

RESPONSE TO SUBMISSIONS AND PREFERRED PROJECT REPORT

LIGHTHORSE INTERCHANGE BUSINESS HUB (SDD_9667)

10 FEBRUARY 2020
P5115
FINAL
PREPARED FOR WESTERN SYDNEY PARKLANDS TRUST

URBIS

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Report Number	February 2020

TABLE OF CONTENTS

1.	Introduction	1
1.1.	Overview	1
1.2.	Structure of this report	2
1.3.	Supporting Information.....	2
2.	The Proposal.....	3
2.1.	Project Overview.....	3
2.2.	Project Amendments.....	3
2.3.	Amended Project Description	5
2.3.1.	Description of the Development.....	5
2.3.2.	Concept Proposal	5
2.3.3.	Stage 1 works	8
3.	Preliminary Assessment	9
4.	Submissions.....	14
4.1.	Blacktown City Council	14
4.2.	Jemena	23
4.3.	Endeavour Energy	23
4.4.	Energy, Environment and Science	24
4.5.	Environment Protection Authority	30
4.6.	Roads and Maritime Services	31
4.7.	Transport for NSW	32
4.8.	Water and the NSW Natural Resources Access Regulator.....	33
4.9.	Blacktown and District Environment Group Inc	34
4.10.	Public Submissions.....	35
5.	Supplementary Environmental Impact Assessment	36
5.1.	Strategic Context	36
5.2.	Statutory Planning Framework	39
5.2.1.	State Environmental Planning Policy (Western Sydney Parklands) 2009.....	39
6.	Conclusion	40
	Disclaimer	42

Appendix A	Site Survey Plan
Appendix B	Concept Masterplan
Appendix C	Landscape Plan
Appendix D	Remediation Action Plan
Appendix E	Civil Engineering Report
Appendix F	Civil Engineering Drawings
Appendix G	Flood Assessment
Appendix H	Plan of Subdivision
Appendix I	Traffic Impact Statement
Appendix J	Biodiversity Development Assessment Report
Appendix K	Visual Impact Analysis
Appendix L	Aboriginal Cultural Heritage Assessment Report
Appendix M	Creek Realignment Design Report

FIGURES:

Figure 1 – Revised Concept Master Plan.....	6
Figure 2 – Revised Landscape Master Plan.....	7
Figure 3 – Areas to be managed in accordance with a Vegetation Management Plan	22

TABLES:

Table 1 – Supporting documentation.....	2
Table 2 – Numeric Overview	5
Table 3 – Proposed Lot Areas	6
Table 4 – Response to DPIE preliminary assessment	9
Table 5 – Response to Blacktown City Council submission.....	14
Table 6 – Response to Endeavor Energy submission	23
Table 7 – Response to Energy, Environment and Science submission #1.....	24
Table 8 – Response to Environment Protection Authority submission	30
Table 9 – Response to Roads and Maritime Services submission	31
Table 10 – Response to Transport for NSW submission	32
Table 11 – Response to Water and the NSW Natural Resources Access Regulator submission.....	33
Table 12 – Strategic Context	36
Table 13 – Compliance with the relevant clauses of SEPP WSP	39

1. INTRODUCTION

1.1. OVERVIEW

This Response to Submissions Report (**RtS**) has been prepared on behalf of the Western Sydney Parklands Trust (**WSPT**), the proponent for State Significant Development (**SSD**) application number SSD18_9667. The application was lodged in July 2019 and is a Concept Development Application in accordance with Division 4.4 of Part 4 of the *Environmental Planning and Assessment Act 1979* (the Act). It seeks development consent for:

- Concept Proposal for the staged redevelopment of the site as an industrial business hub with 157,600 sqm of industrial and light industrial floorspace and 7,900 sqm ancillary office floorspace
- Detailed Proposal for the first stage of development which will include demolition works, remediation, site preparation and bulk earthworks, roadworks, site infrastructure and subdivision of the site

The application was placed on public exhibition from 12 August 2019 to 11 September 2019. Following its conclusion, the NSW Department of Planning Industry and Environment (**DPIE**) issued correspondence dated 23 September 2019 requesting that the proponent respond to the issues raised in the submissions received during the public exhibition period.

A total of 16 submissions were received from NSW government agencies and other stakeholders, including:

- Blacktown City Council
- Department of Primary Industries
- Endeavour Energy
- Energy, Environment and Science
- Environment Protection Authority
- Fire and Rescue NSW
- Heritage Council of New South Wales
- Jemena
- Roads and Maritime Services
- Rural Fire Service
- Sydney Water
- Transport for NSW
- Water and the Natural Resources Access Regulator
- Water NSW
- Blacktown and District Environment Group Inc #1
- Blacktown and District Environment Group Inc #2

Three public submission were received in respect of the proposal.

This report provides a comprehensive response to the 'matters identified by the Department' and each of the issues raised in the submissions received. The proposal has been amended in order to respond to the issues raised and additional justification and technical information has been provided.

1.2. STRUCTURE OF THIS REPORT

This RtS report is structured as follows:

- **Section 1** – Introduction – provides a project overview, key dates and identifies the number and nature of the submissions.
- **Section 2** - The Proposal: Provides a description of the proposal and outlines the modifications made to the design in response to matters raised in the submissions.
- **Section 3** – Preliminary Assessment: Provides a response to key issues raised following the preliminary assessment undertaken by DPIE, as outlined in the correspondence dated 23 September 2019.
- **Section 4** – Submission: Provides a summary of the issues raised in the submissions and a response to each of these, including provision of additional or amended technical information as appropriate.
- **Section 5** – Supplementary Environmental Impact Assessment: Addresses additional matters raised in the submissions that require supplementary assessment.
- **Section 6** – Conclusion.

