

Department of Planning and Environment

Our ref: DOC22/853428
Your ref: SSD-10272349

Pamela Morales
Planning Group
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Subject: Response to Submissions - Yiribana Logistics Estate (SSD-10272349)

Thank you for your email received 23 September 2022 requesting comments from the Environment and Heritage Group (EHG) within the Department of Planning and Environment on the Response to Submissions for the subject State Significant Development proposal. EHG has reviewed the Submissions Report prepared by Urbis dated 16th September 2022 along with the associated reports and plans and provides the following comments.

Trees, Biodiversity and Landscaping

EHG notes that the Order Conferring Strategic Biodiversity Certification on the Cumberland Plain Conservation Plan (CPCP) came into force on 17 August 2022. The subject site is identified as Certified – urban capable land under the Plan. As such, the comments previously raised by EHG in relation to the adequacy of the BDAR no longer need to be addressed. With this noted, the biodiversity mitigation measures identified within section 9 of the BDAR remain relevant to the proposal (regardless of the CPCP) and a condition of approval should be applied requiring the implementation of these measures.

In relation to the C2 – Environmental Conservation zoned riparian corridor within the site, EHG notes that since the exhibition of the Environmental Impact Statement, the corridor has been rezoned to IN1 – General Industrial. Despite this rezoning, EHG recommends and supports the retention of the riparian corridor through the site. No objection is raised to the proposed realignment of the corridor subject to the implementation of the Vegetation Management Plan prepared by Cumberland Ecology dated 14 September 2022.

For clarity regarding the riparian corridor, the CPCP mapping layers and planning controls do not negate the requirements and approvals required by the Water Management Act 2000 and Fisheries Management Act 1994.

Waterway Health

Revised plans and reports have been provided to address waterway health comments raised by EHG in its EIS submission dated 29 October 2012, including a revised Civil Engineering Report Incorporating Water Cycle Management Strategy prepared by Costin Roe and updated MUSIC modelling.

Following a review of the revised plans and reports, EHG notes that does not currently achieve the waterway health objectives and targets outlined at section 2.4 of the Mamre Road Development Control Plan. The stormwater quality targets are likely achieved under the updated strategy however the flow targets have not been achieved.

There are several issues to resolve with the proposed strategy which are highlighted at **Attachment 1**.

EHG notes that there may be alternative solutions for the implementation of a simple 'interim strategy' stormwater management strategy that does not require any change to the layout of roads, lots or warehouses. These potential alternative solutions are identified in **Attachment 2**. These solutions may also allow development of additional lots in the future.

Should you have any queries regarding this matter, please contact Shaun Hunt, Senior Conservation Planning Officer via shaun.hunt@environment.nsw.gov.au or 02 8275 1617.

Yours sincerely,

A handwritten signature in black ink that reads "S. Harrison".

13/10/22

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

Department of Planning and Environment

Attachment 1: Environment and Heritage Group comments in relation to proposed stormwater management strategy for Yiribana Logistics Estate (SSD-10272349)

EHG raises the following issues with the proposed storm water management strategy that require further resolution.

Erosion and Sediment Control

- The soils on the site are sodic to highly sodic and represent a high risk (refer to EIS Appendix Y, PSM 2021).
- To achieve the construction phase stormwater targets (in particular the 80% of flow to be 50mg/L), the following is required as a minimum:
 - high efficiency sediment (HES) basins
 - amelioration of sodic soils and topsoils is required to stabilise soil and allow vegetation to establish. Soil amelioration requirements are to be provided by a soil scientist along with certification. This requirement may form a condition of approval.
- The batch sediment basins proposed are not appropriate to achieve the construction phase targets. No Certified Professional in Erosion and Sediment Control (CPESC) certification has been provided. The strategy should be updated to provide adequately designed HES basins and the whole Erosion and Sediment Control strategy is to be certified by a CPESC to achieve the construction phase targets.

