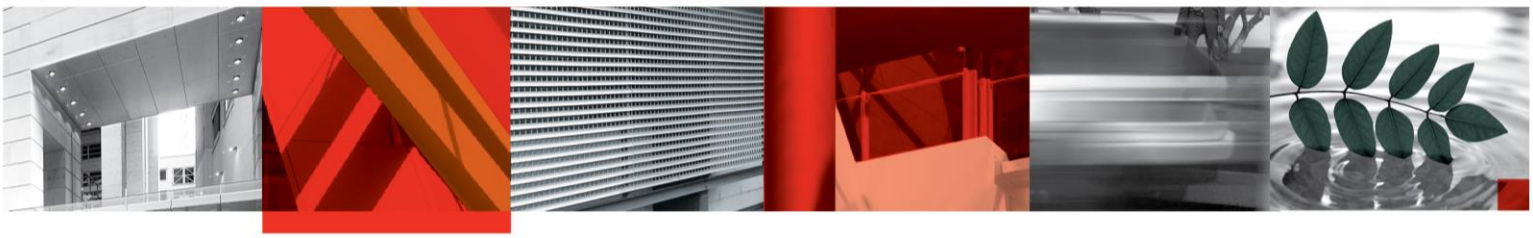
Response to Submissions

Staged DA (SSD 5248)



813-819 Wallgrove Road, Horsley Park

Gazcorp Industrial Estate, Western Sydney Employment Area

Submitted to Department of Planning and Environment
On Behalf of Gazcorp

May 2015 ■ 11730

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JBA operates under a Quality Management System that has been certified as complying with ISO 9001:2008. This report has been prepared and reviewed in accordance with that system. If the report is not signed below, it is a preliminary draft.

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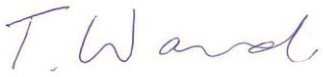

Tim Ward 8/05/2015

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1.0 Introduction

An Environmental Impact Statement (EIS) in support for of an application for State Significant Development (SSD) regarding an industrial estate comprising warehouse and distribution facilities (reference SSD 5248) was exhibited for a period of 44 days from 9 April 2014 to 23 May 2014.

In total 43 submissions were received in response to the application during this public exhibition period. Of these submissions:

- Ten were from Government Agencies;
- Two were from the local interest groups; and
- Thirty-one were from members of the general public, one of which was signed by 16 individuals.

The key issues identified in these submissions generally fell within the following categories:

- Flooding;
- Ecological impacts and bio-banking;
- Vehicle access and traffic management;
- Noise; and
- Visual amenity and site suitability.

The proponent, Gazcorp, and its consultants have reviewed and considered the comments and submissions received regarding the EIS and have prepared a Response to Submissions (RTS).

The RTS sets out the proponent's response to the issues raised during the exhibition period, describes modifications made to the proposal to address the issues raised in submissions and provides further environmental assessment of these changes (where relevant), and provides a revised schedule of mitigation measures for which development approval is now sought.

This report should be read in conjunction with the EIS, prepared by JBA dated February 2014, and its accompanying documentation.

1.1 Project Background

Sections 4.0 and 5.0 of the EIS described in full the details of the application, which are summarised as follows:

- Staged development consent was sought under Section 83B of the *Environmental Planning and Assessment Act 1979 (*EP&AAct) for the following development:
  - Indicative layout and configuration of development sites, structured around the central internal access road;
  - Gross floor areas for warehousing and associated offices;
  - Indicative building envelopes, including maximum heights and minimum setbacks; and
  - Indicative vehicular access and car parking arrangements.
- Detailed development consent was sought for:
  - Vegetation clearing and bulk earthworks associated with Stage 1 Warehouse Building and associated infrastructure.

- Construction of the building pad for Lot 10.
- Construction of a 45,225m^2 warehouse building on Lot 10, which includes 3,000m^2 of office.
- Vehicular access from Wallgrove Road and construction of internal road/driveway network and a new signalised intersection on Wallgrove Road.
- On grade parking (223 spaces) for Lot 10.
- Landscape works associated with the Stage 1 Warehouse Building and the internal access road.
- Extension and augmentation of services, utilities and infrastructure, including the water, sewer and electricity services infrastructure and interim stormwater infrastructure arrangements to be in place until the subsequent stage is developed.

1.2 Structure of the Report

Section 2 of this RTS provides a summary of the key issues raised in the submissions from Government agencies, industry organisations, local interest organisations and the general public.

Section 3 describes the changes to the proposed development, which has been developed by Gazcorp to further address the issues raised in submissions.

Section 4 includes further environmental assessment of the development as it has been amended and is now proposed, particularly with regard to the issues identified in the submissions.

Section 5 is a final schedule of mitigation measures, which has been informed by the revised environmental assessment.

2.0 Summary of Submissions

The following section provides a summary of the key issues raised by government agencies, community interest groups, industry bodies and private companies, and members of the general public. A detailed response to submissions made by government agencies is included at **Appendix A**, whilst a summary and response to all other submissions is included at **Appendix B**.

Ten submissions were received from government agencies during the public exhibition period, including:

- NSW Department of Trade and Investment, Mineral Resources Branch;
- Greater Sydney Local Land Services;
- NSW State Emergency Services (SES);
- Sydney Catchment Authority (SCA);
- Fairfield City Council (FCC);
- Department of Primary Industries (DPI);
- NSW Office of Water (Office of Water);
- A combined submission from Transport for NSW (TfNSW) and Roads and Maritime Services (RMS).
- Office of Environment and Heritage (OEH); and
- Sydney Water.

The key issues raised by these government agencies and in all other submissions have been discussed in detail below. Further environmental assessment with regard to some of the issues raised (where required) has been included at Section 4 of this report.

The Department of Planning and Environment (DP&E) also provided a summary of the key issues to be addressed in the Response to Submissions Report, and this in included in **Appendix A**.

2.1 Vehicle Access and Traffic Management

The proposed site access road from Wallgrove Road and associated traffic management measures were identified as an issue in both public submissions and agency submissions including the DP&E, TfNSW/RMS and SCA. Key concerns pertaining to vehicle access and traffic management comprised:

- Whether the truck and heavy vehicle trips generated by the proposed development could be accommodated on Wallgrove Road, sine it is limited to a single lane carriageway in each direction where it connects to the site access road.
- The additional set of traffic lights at the intersection of the site access road and Wallgrove Road, enabling vehicles to access the industrial site, would exasperate traffic congestion on Wallgrove Road.
- Spacing of 250m between signalised intersections on Wallgrove Road (i.e. the future Southern Link Road (SLR) intersection and the proposed site access intersection) is inconsistent with the preferred spacing/design standard of 400 m to 500 m. In particular, queuing from each intersection could impact on the other intersection.
- The EIS traffic report indicates that a 100 m right hand turn (RHT) storage bay is required on the northern approach of the Wallgrove Road/Gazcorp

intersection. This will require a bay length of 200 m to allow for queue and deceleration. The turn bay and deceleration provision on the northern approach to Wallgrove Road/ Gazcorp intersection may overlap with the RHT bay and deceleration provision proposed on southern approach to SLR/Wallgrove Road intersection.

