



Planning, Industry & Environment

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SSD 9522

William Hodgkinson
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NSW Department of Planning, Industry & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Hodgkinson

Notice of Exhibition - Kemps Creek Warehouse, Logistics and Industrial Facilities Hub at 657-769 Mamre Road, Kemps Creek (SSD 9522)

I refer to your letter received by the former Office of Environment and Heritage (OEH) Environment on 5 June 2019, requesting comments on the Environmental Impact Statement for the above State Significant Development. Please note that OEH responsibilities and functions have been transferred to the Department of Planning, Industry & Environment's Environment, Energy and Science Group (EES).

I apologise for the delay in replying. EES provides its recommendations and comments at Attachment A.

If you have any queries regarding this matter, please contact Dana Alderson, Senior Project Officer Planning, on 8837 6304 or at dana.alderon@environment.nsw.gov.au

Yours sincerely

S. Harrison 23/07/19

SUSAN HARRISON
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Attachment A**EES comments on Notice of Exhibition - Kemps Creek Warehouse, Logistics and Industrial Facilities Hub at 657-769 Mamre Road, Kemps Creek (SSD 9522)**

The Environment, Energy and Science Group (EES) has reviewed the Environmental Impact Statement (EIS) for the above State Significant Development (SSD) and provides the following comments.

Biodiversity Development Assessment Report

EES has reviewed the Biodiversity Development Assessment Report (BDAR) prepared by Ecoplaning (22 March 2019) and recommends that the following be addressed in the Response to Submissions.

Description of the proposal

The description of the proposal in the BDAR is confusing and contradicts some of the GIS data and other information provided with the EIS, including:

- the shapefiles provided add up to different total areas than are presented in the BDAR
- there are five vegetation zones in the shapefiles, but only three in the BDAR
- the BDAR says it does not address the proposed rail freight corridor on the north of the site, but the areas in the Construction Stages shapefile includes this
- without shapefiles consistent with the BDAR data, it is not possible to be confident that all the biodiversity impacts of the proposal have been addressed.

Survey

The surveys undertaken to inform the BDAR were not conducted in accordance with the BAM, and expert reports have not been provided in lieu of adequate survey.

The EIS advises that all the vegetation on the site will be cleared and Table 3.6 of the BDAR has post-development vegetation integrity scores for all zones = 0 which indicate complete clearing. Despite this, the assessor notes that “the level of survey conducted is suitable for this planning proposal” (Section 4.3), which would indicate that the assessment does not take into consideration the clearing of vegetation for bulk earthworks over Stages 1 and 2. This should be clarified.

Table 4.3 indicates which candidate species do not have suitable habitat on site. Apart from the erroneous use of breeding habitat for Swift Parrot and Regent Honeyeater for species credits (it should be mapped important areas), the species in that table have been appropriately excluded. The site is not part of the mapped important areas for Swift Parrot and Regent Honeyeater, so these can also be excluded.

Section 4.3 of the BDAR then notes that the other 15 “Confirmed candidate species will need to be assessed consistent with Steps 4 – 6 of Section 6.4 of the BAM and targeted surveys for species credit species should be undertaken in accordance within section 6.5 of the BAM”. However, Figure 4.3 of the BDAR confirms that most of the site has not been surveyed in accordance with the BAM, in that targeted surveys for species credit species were not undertaken.

Serious and irreversible impacts

The information required by 10.2.2 of the BAM with respect to serious and irreversible impacts (SAII) for CPW has not been provided.

Sustainability

EES understands that the proposal intends that the project will achieve a Six-Star-Green Star rating under the Green Star rating tool (NABERS4). EES supports this and recommends that the recommendations and requirements of the Ecologically Sustainable Development report prepared by Frasers Property (10 May 2019) form part of the development consent for the proposal.

(END OF SUBMISSION)