Wildlife Management Plan

Westlink Industrial Estate – Stage 2

1030-1048 and 1050-1064 Mamre Road, 59-62 and 63 Abbotts Road, and 290-308 Aldington Road, Kemps Creek

SSD 46983729

DOCUMENT TRACKING

Version No.	Document No.	Description	Prepared By	Approved By	Date
Rev01	J1997241106.01	Draft issued to client for review	Z Ahmed	R Salisbury	06/11/2024
Rev02	J1997250130.02	Updated for submission with Development Application	R Salisbury	R Salisbury	30/01/2025

AUTHOR(S) DETAILS

Author Details	Qualifications and Experience
Zainab Ahmed	BSc MSc 3 years of experience in environmental planning, assessment and management

APPROVER DETAILS

Approver Details	Qualifications and Experience
Rob Salisbury	BSc DipEnvStud MSc Over 30 years of environmental management experience in the transport, industrial, water, energy, communications and other sectors.

Cover photograph: Site from Mamre Road, looking south-east (Environmental Impact Statement – Westlnk Industrial Estate – Stage 2, Ethos Urban, 15 December 2023)

Table of Contents

List of Figures

List of Tables

Glossary

Aspect	Aspect Environmental Pty Ltd
BDAR	Biodiversity Development Assessment Report
CBD	Central Business District
CEMP	Construction Environmental Management Plan
CoC	Condition of Consent
CPCP	Cumberland Plain Conservation Plan
DCP	Development Control Plan
DP	Deposited Plan
DPHI	Department of Planning, Housing and Infrastructure
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999*
EIS	Environmental Impact Statement
ESR	ESR Developments (Australia) Pty Ltd
GFA	Gross floor area
SSD	State Significant Development
The Project	Stage 2 of the Westlink Industrial Estate
WMP	Wildlife Management Plan
WSA	Western Sydney Airport

1. INTRODUCTION

1.1. Background

This Wildlife Management Plan (WMP) has been prepared by Aspect Environmental Pty Ltd (Aspect), on behalf of ESR Developments (Australia) Pty Ltd (ESR), for the purposes of Stage 2 of an industrial estate known as the Westlink Industrial Estate (the Project).

This WMP is a Sub-Plan of the Construction Environmental Management Plan (CEMP) and has been prepared with reference to:

- State Significant Development (SSD) 46983729 Development Consent and the included conditions of consent (CoC) dated [TBC]
- Environmental Impact Statement (Ethos Urban,15 December 2023)
- SSD 46983729 – Planning Secretary's Environmental Assessment Requirements which were issued in August 2022
- Riparian Assessment Report (Biosis, October 2022)
- Bio-certification Letter for 1030-1048 and 1050-1064 Mamre Road, Kemps Creek (Biosis, September 2022).

1.2. Project Description

The Project comprises the second stage of the Westlink Industrial Estate located at 1030-1048 and 1050-1064 Mamre Road, 59-62 and 63 Abbotts Road, and 290-308 Aldington Road, within the Penrith City Local Government Area. The Project site is approximately 217,670m^2 in area and is irregular in shape. Stage 1 of the industrial estate covers approximately 30,000m^2 in area and Stage 2 will now cover a portion of the site that was included in Stage 1.

In June 2020, the site was rezoned IN1 – General Industrial under *the State Environmental Planning Policy (Western Sydney Employment Area) 2009*. The site is also located in the Mamre Road Precinct and is subject to controls outlined in the Mamre Road Precinct Development Control Plan 2021. The location of the Project site (including both Stage 1 and Stage 2) is indicated by the red outline on Figure 1-1. For clarity, Stage 2 includes Lot 3 and Lot 4 of DP 250002 as well as the eastern portions of Lots 11, 12 and 13 of DP 253503.

The Project site was previously surrounded by rural and rural residential areas, and rural residential lots remain to the east of the site. The rural and rural residential areas to the north, south and west of the site will become warehouse developments in the future. The established large lot residential community of Mount Vernon is located to the south-east of the site. Whilst to the north of the site currently comprises of predominantly rural typology, with a variety of rural dwellings, rural land, farm dams and scattered vegetation apart from the BAPS Temple (230-242 Aldington Road) which is currently under construction. The site is approximately 16km southeast of the Penrith Central Business District (CBD) and 38km west of the Sydney CBD. Some areas of Stage 1 of the Project form part of the layout and are assessed in this document.