- Access to the site solely from the SLR would be the preferred option of TfNSW/RMS, as opposed to Wallgrove Road. TfNSW/RMS also suggest that Gazcorp's State Infrastructure Contribution could be used to construct an initial two lane section of road along the proposed SLR alignment from Wallgrove Road to the proposed access road for the Stage 1 Warehouse Building, eliminating the need for temporary access arrangements directly from Wallgrove Road.
- The encroachment of the SLR along the northern boundary of the site into the Warragamba Prospect Pipeline corridor. Pertaining to this encroachment, the SCA has requested that further geotechnical investigations and adequate erosion and sediment control measures be undertaken, and that in the event of the proposed development being constructed prior to the SLR a security fence will be provided along the property boundary to prevent pedestrians and vehicles from entering the corridor.

2.2 Flooding

Issues with the potential flooding impacts of the proposed development, and cumulative flooding impacts, were identified in a number of submissions from government agencies, community interest groups and neighbouring landowners.

Of principal concern is the predicted impacts associated with increased flood depth and duration on Wallgrove Road, due to the floodwaters crossing through the south-east part of the site.

The SES raised concerns associated with flood access/egress via Wallgrove Road, and whether there were any alternative roads for access/egress to or from the site.

The SCA has also raised concerns regarding the impact of flooding of the Prospect Pipeline corridor.

It is was also requested that the flood modelling consider the 500 year and 2000 year annual recurrence interval (ARI) flood events, as well as the impacts of increased rainfall as a result of climate change.

2.3 Water Cycle Management Systems and Watercourses

Several submissions have raised concerns with the proposed water cycle management and those works to the identified watercourses on site. These concerns were raised by the NSW Office of Water and DPI and relate largely to the level of detail provided with regards to the watercourse that traverses the south eastern corner of the site, including:

- The management of riparian zones;
- The location, top of bank, and remnant vegetation of watercourses on the site;
- The location of the on-site detention basin; and
- The management of vegetated buffers.

Further recommendations for the management of the site have also been proposed by the NSW Office of Water regarding access to the banks of Reedy Creek and the potential for stream bank erosion, and that the Riparian Management Plan adhere to the Office of Water (2012) Guidelines for Vegetated Management Plans on Waterfront Land.

2.4 Ecological Off-Sets and Bio-Banking

The OEH, FCC and the DP&E raised concerns about the appropriateness of the proposal to offset only 50 percent of the ecosystem credits calculated in the bio banking assessment. The agencies indicated that they did not consider it appropriate in this instance to apply any discount to the required ecosystem credits calculated in the bio banking assessment.

2.5 Residential Amenity – Noise and Visual

2.5.1 Noise

The potential impact of noise generated by the development has been raised as an issue in several public submissions and referenced in the FCC submission. Specifically, these submissions requested that further investigation be undertaken to provide a landscaped mound and masonry wall in place of the proposed colourbond fencing as a noise barrier.

2.5.2 Visual Amenity

The overall design and location of the proposed development has been raised in a number of submissions from government agencies, community interest groups and neighbouring landowners. Issues relating to the treatment of site boundaries, building heights, site setbacks, the detailed design of the proposed buildings and the resultant visual impact of the proposed development are raised in particular in relation to the adjoining properties to the south of the site.

The Department has specifically raised the following issues:

- Provide greater consideration to the interface of the proposal with the residential properties to the south of the site. Some of the residences are within 200 m of the site boundary.
- The 3 m high colour bond acoustic fence proposed as part of Stage 1 is not considered visually appropriate for a residential interface and is required to be replaced with a boundary/fence treatment which is aesthetically acceptable when viewed from the residential properties. In this regard, consideration should be given to a boundary treatment which combines earth mounding, fencing and landscaping.
- Provide specific details of measures to preserve the visual and acoustic amenity of potentially affected residences.
- Boundary design treatments, including fencing and landscaping should be provided.

FCC has also submitted that the proposal does not meet the development standards provided in the *State Environmental Planning Policy (Western Sydney Employment Area) 2009* (WSEA SEPP) pertaining to the height of buildings and the proposal's response to site topography.

3.0 Description of Revised Development

In response to the issues raised in submissions and further design refinement since the EIS was exhibited, Gazcorp has made a number of changes to the Staged DA, including the Masterplan and the detailed Stage 1 development.

The proposed changes and a description of the proposed development for which approval is now being sought are set out in the following sections.

3.1 Summary of Proposed Development

3.1.1 Concept Masterplan

The concept Masterplan for which development consent is now sought is provided in **Appendix C** and is described below:

- An indicative layout of fifteen (15) new industrial development sites of varying size and dimensions. The indicative area of each development site is listed in **Table 1**.
- Indicative building envelopes tailored to accommodate future industrial/warehouse uses and sited to effectively integrate with the proposed layout.
- A central service road that will provide direct access to the development sites via a signalised connection with the SLR.
- Allocated space to account for the future parking and servicing needs of each proposed development site. Indicative gross floor areas (GFAs) for each development site are provided in **Table 1**.
- Landscaped open space along the Wallgrove Road frontage, around the site periphery and along the proposed new central roadway.
- A 20-30 metre riparian setback zone along the site's western boundary to Reedy Creek.
- A swale to redirect water flow through the south eastern corner of the site.
- A swale to redirect water flow from south of the site along the south-western boundary to Reedy Creek.

Table 1 – Overview of the Masterplan development sites

Future Development Site	Area (ha)	Area Change (ha)	Indicative GFA (m^2)	GFA Change (m^2)
1	1.16	0.00	5,800	0
2	1.57	0.04	7,260	0
3 (3A + 3B)	5.02	0.04	16,334	-676
4	3.51	0.00	16,026	866
5	2.80	0.00	11,685	807
6	2.65	0.00	10,833	834
7	2.29	0.00	10,512	432
8	1.79	0.00	9,531	432
9	1.53	0.00	6,214	632
10	8.92	0.00	45,225	0
11	2.91	0.49	15,783	2,991
12	2.51	-0.32	15,783	-1,753
13	2.08	-0.75	11,442	-6,094

Future Development Site	Area (ha)	Area Change (ha)	Indicative GFA (m^2)	GFA Change (m^2)
14	3.06	0.00	16,510	-1,026
15	2.61	0.00	12,604	4
Total	44.41	-0.50	211,542	-2,551

