



Carl Dumpleton
Team Leader
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2124

4 June 2026

Subject: Environmental Impact Statement - 225-245 Martin Road, Bradfield Bulk Earthworks (SSD-97711727) (Liverpool City)

Dear Carl,

Thank you for your referral received 8 April 2026 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.

CPHR has reviewed the Environmental Impact Statement (Urbis, 27 March 2026) and accompanying technical reports and provides its comments at Attachment A. In summary:

Biodiversity certification

- The relevant biodiversity measures of the Order to confer biodiversity certification on the State Environmental Planning Policy (Sydney Region Growth Centres) 2006 (the Order) have not been addressed.
- The development footprint identified as 'Subject Land' within the Biodiversity Development Assessment Report (BDAR) does not accurately reflect this proposal.
- The full extent of protected existing native vegetation (ENV) on the site as identified in the State Environmental Planning Policy (Precincts – Western Parkland City) 2021 (WPC SEPP) and Western Sydney Aerotropolis Precinct Plan (Precinct Plan) has not been mapped, and the direct and indirect impacts have not been assessed for both certified and non-certified land under the Order.
- Clauses 4.25 and 4.25A of the WPC SEPP, and Section 4.5.4 of the Precinct which apply to the preservation and clearing of ENV have not been addressed for the full extent of ENV within the site.

Biodiversity

- There is conflicting information in the BDAR as to whether Plant Community Type (PCT) 3320_Grassland is commensurate with the Cumberland Plain Woodland in the Sydney Basin Bioregion Threatened Ecological Community.

- The BDAR contains inconsistencies regarding candidate species retained for further assessment.
- Insufficient evidence has been provided to support the exclusion of several candidate species from further assessment.
- The EIS and accompanying technical reports and plans include development in the ENZ zone that is outside the scope of this application.
- Minor amendments are required to the generated credit classes in the Biodiversity Assessment Method Calculator (BAM-C) for PCT 3975.
- Figure 14 of the BDAR does not clearly show impacts requiring offset, impacts not requiring offset, and areas not requiring assessment.

Waterway health

- It is unclear when the current Environmental Protection License (EPL 684) will cease to apply and the conditions relating to this current application will come into effect for the water management requirements for the site.
- The following issues are identified in relation the Erosion and Sediment Control (ESC) strategy and water balance documented in the Surface Water Impact Assessment (SWIA):
 - some of the erosion and sedimentation strategy approaches are operationally challenging to implement, particularly:
 - the enlarged Type-D basins which will result in very large volumes of water requiring treatment and dewatering, and
 - the use of temporary soil binder which has a short life and will require reapplication over large areas of the site
 - the proposed use of Alum (aluminium sulphate) as a flocculant chemical is not recommended as it lowers pH and creates toxic forms of aluminium, there are safer options available
 - the model only represents a fully pervious site, which is appropriate for the works being applied for, but will result in sediment basins being undersized for the next phase of works when warehouse construction commences and impervious surfaces are added to the basin catchments
 - the water balance model does not recognise that construction operations (fill material conditioning, dust suppression and irrigation) change when rainfall occurs which will increase the volume of water needing to be treated and released as controlled discharge to dewater the basins
 - there are some elements of Tables 5.4 – 5.6 of the SWIA which are unclear or conflict and need to be resolved.

Flooding

- The Flood Impact and Risk Assessment (FIRA) and modelling need to be updated to:
 - show compatibility with the Wianamatta South Creek- Existing Conditions (Advisian, 2022) flood study
 - include the base case scenario that incorporates development in the Aerotropolis that is constructed, under-construction and approved

- model the developed case scenario by incorporating the proposed works identified in section 1.1 of the FIRA to the base scenario at the critical point downstream of the junction of Badgerys Creek and Wianamatta South Creek.

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

Yours sincerely



Susan Harrison

**Senior Team Leader, Central Metropolitan
Conservation Planning and Assessment
Conservation Programs, Heritage and Regulation Group**

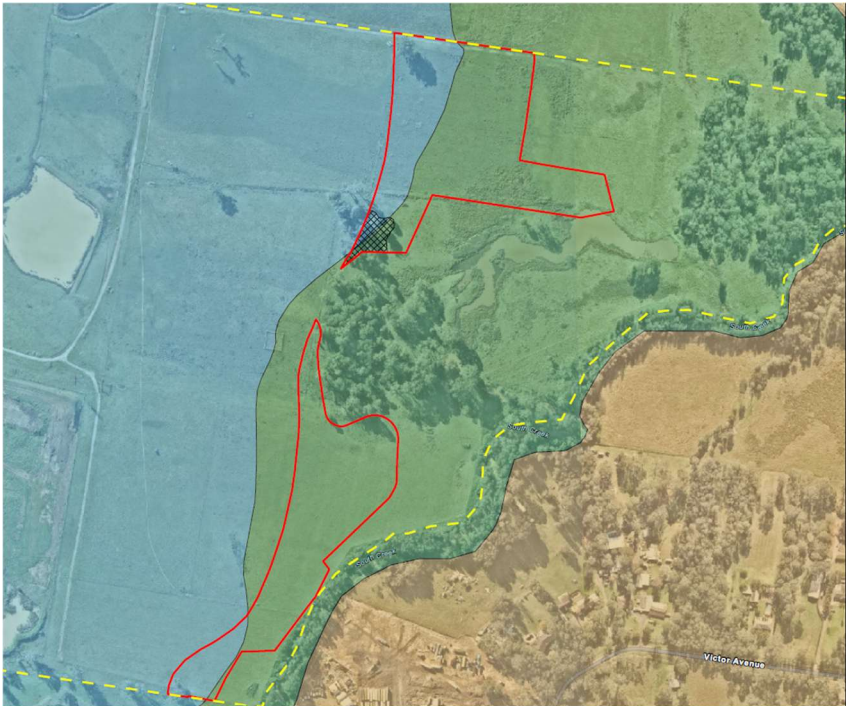
CPHR comments on the Environmental Impact Statement - 225-245 Martin Road, Bradfield Bulk Earthworks (SSD-97711727) (Liverpool City)