Figure 1-1: Site context for Westlink Industrial Estate (EIS, Ethos Urban, December 2023)

The Project comprises the development of a warehouse and distribution centre and completion of remaining earthworks across the site to support serviced and benched pads. In addition, the Project includes the internal road network across the Westlink Industry Estate.

The Project includes the following scope of works:

- Site preparation works, including:
  - Demolition and clearing of all existing built form structures
  - Clearing of all existing vegetation
  - Bulk earthworks across the site to enable construction of the proposed built form and completion of the internal road network across the Westlink Industry Estate
  - Inter-allotment, road and boundary retaining walls where necessary
- Site servicing and utility infrastructure, including:
  - Construction of internal roads linking to the approved Westlink Stage 1 development
  - Stormwater infrastructure including a trunk drainage channel
- Subdivision of the site into six (6) individual lots, with three (3) being residual lots for future development as part of future stages
- Construction of a warehouse and distribution centre (identified as Lot 6) with ancillary office space comprising a total gross floor area (GFA) of 37,490m^2, including:
  - 35,750m^2 of warehouse GFA
  - 970m^2 of office A GFA
  - 770m^2 of office B GFA
- Hardstand area to facilitate loading/unloading and vehicle manoeuvring
- On-lot car parking

- Landscaping
- Estate signage including signage zones
- Hours of operation of 24 hours, 7 days a week.

The site layout for Stage 2 of the Westlink Industrial Estate is shown in Figure 1-2, including the proposed bulk earthworks cut and fill arrangements for Lots 2, 4 and 5. The site plan for the Lot 6 Warehouse is shown in Figure 1-3.

Figure 1-2: Stage 2 site layout (20-748-C5033 Issue G, Civil Drawings, AT&L, 13 January 2025)