Table 2 – Numerical overview of the Master Plan site

Component	EIS	RTS
Total Site Analysis (Percentages of total site area, excluding the SLR road reserve)		
Site area (total)	52.2 ha	52.2 ha
Southern Link Road Reserve	2.5 ha (5%)	2.5 ha (5%)
Area of Development Sites (Note: the development sites include the Transgrid easement)	44.9 ha (86%)	44.4 ha (85%)
Internal Access Road (including footpaths)	1.5 ha (3%)	1.68 ha (3%)
Shared Landscaped Areas	2.3 ha (4%)	2.13 ha (4%)
Riparian Corridor	0.85 ha (2%)	0.83 (2%)
Built Area (Warehouses and Offices)	208,000 m^2	204,700 m2
Gross Floor Area (GFA)	214,400 m^2	211,550 m^2
Floor Space Ratio (FSR) (across whole site, excluding the SLR road reserve))	0.43:1	0.43:1
Site coverage (across whole site, excluding the SLR road reserve)	0.42:1	0.42:1
Car Parking Spaces	2,089	1,500
Maximum building height	14m	14m
Development Site Analysis (Percentages of development area only)		
Area of Development Lots	44.9 ha	44.4 ha
Built Area (Warehouses and Offices)	20.8 ha (46%)	20.5 ha (46%)
Unbuilt area (including roads, driveways and parking)	16.9 ha (38%)	16.2 ha (36%)
Landscaped area	7.2 ha (16%)	7.7 ha (17%)
GFA (warehouse)	202,000 m^2	198,300 m^2
GFA (offices)	12,400 m^2	13,250 m^2
GFA (total)	214,400 m^2	211,550 m^2
FSR (average, across development lots)	0.48:1	0.48:1
Site coverage (average across development lots)	0.46:1	0.46:1

3.1.2 Stage 1 Warehouse Development

Detailed development for the Stage 1 Warehouse for which development consent is now sought is provided in **Appendix D** and is described below:

- Vegetation clearing and bulk earthworks associated with Stage 1 Warehouse Building and associated infrastructure.
- Construction of the building pad for Lot 10.
- Construction of a 45,225m^2 warehouse building on Lot 10, which includes 3,000m^2 of office.
- Construction of internal road/driveway network.
- Vehicular access to Wallgrove Road at the future intersection with the SLR Road, via the construction of the two southern lanes of the future SLR between Wallgrove Road and the internal road, including interim intersection arrangement at the Wallgrove Road intersection.
- Future access to the site from a signalised intersection on the SLR (once it is built) connecting to the internal road.

- On grade parking (223 spaces) for Lot 10.
- Landscape works associated with the Stage 1 Warehouse Building and the internal access road.
- A swale to redirect water flow from south of the site along the south-western boundary to Reedy Creek.
- Extension and augmentation of services, utilities and infrastructure, including the water, sewer and electricity services infrastructure and interim stormwater infrastructure arrangements to be in place until the subsequent stage is developed.

The key numerical development information for the Stage 1 Warehouse Building is summarised in **Tables 3** below. There have been no substantive changes to this numerical summary compared to what was originally set out in the EIS.

Table 3 – Numerical overview of Lot 10

Component	Proposal
Site area	89,155m^2
Built Area	43,506m^2 (49%)
Gross Floor Area (GFA)	45,225m^2 ▪ 42,219m^2 warehouse ▪ 3,006m^2 office (over two levels)
Floor Space Ratio (FSR)	0.51:1
Maximum Height	14m
Car spaces	223
Unbuilt area (including roads, driveways and parking)	28,944m^2 (32%)
Landscaped area	16,705m^2 (19%)
Site coverage	0.49:1

3.2 Key Changes to Exhibited Project Application

3.2.1 Vehicle Access and Traffic Management

The proposed development has been modified principally as a result of changing the access arrangements for the industrial estate in response to submissions that raised issues associated with the direct access (and signalised intersection) to Wallgrove Road.

Accordingly, the proposed development has been modified so that the internal road intersects with the future SLR approximately 350m west of Wallgrove Road, as detailed in the amended Civil Plans prepared by Brown at **Appendix E**. No direct access to Wallgrove Road is now proposed.

It is highlighted that whilst the proposed development is expected to be completed prior to the opening of the SLR, the addendum letter from GHD at **Appendix F** has proposed appropriate access arrangements through the lifetime of the project, as follows:

- For the construction of Stage 1 it all vehicles would access the site via the western approach of the Wallgrove Road/SLR/Austral Bricks access.
- As an interim scenario, a temporary access driveway will be provide access to the Gazcorp site and will form the western approach of a signal controlled intersection with Wallgrove Road and the Austral Bricks access. This intersection will be a single lane in each direction, generally located on the

southern lanes of the future SLR alignment. The general arrangement of this interim intersection arrangement was agreed between Gazcorp and RMS, and is provided in **Appendix L**.

- Upon the completion of the SLR, all vehicles would access the development site via a signal controlled intersection with the SLR on the northern boundary of the development site. The final SLR arrangement will have two lanes in each direction.

The alignment and design of the SLR assumed above for future access arrangements has been provided by the RMS and agreed with Gazcorp. The timing of delivery of the SLR is outside of Gazcorp's control and will be determined by the RMS and/or DP&E. Accordingly, the SCA requirements for the SLR in relation to the encroachment of the future road corridor into the Warragamba Prospect Pipeline would be addressed by RMS / DP&E at the appropriate time. In relation to the interim arrangement Gazcorp would ensure that suitable security fencing is in place between the Warragamba Prospect Pipeline land and the interim access road.

3.2.2 Project Footprint

Master Plan Site

As can be seen in the site layout plans provided in **Appendix C** the overall development footprint of the site is generally consistent with the EIS. The main changes to the overall arrangement of the development have arisen because of the revised access arrangements. In particular:

- The quantum of land required for the internal road within the estate has increased by approximately 0.18ha.
- The location of the internal access road has resulted in shifting the size of development sites 11, 12 and 13 to make way for the north-south component of the internal access road
- The modified site arrangement has resulted in the revised layout of development site 3, which now potentially comprises 2 buildings located further east on the development site.
- These changes have resulted in an overall reduction in the area of the development sites by approximately 0.5ha.

3.2.3 Civil Plans and Earthworks

The revised civil plans and sections, as well as a new cut and fill plan, to accommodate the revised internal road and general layout, are included in the Civil Plans at **Appendix E**. There have been no substantive changes to overall site levels or the cut and fill plan.

3.2.4 Stormwater

A revised Stormwater Concept Plan has been prepared for the revised development (see **Appendix G**). The intent of the proposed stormwater management system has not changed. However, the revised site layout has altered the location and size of stormwater basins under both the interim and ultimate (i.e. full site development) stormwater management strategy for the site.

Interim Stormwater Arrangements for Stage 1

In relation to the Interim scenario, on-site detention (OSD) of stormwater is to be provided for the Stage 1 warehouse under the Site Storage Requirements and Permissible Site Discharge requirements that were established in the EIS.

Temporary detention is to be provided for the access road until the future development of the overall site proceeds such that interim peak flows at each discharge point at Stage 1 does not exceed existing hydrological conditions.