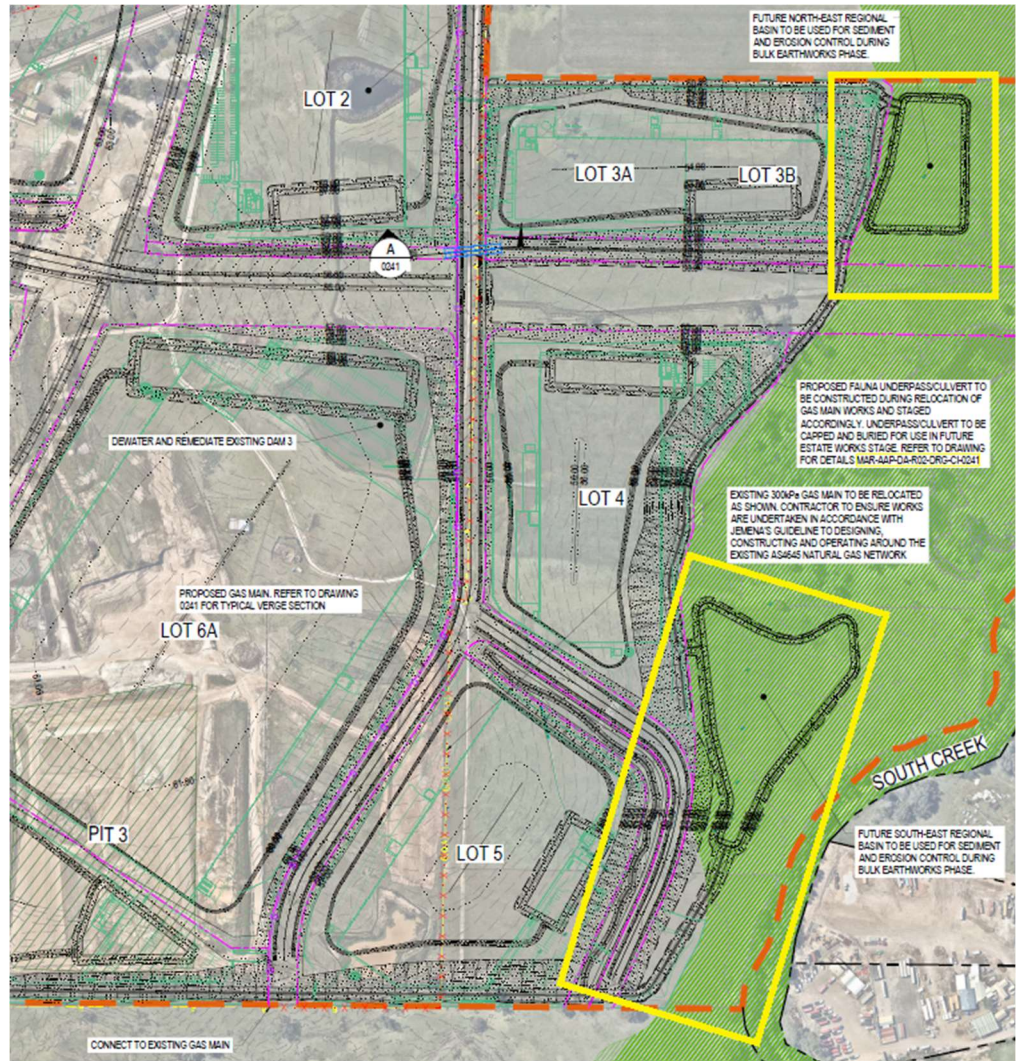
In preparing this advice CPHR has reviewed the following documents:

- Environmental Impact Statement (Urbis, 27 March 2026) (EIS)
- Appendix F – Civil Drawings (Arcadis, 4 March 2026)
- Appendix I – Surface Water Impact Assessment (Engeny, 12 March 2026) (SWIA)
- Appendix J – Biodiversity Development Assessment Report (SLR, 20 March 2026) (BDAR)
- Appendix J1 – Notification of referral decision (Australian Government Department of Climate Change, Energy, the Environment and Water, 19 March 2026)
- Appendix N – Civil Engineering Report (Arcadis, 11 March 2026)
- Appendix O - Bushfire Advice (Blackash Bushfire Consulting, 12 March 2026)
- Appendix P – Flood Impact & Risk Assessment (Colliers, 19 March 2026) (FIRA)
- Appendix BB – Riparian Land Assessment (SLR, 16 March 2026).