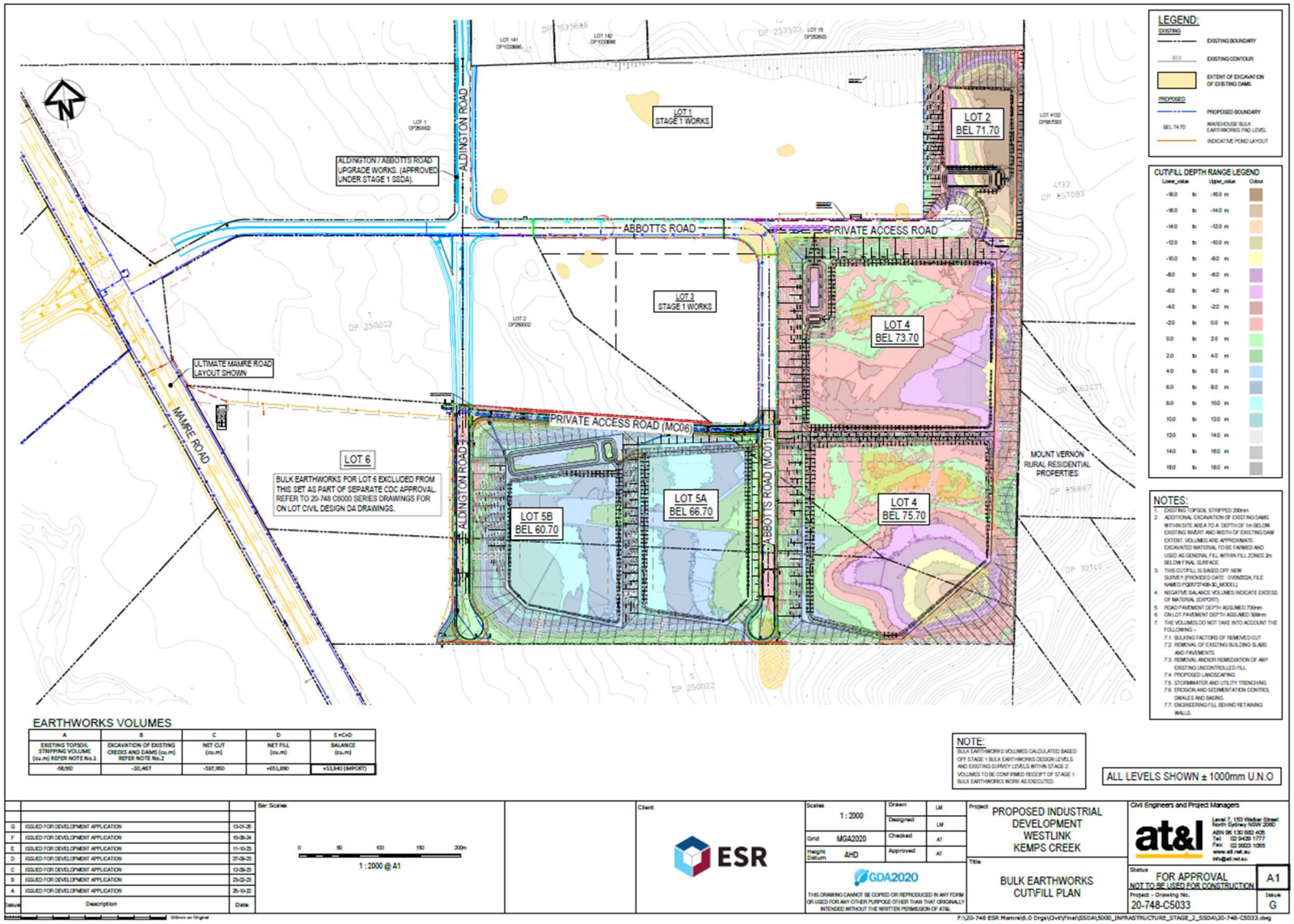
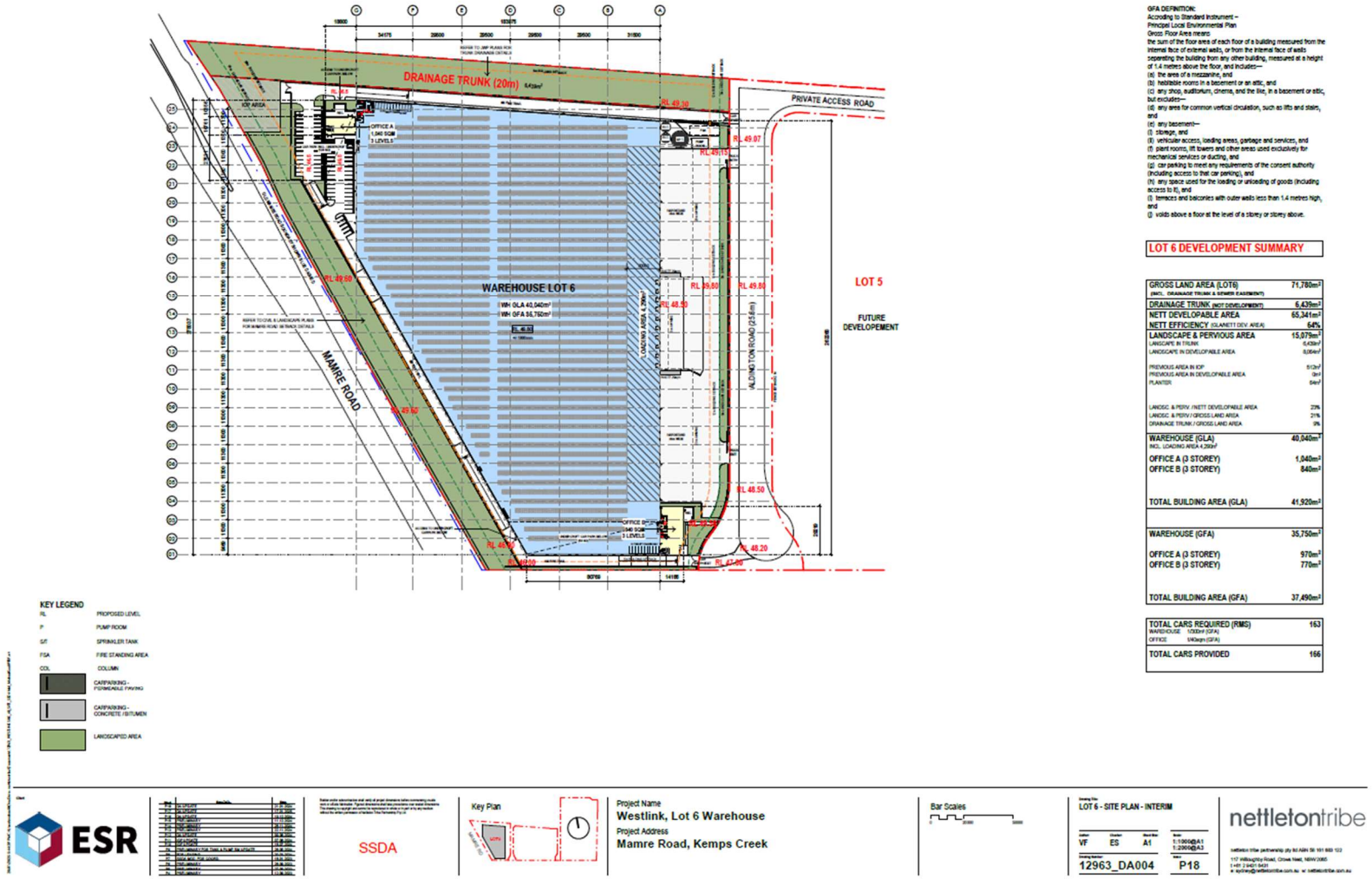


