

Our ref: DOC21/238759
Senders ref: SSD 10479

Mr David Schwebel
Planning and Assessment Group
Department of Planning, Industry and Environment
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

Dear Mr Schwebel

Subject: amended plans and documentation for the proposed 200 Aldington Road Industrial Estate (SSD-10479) in response to issues raised with the Applicant's Response to Submissions

Thank you for your email received on 5 October 2021, requesting comment from the Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment (DPIE) in relation to amended plans and documentation for the proposed 200 Aldington Road Industrial Estate (SSD-10479) in response to issues raised with the Applicant's Response to Submissions (RtS).

EES has reviewed the relevant documentation and provides comments in Attachment A regarding biodiversity and waterway health.

Should you have any queries regarding this matter, please contact Marnie Stewart, Senior Project Officer Planning on 9995 6868 or Marnie.Stewart@environment.nsw.gov.au.

Yours sincerely



28/10/21

Susan Harrison
Senior Team Leader Planning
Greater Sydney Branch
Biodiversity and Conservation

Attachment A – EES comments on Response to Submissions for 200 Aldington Road Industrial Estate (SSD-10479)

Biodiversity

EES notes that Appendix D: Biodiversity credit report has not been included in the BDAR. In addition, the credit report has not been finalised in the BAM-C and submitted to consent authority, so EES is not able to verify the calculator data. EES assumes the credits in the credit report and calculator align with the credit summary in Section 3.3.3 of the BDAR.

There is also no explanation provided for how the species polygon for Southern Myotis (*Myotis macropus*) was defined. Table 17 suggests that hollow bearing trees within 200m of the riparian zone were used to define the polygon. However, this geographic limitation is used to determine whether the species should be surveyed for on-site and is not relevant to the definition of the species polygon. Despite this, it appears that the species polygon has been defined appropriately, ie in accordance with the Threatened Biodiversity Data Collection (TBDC), which states that the '*Species polygon boundaries should align with PCTs on the subject land to which the species is associated that are within 200m of waterbodies mapped.*'

EES considers all matters previously raised have been adequately addressed.

Waterway health

EES has reviewed the Civil Infrastructure Report dated September 2021 and associated concept plan and drawings for the SSD and provides the following comments.

Section 8 – Sedimentation and Erosion Control

Sedimentation and erosion controls should demonstrate that EES's Construction Phase Targets are being achieved. Please refer to Table 1 of the EES 'MUSIC MODELLING TOOLKIT – WIANAMATTA' previously provided to DPIE Planning and Assessments Group on 5 August 2021.

Section 11 – Stormwater Management

EES seeks further clarification of section 11.3, where it is identified that part of the overall stormwater strategy for the site involves conveying the stormwater flows associated with upstream (external) catchments. Specifically, if this strategy is adopted, the applicant will be required to demonstrate that the development site will still achieve the Operation Phase Targets Stormwater Quality and Quantity Targets in the Mamre Road Precinct Development Control Plan (DCP) (see Tables 2, 3 of the 'MUSIC MODELLING TOOLKIT – WIANAMATTA').

Section 12 – Water Balance and Quality

The revised concept plan is similar to the previous concept plan, reviewed by EES as part of the applicant's previous RtS, although EES notes that the size of Basin B at Lot D has increased.

EES cannot provide advice on whether the concept plan being proposed complies with/achieves the Stormwater Quantity and Quality Targets in the Mamre Road Precinct DCP, for the following reasons:

- No information is provided on the rainfall period and potential evapotranspiration parameters that were used for the development of MUSIC X. EES therefore requests that the applicant supply the MUSIC X model as part of the submission to review.
- Scenario 1 cannot be considered by EES, as we have not had confirmation that a regional approach is a viable strategy for the Mamre Road Precinct.
- Scenario 2 meets the Operation Phase Targets Stormwater Quality and Quantity Targets, on the basis that much of the site is undeveloped. To demonstrate that the larger Basin (B) at lot

D in the concept plan achieves the targets, EES requests that the applicant provide their MUSIC X model and supporting excel spreadsheet titled 'Flow Duration Curve Development Scales – South Creek – Locked.xlsx' for review. On this basis, EES cannot make a comment on the feasibility of Scenario 2, at this stage.

(END OF SUBMISSION)