Sodic Soils

- Appendix Y – Geotechnical Investigation (PSM, 2021) submitted with the EIS found the site soils to be sodic to highly sodic (dispersive). This is consistent with the soil mapping for the area.
- Given the nature of the soils,
 - Infiltration of stormwater is not supported, and all stormwater treatment systems need to be lined with an impermeable liner. MUSIC modelling must not include exfiltration of stormwater (exfiltration = 0mm/hr). EHG notes the typical cross section for bioretention systems is lined with HDPE in the civil drawings which is supported.
 - All areas to be irrigated must have soils appropriately ameliorated (topsoil and subsoils) to avoid sodic soil issues and dispersion. Amelioration (i.e., gypsum application, etc) must be defined and certified by soil scientist as part of the design and construction.

Catchment and WSUD Plan

No catchment/WSUD plan or table has been included in the reporting. A plan and table must be provided showing:

- all catchments and land use splits (and areas/% impervious)
- drainage locations and any flow diversions/splits
- WSUD systems
- proposed irrigation areas for tanks and ponds.

Ocean Guards

Ocean guards have been included in the strategy to provide removal of litter, TSS, TP and TN, however these devices are not currently certified through Stormwater Quality Improvement Device Evaluation Protocol (SQIDEP) for the removal of TSS, TP and TN.