Key Assessment Issues

Growth Centres Biodiversity Certification

1.	The BDAR Subject Land development footprint does not reflect this proposal	The Biodiversity Development Assessment Report (BDAR) defines the development footprint as the 'Subject Land' which is both the construction footprint and operation footprint of the project in the non-certified portion of the site. The Subject Land identified in Figure 5 the BDAR (as outlined in red on the extract below) does not accurately reflect the development footprint of this State significant development (SSD) application for bulk earthworks but instead reflects the development footprint of the separate Internal Works SSD (SSD-97688711).  The Subject Land in the BDAR is a different shape and size than that depicted in the civil plans extracted below (see yellow outline). Additionally, the BDAR does not include an assessment of the protected existing native vegetation (ENV), a portion of which adjoins the Subject Land, which may be directly or indirectly impacted by the development.
----	--	---

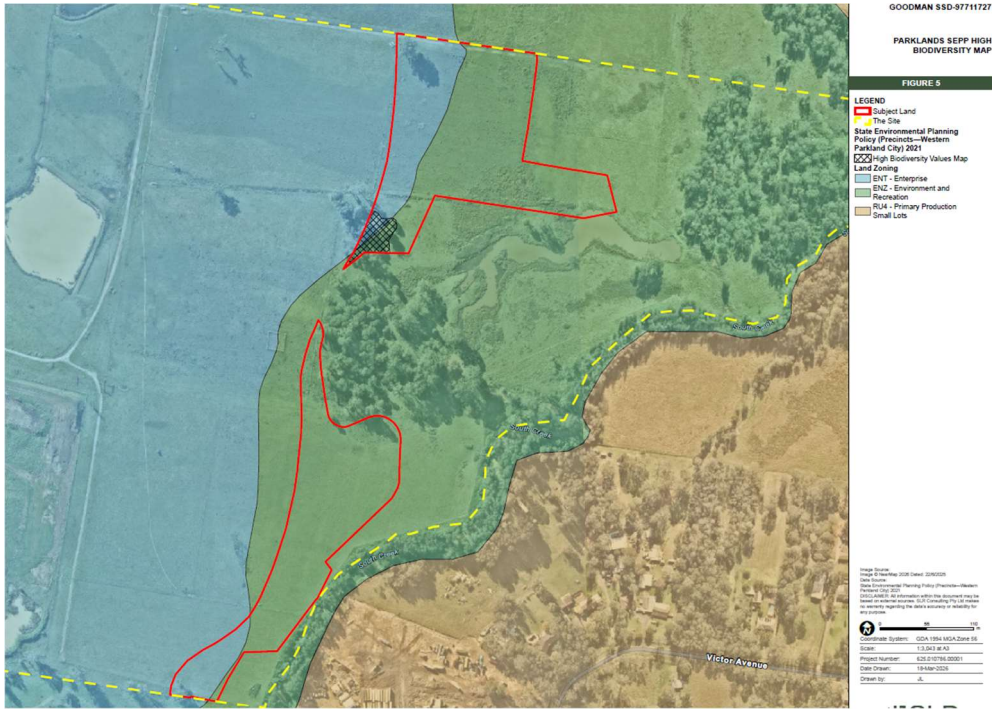


Recommended actions:

- Update the BDAR to reflect the accurate development footprint for this SSD application.
- The BDAR is to identify all ENV in the non-certified land and demonstrate that there will be no direct or indirect impacts.

Extent and Timing

Prior to determination.

2.	Protected ENV in non-certified area	The non-certified portion of the site contains existing native vegetation (ENV) which is identified in both the State Environmental Planning Policy (Precincts – Western Parkland City) 2021 (WPC SEPP), and Section 4.5.4 of the Western Sydney Aerotropolis Precinct Plan (the Precinct Plan). The full extent of the protected ENV has not been reflected in the EIS or BDAR. As noted in point 1, the BDAR has assessed the development footprint within the non-certified portion of the site referred to as the ‘Subject Land’. Figure 5 of the BDAR (extracted below) maps a portion of ENV identified on the WPC SEPP High Biodiversity Values Map, however the SSD does not reflect the full extent of protected ENV in the non-certified areas, some of which directly adjoins the development footprint and may be directly or indirectly impacted by the proposal.  <u>SEPP</u> WPC SEPP High Biodiversity Value Areas Map (yellow outline shows the area of protected ENV in non-certified land)
----	-------------------------------------	--



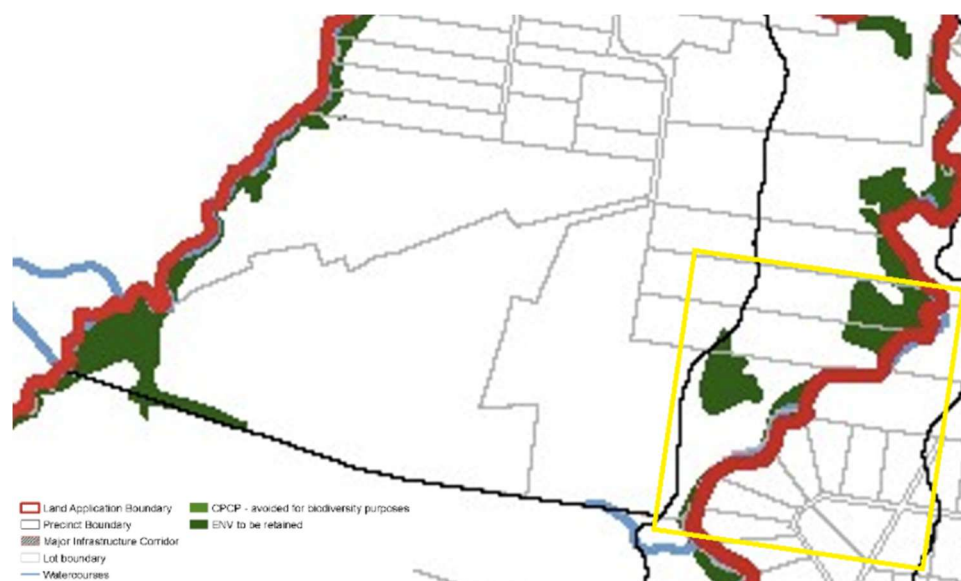
Under the WPC SEPP, the following clauses must be addressed:

- clause 4.25 which applies to preservation of trees and vegetation in land in the ENZ or shown as ENV on the High Biodiversity Value Areas Map (both of which apply in this instance)
- clause 4.25A which applies to the clearing of land shown as ENV on the High Biodiversity Value Areas Map.

While Clauses 4.25 and 4.25A have been addressed in the Compliance Table and BDAR, this is limited only to the protected ENV identified in the Subject Land which does not accurately reflect the development footprint of this proposal. This assessment is considered inadequate as it has not considered the full extent of protected ENV in the non-certified land.

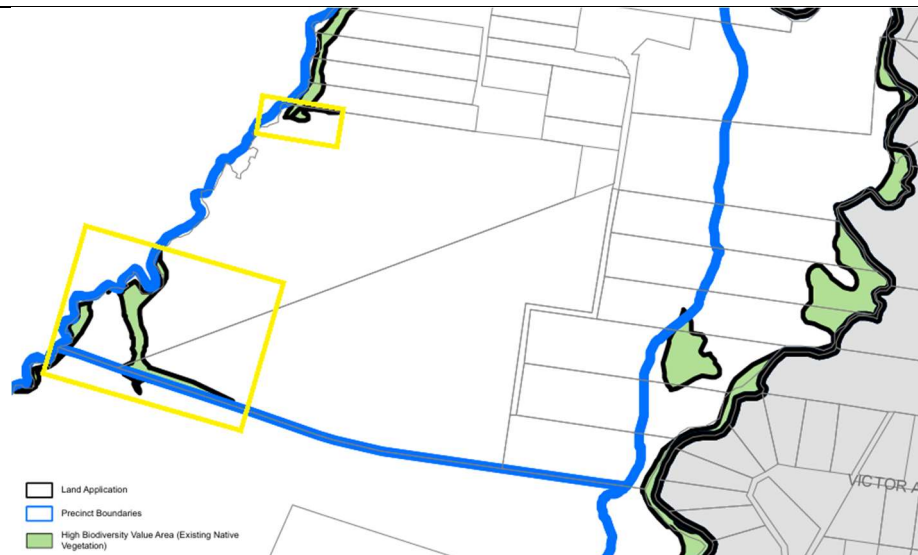
Precinct Plan

Figure 7 of Precinct Plan - Protected Existing Native Vegetation and Protected areas under the Cumberland Plain Conservation Plan (yellow outline shows the area of protected ENV in non-certified land)



Section 4.5.4 of the Precinct Plan requires the protection of ENV, which has been addressed in the Statutory Compliance table submitted with the EIS and refers to the BDAR.

		As noted above, the 'Subject Land' footprint assessed in the BDAR does not accurately reflect the development footprint of this SSD, and there is protected ENV directly adjoining Subject Land which has not been assessed. Recommended actions: - Clearly map all protected ENV on non-certified land as identified in the WPC SEPP and Precinct Plan, including those areas outside of the development footprint. - Demonstrate that the development will not directly or indirectly impact on protected ENV. - Update the civil plans to show the areas of protected ENV and provide cross-sections and levels where there is adjoining development and demonstrate an adequate buffer. Specifically, the north-east and south-east regional sediment and erosion control basins within the ENZ zoned land. - Address the following clauses of the WPC SEPP for the non-certified areas of the site: - clause 4.25 which applies to preservation of trees and vegetation in land in the ENZ or shown as ENV on the High Biodiversity Value Areas Map (both of which apply in this instance) - clause 4.25A which applies to the clearing of land shown as ENV on the High Biodiversity Value Areas Map. - Address Section 4.5.4 of the Precinct Plan, ensuring that the development footprint is accurately depicted in the BDAR, and that all ENV has been clearly mapped.
	<i>Extent and Timing</i>	Prior to determination.
3.	Protected ENV in the certified area	As depicted in Figure 4 of the BDAR, most of the site is 'certified' land as defined by the Order to confer biodiversity certification on the State Environmental Planning Policy (Sydney Region Growth Centres) 2006 (the Order). The Order is subject to conditions known as relevant biodiversity measures (RBMs) which are required to be addressed. The RBMs have not been addressed in the EIS. The certified portion of the site contains protected ENV which is identified in both the WPC SEPP and the Precinct Plan. The protected ENV within the certified land has not been reflected in the EIS. <u>SEPP</u> <i>WPC SEPP High Biodiversity Value Areas Map (yellow outlined areas show the area of protected ENV in certified land)</i>



