is zoned as Western Sydney Parklands. Justification should have reference to the Noise Policy for Industry (NPI). Where a change in receiver category would affect a group or catchment of residential</p>	<p>Further justification on the NPI classification of the surrounding receivers has been provided in Section 5.4.2 of the updated NVIA.</p>	<p>Refer to Section 5.4.2 of the Updated Noise and Vibration Impact Assessment.</p>

Comments	Responses	Changes to EIS
receivers, the justification should extend to a demonstration that the matters influencing the change would apply across the whole catchment.		
3. The NVIA provides limited information on how the evaluation methodology to quantify existing ambient and background noise levels has been applied. Further information is required in this regard, with reference to Fact Sheet A of the NPFI.	Section 3.1 of the NVIA has been updated based on the requirements of Fact Sheet A of the NPI.	Refer to Section 3.1 of the Updated Noise and Vibration Impact Assessment.
4. The Department notes that the NVIA only appears to describe the proposal with up to 18 trucks concurrently using the site as a worst-case. The NVIA should describe and assess the worst-case scenario, when all loading docks are in use, or clarify why this level of intensity of use has not been assessed.	<p>Americold has confirmed the worst-case scenario activities for each period and the NVIA has been updated (See Table 24 of the NVIA).</p> <p>Americold also manage their bookings to prevent all docks being filled with trailers simultaneously (this is noted in the report in the paragraphs before Table 24).</p> <p>Further to this we note that for the day scenario there is a combination of 28 trucks using the dock simultaneously in the worst-case scenario modelled as shown by the following activities:</p> <ul style="list-style-type: none"> a. 2x trucks moving and accelerating (leaving the dock). b. 4x trucks reversing onto dock. c. 4x trucks on dock idling with freezer motor running d. 18x trucks on dock with engine off but freezer motor running. 	Refer to Table 24 of the Updated Noise and Vibration Impact Assessment.
5. With regard to part 7.5 Operational sleep disturbance impacts of the NVIA further information is required to demonstrate why +8 dB(A) has been derived as being reasonable. The source of noise levels for L _{Amax} should also be identified for Tables 25 and 26.	Section 7.5 of the NVIA has been updated to address why +8 dB(A) is reasonable and provide the L _{Amax} noise sources.	Refer to Section 7.5 of the Updated Noise and Vibration Impact Assessment.

Comments	Responses	Changes to EIS
6. The Department requires that the NVIA identify how effective each noise mitigation recommendation will be (grouped by source and transmission path).	Table 32 of the NVIA identifies how effective each noise mitigation recommendation will be.	Refer to Table 32 of the Updated 32Noise and Vibration Impact Assessment.
7. The NVIA should also be updated to ensure that any updates to the traffic information required by TfNSW (if required) are reflected.	<p>The traffic report “Traffic Impact Assessment Report, prepared by Beca Pty Ltd, revision no. 002, dated 28 September 2022” has been incorporated into the construction and operational road traffic noise assessments in Section 6.3 and 7.6 of the NVIA respectively.</p> <p>No information required by TfNSW has resulted in any changes to the NVIA.</p>	Nil
Biodiversity		
8. The Biodiversity Development Assessment Report (BDAR) identifies that the north-eastern corner of the site falls within the Coastal Wetland Proximity Area, with Coastal Wetland Area (as identified by State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP)) located off site to the northeast. The Preliminary Site Investigation Report identifies that the eastern part of the site (particularly in the location of the warehouse addition and works to the north-eastern parking and road areas including significant cut and fill) is high in salinity, and that potentially contaminated historic fill may exist in this area. Further, the site drains towards the north-eastern corner of the site and the Coastal Wetland Area.	Noted.	Nil
9. The BDAR makes no mention of the high salinity levels or potentially contaminated fill on site, and any associated potential impacts of the development on the Coastal Wetland Area. The Department requires the BDAR to assess risks	Details regarding the high salinity levels and potential contamination have been added to Table 3.1 (Section 3.0) of the BDAR.	Updated Section 7.9 to add findings related to salinity and the