The storage requirements for temporary Basin Number 1 and Number 2 are 536m^3 and 817m^3 respectively, however once the remaining development sites have been developed at a future stage, the OSD systems provided across all the development sites will compensate for the impervious area of the access road as provided for under the ultimate strategy and the temporary basins can be decommissioned. This approach is consistent with the approach set out in the EIS, and the only change has been to the storage volumes for the temporary OSD basins.

Permanent Stormwater Arrangements for Full Development

As is consistent with the original proposal, two outlets will convey water into stormwater infrastructure on Wallgrove Road and the third will discharge into Reedy Creek. The revised layout and earthworks plan has changed the size of the internal catchments as shown in **Table 4** below.

Table 4 – Catchment Areas

	Old Catchment Area (Ha)	New Catchment Area (Ha)	Indicative Change (%)
Catchment 1	15.55	15.25	-2%
Catchment 2	13.03	10.48	-20%
Catchment 3	23.85	26.70	+12%
Total	52.43	52.43	-

Conveyance of Off-Site Flows

There are two external upstream catchment areas draining through the site. The South Eastern external catchment is 74.71ha in area, which drains through the south-eastern corner of the site and combines with the outflows from internal Catchment 1. The South Western external catchment is 5.6ha in area, which drains through the site along the southern boundary and eventually discharges to Reedy Creek at the south-western corner of the site.

The two external catchment areas draining through the site are to be conveyed via vegetated swales and have been designed for storms up to 100 year ARI. The dimensions of the proposed vegetated swales located at southeast and southwest of site are provided in **Appendix G**, which also includes a conceptual design for the southwest swale, as it is proposed to be built as part of the Stage 1 works. In summary:

- The southeast swale will have a depth of up to 1.5m, a base width of 3m and a top width of up to 20m.
- The southwest swale will have a depth of up to 1.1m, a base width of 2m and a top width of up to 8.6m.

The southwest swale involves a diversion around the base of the transmission pylon, which requires the construction of a rock retaining wall up to 1.25m high.

3.2.5 Landscaping and Boundary Treatment

In response to the public submissions relating to the visual impact of the development, a revised Landscape Report has been prepared by Site Image Landscape Architects and is included at **Appendix H**. The revised Landscape Report includes a Landscape Concept Design for the revised Masterplan as well as

details for the Stage 1 Warehouse building and associated infrastructure works (i.e. the internal road and the SLR-link to Wallgrove Road).

The amended landscape design for the Stage 1 site proposes additional shrubs (up to 4m high) in addition to the tall native grasses along the Transgrid easement in front of the noise barriers to soften the development when viewed from the south. The site currently fenced by a chainmesh fence. Given the boundaries of the estate it is not considered necessary for estate-wide fencing to be installed, and no additional fencing around the boundary of the estate (i.e. over-and-above what will be provided for individual development sites within the estate) is proposed. Where appropriate the existing chainmesh fence will be removed.

Due to the revised location of the site access road, the site landscaping has been amended to address the approach to the SLR intersection with Wallgrove Road and the new site entrance off the SLR. This revised design remains consistent with the intent of the original proposal to create a landscape design that accentuates the arrival to the site with a formal array of ornamental trees that contrast with the large canopy copse planting.

3.2.6 Water and Sewer Servicing

The proposed water servicing arrangements have been revised, to reflect the revised access arrangements, and a supplementary letter is provided at **Appendix I**. There have been no substantive changes to overall site levels or the cut and fill plan.

3.2.7 Contributions

A revised Letter of Offer to enter into a Voluntary Planning Agreement (VPA) is provided alongside this Response to Submissions Report. No changes have been made to the proposed contributions in relation to the quantum of the State Infrastructure Contribution, however as Gazcorp are now proposing to construct part of the future SLR it is proposed that a work-in-kind arrangement be provided for in the VPA so that these construction works can be carried out in lieu of a cash contribution.

In relation to local infrastructure contributions Gazcorp consider that it would be reasonable to contribute levies under Section 94A of the EP&A Act at a rate of 0.5%. The 50% reduction (from the top rate of 1.0%) is considered appropriate due to the high Capital Investment Value of the project compared to the low number of on-site employees and the likely degree of impact in relation to demand for social services.

4.0 Further Environmental Assessment

In some instances, the submissions have requested further environmental assessment, or more detailed environmental assessment for particular issues. Further, the design changes to the industrial precinct have resulted in the need to update certain sections of the environmental impact assessment.

Table 5 below sets out an assessment for each issue to determine whether further environmental assessment is required in this RTS, due either to issues raised in submissions, or because of the design changes to proposed development. Where further assessment has been determined to be warranted, the following sections provide the appropriate environmental assessment.

Table 5 – Items requiring further environmental assessment

Issue	Implications of Environmental Assessment	Further Environmental Assessment
Contamination	The contamination assessment has not changed, and the overall site footprint has not changed. Contamination was not raised an issue of concern in submissions.	No further environmental assessment required. The recommended mitigation methods will not need be modified in response to the design changes or the issues raised in submissions.
Layout and Urban Design	The site layout has been subject to only minimal changes. No changes are proposed to the Urban Design Guidelines prepared to guide future development, however the DP&E has raised a query as to the adequacy of the EIS and the Urban Design Guidelines in meeting the requirement for a Development Control Plan (DCP) in the WSEA SEPP. FCC has submitted that the proposal does not meet the development standards provided in the WSEA SEPP pertaining to the height of buildings and the proposal's response to site topography.	Further consideration of the requirement for a DCP in the WSEA SEPP, and other requirements of the WSEA SEPP, has been provided. Refer to **Section 4.1** of this report.
Economic Impact	The changes to the project will not affect the social and economic impacts of the project.	No further environmental assessment required.
Noise	The Industrial Noise Policy has been used to establish the project specific noise criteria for the estate, and the noise barrier methods implemented. The assessment of the proposal within the EIS determined that the colourbond fencing along the boundary of the site was sufficient to meet the noise criteria. No alterations to the noise assessment or mitigation measures are proposed as part of this report.	No further environmental assessment required. The recommended mitigation methods will not need be modified in response to the design changes or the issues raised in submissions.
Transport and Accessibility	Vehicle access to the site has been relocated from Wallgrove Road to the Southern Link Road.	A revised traffic impact assessment has been carried out. Refer to **Section 4.2** of this report and **Appendix F**.
Geotechnical	The proposed modifications to the development will not alter the geotechnical assessment undertaken by Douglas Partners as part of the EIS.	No further environmental assessment required.
Sediment, Erosion, and Dust Controls	A revised sediment and erosion control plan has been prepared by Brown Consulting and included at **Appendix E.** Only minor changes have been made to the plan to reflect the modified site layout and internal access road arrangement.	No further environmental assessment required.