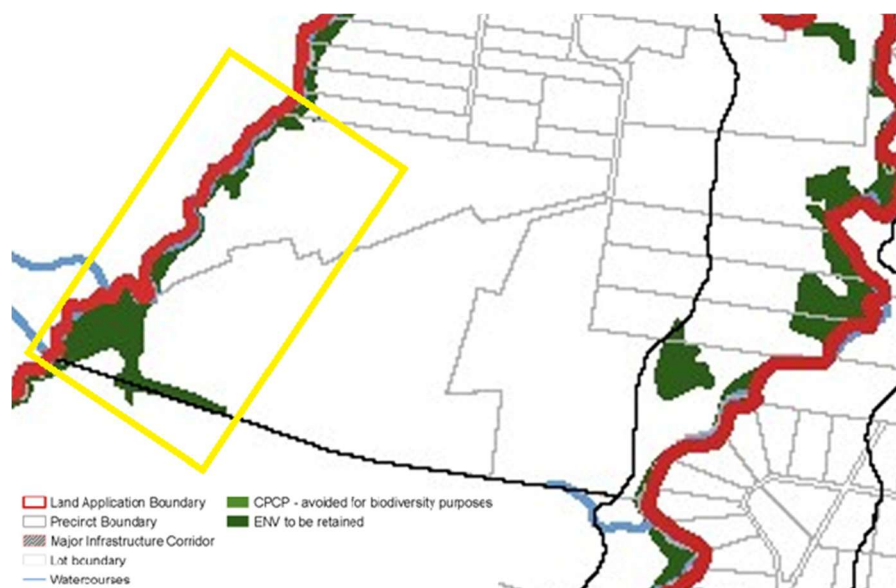
Under the WPC SEPP, the following clauses must be addressed for the protected ENV in certified land:

- clause 4.25 which applies to preservation of trees and vegetation in land in the ENZ or shown as ENV on the High Biodiversity Value Areas Map (both of which apply in this instance)
- clause 4.25A which applies to the clearing of land shown as ENV on the High Biodiversity Value Areas Map.

CPHR notes that these clauses of the WPC SEPP have been addressed in the BDAR, this relates only to the non-certified land. These clauses are required to be addressed for all the protected ENV including the protected ENV located in certified land.

Precinct Plan

Figure 7 of Precinct Plan - Protected Existing Native Vegetation and Protected areas under the Cumberland Plain Conservation Plan (yellow outline shows the area of protected ENV in certified land)



		Section 4.5.4 of the Precinct Plan has not been assessed for the certified land. Recommended action: • Address the relevant biodiversity measures of the Order. • Clearly map all protected ENV on certified land as identified in the WPC SEPP and Precinct Plan. • Demonstrate that the development will not directly or indirectly impact on protected ENV. • Update the civil plans to show the areas of protected ENV and provide cross-sections and levels where there is adjoining development and demonstrate adequate buffers are provided. • Address the following clauses of the WPC SEPP: ○ clause 4.25 which applies to preservation of trees and vegetation in land in the ENZ or shown as ENV on the High Biodiversity Value Areas Map (both of which apply in this instance) ○ clause 4.25A which applies to the clearing of land shown as ENV on the High Biodiversity Value Areas Map. • Address Section 4.5.4 of the Precinct Plan, which requires the protection of ENV. • In relation to the protected ENV land on the southern boundary: ○ provide details as to the ownership and management arrangements of the protected ENV and which is shown as being outside Lot 12, and isolated by the proposed road crossing the south-western boundary ○ provide details of setbacks (including from the indicative retaining wall footings) and extent of the buffers to the protected ENV land from the adjoining development within the site (Lot 12) ○ provide detailed cross-sections and levels (including any retaining walls and batters) of the protected ENV land and surrounding development including: ▪ the levels of the building pad for Lot 12 ▪ the proposed north-south road which crosses the protected ENV at south-western boundary to connect to the IPG land ▪ the proposed road within the IPG Badgerys Creek Road Masterplan which is parallel to the protected ENV to the south.
	<i>Extent and Timing</i>	Prior to determination.

Biodiversity

4.	<i>Confirm if Plant Community Type (PCT) 3320_Grassland is commensurate with</i>	BDAR Section 4.2.1.5 indicates that the grassland condition of PCT 3320 does not fit the description of the NSW Scientific Committee final determination, however, the impact assessment (BDAR Section 8) and Serious and Irreversible Impact (SAII) assessment (BDAR Section 10) include it as being commensurate.
----	---	--

	<i>the Cumberland Plain Woodland in the Sydney Basin Bioregion Threatened Ecological Community (TEC)</i>	CPHR notes that the BDAR has appropriately evaluated the current risk extinction of this SAIL TEC in Section 10 of the BDAR. CPHR agree that the proposal is unlikely to result in the extinction of this community, despite the removal of up to 0.07 ha of associated vegetation and therefore does not trigger a SAIL. Recommended action: Confirm if PCT 3320_Grassland is commensurate with the TEC, and if so, update the BDAR to clearly state this in Section 4.2.1.5. If not, adjust the impact assessment per Key Assessment Issue 8 in the table below and adjust the areas and mapping throughout the BDAR.
	<i>Extent and Timing</i>	Prior to determination.

