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Senders ref: SSD10396 (City of Blacktown)

Emma Barnet  
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 Barnet,

**Subject: Notice of Exhibition – Kings Park Metal Recovery and Recycling Facility Expansion located at 23-43 and 45 Tattersall Road, Kings Park (SSD 10396)**

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 Kings Park Metal Recovery and Recycling Facility Expansion located at 23-43 and 45 Tattersall Road, Kings Park.

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

Biodiversity

A Biodiversity Development Assessment Report (BDAR) Waiver Request was approved on 4 December 2019.

Flooding

EES notes that the flood impact assessment prepared by ARCADIS, dated July 2020 concludes “that as the proposal is for operational change and existing ground conditions are maintained, no flood impacts are predicted”.

EES highlights that, the flood impact and risk assessment should adequately outline existing flood behaviour for the full range of flooding up to the Probable Maximum Flood (PMF). ARCADIS’s assessment is limited to the 1% AEP.

EES reviewed a flood impact assessment by CSS dated August 2020, for the adjacent site 57-69 Tattersall Road (SSD 8375). It is noted that there are discrepancies in the 1% AEP existing condition presented in ARCADIS’s Figure 7 and CSS’s Figure 2. EES recommends that the report should include a map to show the hydraulic categories within the site. Council’s Eastern Creek Hydraulic Assessment and the Flood Assessment Report prepared by CSS (August 2020) categorises the site as mostly flood storage area.

The Eastern Creek Hydraulic Assessment prepared by CSS, dated 2014 shows the site is largely inundated in the PMF event and classified high hazard. Accordingly, consideration should be given to the emergency management of the site during rarer events up to the PMF to ensure the safety of the workers and users of the site.

Further EES recommends that Figure 5 will need to be updated with a legend of elevation and Figure 7 with contours of floodwater levels.

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](mailto: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](mailto: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.

14/10/20

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