

Our ref: DOC20/622231
Senders ref: SSD 10344

Russell Hand
Principal Planning Officer
Key Sites Assessments
Planning and Assessment Group
Department of Planning, Industry and Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Mr Hand,

Response to Submissions – Bella Vista Station Precinct Concept Proposal (SSD 10344)

Thank you for your email of 3 August 2020, requesting input from Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment (DPIE) on the Response to Submissions (RtS) for Bella Vista Station Precinct Concept Proposal.

EES provided previous correspondence dated 21 November 2019 and EES have reviewed the RtS table prepared by GLN Planning dated July 2020 and makes the following comments.

Aboriginal Cultural Heritage

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

Biodiversity

There is no further comment in relation to biodiversity, as the updated Biodiversity Development Assessment Report (BDAR) prepared by wsp dated July 2020 adequately addresses the issues previously raised.

Flooding

The RtS table refers to a revised Stormwater Management Plan (SMP) as addressing comments on flooding. EES has reviewed Chapter 4 Flood Impact Assessment of the SMP prepared by Stantec dated 9 June 2020, and it does not address EES's previous comments provided in November 2019, and from a floodplain risk management perspective, it is considered inadequate.

The purpose of the flood impact assessment is to address floodplain risk management aspects for the full range of flooding including the emergency management response. Undertaking a flood study up to the flood of design (i.e. 1% AEP) does not provide an understanding of the nature of flooding and the constraints of the land for the full range of flooding. On the other hand, the EMC trunk drainage concept design main purpose is to "...design and document the preferred trunk drainage concept design for EMC...". Both above-mentioned studies are not considered an adequate flood impact and risk assessment.

Accordingly, EES previous advice is still relevant and the Flood Impact Risk Assessment should address the following dot points:

- outline existing flood information, for the full range of flood including the probable maximum flood, based on council's flood information or other relevant studies or historical information where available to address pre-development state
- identify the impacts of the proposed development on flooding and the flood emergency response of the community
- assess the impacts of flooding on the proposed development and identify management options to manage these impacts
- provide a review of the proposed development against the flood related requirements of the consent authority and, where available, existing council strategic studies
- make any recommendations for changes to the proposed development to address any adverse impacts or development requirements and conditions
- provide adequate information for consideration of the proposed development by the consent authority and referral agencies
- assess the compatibility of proposed development with the flood risk

If you have any queries or would like additional information regarding this matter, please do not hesitate to contact Bronwyn Smith Senior Conservation Planning Officer on 02 8973 8604 or at Bronwyn.smith@environment.nsw.gov.au

Yours sincerely



10/08/20

Susan Harrison
Senior Team Leader Planning
Greater Sydney Branch
Environment, Energy and Science