Figure 1-3: Stage 2 Lot 6 Warehouse plan (Westlink Lot 6 Warehouse Architectural Plans, NettletonTribe, 21 January 2025)



1.3. Purpose of this Plan

This WMP has been prepared to address the conditions of the SSD 46983729 Development Consent related to biodiversity (CoC [TBC]), to provide methods to monitor and manage impacts to biodiversity and wildlife strike risk during the construction and operation of the Project. Construction and operation of Stage 2 of the Westlink Industrial Estate will be undertaken in accordance with the most recent, approved version of this WMP. Note that a separate WMP has been prepared for the construction and operation of Stage 1 of the Westfield Industrial Estate.

All Project personnel are responsible for the implementation of this WMP and have the responsibility to stop works if there is the potential for a safety or environmental incident to occur.

Roles and responsibilities for environmental management of the Project are outlined in the CEMP.

1.4. Objectives and Targets

The objectives and targets of this WMP are summarised in Table 1-1.

Table 1-1: Objectives and targets

Objectives	Targets	Timeframe	Responsibility	Monitoring Method
Enable compliance with relevant legislation, CoC, requirements and guidelines	No written warnings or infringement notices	At all times	Environmental Manager Project Manager	Environmental Manager's daily checklist Environmental inspection checklist Daily logbook
Minimise impacts to biodiversity during construction	No impacts to biodiversity	At all times	Environmental Manager	Environmental Manager's daily checklist Environmental inspection checklist Six-monthly monitoring by suitably qualified ecologist
Minimise impacts of wildlife to Western Sydney Airport (WSA) operations	Minimal occurrence of common strike species at the site	At all times	Environmental Manager	Environmental Manager's daily checklist Environmental inspection checklist Six-monthly monitoring by suitably qualified ecologist

2. LEGAL AND OTHER REQUIREMENTS

2.1. Legal Requirements

The Project is to be constructed in accordance with applicable legislative instruments, permits, licences and guidelines as required. The instruments relevant to the management of biodiversity and wildlife across the Project are outlined in Table 2-1 below.

Table 2-1: Legislative and related instruments relevant to the Project

Instrument	Key Project Requirements	Activity/Aspect
Environment Planning and Assessment Act 1979	Establishes a system of environmental planning and assessment of proposed developments in NSW. The Project must comply with the Development Consent.	All
Environment Protection and Biodiversity Conservation Act 1999 (Cwlth)	Requirements in relation to protection and management of nationally and internationally important flora, fauna, ecological communities, and heritage places.	Threatened species and ecological environments
Biodiversity Conservation Act 2016	Comply with conservation requirements for any identified threatened species.	Threatened species and ecological environments
Mamre Road Development Control Plan (DCP)	Comply with precinct-wide planning controls for industrial development relating to the protection of biodiversity and vegetation.	Biodiversity and ecological environments
Cumberland Plain Conservation Plan (CPCP)	Project location mapped as certified-urban capable land suitable for development. Consistency with the CPCP removes the requirement for further biodiversity approvals under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).	Biodiversity and ecological environments

2.2. Development Consent Conditions

The Project will be constructed in accordance with the SSD 46983729 Development Consent The conditions which apply to biodiversity and wildlife are identified in Table 2-2.

