



Our ref: DOC21/928484
Senders ref: SSD-17647189

Rebecka Groth
Planning Officer
Planning and Assessment Group
Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Ms Groth

Subject: Exhibition of Environmental Impact Statement – Access Logistics Estate (SSD-17647189)

Thank you for your email received 18 October 2021 requesting comments from Environment, Energy and Science Group (EES) on the subject proposal which seeks development consent for the construction and operational use of a proposed warehouse and logistics hub at 884-928 Mamre Road, Kemps Creek, in the Mamre Road Precinct.

EES has reviewed the relevant documentation and provides comments in relation to biodiversity and floodplain risk management at Attachment A.

Please note that comments on waterway health will be provided separately.

If you have any queries please contact Marnie Stewart via marnie.stewart@environment.nsw.gov.au or 02 9995 6868.

Yours sincerely

A handwritten signature in black ink that reads 'S. Harrison'.

23/11/21

Susan Harrison

**Senior Team Leader Planning
Greater Sydney Branch
Biodiversity and Conservation**

Attachment A – EES response to EIS for Access Logistics Estate (SSD-17647189)

Biodiversity

The copy of the credit report in the Biodiversity Development Assessment Report (BDAR) indicates that the credit report has not been finalised. In addition, no calculator for the assessment has been submitted to EES for review.

The BDAR should include a copy of the biodiversity credit report 'like for like' to demonstrate the matching credit profiles, as per the requirement in Table 25 of the BAM 2020.

Floodplain risk management

EES has reviewed Appendix E in the *Civil Engineering Report Incorporating Water Cycle Management Strategy Rev D* prepared by Costin Roe Consulting, and provides the following comments:

- The site is not impacted by South Creek mainstream flooding. However, it is impacted by overland flow as identified in Penrith Council's Overland Flow Study 2006.
- The flood assessment has not considered the cumulative impact of surrounding development. Rather it dealt with this major project as a standalone development.
- In the 1% AEP event, the development impacts the upstream areas to the north of the site, inundating previously dry areas.
- The 1% AEP Afflux map is not consistent with the 1% AEP pre and post development maps.
- For larger event, such as the PMF the development would result in an increase in depth up to 1m outside of the site.

The overland assessment needs to consider the cumulative impact of the development within the vicinity of the site and to address suitable management measures to mitigate the impact of the development on adjacent, upstream and downstream properties.

End of Submission