Issue	Implications of Environmental Assessment	Further Environmental Assessment
Infrastructure, Utilities and Services	The proposed water servicing arrangements have been revised, to reflect the revised access arrangements, and a supplementary letter is provided at **Appendix I**. There have been no substantive changes to overall site levels or the cut and fill plan.	No further environmental assessment required.
Flora and Fauna	No changes to the flora and fauna assessment are required, and none have been carried out in response to issues raised in submissions. However, the adequacy of the proposed offsets arrangements was raised in submissions, as was the need for a referral to the Commonwealth for impacts to Cumberland Plain Woodland.	A revised biodiversity offset is proposed and further consideration of the need for a referral to the Commonwealth has been provided. Refer to **Section 4.3** of this report.
Bushfire	The changes to the project will have no impact to bushfire risk, and as such the development will remain consistent with the assessment against the *Planning for Bushfire Protection 2006* outlined in the original application.	No further environmental assessment required.
Flood and Stormwater Drainage Management	A revised Hydraulic Modelling and Impact Report has been prepared by BMT WBM and included at **Appendix J** to flooding issues raised in submissions. A revised Stormwater Concept Plan is provide in **Appendix G**.	Refer to **Section 4.4** of this report.
Waste	The changes to the project will not affect the proposed approach to waste management.	No further environmental assessment required.
Heritage	The design changes have not resulted in any changes to the impacts or mitigation measures for heritage.	No further environmental assessment required.
Visual Impact	The changes to the project will have a minimal impact on the nature, extent and visibility of the structures and infrastructure. However, visual impact was an issue raised in a number of submissions, and was specifically identified as a key issue by the DP&E.	Refer to **Section 4.5** of this report.

4.1 Statutory Requirements

4.1.1 Requirement for a DCP

Section 83(C)(2) of the EP&A Act specifically states that

> *" if an environmental planning instrument requires the preparation of a development control plan before any particular or kind of development is carried out on any land, that obligation may be satisfied by the making and approval of a staged development application in respect of that land."*

As such, it is the entire Staged DA (including the Masterplan) that takes the place of the DCP, not just Section 4.2 of the EIS which provides an assessment of the Masterplan against the relevant provisions of the WSEA SEPP to demonstrate that all of the relevant matters have been considered in the preparation of the Masterplan and Staged DA.

The Urban Design Guidelines (see Appendix L of the EIS) also form part of the Staged DA and address matters relating to future development of the estate not otherwise captured in the design and layout of the Staged DA Masterplan.

4.1.2 Compliance with the WSEA SEPP

Clause 21 of the WSEA SEPP states that the consent authority must not grant consent to development unless it is satisfied that:

- building heights will not adversely impact on the amenity of adjacent residential areas, and
- site topography has been taken into consideration.

The proposal is compliant with Clause 21 of the WSEA SEPP, as the proposed development and building envelopes have been designed in such a way as to minimise any adverse impacts on the amenity of the nearby rural residential properties.

Due to the topography of the Site there is only a limited interface between the industrial area and the adjoining rural residential properties. The closest residential dwelling is located almost 200m from the Stage 1 building (which is the closest building). This residence is not orientated towards the proposed Gazcorp estate and does not have views across the site due to the existing vegetation and topography. Further, the industrial buildings will not overshadow or block solar access for existing residents.

4.2 Transport and Accessibility

An addendum Traffic Assessment has been prepared by GHD and included at **Appendix F** to address the proposed modification for vehicle access to/on the site.

4.2.1 Access

The revised site access options outlined in Section 3 has been proposed to address the issues raised by the DP&E, TfNSW and the RMS, the SES, SCA and the general public. As is outlined in the detailed response to submissions made by government agencies at **Appendix A** and the general public at **Appendix B**, the revised access arrangement resolves those issues raised whilst also providing appropriate access to the industrial estate before and after the construction of the SLR.

4.2.2 Traffic Impact

In light of GFA on the site remaining generally consistent with the original proposal, the modified development will not generate any additional trips than what was originally assessed. However, the 600 trips per hour during peak times that were predicted in the original assessment will now be split 57% from Wallgrove Road (north), 27% from Wallgrove Road (south) and 16% from the SLR (west).

SIDRA intersection modelling has been undertaken for the revised vehicle movement split and site access location using the proposed 2031 traffic generation and background traffic assumptions. This analysis confirms that the intersection arrangement is expected to operate at an acceptable level during both the AM and PM peak periods. Accordingly, the proposed access solution will provide for efficient and effective vehicular movements in and out of the site with minimal disruption to traffic flows along Wallgrove Road and the future SLR.

4.2.3 Parking

The proposed master plan has been modified to comprise of 1,500 parking spaces, which is reduced from the 2,231 initially proposed in the EIS. This reduction in the number of parking spaces on site addresses a concern raised by TfNSW that the original number of car parking spaces was excessive.

4.3 Flora and Fauna

4.3.1 Biodiversity Offset

As stated in the EIS, Gazcorp intends to seek a biodiversity offset for the project through the purchase and retirement of BioBanking biodiversity credits. The number and type of credits to be purchased and retired has been established by using the BioBanking Assessment Methodology. A BioBanking Assessment was completed to identify the number and types of biodiversity credits that would be required, and is attached at **Appendix K**. The BioBanking Assessment identified the following credits as being required:

- Ecosystem Credits:
  - Shale Hills Woodland [HN529] Grey Box - Forest Red Gum grassy woodland on shale of the southern Cumberland Plain, Sydney Basin (173 credits).
  - Shale Plains Woodland [HN528] Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin (56 credits).
  - Iluvial Woodland [HN526] Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin (30 credits).
- Species Credits
  - Southern Myotis (potential breeding habitat) (36 credits).

In total 295 biodiversity credits would be required to be purchased and retired in order to offset the biodiversity impacts from the project. Gazcorp has identified that biodiversity credits for all three vegetation communities are available on the BioBanking market at this time, however credits for Southern Myotis (potential breeding habitat) is not currently available.

Gazcorp's biodiversity offset strategy is therefore to purchase and retire 295 biodiversity credits. However, to ensure suitable flexibility is retained in delivering the biodiversity offset outcomes Gazcorp will continue to investigate alternative means ways to achieve a biodiversity offset equivalent to the purchase and retirement of 295 biodiversity credits as set out above. Other biodiversity offsets that could be implemented to obtain an equivalent level of biodiversity offset include, but are not limited to:

- Gazcorp could identify and purchase land that is subsequently managed and maintained in perpetuity for biodiversity outcomes, in accordance with an agreed management plan or deed of agreement such that it achieves biodiversity offsets equivalent to the purchase and retirement of 295 biodiversity credits.
- Gazcorp could identify land held by a third party that is subsequently managed and maintained in perpetuity for biodiversity outcomes, in accordance with an agreed management plan or deed of agreement such that it achieves biodiversity offsets equivalent to the purchase and retirement of 295 biodiversity credits.
- Gazcorp could contribute a quantum of money to the NSW Biodiversity Offsets Fund, or any interim biodiversity offsets fund, that is operated by the OEH, which achieves biodiversity offsets equivalent to the purchase and retirement of 295 biodiversity credits.

