



Thomas Bertwistle
Senior Environmental Assessment Officer
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2124

19 September 2025

Subject: Environmental Impact Statement – Alspec Warehousing Facility (SSD-81434988) (Penrith)

Dear Thomas,

Thank you for your referral received 19 August 2025 seeking comments from the Conservation Programs, Heritage and Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) on the above project located at 221 – 235 Luddenham Road, Orchard Hills.

CPHR has reviewed the Environmental Impact Statement (EIS) (Urbis, 18 July 2025) and accompanying technical reports and provides its comments and recommendations at Attachment A. CPHR notes Penrith City Council approved DA24/0294 on 5 May 2025 for, amongst other things, bulk earthworks, vegetation removal, and basins for stormwater treatment and storage at 211 - 227 and 289 - 317 Luddenham Road, Orchard Hills. This DA includes the site the subject of this SSD.

Waterway health

- Insufficient information has been provided to demonstrate that the Wianamatta-South Creek stormwater management targets have been met. CPHR recommends that the proponent addresses the [Technical guidance for achieving Wianamatta–South Creek stormwater management targets](#), and provides a water and stormwater management plan, detailed MUSIC model and detailed designs and civil drawings that align with each other.

Biodiversity

- The site is wholly within certified – urban capable land under the Cumberland Plain Conservation Plan (CPCP) and has boundaries with certified land, therefore no further biodiversity assessment is required.
- CPHR considers that the proposal is generally consistent with the CPCP Mitigation Measures Guidelines noting that no trees, vegetation or topsoil remain on the site following completion of the works approved under the Council Bulk Earthworks DA.
- CPHR recommends that a condition of consent is applied requiring compliance with the CPCP Mitigation Measures Guidelines.

Flooding

- The location of the site within Alspec Industrial Business Park is not impacted by flooding, therefore, CPHR has no further comments regarding flooding.

Should you have any queries regarding this matter, please contact Rachel Walker, Senior Conservation Planning Officer via rachel.j.walker@environment.nsw.gov.au.

Yours sincerely



Louisa Clark

**Director
Regional Delivery - Greater Sydney Branch
Conservation Programs, Heritage and Regulation Group**

CPHR comments on Environmental Impact Statement – Alspec Warehousing Facility (SSD-81434988) (Penrith)

Documents Reviewed

In preparing this advice, CPHR has reviewed the following documents:

- *Environmental Impact Statement* (Urbis, 18 July 2025)
- *Appendix A – SEARs Compliance Table* (Urbis, not dated)
- *Appendix C – Statutory Compliance Table* (Urbis, not dated)
- *Appendix D – DCP Compliance Table* (Urbis, not dated)
- *Appendix J – Architectural Plans* (Nettleton Tribe, 23 May 2025)
- *Appendix M – Biodiversity Management Plan Letter* (Eco Planning, 15 April 2025)
- *Appendix O – Civil Plans* (Henry & Hymas, 10 April 2025)
- *Appendix V – Flooding Risk Letter* (Arcadis, 10 June 2025)
- *Appendix Z – Integrated Water Cycle Management Report* (Henry & Hymas, May 2025)
- *Appendix AA – Landscape Plans* (Geoscapes, 11 July 2025)
- *Appendix FF – Survey Plan* (LTS Surveyors, 29 April 2025)
- *Alspec Industrial Park Flood Risk Assessment* (Arcadis, April 2024) (submitted as part of Alspec Manufacturing Warehouse SSD-69845208).

Key Assessment Issues

Waterway health

1.	<i>Compliance with Wianamatta-South Creek stormwater management targets</i>	CPHR reviewed Section 6.9.2 of EIS and the Integrated water cycle management report. The stormwater targets as outlined in the Technical guidance for achieving Wianamatta–South Creek stormwater management targets are not referenced in either document. There is insufficient information, therefore, to demonstrate how the stormwater management targets have been met. Recommended action: The proponent should: • reference the Technical guidance for achieving Wianamatta–South Creek stormwater management targets and assess the stormwater design so that it meets the targets and include this in the Response to Submissions report. • provide detailed designs and civil drawings that align with the above.
	<i>Extent and Timing</i>	Pre-determination

2.	<i>Water and Stormwater management plan</i>	A water and stormwater management plan (WSMP) has not been submitted for review. A WSMP is required to assess the stormwater design and treatment train and determine if the stormwater management targets have been met. Recommended action: The proponent should provide a WSMP as outlined in Table 7 of the Technical guidance for achieving Wianamatta–South Creek stormwater management targets and demonstrate how the stormwater targets have been met.
	<i>Extent and Timing</i>	Pre-determination

3.	<i>MUSIC Model</i>	Section 3.3 of Integrated water cycle management report (Appendix Z) references MUSIC model titled '241745_R1.sqz', however, this was not included in the package. Recommended action: The proponent should provide a MUSIC model that: - aligns with the stormwater design outlined in a Water and Stormwater Management Plan and civil plans - shows adherence to the Wianamatta-South Creek stormwater targets.
	<i>Extent and Timing</i>	Pre-determination

Biodiversity

4.	Consistency with the Cumberland Plain Conservation Plan (CPCP)	CPHR reviewed the EIS for Alspec Warehousing Facility (SSD-81434988) for consistency with the CPCP. The site is wholly within certified-urban capable land and has boundaries with certified land (certified-urban capable land and certified-major transport). Accordingly, no further biodiversity assessment under the <i>Biodiversity Conservation Act 2016</i> or <i>Environment Protection and Biodiversity Conservation Act 1999</i> is required. CPHR considers that the proposal is generally consistent with CPCP Mitigation Measures Guidelines noting: - no trees remain on the subject site following completion of work approved under the Bulk Earthworks development application (DA) approved by Penrith City Council (DA/24/0294) - vegetation and topsoil have been stripped from the study area under the Bulk Earthworks DA. Recommended action: - A condition of approval requires the proposal to comply with the CPCP Mitigation Measures Guidelines.
	<i>Extent and Timing</i>	Conditions of consent

Flooding

The location of the site within Alspec Industrial Business Park is not impacted by flooding, therefore, CPHR has no further comments regarding flooding.

End of Submission