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In consideration of the above, should Ocean Guards be utilised, they should only be considered for the removal of ground level runoff litter. In addition, they should be located wholly within private land with a 10-year maintenance agreement applied as a condition of approval.

External Catchment to Online Swale and Pond

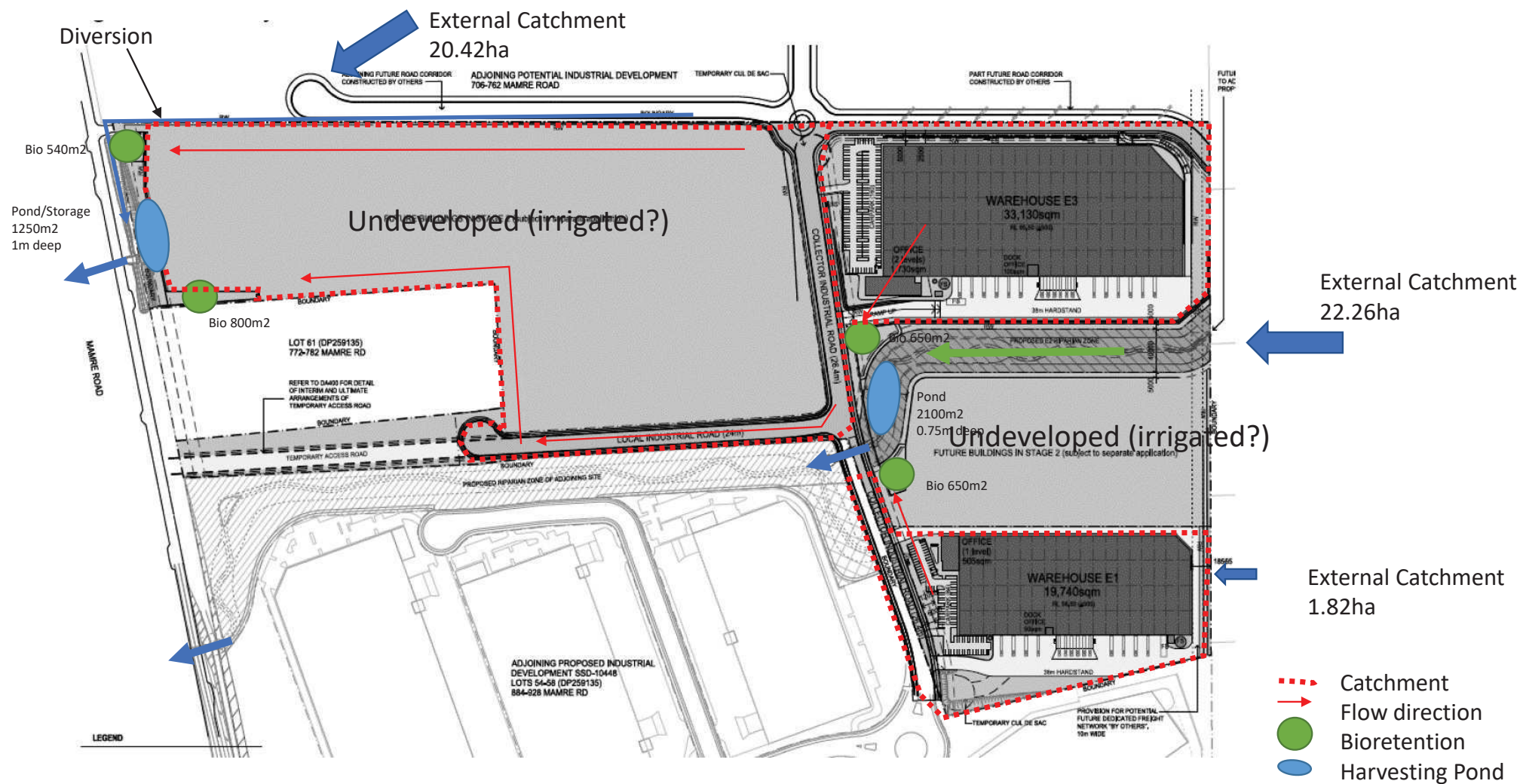
- The western 22.26ha external catchment enters the site into the proposed swale / waterway corridor and the online harvesting pond. Given the swale and pond are online to the external catchment, then this catchment needs to be included in the modelling. Currently the site is undeveloped but will ultimately be developed with WSUD. Both scenarios need be included in the strategy and modelling.
- The swale has been included in the MUSIC modelling to treat the development flows. However, development flows do not engage with the swale as they pass through the proposed bioretention systems and discharge to the proposed harvesting pond. The swale should be removed from the MUSIC model.
- To simplify the strategy and modelling, it is recommended that the harvesting pond is moved offline (refer potential alternative strategy at Attachment 2).
- It is unclear if the northern 20.42ha external catchment to the north has been modelled to confirm the diversion channel/pipe requirements.