5.	<i>Inconsistencies regarding candidate species retained for further assessment</i>	BDAR Table 22 is inconsistent with the Biodiversity Assessment Method Calculator (BAM-C). For instance, the following candidate species have conflicting assessments for requiring surveys between Table 22 ('Retained in Assessment') and BAM-C Tab 5 ('Confirmed Candidate Species'): <i>Maundia triglochinoides</i> <i>Pomaderris brunnea</i> <i>Pultenaea pedunculata</i> <i>Burhinus grallarius</i> <i>Cercatetus nanus</i> <i>Meridolum corneovirens</i> <i>Myotis Macropus</i>. Additionally, several candidate species are missing from the BAM-C, presumably due to their association with PCT 4023 which was not included in the impact assessment as it falls outside of the subject land boundary: <i>Commersonia prostrata</i> <i>Gryostemon thesioides</i> <i>Senna acclinis</i>. Recommended action: - All candidate species in which targeted surveys were conducted for should be listed as 'Yes' in both Table 22 and BAM-C Tab 5, or else 'No' if excluded per the Biodiversity Assessment Method (BAM) Section 5.2.3. - Manually add the missing candidate species to BAM-C Tab 5.
	<i>Extent and Timing</i>	Prior to determination.

6.	<i>Insufficient evidence to exclude candidate species</i>	The BDAR has excluded several candidate species from requiring additional assessment. CPHR agrees with the majority of exclusions, however, further information is required to reasonably exclude the following candidate species:
----	---	---

		• <i>Gyrostemon thesioides</i> - the subject land does occur within 50m of mapped watercourses. This candidate appears to be associated with PCT 4023 and not PCT 4025, however, information on the preferred habitat is limited and indicates broadly that it is known from hillsides, slopes, terraces and riverbanks within 180m of watercourses. As such, since PCT 4025 is a forested wetland associated with a watercourse, further justification for exclusion of this species is needed. • <i>Pterostylis saxicola</i> - the geographic distribution of this species includes the Study Area and no geographic limitation is listed in the BAM-C. The species is predominantly located in proximity to the Georges River National Park, however, its associated habitat is broad and includes; grassy woodlands on flat to gently sloping landscapes on shale soils, open-forest on hilly landscapes on transitional soils, and woodland on the rims and steep sides of river valleys on sandstone soils. As the subject land includes this type of habitat further justification for exclusion of this species is needed. • <i>Callocephalon fimbriatum</i> (Gang-gang Cockatoo) - excluded on the basis of lack of suitable hollows, however, the BAM data indicates that hollows are present in multiple vegetation zones (VZs). Given that large forest owl surveys were conducted it is assumed that large hollows were present, and therefore, further information regarding the hollows present within the subject land and surrounding Study Area is required. • <i>Calyptorhynchus lathami lathami</i> (Glossy Black Cockatoo) - same comments apply as directly above. Additionally, the following candidate species did not have justifications in BDAR Section 5.3.2 for their exclusion from candidate surveys: • <i>Commersonia prostrata</i> • <i>Pomaderris prunifolia</i> • <i>Wahlenbergia multicaulis</i> - <i>Endangered population</i>. Recommended action: • Provide additional justification for the exclusion of the above listed species. If a reasonable justification cannot be provided, then it is recommended that surveys be undertaken in accordance with the methodology listed in the Threatened Biodiversity Database Collection (TBDC). • If surveys cannot be conducted, assume presence and prepare a SAI assessment for both species. Alternatively, engage with a species expert to prepare an Expert Report.
	<i>Extent and Timing</i>	Prior to determination.
7.	<i>Development outside the scope of this SSD</i>	CPHR notes that the EIS, BDAR and civil plans show the indicative location of the east-west road identified in the Precinct Plan that traverses the Environment and Recreation Zone land along the eastern boundary. Specifically Figure 3 of the BDAR depicts development outside the scope of this SSD including this future road that crosses the ENZ zoned land.

		Recommended action: The EIS, BDAR and other technical report and plans should be updated to reflect only the works proposed under this SSD
	<i>Extent and Timing</i>	Prior to determination.

8.	<i>Minor amendment to the generated credit classes for PCT 3975</i>	CPHR agree that PCT 3975_Artificial is not commensurate with the <i>Biodiversity Conservation Act 2016</i> listed Endangered Ecological Community - <i>Freshwater Wetlands on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions</i>. However, in the BAM-C this VZ is attributed to this TEC. Note, this is also the case for PCT 3320_grassland, however, given that the vegetation integrity (VI) for this VZ is below the scoring threshold updates to this VZ in the BAM-C will not change the credit class generated. Recommended action: Amend Tab 3 of the BAM-C to include PCT 3795 without the TEC association. Note, the overall credit liability for this PCT will not increase, however, 1 credit for Coastal Freshwater Lagoons - $\geq 90\%$ cleared group will be produced, with the remaining 18 credits being attributed to the TEC.
	<i>Extent and Timing</i>	Prior to determination.

9.	<i>Impact figure missing</i>	BDAR Figure 14 does not clearly show impacts requiring offset, impacts not requiring offset, and areas not requiring assessment Recommended action: Amend BDAR Figure 14 per BAM section 9.2.1 and Table 24 as above.
	<i>Extent and Timing</i>	Prior to determination.

