

Our ref: SSD-46983729

Ms Grace Macdonald
NSW Planning Manager
ESR Australia & New Zealand
Level 13, 39 Martin Place
SYDNEY NSW 2000

15 August 2025

Subject: Request for Additional Information – Cumulative Air Quality Assessment

Dear Ms Macdonald

I refer to your application for the Westlink Industry Park Stage 2 (SSD-46983729). As mentioned to you recently, after careful consideration, the Department requires further cumulative air quality impact assessment information to complete its assessment of the Westlink Industry Park Stage 2 (SSD-46983729)

The cumulative construction air impact assessment for SSD-46983729 undertaken by SLR, dated 26 February 2025, is based on background data from the Bringelly air quality monitoring station plus predicted emissions from the Westlink Stage 2 project. It does not include any emissions calculations for other approved construction projects nearby. This has likely presented an under-estimation of actual impacts, noting there is currently around 190 hectares of active earthworks near the site. The Department's assessment of other recent developments in the Mamre Road Precinct (MRP) has indicated PM₁₀ levels in the order of 180 µg/m³ at residences in the MRP, which is significantly above the criteria of 50 µg/m³ (24 hour). This has been raised with the EPA who have highlighted concerns and will provide further advice on this issue.

Given the proximity of the Westlink site to sensitive receivers, further quantitative assessment is required to give a more accurate representation of air quality impacts during construction.

The Department requires a quantitative cumulative impact assessment that models:

- Background air quality plus,
- Project emissions based on worst-case earthworks plus,
- Quantitative emissions estimates from other approved and proposed developments in the MRP. Information for these projects is publicly available on the Department's website. In the absence of detailed emissions inventories for each project, your assessment should estimate emissions based on approved and proposed volumes/area of earthworks and other dust

generating sources. The assessment must be conservative, noting most projects are undertaking earthworks across the full development area. Active earthworks areas are also clearly visible on aerial imagery.

The quantitative assessment must:

- show project (incremental) and cumulative TSP, PM₁₀ and PM_{2.5} emissions at the sensitive receivers, including the schools, aged care facility, residential receivers and the BAPS temple in the MRP and residential receivers in Mount Vernon
- compare predicted emissions with relevant EPA criteria
- where exceedances of criteria are identified, identify the mitigation measures that would be implemented
- provide an estimate of the likely emissions reductions from the proposed mitigation measures for comparison with criteria.

The assessment should be undertaken in accordance with the Department's 'Cumulative Impact Assessment Guidelines for State Significant Projects' and the relevant NSW EPA guidelines for air quality assessment.

If you have any questions, please contact me on 9274 6400 or via email at david.schwebel@planning.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Schwebel'.

David Schwebel
A/Team Leader
Industry Assessments