MUSIC Modelling

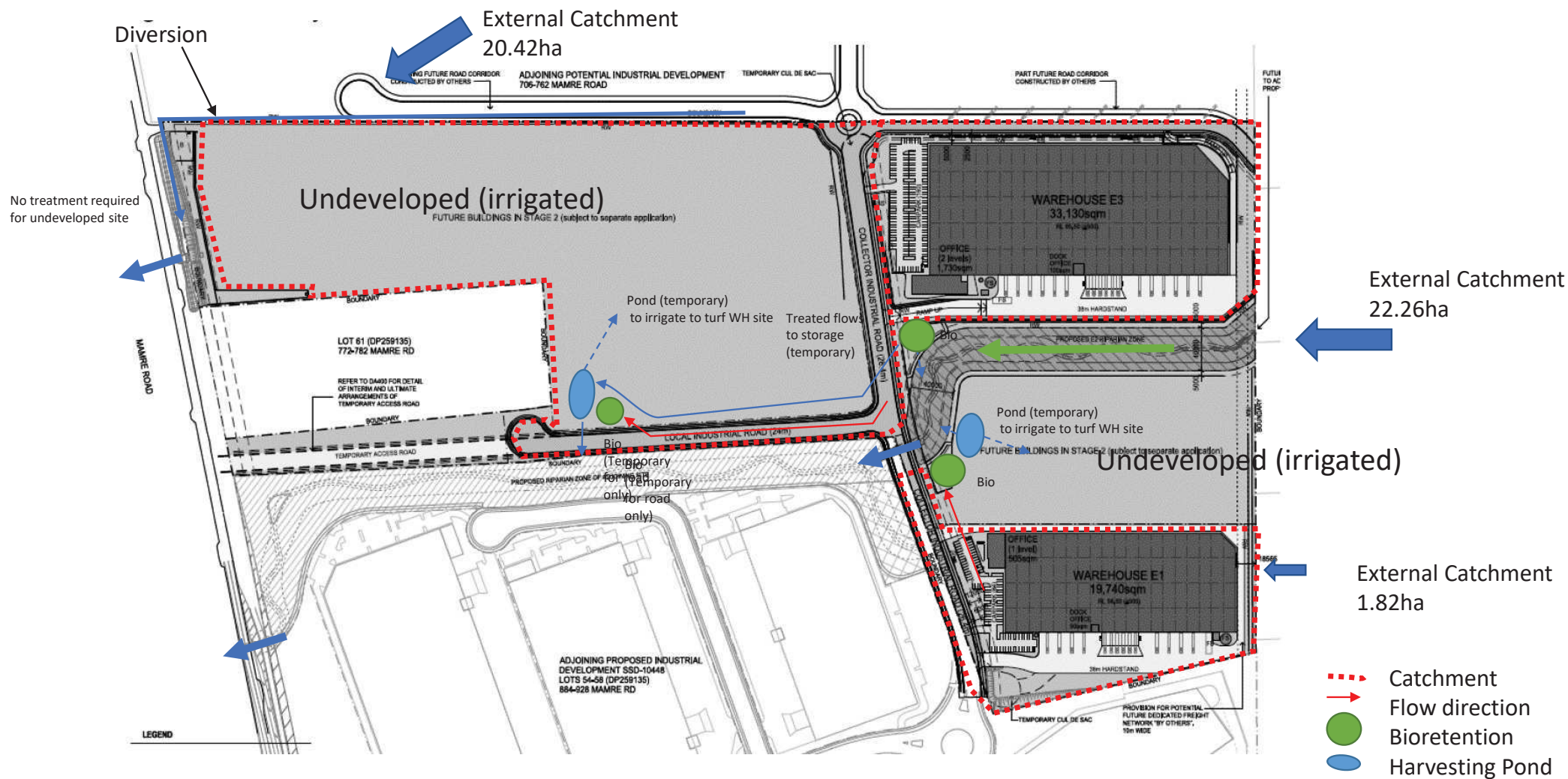
- Exfiltration - Given the sodic soils, exfiltration is not supported. Exfiltration should be set to 0mm/hr in all treatment nodes and the design of all WSUD systems including impermeable liner.
- Ocean guards - adjust the modelling of these systems as per comments above (litter removal only).
- Swale - Remove from MUSIC model as flows from the development enter downstream end directly into online pond.
- Tanks- Please provide breakdown of demands and location of irrigation areas on plan.
- Street trees - Appear to be modelled as ponds which are 0.15m deep. It is unclear if these are bio-retention trees or passively water trees? Please clarify how the tree design relates to the MUSIC modelling method.
- Stormwater harvesting ponds - Set exfiltration to 0mm/hr and provide a breakdown of demands (area, irrigation rate, kL yr and location of irrigation areas on plan).
- External Catchment - If the online swale and harvesting pond are to be retained in the strategy, then the external catchment existing and post development will need to be considered in the modelling.

Attachment 2: Environment and Heritage Group comments in relation to potential alternative stormwater strategies for Yiribana Logistics Estate (SSD-10272349)