Table 2-2: Relevant CoC and where the WMP addresses them

SSD 46983729 CoC		WMP Section
[TBC]	[TBC]	[TBC]

3. EXISTING ENVIRONMENT

A Biodiversity Development Assessment Report (BDAR, Eco Logical Australia, 14 April 2022) was prepared for the site as part of Stage 1 of the development which covers part of Stage 2 (i.e. Lot 2 and the northern part of Lot 4) and included habitat assessments for fauna within the Project site. The dominant habitat features identified on site included dams/aquatic vegetation and native vegetation as described in Table 3-1.

Table 3-1: Habitat Features and Risk Ratings

Habitat feature	Category	Wildlife attraction risk	Justification of potential risk rating
Dams/ aquatic vegetation	Farm dam	High	The large dams across the Project site provide foraging habitat for ibis, ducks, wading birds and microbats. Dense wetland vegetation is limited.
Native vegetation	Conservation area (dryland)/ Natural areas	Moderate	Native vegetation within the Project site provides potential foraging and roosting habitat for a variety of species including, megabats (foraging only), and a wide variety of birds including raptors, crows and parrots.
Open grassland	Intensive Livestock Agriculture	Moderate	Open native and exotic grassland provides potential habitat for an array of native and non-native birds including raptors, lapwings, crows, galahs/cockatoos and parrots.

The farm dams within the site are currently the highest attracting habitat for wildlife as they provide resources for fauna to drink, forage, and nest/shelter within the banks of the dams. This is especially important for fauna in a landscape which is becoming increasingly urbanised.

The large open expanses of native and exotic grassland within the area also provides many bird species with foraging or nesting habitat. Open grassland areas also provide habitat for larger mammals such as kangaroos, wallabies and smaller mammals, such as rabbits, mice and rats. This in turn attracts predators such as raptors and owls and pest species like foxes.

The native flowering canopy species within the site provide foraging habitat for native and non-native bird species. These species also provide habitat for microbats and mega bats, such as the Grey-headed Flying Fox, to forage.

A Bio-Certification Letter prepared by Biosis (21 September 2022) for Stage 2 (including Lots 5 and 6, and the southern part of Lot 4) identified that a strategic biodiversity certification was conferred under Section 8.2 of the EPBC Act upon this land as ‘Certified – Urban Capable Land’ or ‘Certified – Major Transport Corridor’ under the Order Conferring Strategic Biodiversity Certification – Cumberland Plain Conservation Plan (NSW Government Gazette 2022).

As a result, vegetation within Stage 2 is now wholly within land designated as Certified – Urban Capable Land under the CPCP and the preparation of a BDAR was not required for the Project.

A Riparian Assessment Report (Biosis, 27 October 2022) was prepared for Stage 2 (including Lots 5 and 6, and the southern part of Lot 4). This assessment concluded:

- That one mapped, un-named second order stream (in the northwest corner), two man-made dams and one drainage line were present within the site.
- No riparian corridor was considered to be present within the site.
- Due to the extent of historical clearing, no remnant vegetation occurs within the site.
- No aquatic or terrestrial groundwater dependent ecosystems occur within the site or were expected to be impacted by the Project.
- It was considered highly unlikely that listed threated species would occur within the site.

4. MANAGEMENT MEASURES

4.1. Biodiversity Management

The biodiversity management measures to be implemented during construction and operation of the Project are detailed in Table 4-1. These measures have been sourced and developed from the BDAR (Eco Logical Australia, 14 April 2022), Riparian Assessment Report (Biosis, 27 October 2022) and Bio-Certification Letter (Biosis, 21 September 2022) to mitigate and manage impacts of the Project on the environment, including Matters of National Environmental Significance (under the EPBC Act), and to enable compliance with the requirements of both the CPCP and Mamre Road DCP.

