



Your ref: SSD-74191717
Our ref: DOC25/470234

Sally Munk
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

18 July 2025

Subject: CPHR Advice – Environmental Impact Statement - Badgerys Creek Industry Park (SSD-74191717) (Liverpool City)

Dear Sally,

Thank you for your referral received on 5 June 2025 seeking advice from the Conservation Programs, Heritage and Regulation (CPHR) Group of the NSW Department of Climate Change, Energy, the Environment and Water on the Environmental Impact Statement (Urbis, May 2025) (EIS) for the Badgerys Creek Industry Park (SSD-74191717).

According to the EIS, the SSDA seeks approval for development across the entire estate, which consists of Stages 1 and 2. Stage 1 comprises the development of three warehouses, including Warehouses A, B and C and the private road. It proposes a designated landscape area to remain undeveloped as part of the interim stormwater arrangements. Stage 2 comprises the development of Warehouse 4 over the remaining undeveloped area.

CPHR has reviewed the EIS and supporting studies and provides detailed waterway health comments at **Attachment A**. In summary, CPHR:

- supports the proposed approach in the EIS and *Integrated Water Management Plan* (Infrastructure and Development Consulting, February 2025) (IWMP) to defer Stage 2 until the regional downstream stormwater infrastructure has been delivered by Sydney Water
- recommends discrepancies in catchment area be corrected across documents and the MUSIC model
- recommends the IWMP reference the Salinity Management Plan (Douglas Partners, 21 November 2024), particularly outlining the risk of sodic soils
- provides the recommended level of information to be included in the water quality treatment device detailed designs and requests that the detailed designs be referred to CPHR for review and advice
- recommends an erosion and sediment control plan be prepared prior to the commencement of construction works.

If you have any further questions about this issue, please direct them to Liz Peterson, Senior Conservation Planning Officer at elizabeth.peterson@environment.nsw.gov.au.

Yours sincerely

Louisa Clark
Director, Greater Sydney Branch
Regional Delivery
Conservation Programs, Heritage and Regulation

Attachment A – CPHR'S advice – Environmental Impact Statement - Badgerys Creek Industry Park (SSD-74191717)

Documents Reviewed

In preparing this advice CPHR has reviewed the following information:

- *Environmental Impact Statement* (Urbis, May 2025) (EIS)
- *Integrated Water Management Plan* (Infrastructure and Development Consulting, February 2025) (IWMP)
- *Aerotropolis Development Control Plan Compliance Table* (Urbis)
- *Civil Plans* (Infrastructure and Development Consulting, 4 December 2024)
- MUSIC model (Infrastructure and Development Consulting).

Key Assessment Issues

1.	Stage 2 commencing once the Regional Stormwater Scheme has been built	CPHR notes the proposal includes Stage 1 and Stage 2 components. The MUSIC model has only considered Stage 1. The EIS indicates that the delivery of <i>Stage 2 is dependent on the regional stormwater infrastructure solution being delivered by Sydney Water</i> and the <i>provision for the deferred commencement of Stage 2 will be through a condition of consent.</i> Further, Section 3 of the IWMP states that <i>Stage 2 = Following completion of the future regional downstream stormwater infrastructure by Sydney Water, the temporary on-lot stormwater management facilities are to be decommissioned, and the final warehouse (Warehouse 4) constructed.</i> CPHR supports the approach outlined in the EIS and IWMP that Stage 2 not proceed until the regional downstream stormwater infrastructure has been completed. Recommended action: • A condition of consent be imposed that Stage 2 not commence until the Sydney Water regional downstream stormwater infrastructure is in place.
	<i>Extent and Timing</i>	Prior to determination - condition of consent
2.	Discrepancies in the consolidated catchment area for the development	Discrepancies in the consolidated catchment area for the development have been identified, as listed below: • Section 2 of the IWMP states <i>approximately 17 Ha</i> • Table 7 of the IWMP lists <i>Total site area = 15.7</i> • page 36 of the Civil Plans - <i>Total area = 161601.9585m²</i> While the discrepancies are minor, the catchment area should be consistent across the documentation as this can impact the MUSIC modelling. Recommended action: • The catchment area of the development be corrected across all documentation and the MUSIC model.
	<i>Extent and Timing</i>	Pre-determination

3.	Incorporating Salinity Management Plan in the IWMP	The proponent completed a Salinity Management Plan (SMP) for salinity and sodic soils. However, the risk of sodic soils was not explicitly addressed in the IWMP. CPHR recommends the SMP be referenced in the IWMP. It is noted the treatment systems are lined in the IWMP bioretention MUSIC parameter table and this should be explicit in the IWMP. Recommended action: The proponent adequately references the SMP in the IWMP, particularly outlining the risk of sodic soils.
	<i>Extent and Timing</i>	Pre-determination

4.	Water quality treatment device details	Details of water quality treatment devices and how they interact are missing from plans. Detailed designs should include inlets, outlets, levels, maintenance access tracks (need to be around all water quality treatment devices, not just around entire block of combined treatment), depths, levels, widths and batter slopes. The proponent has indicated this detail will be provided in the detailed design. CPHR is of the view that this information should be provided prior to determination of the application Recommended action: The detailed designs for the water quality treatment devices include inlets, outlets, levels, maintenance access tracks (need to be around all water quality treatment devices, not just around entire block of combined treatment), depths, levels, widths and batter slopes be provided to CPHR.
	<i>Extent and Timing</i>	Pre-determination

5.	Erosion and Sediment Control Plan (ESCP)	An ESCP should be prepared prior to the commencement of construction works that includes the following details: - Plans for each major phase of works, including clearing and grubbing, bulk earthworks (existing and final levels), civil works, and stabilisation/practical completion. - Identification of the type of sediment basin and details for all functional components for example forebay, level spreader, spillway, dosing system, and flocculant type. Note that Type-B basins will likely be required to achieve the Mamre Road Precinct DCP Table 5 targets. - Provide sediment basin calculations demonstrating compliance with the Mamre Road Precinct DCP Table 5 targets. - Provide catchment plans identifying the sub catchments for all major drainage and sediment controls for each phase of works. - Provide calculation tables and sizing/dimensions for all major controls during all phases of works. - Provide a construction sequence identifying the order and timing for both the implementation and decommissioning of all controls, relative to specific site activities/hold points.
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	Timing	Prior to determination - condition of consent

End of Submission