



Office of
Environment
& Heritage

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SSD 7664

Ms Joanna Bakopanos
Team Leader Industry Assessments
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Nicola Chisholm

Dear Ms Bakopanos

Notice of Exhibition - Horsley Drive Business Park Stage 2, Cowpasture Road, Wetherill Park (SSD 7664)

I refer to your letter received 12 December 2016 to the Office of Environment and Heritage (OEH) requesting comments with respect to the exhibition of the Horsley Drive Business Park Stage 2 (SSD 7664).

OEH has reviewed the documentation provided and provides comments at Attachment 1.

Please note that OEH has made the decision not to provide comments on Aboriginal cultural heritage at this time. This should not be taken as support for the proposal and Aboriginal cultural heritage matters may still need to be considered by the Department.

If you have any further questions about this issue please contact Marnie Stewart on 9995 6868 or marnie.stewart@environment.nsw.gov.au.

Yours sincerely

S. Harrison 03/02/17

SUSAN HARRISON
Senior Team Leader Planning
Regional Operations

ATTACHMENT 1 – Office of Environment and Heritage comments on Exhibition of Horsley Drive Business Park Stage 2 (SSD 7664)

1. Background

OEH understands that the application involves a Concept Proposal for a general industrial, light industrial and warehouse and distribution centre development. The Concept Proposal identifies future land uses, site levels, building footprints, landscaping, internal roads and access arrangements. Concurrently to the Concept Proposal, approval is being sought for a Stage 1 DA to facilitate the proposed subdivision works (subdivision, earthworks, site servicing, internal roads, stormwater infrastructure and landscaping).

OEH has reviewed the exhibition documentation and provides the following comments.

2. Biodiversity

OEH has reviewed the Biodiversity Assessment Report (BAR) prepared by Ecoplanning dated 24 November 2016 and associated Framework for Biodiversity Assessment (FBA) calculator data and provides the following comments.

Lot 7 of proposed subdivision

Several of the plans provided, such as the indicative masterplan and the development footprint shapefile, show something being constructed within Lot 7 of the proposed subdivision. It looks like contours on a steep slope, so may be an embankment or batter. This part of the site is mapped in the assessment as native vegetation and by OEH (2013) as CPW (PCT - Grey Box – Forest Red Gum grassy woodland on shale of the Cumberland Plain). The FBA assessment, however, does not include this in the relevant vegetation zone nor calculate the credits that would be required as an offset. It does, however, include the steeper batters north and south of this. It needs to be confirmed whether this embankment is a consequence of the development and, if it is, then the assessment must be modified to calculate the credits required to offset it.

Matters for further consideration

Sections 9.2.4.2 (b)-(f) of the FBA have not been addressed. These matters need to be addressed before the consent authority can determine the application.

Cumberland Plain Land Snail

The FBA Calculator and Table 4.2 both state that the required habitat feature for the Cumberland Plain Land Snail (CPLS) is present. Appendix B, however, has concluded that the species is not present based only on the distance and dates of nearby records. The justification for not doing any surveys needs to be expanded, or surveys need to be done.

Threatened species survey

The BAR states that no threatened species surveys were undertaken as habitat was not present, but the 'Threatened species survey results' tab of calculator excludes all species with the 'Id method' of 'survey'. This is not considered to be a significant issue provided that CPLS are addressed, as OEH agrees that all other target species will not be present.

Biodiversity Offset Strategy

The BAR states that the required credits will be purchased from the market, with Western Sydney Parklands Trust (WSPT), who have credits available, likely to be the source.

Construction and Operational matters

OEH recommends that conditions be imposed to protect any vegetation to be retained, during both the construction and operational phases of development.

3. Floodplain Risk Management

Costin Roe Consulting's Civil Engineering Report includes a discussion on flooding and overland flow assessment that has been undertaken by Cardno. OEH comments on the assessment are generally confined to the methodology as discussed in Costin Roe paper dated 22 December 2016.

The paper indicates that Cardno has utilised Fairfield City Council's existing flood model as a base model to address flooding behaviour within the vicinity of the site for existing and post development scenarios. The paper includes mapping presenting flooding characteristics and flood hazard for the 5% and 1% AEP events and the probable maximum flood (PMF). Management measures have been included in the developed scenario including attenuation of the proposed site drainage, new dam and attenuation storage to three upstream overland flow paths. Emergency evacuation of the site in the PMF event is also considered.

From a floodplain risk management perspective, the methodology is considered adequate.

4. Landscaping

The planting list outlined in the Landscape Plan is acceptable with the exception of *Eucalyptus quadrangulata* (Coast White Box) and *Acacia penninervis* (Mountain Hickory). These two species are not locally native Cumberland Plain species.

5. Bushfire Management

In relation to bushfire management, OEH notes that all bushfire management operational activities will be undertaken within the development site and not within the Western Sydney Regional Park. OEH therefore supports the recommendations of the Bushfire Assessment prepared by Peterson Bushfire (November 2016).

(END OF SUBMISSION)