Table 4-1: Biodiversity management measures

ID	Measure	Action	Timing	Responsibility
BD 1	Implementation of clearing protocols, including pre-clearing surveys and staged clearing, the presence of a trained ecological or licensed wildlife handler during clearing events.	Pre-clearance survey of trees to be removed and identification/location of habitat trees (i.e. for birds or possums) by a suitably qualified ecologist. Supervision by a qualified ecologist/licensed wildlife handler during habitat tree removal in accordance with best practise methods. Any tree removal is to be undertaken by a suitably qualified and insured arborist.	Prior to and during all clearing works	Project Manager/ Ecologist
BD 2	Installation of artificial habitats for fauna in adjacent vegetation and habitat or human made structures to replace the habitat resources lost and encourage animals to move from the impacted site, e.g. nest boxes.	A ratio of one nest box per hollow removed. Nest boxes are to be of a similar dimension to hollows removed and installed under the supervision of an ecologist in an offset location. The location of nest boxes will be identified in consideration of the measures for management of potential bird strike species document in this plan.	Prior to and during all clearing works	Project Manager/ Ecologist
BD 3	Timing of works to avoid critical life cycle events such as breeding or nursing.	Where possible within construction timelines, avoid clearing works in later winter/ spring during breeding / nesting period for birds and mammals.	During works clearing	Project Manager
BD 4	Installation and maintenance of sediment barriers or sedimentation ponds to control the quality of water released from the site into the receiving environment.	Appropriate controls are to be utilised to manage exposed soil surfaces and stockpiles to prevent sediment discharge into waterways. Soil and erosion measures such as sediment fencing and clean water diversion must be in place prior to the commencement of the construction work.	During construction	Project Manager

ID	Measure	Action	Timing	Responsibility
BD 5	Minimisation of impacts of noise, dust and light spill on native fauna species.	Construction lights or development lights should be positioned to prevent shine into future planted vegetation. Streetlights should use ecologically sensitive designs including use of shields and timers and positioned away from retained vegetation. Noise should be limited to construction hours only. Dust should be managed through appropriate dust control management plan.	During construction	Project Manager
BD 6	Minimisation of potential damage to vegetation retained adjacent to site.	Clearly delineate clearance limits and identify all trees for removal.	During construction	Project Manager
BD 7	Minimisation of the dumping of rubbish found on site.	Waste bins to be present on site. Covers to be used to prevent blown litter and the entry of pest animals or rain. Removal and appropriate disposal of general waste.	During construction	Project Manager
BD 8	Implementation of hygiene protocols to prevent the spread of weeds or pathogens between infected areas and uninfected areas.	Vehicles, machinery and building refuse should remain only within the development site. Washdown protocols for vehicles should be observed to prevent the entry of soil borne pathogens. Weed management to be undertaken where required. Weeds should be removed and handled in accordance with relevant Biosecurity Act protocols if high threat weeds are present.	Prior to and during all clearing works	Project Manager
BD 9	Staff training and site briefings will communicate environmental features to be protected and measures to be implemented.	All training will be in accordance with Section [TBC] of the CEMP.	During construction	Project Manager
BD 10	Provision for the ecological restoration, rehabilitation and/or ongoing maintenance of retained native vegetation habitat on or adjacent to the development site.	It is recommended that landscaping in the development site considers the use of locally derived native species and those found within Plant Community Type 849/850.	During construction and following completion of construction activities.	Project Manager

ID	Measure	Action	Timing	Responsibility
BD 11	Manage pest, vermin, and declared priority weeds on the site. Note: For the purposes of this measure, priority weed has the same definition of the term in the *Biosecurity Act 2015*.	Implement suitable measures to manage pest, vermin, and declared priority weeds on the site. Inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or priority weeds are not present on site in sufficient numbers to pose an environmental hazard or cause the loss of amenity in the surrounding area.	During construction	Environmental Manager
BD 12	Undertake ecological clearance of dams under a dam decommissioning plan.	Prior to dam dewatering and removal of dam structures, a suitably qualified ecologist will inspect the dam to identify the presence or likely presence of aquatic species of flora and fauna. The ecologist will determine whether the dam water is suitable for the proposed water reuse option and whether additional actions are required prior to or during the dam dewatering.	Prior to and during dam dewatering and removal of dam structures	Project Manager

4.2. Wildlife Management

A wildlife risk assessment was undertaken as part of the Westlink Industrial Estate Wildlife Management Assessment Report (Eco Logical Australia, 14 April 2022), utilising the wildlife hazard assessment process set out in the Aerotropolis Aviation Wildlife Safeguarding Framework (Appendix B of that report). Given that the Project site is within the area of the Western Sydney Airport (WSA), the assessment compared the wildlife attraction of the existing environment with the potential wildlife attraction associated to the Project to ascertain the impact to the risk of engine strike the Project poses to air traffic at the WSA.

