



DOC20/704054

Senders ref: SSD 10399 (Cumberland, Blacktown)

Deana Burn
Industry Assessments
Planning and Assessment Group
NSW Department of Planning, Industry and Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Ms Burn,

Subject: Notice of Exhibition – Prospect Logistics Estate, Clunies Ross Street, Prospect (SSD 10399)

Thank you for your e-mail dated 28 August 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 Prospect Logistics Estate, Clunies Ross Street, Prospect.

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

Biodiversity

The BDAR states that the project footprint has not been designed to avoid impacts to one of the endangered ecological communities (EECs) on site (PCT 835). The BDAR also states that the footprint has not been reduced during project design. No justification has been provided on these points. The BDAR is therefore inconsistent with the Biodiversity Assessment Method in relation to the requirement to discuss how impacts on biodiversity values have been avoided. Either the footprint must be amended to avoid impacts on biodiversity, particularly EECs, or if this is not possible, detailed justification for the proposed footprint must be provided.

Flooding

Costing Roe Civil Engineering Reports indicate that modelling has been undertaken for pre and post development scenarios, including proposed modification of the existing regional basin. The reports lack information on the modelling inputs, parameters and assumptions. Therefore, EES comments are limited to the reports' discussion.

The reports show pre and post development flood extent and the basin's levels and storage volumes for a range of flood events from the 5% AEP up to the probable maximum flood. The developed scenario is mainly based on the proposed updates to the prescribed regional basin to mitigate the impact of the development. Therefore, it is prudent to ensure that the basin is adequately assessed regarding the requirements of the NSW Dams Safety Committee (DSC) in order to determine the level of safety the basin requires under the risk management approach.

Nevertheless, careful consideration must be given to the basin overtopping during rarer flood events larger than the design capacity of the basin and its outflow capacity. Special consideration should be given for effective management of this impact on adjacent and downstream area, evacuation routes, roads and infrastructure.

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

A handwritten signature in black ink that reads "S. Harrison". The signature is written in a cursive, flowing style.

21/09/20

SUSAN HARRISON
Senior Team Leader Planning
Greater Sydney
Biodiversity Conservation and Science