If Gazcorp ultimately prefer, or are forced (e.g. if sufficient and/or suitable BioBanking biodiversity credits are not available for purchase), to achieve the biodiversity offset via a mechanism other than the purchase and retirement of BioBanking biodiversity credits, then a Biodiversity Offset Strategy will be

submitted to the Secretary for approval. The Biodiversity Offset Strategy will demonstrate how a biodiversity offset outcome equivalent to the purchase and retirement of 295 biodiversity credits would be achieved by the alternative mechanism, and will be prepared in consultation with the OEH. The Biodiversity Offset Strategy would also set out the timing associated with implementing the alternative mechanism.

Gazcorp would ensure that the purchase and retirement of sufficient and suitable BioBanking biodiversity credits is completed prior to the removal of the specified vegetation. It is highlighted that the project involves a Staged DA, which means that only the first stage of the project is currently the subject of a detailed SSDA. The purchase and retirement of biodiversity credits (or any other approved alternative mechanism) for subsequent stages may be delayed until immediately prior to the clearing associated with those subsequent stages occurring.

4.3.2 Commonwealth Referral

Although Cumberland Woodland exists on the site the native understorey and ground stratum have been almost entirely removed and replaced with exotic plants. The mean projective foliage cover of weeds in the ground stratum within woodland vegetation is approximately 92%.

Under the Commonwealth Listing Advice to the Minister for CPW CEEC, there are four recognised categories of vegetation that are considered to meet the description of the listed CPW CEEC. These categories carry the following condition thresholds:

- Category A
  - minimum patch size ≥ 0.5 ha; AND
  - 50% of the perennial understorey cover is comprised of native species.
- Category B
  - minimum patch size ≥ 5 ha; AND
  - ≥ 30% of the perennial understorey cover is comprised of native species.
- Category C
  - minimum patch size ≥ 0.5 ha; AND
  - ≥ 30% of the perennial understorey cover is comprised of native species; AND
  - patch is contiguous with native remnant vegetation (where native vegetation cover in each layer is dominated by native species) that is ≥ 5 ha in area.
- Category D
  - minimum patch size ≥ 0.5 ha; AND
  - ≥ 30% of the perennial understorey cover is comprised of native species; AND
  - patch has at least one tree with hollows per hectare or at least one large tree (> 80 cm DBH) per hectare.

This does not apply on the subject land and so the vegetation does not meet Commonwealth listing criteria. As such referral to the Commonwealth is not required for impacts to CPW.

4.4 Flood and Stormwater

4.4.1 Stormwater Concept Plan

The approach to stormwater water management at the site has not changed. The revised Stormwater Concept Plan (see **Appendix G**) has remodelled the site storage requirements and the permissible discharges for both the interim development scenario and the ultimate (i.e. full site development) development scenario. The modified development will continue to meet peak flow reduction and appropriate stormwater quality targets.

4.4.2 Southeast Riparian Corridor

There is an existing depression in the landscape in the south eastern corner of the site that only conveys water during rain events. The NSW Office of Water has asked for further details about this watercourse. However, it is highlighted that there is no defined bank for the watercourse, as can be seen in a photograph of the south-east corner of the site taken from Wallgrove Road, at **Figure 1**.

Under the Guidelines for Riparian Corridors on Waterfront Land the ephemeral drainage depression could constitute a 1st Order stream, however since it does not exhibit a defined channel with bed and banks it may not constitute waterfront land for the purposes of the *Water Management Act 2000*. It is proposed to create a swale in this section of the site to convey upstream flood waters through the site to the existing culvert under Wallgrove Road.

Figure 1 – Photo of the SE corner of the site (from Wallgrove Road looking to SW)

The details of the proposed swale in the southeast corner of the site have not been provided in the Staged DA since the swale is not proposed to be constructed as part of the Stage 1 development works. The future detailed DA phase for this part of the site will include details for the swale for the approval of the NSW Office of Water, including consideration of the Guidelines for Riparian Corridors on Waterfront Land, if relevant.

4.4.3 Flooding

Flood Impact on Wallgrove Road

The Hydraulic Modelling and Impact Report was updated taking into account the revised site layout and is provided in **Appendix J**. The updated Hydraulic Modelling and Impact Report also provides flood modelling outputs for 500 year ARI and 2,000 year ARI events, as well as providing further consideration of climate change.

As with the original flood modelling results, the updated flood model indicates minimal flooding impact beyond the site boundary, with e most pronounced impacts around the south-east corner of the site.

The updated modelling results show no flood impacts south of the proposed development (i.e. upstream of the site), however, there are some impacts to the east of the M7 motorway (downstream of the site) where flood levels could increase by up to 25mm and peak velocity by up 0.25m/s in a small section of the flood channel. This potentially indicates that the swale is too efficient at conveying the water around the south east corner of the site, resulting in increased flood levels downstream.

Reducing the efficiency of this swale drain, should decrease the peak flood heights downstream of the site to ensure impacts above the designated threshold are reduced. This would be achieved through an iterative design process at the detailed DA phase for this part of the site, whereby the size and shape of the swale can be progressively reduced until the optimal flooding outcome is achieved. Details of this channel will be subject of approval from the NSW Office of Water at the appropriate time.

4.4.4 Flood Evacuation

The site will not rely on the flood effected parts of Wallgrove Road for egress or emergency access during a flood, as all vehicular traffic to the site is now proposed to be via the SLR. The updated flood modelling confirms that the SLR will not be flood affected during a design (100 year ARI) flood event. As such, flood evacuation from the site would not be compromised.

It is highlighted that the site would not be flood affected as the proposed development involves filling the site on its northern, eastern and western boundaries by up to 5m above current levels.

4.5 Residential Amenity – Noise and Visual

4.5.1 Noise

The EPA's Industrial Noise Policy has been used to establish the site specific noise criteria for the estate, and the specifications for noise mitigation. The noise impact assessment of the proposal within the EIS determined that the colourbond fencing along the boundary of the site was sufficient to meet the relevant site specific noise criteria. Submissions have requested that further consideration of a landscaped mound and/or a masonry wall be provided. However, the need for a bund and/or a masonry wall for noise mitigation is not required in order to meet the site specific noise criteria.

Further consideration of a bund and/or masonry wall in relation to visual amenity impacts is provided below.

4.5.2 Visual Amenity

The closest residence to the south of the site is located on Flavex Lane approximately 150m from the southern boundary. There is a row of residential properties stretching southwards along Flavex Lane, south of the closest residence. The closest residential receptor is shown in **Figure 2**, in the context of the site boundary.

Further consideration of the views from these residential properties on Flavex Lane has been requested by DP&E and FCC, as well as in public submissions. In particular submissions requested further consideration of the installation of a landscaped mound combined with a masonry wall to provide improved amenity outcomes for residents.

