



Your ref: SSD-46983729
Our ref: DOC24/785209

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Department of Planning, Housing and Infrastructure
4 Parramatta Square, 21 Darcy Street
Parramatta NSW 2150

16 October 2024

Response to Submissions – Westlink Industrial Estate Stage 2 (SSD-46983729)

Dear David,

Thank you for your correspondence received 19 September 2024 seeking comments from the Biodiversity, Conservation and Science Group (BCS) regarding the Response to Submissions (RtS) for Westlink Industrial Estate - Stage 2 (SSD-46983729) located 1030-1048 and 1050-1064 Mamre Road, 59-62 and 63 Abbots Road, 290-308 Aldington Road, Kemps Creek.

BCS's review of the Response to Submissions and relevant supporting technical reports has identified biodiversity and stormwater management issues that need to be addressed which are detailed in Attachment A.

In summary, BCS's key issues are as follows:

- Cumberland Plain Conservation Plan (CPCP) – works in 'excluded' land
- Waterway health and stormwater management – additional information is required regarding the MUSIC model, engineering plans, bulk earthwork plans and landscaping plans erosion.

I request that BCS not be given a role in any conditions of consent unless BCS agrees to the role and the condition.

Should you have any queries regarding this matter, please contact the Greater Sydney Planning Team on rog.gsrplanning@environment.nsw.gov.au.

Yours sincerely

Louisa Clark
Director
Greater Sydney Branch
Biodiversity, Conservation and Science

BCS advice – RtS for Westlink Industrial Estate Stage 2 (SSD-46983729)

Biodiversity

In response to BCS's advice that the Mamre Road corridor and a very small portion of land in the SSDA site is 'excluded land' from the CPCP is the statement that 'the Applicant has specifically excluded any works proposed in the SP2 Infrastructure zoned land under the Westlink Stage 2 SSDA'.

DPHI must be satisfied that works are not proposed in excluded land as section 7.9 of the *Biodiversity Conversation Act 2016* applies to any works on excluded land. As such, BCS recommends that a plan be provided to clearly identify the location of works in relation to the CPCP excluded land in order to clearly demonstrate that there are no works proposed in the excluded land.

Flood Risk Management

BCS has reviewed the following documents:

- *Westlink Industry Park – Stage 2 Submissions Report* (Ethos Urban, September 2024)
- additional flood impact information provided by Stantec (15 August 2024).

Key Assessment Issues:

1.	Flood Emergency Management	<p>The Proponent has responded to the recommendation that 'As the development is a 24/7 warehouse and distribution centre the development is to have a site-specific action plan in place for flooding. This will ensure the businesses is able to respond to flooding in extreme storm events consistent with responsibilities identified in NSW State Emergency Service's Local Flood Plan for the area' with:</p> <p><i>'A site specific action plan can be prepared as part of the Operational Environmental Management Plan (OEMP) in accordance with a condition of consent'.</i></p> <p><u>Recommendation:</u></p> <p>As per previous BCS advice, it is recommended an emergency management plan be prepared prior to determination.</p>
	<i>Extent and Timing</i>	<u>Pre-determination</u>

Waterway Health and Stormwater Management

In preparing this advice BCS has reviewed the following documents:

- *Water and Stormwater Management Plan Stage 2, Rev 5 (AT&L, 16/08/2024)*
- *AT&L Engineering Drawing set (updates dated 15/08/2024)*

Key Assessment Issues:

1.	MUSIC Model	<p>Stage 1 and Stage 2 are no longer 'stand-alone' due to Stage 1 now relying on lots within Stage 2 for irrigation plus inclusion of basins in Lot 3 and 5. The report should include results for each of the 2 release points/trunk channels from the site in order to assess the proposal holistically. If Stage 2 is to be assessed on a stand-alone basis then there should be no interaction/reliance between Stages 1 and 2.</p> <p>External catchments are still not included in the MUSIC model. Where the external catchments are designed to be managed around the</p>
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		<p>treatment systems, then the exclusion of these catchments is appropriate (i.e. EX.B1 and EX.B2). However, where the external catchments drain into treatment devices then they need to be included in the model as they will impact performance of the devices and treatment system (i.e. EX.D1).</p> <p>The treatment flowrate and TSS and TP removal rates adopted for the Stormfilter are slightly higher than those endorsed for use in the SQIDEP verification certificate and should be amended. Clarify exactly how many cartridges and of what size are proposed as there seems to be conflicting details between plans, report and model.</p> <p>The high flow bypass for the oceanguard treatment node has been set at 100m³/s, which would correspond to 5000 devices based on a treatment flowrate in the SQIDEP verification certificate of 20L/s per device. This needs to be revised to a high flow bypass rate reflective of the actual number of devices specified.</p> <p><u>Recommended action:</u></p> <p>Provide an updated MUSIC model and flow spreadsheet which accounts for the influence of any external catchments which will flow through the treatment devices.</p>
	<i>Extent and Timing</i>	<p><u>Pre-determination</u></p> <p>This issue needs to be addressed prior to determination in order to ensure adequate space is provided for WSUD elements in the proposed layout.</p>

2.	Engineering Plans	<p>Drawing 20-748-C5220 (Stormwater Management Plan Interim Arrangement) has the following issues:</p> <ul style="list-style-type: none"> • ponds/basins proposed for Lot 5 and Lot 3 also need to appear on this plan not just the ESCP • irrigation main from Lot to Lot 6 needs to be amended to connect to irrigation areas not Lot 6 pond/basin • check numbers nominated for stormfilter cartridges match model. <p>The updated LandPartners plan of subdivision uses different Lot numbering to the civil engineering plans. These should be consistent.</p> <p>Ensure consistent flood levels between the AT&L and JWP plans and that conservative flood levels have been adopted, reflective of the uncertainty of the final Mamre Road culvert design.</p> <p><u>Recommended action:</u></p> <p>Address the above issues and provide a written response which explains how they have been addressed.</p>
	<i>Extent and Timing</i>	<p><u>Pre-determination</u></p> <p>This issue needs to be addressed prior to determination to ensure adequate space is provided for WSUD elements in the proposed layout and that the stormwater infrastructure on which the masterplan relies can be delivered. This will also enable conditions to correctly reference the proposed details and lots.</p>

3.	Bulk Earthworks Plans	<p>The external catchments to the east are not provided with any detail on how they will be conveyed down the batters of Lot 5. Swales at the top of batter directing flows to batter chutes are needed to avoid severe erosion of the batter. Swales are nominated on the earthworks sections at top of batter, however appear to be small for the catchment size and don't connect to any batter chutes.</p> <p>Some drainage is shown on the ESC plans for once runoff is on the lot pads, however these ESC plans are very preliminary and the interim drainage should be shown on other plans which could be approved as part of this package (as the ESC plans will not be).</p> <p><u>Recommended action:</u></p> <p>Provide updated drawings (bulk earthworks, and/or stormwater drainage) which include interim drainage measures which will manage runoff for external catchments, such that flows are directed to the underground drainage system in a controlled manner and without causing erosion.</p>
	Extent and Timing	<p><u>Pre-determination</u></p> <p>This issue ideally needs to be addressed prior to determination. However, the plans could be amended prior to construction.</p>

4.	Landscaping Plans	<p>As the site is close to the airport, provide the required Wildlife Hazard Assessment and Management Plan and make any required changes to the design of the sediment basins and retention ponds to mitigate the hazard.</p> <p>Extend the landscape drawing set to also encompass the on-lot Pond and incorporate recommendations from the Wildlife Hazard Assessment and Management Plan.</p> <p><u>Recommended action:</u></p> <p>Address the above issues and provide a written response which explain how they have been addressed.</p>
	<i>Extent and Timing</i>	<p><u>Pre-determination</u></p> <p>This issue ideally needs to be addressed prior to determination. However, the plans could be amended prior to construction.</p>

End of Submission