

DOC20/874675 Senders ref: SSD 10470 (Cumberland)

Ania Dorocinska Senior Environmental Assessment Officer Industry Assessments Planning and Assessment Group NSW Department of Planning, Industry and Environment 4 Parramatta Square 12 Darcy Street PARRAMATTA NSW 2150

Dear Ms Dorocinska,

## Subject: Notice of Exhibition – Woolworths Warehouse and Distribution Centre,11-13 Percy Street, Auburn (SSD 10470)

Thank you for your e-mail dated 23 October 2020, inviting Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment (DPIE) to comment on the Notice of Exhibition for Woolworths Warehouse and Distribution Centre, 11-13 Percy Street, Auburn.

EES has reviewed the relevant documentation and make the following comments.

## **Biodiversity**

EES provides no further comment in relation to biodiversity.

## Flooding

Climate change implications from sea level rise and/or increased rainfall intensity must be considered in the flood assessment, 0.5% and 0.2% AEP events can be adopted as a proxy. The proposed development should be designed to include any climate change increase. The 0.5m freeboard must not be eroded to account for climate change impacts as incorrectly stated in the Flood Assessment.

It is recommended that a blockage assessment using the Australian Rainfall and Runoff (ARR2016) blockage guidance is undertaken, because under developed conditions the flood risk may be sensitive to different structure blockage assumptions.

Further to Section 7.2.7 of the environmental impact statement (EIS) EES advises that in addition to Cumberland Council the NSW SES Zone Commander is also consulted on the preparation of a Flood Emergency Plan and the recommended measure of 'Shelter in Place'. The Plan should consider the impacts on managing risk to life, emergency management arrangements, evacuation, access and contingency measures for the development considering the full range of flood risk. This Plan should include education and awareness of owners and occupiers of the proposed site. As the lead flood combat agency SES endorsement is considered imperative. Reference should be made to the Local Flood Plan, prepared by SES.

It is unclear if the flood assessment and EIS have considered the impacts of the development on flood behaviour for the full range of flooding i.e. from floods more severe than the 1% AEP event up to the PMF, resulting in detrimental changes in potential flood affection of other developments or land. This may include redirection of flow, flow velocities, flood levels, hazard categories and hydraulic categories.

Please note from 1 July 2020 Aboriginal cultural heritage regulation, including advice regarding SSIs and SSDs, is now managed Heritage NSW. The new contact for the ACH regulation team is heritagemailbox@environment.nsw.gov.au.

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.

Yours sincerely

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09/11/20

SUSAN HARRISON Senior Team Leader Planning Greater Sydney Biodiversity and Conservation

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