A more detailed landscape plan has been prepared (see **Appendix H**), which includes a perspective of the Stage 1 warehouse building viewed from the south. The perspective is provided in **Figure 3**, and **Figure 2** illustrates the approximate vantage and and outlook for the perspective.

It should be noted that the orientation of three closest residences is towards the west, taking in views of the creek and associated riparian corridor vegetation, as can be seen in **Figure 4**. There are no significant existing vistas towards the site from the nearest residences, and the view towards the site from the south is also impacted by an existing 330kV electricity transmission line (including a pylon).

As can be seen in the perspective, the Stage 1 warehouse building is predominantly located west of the existing transmission pylon, and is therefore partially screened from residents by the existing riparian corridor of Reedy Creek. As this land is Zoned E2 and is a protected riparian corridor it is expected that it will remain relatively heavily vegetated in the future and therefore will continue to provide partial screening. The building will also be landscaped to the north by Cumberland Plain buffer planting, which will ultimately create a tree canopy back-drop to the building.

Figure 2 – Aerial image dated November 2014 of the subject site and surrounding development

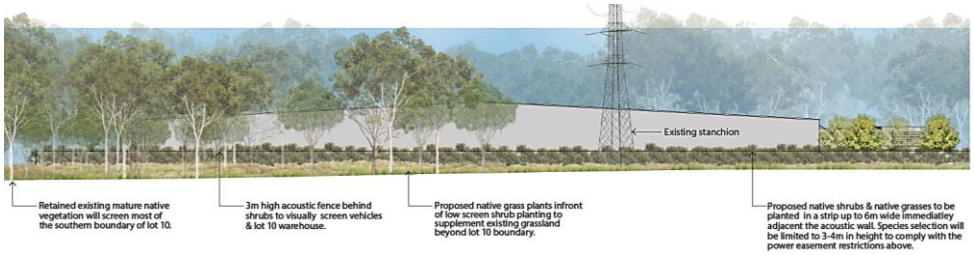

Figure 3 – View of the Stage 1 Warehouse from the south
Source: Site Image Landscape Architects

Figure 4 – Aerial photograph of 3 closest residences
Source: GoogleEarth

The southern boundary of the site is traversed by a 330kV Transgrid electricity transmission easement, meaning that the Stage 1 warehouse building is set back approximately 40m from the site boundary, and the setback from the closest residence is approximately 190m. As such, coupled with the fact that the nearest residential dwellings do not overlook the site, the construction of a raised mound with a masonry wall is not considered to be necessary.

The boundary treatment along the southern boundary of the site has been revised to including additional landscaping in front of the acoustic wall, by way of shrubs up to 4m in height. As such, the acoustic wall will be screened when viewed from the south.

5.0 Mitigation Measures

The collective measures required to mitigate the impacts associated with the proposed development are detailed in **Table 6** below. These measures are generally consistent with those that were established in the EIS, and have been amended to take into account he revised proposal, and the outcomes of the additional or revised assessments completed as part of this RTS.

Table 6 – Mitigation Measures

Mitigation Measures
Construction Management ▪ A Construction Management Plan (CMP) will be prepared and submitted to the Principal Certifying Authority for approval prior to the release of the Construction Certificate. ▪ A Works Agreement Deed is to be negotiated with the RMS and executed prior to the issue of a Construction Certificate. ▪ A Traffic Construction Management Plan is to be prepared and recommendations are to be implemented for the Stage 1 construction works.
Heritage ▪ Prior to the Stage 1 works a program of test and salvage excavation will be undertaken on the slightly elevated land adjacent to the creek and its confluence, within the area of archaeological sensitivity that is proposed to be impacted.
Noise ▪ The following design elements will be included as part of the Stage 1 warehouse building: ▪ The southern wall of the Stage 1 building (made of Colourbond steel) will require 50mm of glasswool insulation to attenuate noise. ▪ The roof to be constructed from minimum 0.42mm sheet metal with 50mm glasswool insulation underneath. ▪ A noise barrier along the southern boundary will be provided. The minimum height for the screen will be 3m (above the elevation of the land), the barrier can be constructed with Colourbond, CFC sheet, Perspex or similar. ▪ Operational noise management measures that would be implemented include: ▪ Truck delivery drivers should limit the use of exhaust brakes on internal roads and Wallgrove Road. ▪ Where practical, trucks are to be switched off whilst in the loading dock and not to be left idling. This would apply to airbrake compressors to limit discharge within the loading dock area.
Waste ▪ An Operational Waste Management Plan will be prepared for the Stage 1 building prior to the occupation of the warehouse.
Visual ▪ Details of the Stage 1 building colour scheme, external cladding and finishes will be provided for the approval of the Director-General prior to the commencement of construction. ▪ Future applications will be lodged providing detail on signage and lighting for the Stage 1 building.
Geotechnical ▪ Prior to filling commencement, remove all vegetation and root affected soil from the proposed filling area. ▪ Rip the exposed surface to a depth of not less than 300mm and re-compact to a minimum dry density ratio of 98%, relative to Standard compaction, adjusting the moisture content of the ripped and re-compacted surface to within 2% of Standard optimum moisture content. Proof roll the treated surface using a minimum 10 tonne smooth drum roller in non-vibration mode. The surface should be rolled with a minimum of six passes with the last two passes observed by an experienced geotechnical engineer to detect any 'soft spots'. ▪ Any heaving materials identified during proof rolling should be treated as directed by the geotechnical engineer, which is likely to require the localised removal and replacement of unsuitable soil. ▪ Place all new filling in layers of 300 mm maximum compacted thickness. The filling should be free of oversize particles (>150 mm) and deleterious material. ▪ Compact all filling to a minimum dry density ratio of 98%, relative to Standard compaction, whilst maintaining a moisture content within 2% of Standard optimum moisture content. The minimum dry density ratio should be increased to 100% relative to Standard compaction within the upper 300 mm of pavement subgrades and building footprints. A maximum dry density ratio of 102% is recommended for all filling to reduce the potential for swelling post-compaction. ▪ Maintain the moisture within the clay until the area is covered by buildings or pavements. Recent monitoring of foundation/floor slab movement measured heave of up to 60 mm for a warehouse floor slab cast on dry clay filling. ▪ Density testing of the filling should be carried out in accordance with AS3798 "Guidelines for Earthworks for Commercial and Residential Developments". Filling placed beneath building platforms and pavements should be carried out to a Level 1 inspection and testing programme. ▪ Prior to placement of filling it will be necessary to pump out all existing water from the dam, remove all soft