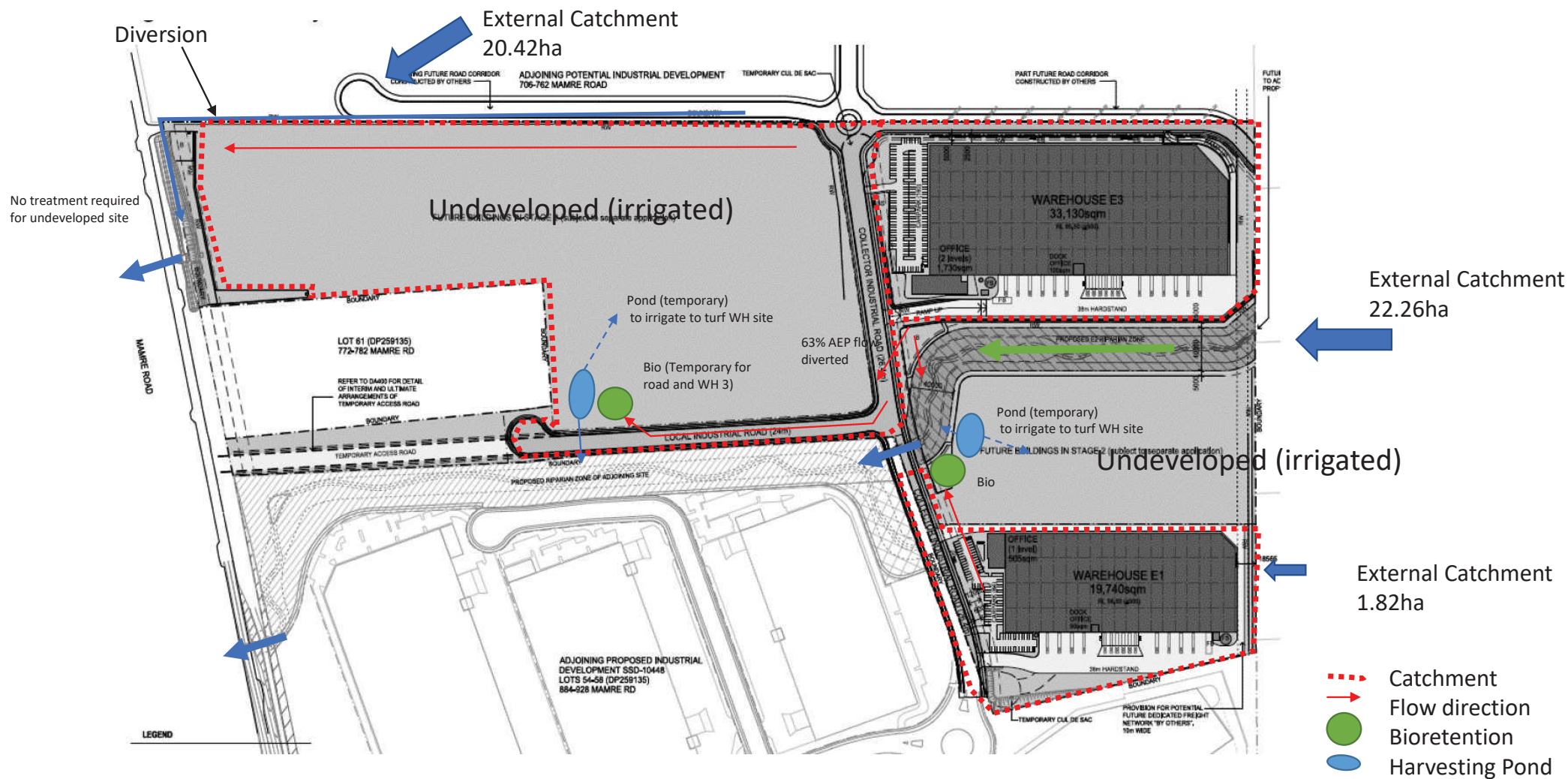
EHG has engaged Design Flow to assist in the review of the stormwater strategy. Several potential alternative stormwater strategies for the proposal have been identified and attached for the consideration of the proponent.



