



Our ref: DOC19/852071

Senders ref: SSI 9186

Nathan Heath
Planning Officer
Transport Assessments
NSW Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Heath,

Subject: Request for Comment on Cabramatta Rail Loop – extended exhibition period (SSI 9186)

Thank you for your e-mail dated 27 September 2019, inviting Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment to comment on the Cabramatta Rail Loop (SSI 9186).

EES has reviewed the response to submissions prepared by ARTC undated and provide the following comments:

Aboriginal Cultural Heritage

If the application is granted approval, EES recommends that any conditions recommended by the Aboriginal Cultural Heritage Assessment report prepared by biosis dated 7 August 2019 be included as conditions of consent.

Biodiversity

EES was not provided with the Biodiversity Development Assessment Report (BDAR) shapefiles or access to the calculator, which are required in order to conduct a full review. However, the following comments are provided on the information that was received:

Regarding the potential indirect impacts on the nearby Grey-Headed Flying Fox (GHFF) camp:

- The BDAR has conducted an assessment based on the extent of the camp at the time of the survey, and not the maximum known extent or any other extent based on a long-term assessment of the camp. The camp is surveyed and mapped quarterly as part of the national Flying Fox census.
- The maximum known extent of the camp (as provided in a licence application by Liverpool City Council) is about 50m closer to the project site than the camp extent mapped in the BDAR, which notes the distance to the camp is 350m.
- A reduction in distance to the camp from 350m to 300m would increase the sound intensity of any construction activities by 36% (assuming no intervening obstacles).
- It is not known how often the camp occupies its maximum extent.
- Of most concern would be the use of ballast tamping, pile driving, or night works when flightless young remain in the camp.

Given that EES is unable to assess the indirect impacts, it is recommended that if approved, a condition of consent be imposed requiring a Biodiversity Management Plan to address the potential indirect impacts on GHFF including, but not limited to:

- The appointment of a GHFF expert to monitor the GHFF camp
- Monitoring of the camp during operations, such as ballast tamping, pile driving or night works, most likely to impact on the camp.
- Cessation and re-scheduling of operations that the expert determines are adversely impacting on the GHFF in the camp.
- Reporting on all the above matters.

Flooding

The applicant submitted an updated version of the Technical Report 5 – Hydrology and Flooding Impact Assessment prepared by GHD in August 2019 by incorporating some minor changes to the June 2019 report, though, EES previous comments on the flood study completed in June 2019 are still applicable in addition to the following comments.

The modelling results indicate that some pockets of the existing catchment (especially properties along Bloomfield Street) are likely to be impacted by flooding under the post construction and operational stage of rail infrastructure. The adopted criteria (Table 4.3 of Technical Report 5) for the change in flood levels have been exceeded within the boundary of impacted properties. The proponent will use 690m³ of fill for the realignment of Bloomfield Street to accommodate the proposed loop rail.

The assessment of flooding risks under baseline conditions and the post construction stage has been undertaken by using a normal depth boundary relationship at the outlet of Bloomfield Street Catchment (Section 2.3 of Bloomfield Street Flood Study Assessment). This may underestimate the flooding conditions and inundation depths within the Bloomfield Street Catchment since the intersection of Bloomfield and Sussex Streets is approximately 100m from Cabramatta Creek and is expected to be submerged under a 5% AEP event. The assessment should also be made considering QH (rating table) or HT (time variant water level) boundary conditions at the outlet of Bloomfield Street Catchment to evaluate flooding conditions and develop appropriate flood mitigation measures under post construction and operational stage of the proposed infrastructure.

The flood maps should include the changes in flood depths within the Bloomfield Street Catchment with and without infrastructure development (i.e. difference of flood levels) for a range of events to evaluate flooding impacts and the development of appropriate mitigation measures.

Should you have any queries regarding this matter, please contact Bronwyn Smith Senior Conservation Planning Officer on 9873 8604 or Bronwyn.smith@environment.nsw.gov.au

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