

16 February 2022

Fraser's Property Industrial
Attention: Mr Paul Solomon
 Level 2/1C Homebush Bay Drive
 RHODES, NSW 2138

Dear Sir,

**Re: The Yards Kemps Creek Estate - Ardex Facility
 Responses to Additional Information Requests – SSD-25725029**

Further to your request we are pleased to provide our response to the civil items raised by DPIE and agencies as part of their information requests relating to SSD-25725029.

We provide the following response table to the engineering items in the document noted above.

No.	Item and Response
Department Comments	
Item 1	<p><i>5. The EIS and Civil report propose indicative finished site levels +/-500mm. Where finished site levels and building heights are unknown, the worst case scenario should be assessed. The RIS and relevant technical assessments including but not limited to the Archeitctural Plans, Visual Impact Assessment Report and Civil Report should be revised.</i></p> <p>RESPONSE</p> <p>Refer updated report which includes notes on upper bound/ maximum amount of cut to fill based on the upper limit of levels.</p>
Item 2	<p><i>The Civil Report indicates that several retaining walls are proposed. These are not discussed / considered in the EIS. The Department requires that this detail is included in the RIS.</i></p> <p>RESPONSE</p> <p>Low height retaining walls are proposed as shown on drawing Co13362.05-SSDA50. Walls are noted to boundary and locally around garden beds. Walls fronting public domain are less than 1.2m and have been setback from the boundary in accordance with the DCP.</p> <p>We have prepared typical wall details and included these in the updated EIS documents.</p>

No.	Item and Response
Item 3	<p><i>The Civil Report reference 'this Mod 1 application' it is unclear if this reference is in relation to SSD-9522-Mod 1. Please update the Civil Report as relevant.</i></p> <p><u>RESPONSE</u></p> <p>The wording of Section 4.4 has been adjusted to remove the reference to 'this Mod1 application'.</p>
Council Items	
Item 4	<p><i>The applicant proposed for 30-meter-long super B-Doubles to access the site however, Council understands is that the surrounding roads are only designed to cater for 26 meter long B-Doubles. Therefore, the use of super B-Doubles or any other heavy vehicle larger than a 26 meter B-Double is not supported.</i></p> <p><u>RESPONSE</u></p> <p>External roads are designed for the 30m super b-double as per the SSD-9522 Mod1 approval (Condition A6). Further, the design has been tested for the 36.5m PBS Level 3&4 vehicle as required of the DCP.</p>
Item 5	<p><i>Widths of the verge and road pavement lanes of the adjoining Public Access Roads 1 and 3 shall comply with the engineering plans submitted for the SSD-9522 MOD2 application. Full details are to be provided.</i></p> <p><u>RESPONSE</u></p> <p>External roads and verges are confirmed to be consistent with the engineering plans submitted for the SSD-9522 MOD2 application which is currently being assessed by DPIE and associated agencies. The Ardex design drawings, including any swept path, or other assessments have utilised the noted designs submitted for the SSD-9522 MOD2.</p> <p>Please refer to SSD-9522 MOD2 for details pertaining to road design information. Provision of full details is not relevant to the SSD-25725029 application.</p>
Waterways Considerations	
Item 6	<p><i>Regarding the proposed stormwater management strategy, the following matters are raised for the Department's consideration.</i></p> <p><i>The Ardex site falls within 'The Yards' Industrial Estate which was approved with an estate wide stormwater management strategy under SSD9522.</i></p> <p><i>A review of the Civil Engineering report identifies gaps between the stormwater strategy approved as part of the SSD 9522 and the water quality and flow management targets included in the newly finalised Mamre Road Precinct DCP. As such, the proposed stormwater management approach does not comply with</i></p>