The risk assessment methodology rated the risk associated to the identified strike species/groups on site and the existing habitat types against the proposed habitat type and the species/group it is likely to attract and the corresponding risk of strike.

The outcomes of the risk assessment are summarised below.

- Megabats were considered to pose the greatest potential of being involved in a strike incident and have potential to cause significant damage.
- Ibis, Galahs and Lapwings were considered to have moderate potential to be involved in a bird strike incident and cause damage.

The mitigation measures provided in Table 4-2 are targeted towards these species.

The Project will reduce the overall wildlife attraction risk, primarily due to the removal of existing farm dams, which were identified as being the primary wildlife attractant onsite and the highest risk existing habitat feature. The retention basins that form part of the Project's stormwater system have been designed to fully drain within 24 hours of a storm, exceeding what is required by the Mamre Road DCP, to further mitigate the potential attraction of that development element.

Additionally, the replacement of large swathes of open grassland with warehouse development will reduce the likelihood of many common strike species being attracted to the area. This includes cockatoos, galahs, ibis and magpies.

The Project includes restoration of riparian corridors, open space and retention basin that require monitoring and mitigation measures to further reduce the risk of wildlife being attracted to the area and causing bird strike. It is also important to note the risk of bird strike will increase through time as the demand for flights at WSA increases and aircraft movements increase accordingly.

The wildlife management measures to be implemented for Stage 2 of the Project are detailed in Table 4-2. The outcomes identify the trigger points for additional management measures linked to the presence of common strike species to reduce the wildlife attractant properties of the Project.

Table 4-2: Wildlife management measures

ID	Measure	Action	Timing	Responsibility
WL 1	Diurnal bird surveys to be undertaken during construction.	Monitoring of diurnal bird species, including common strike species, to be carried out by a suitably qualified ecologist.	Six-monthly, once WSA is operational	Environmental Manager
WL 2	Nocturnal megabat surveys to be undertaken for the landscaping and street trees.	Monitoring of nocturnal megabat species to be carried out by a suitably qualified ecologist.	Annually; during summer, once landscaping street trees is provided	Environmental Manager
WL 3	Monitoring of existing vegetation during construction (and landscaping during operations) for habitat availability for common strike species.	Monitoring of vegetation to be carried out by a suitably qualified ecologist.	Six-monthly	Environmental Manager
WL 4	Diurnal bird surveys to be undertaken for water management infrastructure (i.e. on-site detention basin and rain gardens).	Monitoring of diurnal bird species, including common strike species, to be carried out by a suitably qualified ecologist.	Six-monthly, after a rainfall event, once infrastructure is constructed	Environmental Manager
WL 5	Cover exposed/vacant areas during construction.	Grass excavations planned to be exposed for more than three months and vacant areas awaiting warehouse and other development.	Construction	Project Manager
WL 6	Implement additional management measures if monitoring identifies the ongoing use of the site by common strike species.	Monitoring outcomes will inform the need for additional management measures. The following additional measures will be considered: • Netting of waterbodies • Installation of bird deterrents, including sonic and visual deterrents • Vegetation management including the removal of fruits, nests, perches and replacement of landscaping/street trees • Installation of exclusionary devices such as netting or anti-perching spikes • Egg oiling and relocation of common strike species.	Construction	Project Manager

5. MONITORING AND REVIEW

In addition to the monitoring outlined in Table 4-1, ongoing environmental inspections, monitoring and reporting for the Project are detailed in Section [TBC] of the CEMP. The monitoring and review actions relevant to this WMP are provided below.

5.1. Environmental Inspections

Environmental inspections to be undertaken are described in Section [TBC] of the CEMP. The regular environmental inspections undertaken by the Environmental Manager (daily), ESR (weekly) and the ER will include the implementation of this WMP.

5.2. Environmental Monitoring

Environmental monitoring is summarised in Section [TBC] of the CEMP and will be undertaken to assist in the management of the following:

- Construction of the Project in accordance with environmental approvals
- Compliance with all relevant legislative requirements
- The minimisation of potential environmental incidents
- Effectiveness of environmental controls
- Implementation of this WMP.