Waterway health

10.	Existing and current application permit requirements	The existing site is heavily disturbed and is currently being managed under existing environmental protection licence requirements (EPL 684) which are outlined in the Table 4.1 of the SWIA. The existing permit only allows discharge in one location and has a strict non-exceedance (100th percentile) discharge limit of 50 Nephelometric Turbidity Units (NTU). This is a higher standard than the Western Sydney Aerotropolis Development Control Plan (DCP) construction-phase stormwater targets. Over time the water management will transition from the current arrangements to the proposed arrangements which are based on DCP targets. It is unclear when the existing permit (EPL 684) will cease to apply (either in a temporal or spatial sense) and when the conditions applicable to SSD-97711727 will come into effect in terms of water management requirements for the site. The water management approach is documented for 2 points in time: current conditions and ultimate (finished bulk earthworks/final landform conditions) when the DCP targets apply. These are
-----	--	--

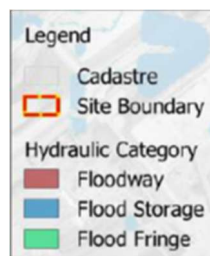
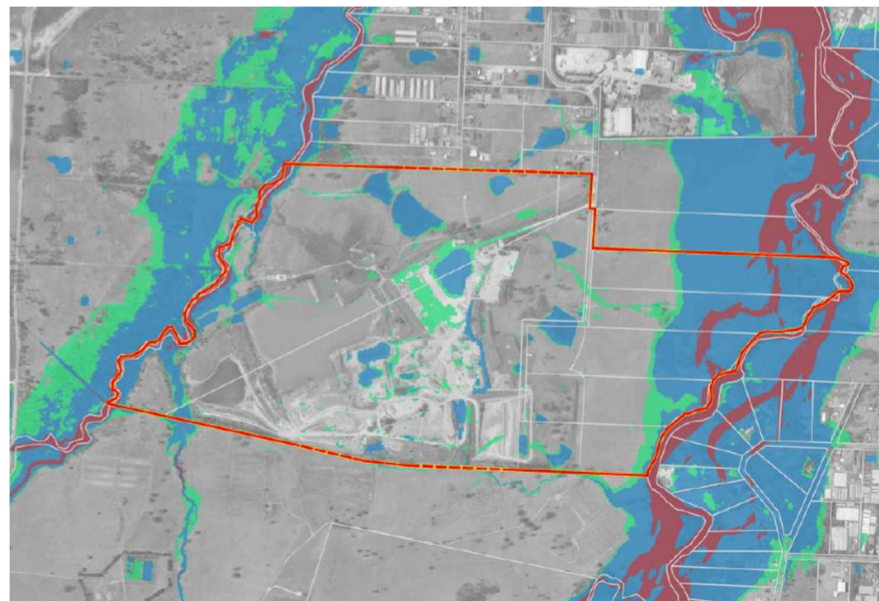
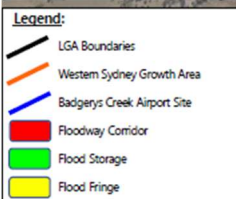
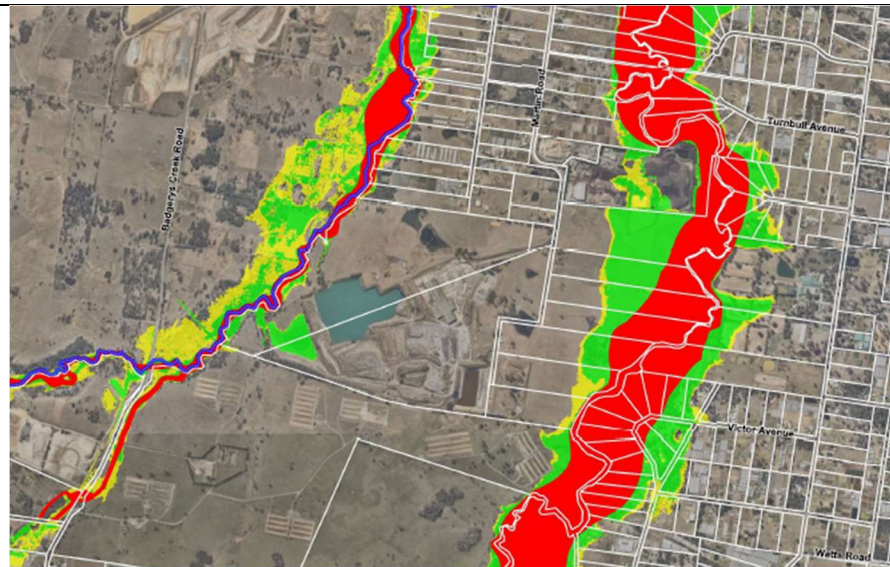
		essentially the end points for the works and there will be many interim phases between these as works progress. Documenting all phases at this stage is not practical and performance-based conditions should be placed on the permit which require continual updating of ESC plans and compliance with performance criteria throughout construction. This issue needs to be addressed so that conditions relating to water management outcomes are clear for both the applicant and regulator Recommended action: • Provide further clarification on how the existing permit EPL 684 will interact with the permit being applied for in this application (spatial and temporally) and suggest how the conditions applicable to SSD-97711727 can be crafted to provide clarity for all parties on what outcomes are required to be met on site in each location and each point in time as works progress between current conditions and the final landform.
	<i>Extent and Timing</i>	Prior to determination.

