



13 April 2018

Chris Ritchie
Director Industry Assessment
Department of Planning & Environment
23-33 Bridge Street
SYDNEY NSW 2000

Attn: Thomas Piovesan, Senior Planning Officer Industry Assessments

Dear Chris,

DEXUS QUARRYWEST PROJECT (SSD 6801) – SECTION 96 MODIFICATION (MOD 6) – RESPONSE TO SUBMISSIONS

Hannas Contracting Services (Hannas) is proposing to modify the development consent for the QuarryWEST Project within the Greystanes Southern Employment Lands. The proposed modification involves changes to the layout of Precinct F of the estate, which is also referred to as the Bluestone Industrial Estate. The proposal is described in the Statement of Environmental Effects (SEE) for the proposal dated 21 February 2018.

The Department of Planning and Environment (the Department) received submissions from 7 government authorities in response to the exhibition/referral of the SEE, namely:

- Blacktown City Council;
- Cumberland Council;
- Department of Industry (DoI), including Crown Lands and Water (CL&W) and Department of Primary Industries (DPI);
- Office of Environment and Heritage (OEH), including the Heritage Division;
- Roads and Maritime Services (RMS);
- Rural Fire Service (RFS); and
- Transport for NSW (TfNSW).

Blacktown City Council, Cumberland Council, DoI, OEH's Heritage Division, RMS and TfNSW did not raise any objections or issues associated with the proposed modification.

OEH raised some issues in relation to biodiversity, in particular the need for a formal Biodiversity Development Assessment Report (BDAR) for the proposed clearing of degraded Cumberland Plain Woodland on the site. RFS raised issues about the bushfire hazards associated with Building A.

The Department also requested some additional information in relation to building heights, fire safety, earthworks and landscaping.

Responses to each of these submissions and requests for additional information are provided in the following table.



Table 1: Response to Submissions

Issue	Response
Rural Fire Service	
Building A bushfire hazard	In accordance with RFS' recommendation, Hannas has amended the building plans to relocate the internal access road adjacent to Building A to act as a perimeter road on the western boundary of the site, essentially by flipping the access road and Building A. The amended plans include: • revised architectural design plans – see Appendix A; • revised landscape plans – see Appendix B; and • revised civil design plans and review – see Appendix C. The bushfire assessment for the proposal has also been updated to reflect the revised layout, and is attached as Appendix D. The access road has been designed and would be constructed to comply with the recommendations in the bushfire assessment, including a minimum width of 6.6m and 'No Parking' restrictions provided on one side with the hydrants located on that side. An additional emergency access would also be provided between the site and Prospect Highway via the existing access track on the eastern side of the site, as outlined in the SEE. The amendments to the design plans do not involve any changes to building areas or landscaping areas within the Precinct F site. Further, the amendments do not involve any significant change to civil or stormwater aspects of the proposed development, apart from a minor increase in net fill material for export from the site (from 40,900m³ to 41,400m³ net export). The revised architectural design plans do include improved rear facades for Building A, given that the flipped building results in the rear of Building A fronting the public domain to the east of the site. Improvements include incorporation of a mix of building materials, colours and finishes along the façade, including precast and profiled-precast concrete, metal cladding, translucent Danpalon wall panelling and addition of windows.
Office of Environment and Heritage	
Biodiversity Development Assessment Report (BDAR)	Further to the biodiversity assessment in the SEE, Eco Logical Australia has prepared a formal BDAR for the proposed modification in accordance with OEH's recommendations and the <i>Biodiversity Conservation Act 2016</i>. The BDAR is attached as Appendix E. The assessment included additional field survey and assessment to meet the requirements of the <i>Biodiversity Assessment Method 2016</i> (BAM), including calculations using the Biodiversity Assessment Method Credit Calculator (BAMC). As outlined in the original biodiversity assessment, the assessment identified a small area of degraded Cumberland Plain Woodland (CPW) Critically