Monitoring required in this WMP is summarised in Table 5-1.

Table 5-1: Summary of environmental monitoring

Monitoring	Frequency/ Timing	Responsible	Reference
[TBC]	[TBC]	[TBC]	[TBC]

5.3. Environmental Auditing

Environmental auditing is described in Section [TBC] of the CEMP. ESR will undertake an internal Health, Safety, Security and Environment audit of the Project annually. Audits will involve a review of all environmental documents, records and reports to verify compliance with the CEMP (and this WMP) to satisfy CoC [TBC]. In addition, the ER may at any time request documents and evidence confirming implementation of the CEMP and Sub-Plans.

Key environmental and procedural aspects to be covered by the audit may include:

- Environmental mitigation measures detailed in this WMP
- Adherence to reporting procedures
- Complaint and incident management
- Legislative requirements.

Records of auditing and reporting will be maintained to demonstrate compliance.

5.4. Contingency Management Plan

If inspections, monitoring and/or auditing indicate that the mitigation measures listed in this WMP are not effective in managing environmental impacts, the responses outlined in Table 5-2 will be implemented. These responses will manage any unpredicted impacts and their consequences. This plan would check that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible.

Table 5-2: WMP contingency management plan

Element	Trigger/ Response	Condition Green	Condition Amber	Condition Red
Biodiversity management	Trigger	No impacts to biodiversity identified.	Minor biodiversity impacts identified on-site.	Significant biodiversity impacts identified.
	Response	No response required.	Review effectiveness of management measures. Implement additional measures to manage impacts.	Stop works causing biodiversity impact. As for Condition Amber.
Wildlife management	Trigger	Minimal occurrence of common strike species at the site.	Common strike species occur regularly at the site.	Common strike species occurring at the site in large numbers.
	Response	No response required.	Review effectiveness of management measures. Consider implementing additional measures to manage species as listed in WL 7.	As for Condition Amber.

This contingency management plan for the WMP is consolidated in Appendix [TBC] of the CEMP to form the Contingency Plan for the Project.

5.5. Non-compliances and Actions

Section [TBC] of the CEMP details the Project team's response following the identification of a non-compliance with the Development Consent, the CEMP and Sub-plans. This includes the reporting, investigation and notification of non-compliances. Non-compliances with this WMP will be addressed as required by the CEMP.

5.6. Environmental Incident and Emergency Response

Section [TBC] of the CEMP details environmental incidents and the response to environmental emergencies for the Project. This includes the reporting, notification and investigation of environmental incidents. Emergency contact details are also provided.

In the event of an environmental incident or emergency related to the implementation of this WMP, the responses detailed in the CEMP will be implemented.

5.7. Environmental Reporting

The reporting of environmental performance during construction will be undertaken as required by the Development Consent. Environmental reporting requirements for the Project are documented in Section [TBC] of the CEMP and reports relevant to this WMP are listed in Table 5-3.

Table 5-3: Summary of environmental reporting for the WMP

Report	Timing/ Frequency	Responsibility	CoC
[TBC]	[TBC]	[TBC]	[TBC]

5.8. WMP Review and Revision Process

As described in Section [TBC] of the CEMP, the Project will review the adequacy of the environmental management measures within the CEMP and Sub-Plans (including this WMP), as well as the effectiveness of their implementation to determine whether they are still applicable to the activities being carried out on site. This review will be undertaken by the Environmental Manager in consultation with the Project Manager and ESR Representative.

This WMP will also be reviewed and updated at the completion of construction to tailor it to the operational phase of the Project.

CoC [TBC] also states that all strategies, plans and programs required under the SSD 46983729 Development Consent will be reviewed and the Planning Secretary notified of the review within three months of:

- the submission of a Compliance Report under CoC [TBC]
- the submission of an incident report under CoC [TBC]
- the approval of any modification of the conditions of the SSD 46983729 Development Consent or
- the issue of a direction of the Planning Secretary under CoC [TBC] which requires a review.

As per CoC [TBC], where documents are revised under the above reviews the revised documents will be sent to the Planning Secretary for approval within six weeks of the review.

All employees and contractors will be informed of any revisions to the WMP during toolbox talks.