11.	Erosion and Sediment Control and water balance modelling	Clarification is sought on the following aspects of the Erosion and Sediment Control (ESC) strategy and water balance documented in the Surface Water Impact Assessment (SWIA): 1. The ESC strategy includes approaches that are operationally challenging to implement. The proposal includes enlarged Type-D basins which will result in very large volumes of water requiring treatment and dewatering and require a high level of commitment and resources to operate successfully. Results within the Aerotropolis and Mamre Road precincts have been mixed. A review of aerial imagery (Nearmap) indicates that Type-B basins on other sites in the area are operating well (good water clarity) and sites with the enlarged Type-D basins are highly turbid and downstream impacts are evident. This suggests that while enlarged Type-D may work in theory, it requires a level of commitment that is not necessarily borne out on site. CPHR recommends that Type-B basins be considered. 2. Similarly, the use of temporary soil binder has been specified in the SWIA for the finished landform rather than establishing vegetation through topsoil and seeding. Soil binder has a short life (~3 months), after which it requires reapplication. Given the large areas involved, this is a high on-going cost if warehouse works do not start soon after final landform is achieved. This places additional compliance burden to ensure re-application and is a higher risk strategy than effective revegetation. Consideration should be given to the timing of warehouse construction and if lower-risk stabilisation approaches (or a mix of approaches) should be adopted. 3. Alum (aluminium sulphate) is proposed as a flocculant chemical. This is not supported as Alum lowers pH and therefore creates toxic forms of aluminium. There are other much safer options available. Refer to the International Erosion Control Association (IECA) <u>Chemical coagulants and flocculants fact sheet</u>.
-----	--	---

		4. What level of imperviousness is the Australian Water Balance Model (AWBM) parameters appropriate for? The model appears to only represent a fully pervious site. That is appropriate for the works being applied for but will result in sediment basins being undersized for the next phase of works when warehouse construction commences and impervious surfaces are added to the basin catchments. The basins should be sized for the final landform based on the worst-case (largest catchment and highest imperviousness) which will occur for the basin's life. 5. In terms of the water balance calculations - fill material conditioning, dust suppression, and irrigation do not occur during or immediately following rainfall. The water balance model should not apply these demands uniformly over the year but should instead recognise that construction operations change when rainfall occurs. The absence of reduction of these demands immediately following rainfall will increase the volume of water needing to be treated and released as controlled discharges in order to dewater the basins within the required 5-day window. This will also increase the water import volume (unless basin sizes are increased beyond the required temporary settling zone volumes and a permanent reuse volume is added). 6. There are some elements of the tables within the SWIA which are unclear or conflict with each other. Table 5.5 – 2nd and 3rd columns headings are not clear. Table 5.5 and 5.6 results for the median year does not appear to match the water balance results presented in Table 5.4. For example, Table 5.4 has runoff of 491ML/yr and uncontrolled discharges of 228ML/yr, resulting in a hydrologic effectiveness of 53%. Recommended action: • Provide an updated SWIA which addresses the above
	<i>Extent and Timing</i>	Prior to determination.

Flooding

12.	Verification of FIRA Models for existing scenario	The Flood Impact and Risk Assessment (FIRA) report should provide a section to show compatibility with the Wianamatta South Creek Flood Study – Existing Conditions (Advisian, 2022). The FIRA modelling must maintain the hydraulic function as identified in the Wianamatta South Creek Flood Study – Existing Conditions (Advisian, 2022) as set in the Benchmarks in the Aerotropolis DCP. The FIRA Figure 3-13 show significant inconsistency between the flood function categories identified by the FIRA and the above-mentioned Wianamatta South Creek flood study.
-----	---	---



Recommended actions:

- Verify the existing case scenario with the Wianamatta South Creek Flood Study – Existing Conditions (Advisian, 2022).

		Provide amended maps for flood function that are consistent with the Wianamatta South Creek Flood Study – Existing Conditions (Advisian, 2022).
	<i>Extent and Timing</i>	Prior to determination.

13.	Base case scenario	A base case scenario that incorporates the development in the Aerotropolis that is constructed, under-construction and development that is already approved, including but not limited to the upstream adjacent to the Ingham Property Group (IPG) Badgerys Creek Masterplan site at 475 Badgerys Creek Road should be provided. The FIRA must clearly provide information on the development and infrastructure included in the Aerotropolis for this base case scenario, and this scenario should be used for the assessment of the development impact. Recommended action: Amend the verified existing condition to provide a base case scenario including the Aerotropolis development that is constructed, under-construction and development that is already approved.
	<i>Extent and Timing</i>	Prior to determination.

14.	Developed case scenario and points of comparisons	The developed case scenario should be modelled by incorporating the proposed works as identified in section 1.1 of the FIRA to the base case scenario. Modelling should report at the critical point downstream of the junction of Badgerys Creek and Wianamatta-South Creek. This is a critical point identified by DPHI's <u>Wianamatta-South Creek Cumulative Impact Assessment Policy</u>. Recommended action: - Incorporate the proposed works components as identified in section 1.1 of the FIRA to the base case scenario to represent the developed case scenario. - Address the impacts of the development on flooding. - Peak flow hydrographs should be provided for both the base case scenario and developed scenario downstream of the confluence of Badgerys Creek and South Creek for the longer durations to ensure flow from Badgerys Creek at the confluence does not coincide with South Creek flooding.
	<i>Extent and Timing</i>	Prior to determination.

End of Submission