No.	Item and Response
	<p><i>Section 2.4 (Integrated Water Cycle Management) of the Mamre Road Precinct DCP.</i></p> <p><i>It is also noted that in order to comply with the DCP, the stormwater strategy relies on the possible future regional approach that is yet to be approved and finalised.</i></p> <p><i>The proposed approach to stormwater management is generally consistent with that which is approved under SSD 9522. However, clarification is required on the need for the development to comply with the water quality and flow management controls in the Section 2.4 of the Mamre Road Precinct DCP, as noted that the approved strategy for the estate does not.</i></p> <p><i>As proposed any compliance with the water quality and flow management targets for the development will rely on the proposed precinct-wide approach to stormwater management which includes the use of regional basins which is yet to be established. As such, there is no certainty the development as proposed will comply with the DCP in terms of water management.</i></p> <p><i>Due to the uncertainty and lack of detail with respect to the proposed regional solution, Council is of the view that the development proposal should be supported by a Stormwater Strategy that demonstrates how the development will be able to comply with the DCP in the absence of a regional system.</i></p> <p><u>RESPONSE</u></p> <p>Please refer to the EES response letter dated 22 December 2021 (enclosed).</p> <p>The whole of The Yards Estate development, including the Ardex Facility, has been provisioned for stormwater management in the stormwater management systems (which include stormwater detention and water quality measures) currently being constructed. These systems have been assessed as meeting acceptable discharge and water quality requirements.</p> <p>No additional measures are proposed for the submitted Ardex development site. Refer enclosed EES response letter.</p>
EPA	
Item 7	<p><i>Whilst it is expected that only rain water will enter the site stormwater catchment, the EPA advises that the facility should be designed so that any spills of liquid or powdered chemicals are contained by adequate bunding and not allowed to enter the stormwater system. Consideration should also be given to installing additional stormwater isolation measures to stop contaminations leaving the site in the event of a pollution incident, subsequently compromising the down stream primary and tertiary treatment systems of the precinct.</i></p> <p><u>RESPONSE</u></p> <p>Bunding for containment of dangerous goods has been allowed for in the building and management processes in place for loading and unloading of dangerous good within the building. No additional external containment</p>

<i>No.</i>	<i>Item and Response</i>
	measures are required or proposed. Please refer to Dangerous Goods report for further details.

This letter is provided by Costin Roe Consulting Pty Ltd. Please contact the undersigned if clarification of any of the above items are required.

Yours faithfully,

COSTIN ROE CONSULTING PTY LTD



MARK WILSON MIEAust CPEng NER RPEQ
Director

Encl. EES Response Letter, Ref: Co13362.05-05.ltr dated 22 December 2021

22 December 2021

Fraser's Property Australia
Attention: Mr Paul Solomon
PO Box 3307
RHODES NSW 2138

Dear Sir,

**Re: Ardex Facility - The Yards, Kemps Creek West Estate
SSD-25725029, DPIE EES RtS**

We provide this letter pertaining to the Response to Submission (RtS) received from DPIE EES (DOC21/1074034 dated 20 December 2021). We provide this letter in relation to the response relating to Stream Health and stormwater discharge.

The Ardex site falls within the Yards Industrial Estate which has been approved (SSD-9522) with an estate wide *Stormwater Management Strategy* which provisions for stormwater management of all development lots (including Ardex). These systems are now currently being constructed based on the approval. Reference to **Section 7.4** of the SSD9522 estate "Water Cycle Management Strategy" by Costin Roe (ref: Co13362.00-07k.rpt) & subsequent mods which discusses, assesses, and provides demonstration of acceptable stream health outcomes for discharge from the estate, consistent with best practice and the site specific DCP.

Given the estate stormwater system, which includes the Ardex facility, has been approved and is currently being constructed, the new EES targets are not considered applicable to the development.

We note that the current level of development in the estate achieves the MARV of 2.0ML/Ha/Yr. A MARV greater than the noted value (based on anticipated development take-up) would not be breached until 4-5yrs in the future. We note the gap between the requested new waterway targets proposed by EES/ DPIE and the approved estate management system can be bridged via the precinct wetland solution proposed by Sydney Water as the Waterway Manager for South Creek. The precinct system is expected to be resolved within the timeframe noted.

We trust the detail included in this letter meets your current needs. If you would like to discuss the above detail please contact us at your convenience.

Yours faithfully,
COSTIN ROE CONSULTING PTY LTD



MARK WILSON MIEAust CPEng NER
Director