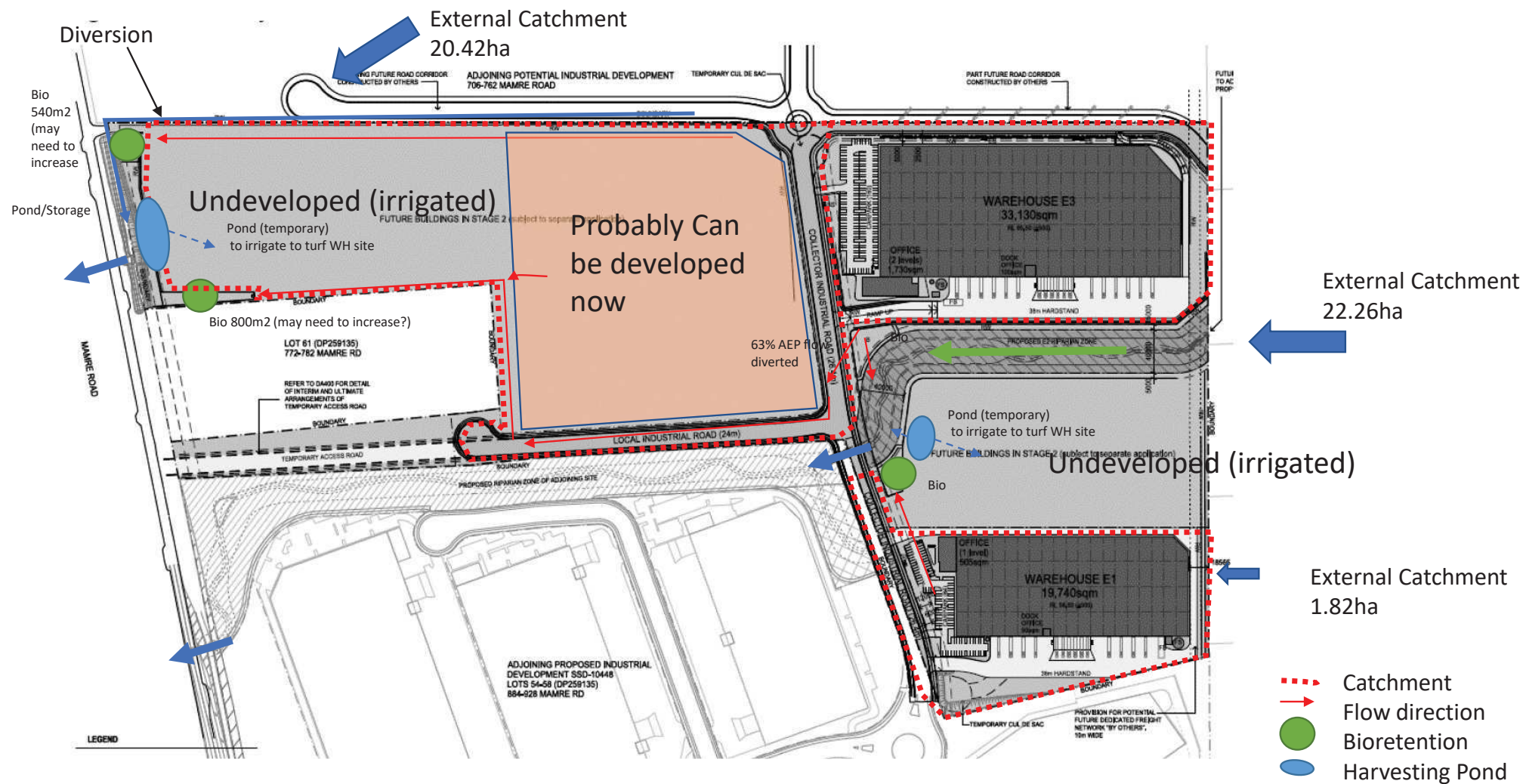
Stormwater Management Strategy (DesignFlow interpretation based on submitted information)



Potential Alternative 1 Stormwater Management Strategy (suggestion only)



Potential Alternative 2 Stormwater Management Strategy (suggestion only)



Potential Alternative 3 Stormwater Management Strategy (suggestion only)