Mitigation Measures
and wet sediments from the sides and base, remove all existing filling within dam embankments and strip the base of each dam to a suitable natural ground surface. Once stripped and prepared, all dams should be inspected by an experienced geotechnical engineer.
Bushfire Protection ▪ Management of the Site generally, except for the vegetation within the riparian corridor to Reedy Creek, shall comply with the recommendations of Appendix A5.4 & Appendix A5.5 of *Planning for Bushfire Protection 2006* and Standards for Asset Protection Zones, including: – Maintain a clear area of low cut lawn or pavement adjacent to the buildings; utilise non-flammable materials such as scoria, pebbles and recycled crushed bricks as ground cover to landscaped gardens in close proximity to the buildings; – Keep areas under shrubs and trees raked and clear of combustible fuels – Maintain trees and shrubs in such a manner that tree canopies are separated by 2m and understorey vegetation is not continuous. ▪ The northern, western and southern walls of the Stage 1 Warehouse Building will be constructed to comply with BAL 40, pursuant to *A.S. 3959 – 2009 – 'Construction of Buildings in Bushfire Prone Areas'*. Louvres or vents located within these walls will be fitted to ember protection mesh comprising corrosion resistant steel or bronze mesh with a maximum aperture of 2mm. ▪ Roller doors will be fitted with ember protection to the head. Ventilation openings [slats] in roller doors will not be permitted. ▪ External seals to precast panels will be non-combustible. ▪ The fire-fighting water supply to the proposed building will comply with the BCA and Australian Standard *A.S. 2419.1 – 2005*. ▪ A site specific evacuation plan will be prepared for each building. The Evacuation Plan shall address the requirements of A.S. 3745-2002 – *'Emergency Control Organisation and Procedures for Buildings, Structures and Workplaces.*
Flora and Fauna <u>Construction Measures</u> ▪ Mark clearing limits to further reduce clearing extents and to retain potential habitat and other ecologically significant features at the edges of the clearing limits wherever practicable; ▪ Limit vehicular and plant equipment access to this area during construction; ▪ Install temporary fencing to mark the limits of clearing and "no-go" areas; and ▪ Construction staff informed with regards to the status and location of protected areas during site induction and/or tool box talks. ▪ Where clearing of vegetation and fauna habitats will take place, pre-clearing and clearing protocols are recommended that include: – Preparation of an inventory of trees and hollows to be removed, prior to clearing; – Pre-clearance checks of hollow-bearing trees for the presence of bird nests and arboreal mammals, such as possums, gliders and bats, prior to felling; – Safe removal of animals found to be occupying trees prior to the clearing of trees and their appropriate relocation into nearby woodlands; and – Relocation of transportable features such as salvaged tree hollows, felled timber and large logs in the woodland areas to be retained to allow their continued use as fauna habitat. ▪ A dam drainage protocol which involves the safe removal of animals to suitable alternate locations by a suitably qualified ecologist or wildlife carer, timing of decommissioning works to non-breeding seasons for appropriate target species and implementation of chytrid protocols for ecologists and machinery entering the water to limit the transmission of disease. ▪ Erosion and sediment control plans will be implemented to mitigate the impact of soil disturbance and to prevent secondary or off-site impacts, particularly impacts on adjacent native vegetation along Reedy Creek. ▪ Stockpiles of overburden will be managed to limit unintended soil movement away from designated compound areas into adjacent woodland. ▪ All work sites will be constructed and managed in accordance with 'Managing Urban Stormwater: Soils and Construction' (Landcom, 2004, "Blue Book"). ▪ Topsoils being stored for reapplication should be stabilised using a blanket type Method. ▪ Any topsoil that is reapplied will be stabilised by seeding using a grass species native to the Cumberland Plain. ▪ A Riparian Management Plan will be prepared and implemented to provide for the biodiversity improvement of the Reedy Creek riparian corridor through restoration and ongoing management. The Riparian Management Plan will include: – Protection of the riparian corridor during construction; – Restoration and ongoing management of riparian vegetation; – Management of riparian vegetation as habitat for native wildlife; – Feral animal management; – Instructions for planting endemic species of local provenance – Weed management;

Mitigation Measures

- Reduction of sediment and nutrient delivery to waterways;
- In-stream erosion control;
- Fire management; and
- Monitoring and reporting protocols.

Biodiversity Offset

- Biodiversity credits for HN528 and HN529 vegetation communities will be purchased and offset to compensate for the clearing of relevant vegetation. The number of credits to purchased and retired will be 259 Ecosystem Credits and 36 Species Credits as established under the BioBanking Assessment Methodology., as follows

Ecosystem Credits:

- Shale Hills Woodland [HN529] Grey Box - Forest Red Gum grassy woodland on shale of the southern Cumberland Plain, Sydney Basin (173 credits).
- Shale Plains Woodland [HN528] Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin (56 credits).
- Iluvial Woodland [HN526] Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin (30 credits).

Species Credits

- Southern Myotis (potential breeding habitat) (36 credits).

Contamination

- An Unexpected Finds Protocol (UFP) will be established for site development, including set procedures in the event that asbestos or chemical contaminated soil is encountered during excavations.
- Further assessment of the dam water will be undertaken to determine an appropriate method of discharge or removal.

Stormwater and Flooding

- The stormwater management system for the Masterplan will need to be designed to ensure that each development site provides peak flow reduction through OSD in accordance with the parameters set out in **Appendix G of the RTS** in order to compensate for the lack of OSD associated with the internal access road.
- The Stage 1 interim stormwater management scenario will need to be designed to provide OSD for the internal access road in accordance with the parameters set out in **Appendix G of the RTS**.
- At each stage of development a revised interim stormwater management system will need to be provided, until all the remaining lots have been developed at which time the OSD systems provided on all the development sites will compensate for the impervious area of the access road, as provided for under the ultimate strategy, and the temporary basins can be decommissioned.
- The stormwater treatment installed will need to remove the pollutant loads for total suspended solids (TSS), total phosphorus (TP), total nitrogen (TN) and Gross Pollutants in accordance with **Appendix G of the RTS**.
- In order to minimise flood impacts, the efficiency of the swale located in the south-east corner of the Site is to be designed so that it operates at a similar efficiency to the existing situation.
- Erosion control measures will be implemented on the banks of Reedy Creek with consideration of the nature of the underlying soil and its susceptibility to scour.

6.0 Conclusion

The proposed Gazcorp industrial estate is State Significant Development which will meet the objectives of the WSEA SEPP in delivering employment generating development.

An EIS was prepared for the SSDA, and has been publicly exhibited, in accordance with the relevant provisions of the EP&A Act. Submissions have been received from NSW Government authorities, Fairfield City Council and the general community.

This RTS report responds to all of the issues made in the submissions. It provides further justification, explanation and clarification in order to address the issues raised in submissions. It also includes a description of the changes that have been made to the proposed development in order to respond to the issues raised in the submissions, and provides revised or supplementary environmental impact assessment of these changes.

The assessment of the proposed development works has demonstrated that the proposal is appropriate in the context of its locality and its location, being within the WSEA SEPP. Further, the implementation of robust and comprehensive management measures during the carrying out of works will ensure significant adverse environmental impacts do not occur.