Comments	Responses	Changes to EIS
and impacts of this aspect of the site and development in greater detail and provide recommendations as necessary to ensure protection of the Coastal Wetland Area. The BDAR must also provide assessment against the relevant clauses of Chapter 2 of the Resilience and Hazards SEPP.	<p>Additional detail has been added to the assessment of the potential risk of salinity and contamination on the Coastal Wetland Area is contained within Table 7.2 (Section 7.2) and Section 8.3 of the BDAR.</p> <p>Recommended measures to mitigate against potential impacts associated with high salinity levels and potential contamination are contained within Table 7.2 (Section 7.3) of the BDAR.</p> <p>An assessment against relevant clauses of Chapter 2 of the Resilience and Hazards SEPP has been added to Table 1.3 (Section 1.5) of the BDAR.</p> <p>The updated BDAR is attached to this submission response.</p>	<p>impacts to the Coastal Wetland Area.</p> <p>Refer to Updated BDAR.</p>
Flood Study		
10. The flood study provided does not appear to specifically reference if the proposed cut and fill in the eastern part of the site adjacent to the creek line along the eastern boundary has been considered. Please clarify that this information was included in the assessment of flood impacts.	Beca can confirm that the flood model provided does include the cut and fill in the eastern part of the site adjacent to the creek line along the eastern boundary.	Nil
ESD & Energy Efficiency Report		
11. The ESD & Energy Efficiency Report provided is a draft. Please provide the finalised version of the report.	The ESD & Energy Efficiency Report has been finalised and provided as part of this response.	<p>Nil</p> <p>Refer to Final Energy Efficiency Report.</p>

12 Department of Planning and Environment: Biodiversity and Conservation

Comments	Responses	Changes to EIS
Biodiversity		
<p>EHG has reviewed the Biodiversity Development Assessment Report dated July 2022 and Biodiversity Development Assessment Report FINAL (Final BDAR) dated January 2023, both prepared by Umwelt (Australia) Pty Ltd.</p> <p>EHG considers that the Final BDAR is adequate and supports the mitigation measures outlined in Section 7.3 (pp. 33-36). EHG notes that the EIS states that indigenous trees, shrubs, groundcover, and grasses are proposed for landscape planting (p.42). However, the Landscape Package prepared by Group GSA (dated 4 July 2022) indicates that the species to be used include several species that do not naturally occur in the area.</p> <p>EHG recommends the landscaping include species typical of Cumberland Plain Woodland (CPW), as this is the ecological community that would have occurred on site prior to clearing. Characteristic species of CPW include: <i>Eucalyptus tereticornis</i>, <i>Eucalyptus moluccana</i>, <i>Eucalyptus crebra</i>, <i>Eucalyptus fibrosa</i>, <i>Bursaria spinosa</i>, <i>Acacia parramattensis</i>, <i>Acacia decurrens</i>, <i>Acacia falcata</i>, <i>Microlaena stipoides</i>, <i>Themeda triandra</i>, <i>Dichondra repens</i>, <i>Brunoniella australis</i>, <i>Cheilanthes sieberi</i> subsp. <i>sieberi</i>, <i>Desmodium varians</i>, <i>Aristida vagans</i> and <i>Glycine tabacina</i>.</p>	<p>Comment noted. Landscaping can include species typical of Cumberland Plain Woodland (CPW) and it is recommended that any updates to the Landscape package is conditioned as part of the approval.</p>	<p>Nil</p>
Flooding		
<p>EHG has reviewed the <i>Americold Prospect South Expansion Flood Modelling Report</i> prepared by Beca Pty Ltd (dated 11</p>	<p>Comments noted. Management of overland flow can be discussed with Cumberland City Council in the future stages of the project.</p>	<p>Nil</p>

<p>July 2022). EHG notes that the hydraulic modelling for mainstream flooding provided indicates that for all flood events up to and including the Probable Maximum Flood there is no significant flood affectation for both the existing and proposed development scenarios. However, EHG notes that the hydraulic modelling does not consider the impacts of overland flooding. EHG recommends that the management of overland flow be discussed with Cumberland City Council in the future stages of the project.</p> <p>No further flooding comments are required at this stage of the project.</p>		
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13 Updated Project Justification

Based on the submissions received during the exhibition period, no substantial changes are required to the proposal development or the EIS. As a result, the justification for the proposed development remains unchanged.