Issue	Response
	Endangered Ecological Community (CEEC) on the site¹. The assessment mapped 0.07ha of the CEEC on the site, which is a small increase on the 0.06ha mapped in the original assessment. The remaining area of the 2.3ha site comprises predominantly exotic vegetation with some planted native trees. No other threatened species were recorded on site. Calculations using the BAMC generated a low vegetation integrity score of 11.1 for the CPW CEEC on the site. Under the BAM, CEECs with a vegetation integrity score of less than 15 do not require offsetting. Hence no ecosystem credits are required to offset the proposed development. Because no habitat for candidate species credit species was recorded in the study area, no species credits are required to offset the development. Serious and Irreversible Impacts (SAIL) values for CPW were also re-considered as part of the assessment. The SAIL threshold for CPW is yet to be published by OEH, but given the small area and poor condition of CPW to be impacted on the site, the assessment considered it unlikely that the development would result in a serious and irreversible impact. To compensate for the loss of CPW on the site, the landscape plan has been designed using CPW species. In this regard, an area of 0.24 ha on the site would be replanted with CPW species, which would result in an overall net increase in the total area of native vegetation on the site.
CPW retention potential	Retention of the CPW on the site is not considered to be warranted or reasonable, given the: • small size of the community on the site (700m²); • degraded and poor quality of the community on the site; • isolated location of the community atop a quarry batter and adjacent to an industrial estate; and • significant impact that retention would have on the development potential of the site, with retention affecting the layout and/or developability of Buildings B to E. As outlined above, the proposed landscape plan would result in a net increase of CPW species on the site.
CPW landscaping	The landscape plan for the proposal uses a diversity of species from the CPW community, providing a total area of approximately 0.24ha of CPW plantings on the Precinct F site. An area of 0.18 ha would be maintained as lawn.

¹ As Plant Community Type (PCT) 849 - Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion



Issue	Response
Department of Planning and Environment	
Building Height Exceedance	The revised architectural design plans (see Appendix A) include updated elevation and section plans showing the height limits from the current ground level and proposed finished ground levels, as requested by the Department. As outlined on the plans and in the original SEE, the majority of the proposed development complies with the applicable height limit, with the exception of the area where Building C overlaps with Buildings D and E. It is also noted that the exceedance from the existing ground level only occurs at the front (or eastern side) of the applicable overlapping area, given the natural slope of the site.
Building Cladding and Fire Safety	A BCA compliance review has been prepared for the proposal by McKenzie Group Consulting, and is attached as Appendix F. The assessment confirms that the proposed development on Precinct F, including the finishes and claddings, is able to comply with the provisions of the Building Code of Australia.
Earthworks	The SEE for the proposal noted that approximately 40,900m³ of material would be exported from the site for beneficial re-use off site. As outlined above, the relocation of the access road has increased this amount marginally to approximately 41,400m³. The material to be exported comprises clayey-sandy soils above a hard rock (dolerite) base, similar to that originally extracted from the former Prospect Quarry. A geotechnical assessment of the material has been prepared by Ground Technologies, and is attached as Appendix G. The assessment confirms that the material can be classified as Virgin Excavated Natural Material (VENM) under the <i>Protection of the Environment Operations Act 1997</i> and the EPA's <i>Waste Classification Guidelines</i> (2008). The material is proposed to be exported to Boral's Wetherill Park Recycling Facility, located directly to the south of the QuarryWEST Estate on Prospect Highway, approximately 1 kilometre to the south of Precinct F². There it would be crushed and screened to size, for use as an aggregate in Boral's concrete batching facility. Boral has confirmed to Hannas that it is interested in accepting the material (which as outlined above, is similar to the material extracted from the former quarry).
Landscaping and Vegetation Management	An estate-wide Landscape and Vegetation Management Plan (LVMP) to address Condition C29 of the development consent was prepared following the original approval for the QuarryWEST Estate, and approved by the Department on 11 February 2016. The LVMP remains generally consistent with the proposed modification to Precinct F, apart from the revised layout and landscaping area of the precinct.

² Or other facility licenced to accept the material, if the Boral Facility is not available.

**Issue****Response**

It is considered that the approved LVMP remains applicable to the project as modified.

Hannas and PJEP trust that this additional information adequately addresses the issues raised in submissions and/or requested by the Department. Should you have any enquiries in relation to this matter, please do not hesitate to contact me on 0400 392 861.

Yours faithfully,

PJEP – Environmental Planning

Phil Jones

Principal Environmental Planner

Cc: Hannas

Attachments:

Appendix A	Revised Architectural Design Plans
Appendix B	Revised Landscape Design Plans
Appendix C	Revised Civil Design Plans/Review
Appendix D	Updated Bushfire Assessment
Appendix E	Biodiversity Development Assessment Report
Appendix F	BCA Review
Appendix G	Geotechnical Assessment



APPENDIX A



APPENDIX B



APPENDIX C



APPENDIX D



APPENDIX E



APPENDIX F



APPENDIX G