1.3. SUPPORTING INFORMATION

This RtS is supported by the following technical studies provided in the appendices. This information is intended to supersede and/or supplement those originally lodged in July 2019. All other consultant reports remain unchanged from the original Environmental Impact Statement lodgement and can be found on the DPIE website.

Table 1 – Supporting documentation

Deliverable	Prepared by	Reference
Site Survey Plan	<i>Boxall Surveyors</i>	Appendix A
Concept Masterplan	<i>Nettleton Tribe</i>	Appendix B
Landscape Plan	<i>Site Image Landscape Architects</i>	Appendix C
Remediation Action Plan	<i>Environmental Earth Sciences</i>	Appendix D
Civil Engineering Report	<i>Henry and Hymas</i>	Appendix E
Civil Engineering Drawings	<i>Henry and Hymas</i>	Appendix F
Flood Assessment	<i>BMT Group</i>	Appendix G
Plan of Subdivision	<i>LandPartners</i>	Appendix H
Traffic Impact Statement	<i>Ason Group</i>	Appendix I
Biodiversity Development Assessment Report	<i>Ecoplanning</i>	Appendix J
Visual Impact Analysis	<i>Nettleton Tribe</i>	Appendix K
Aboriginal Cultural Heritage Assessment Report	<i>Extent Heritage Advisors</i>	Appendix L
Creek Realignment Design Report	<i>Henry and Hymas</i>	Appendix M

2. THE PROPOSAL

2.1. PROJECT OVERVIEW

The SSDA as lodged in July 2019, is a concept development application in accordance with the provisions of section 4.22 of the EP&A Act. Development consent is sought for a concept proposed for the staged redevelopment of the site as an industrial business hub and a detailed proposal for the first stage of works

The first stage of works includes the demolition of existing structures, site remediation, bulk earthworks to establish future development sites, provision of an internal access road, installation of relevant infrastructure and essential utility services and the Torrens title subdivision to create separate development lots. The future industrial buildings, ancillary offices and associated facilities and site works will be subject to separate future development applications (**DA**s) and do not form part of this application.

The key features of the concept proposal are summarised below:

- 165,500 square metres of overall floorspace which includes 157,600 square metres of industrial and light industrial floorspace and 7,900 square metres of ancillary office space to accommodate a range of land use activities including advanced manufacturing, freight and logistics and warehouse and distribution facilities.
- Concept architectural design guidelines for the future built form and landscape concept design to guide visual screening of the proposed buildings from the surrounding road network.
- Access to the proposed business park via a new roadway off Ferrers Road with the existing Wallgrove Road entry/exit driveway retained for emergency access only.
- Stormwater management works to manage the quality and quantity of water flows across the site and avoid adverse impacts to adjoining properties.
- Removal of vegetation from the site and implementation of bushfire protection recommendations.
- Delivery of utility services required to service the proposed development, including necessary upgrades and siting and design of the proposed industrial subdivision to incorporate the existing easements for high-pressure gas, high voltage electricity and sewer.

The Concept DA also includes a detailed proposal to facilitate the commencement of the first stage of the business hub development, including:

- Demolition of existing structures
- Remediation
- Site preparation and bulk earthworks
- Construction of road access and installation of essential infrastructure services
- Provision of flood and stormwater management infrastructure works
- Subdivision

2.2. PROJECT AMENDMENTS

Minor amendments have been made to the proposal in order to address the matters raised in the submissions. These are summarised as follows:

Architectural

- Minor adjustments to the hardstand at lot 6 and 7 to provide additional landscape frontage.
- Landscape Plan and Planting Schedule amended to incorporate local native species and coordination with updated engineer drawings.

Engineer- General Site and Stormwater

- Site plans and details amended to show inclusion of GPTs to all stormwater outlets. Drawings show the removal of all pit basket inserts for all surface inlet pits not discharging into water management basin.
- Site plans and details amended to show adjustment to pipe sizes, grades and alignments in response to a change in downstream hydraulic conditions (due to basin modifications, below).
- Catchment plans amended to show site bypass areas, to coordinate better with the basin modifications, and for general amendments/typographical errors.
- Minor amendments to general notes drawing.
- Minor amendments to earthworks plan to coordinate with amendments to site works (predominately due to basin modifications, below).
- Inclusion of drawing showing turning paths of 25.0m B-double turning throughout the future development. Turning paths provided to justify that a B-Double is able to forward into each site, reverse into the loading docks and exit the site in a forward direction.
- Minor modifications to works surrounding proposed emergency and shared path access from M7 Westlink underpass.
- Minor modification to standard pit details and pit lid schedule to reflect updated stormwater system.

Engineer - Water management basin

- Site plans generally amended for revised north and south bioretention shape.
- Site plans and details generally amended for change in on-site stormwater detention shape and batters.
- Site plans and details generally amended for change in the southern bioretention's distribution system from a perimeter drain system to an up-flow pit distribution system.
- Southern water management basin GPT removed and replaced with graduated trash rack and siltation pond.
- Site plans and details generally amended to show the increase of bioretention basin surface area to accommodate for the inclusion of site bypass in the water quality model.
- Basin details amended to show modifications to discharge control outlets.
- Site plans generally amended to show the modification to the basin's maintenance path network including new maintenance path from Lot 8 to the surrounding parklands area.
- Inclusion of drawing which shows turning paths of an 8.8m medium rigid vehicle (MRV). Turning paths are provided to justify that an 8.8m MRV is able to access and maintain the water management basin.
- Addition of section which shows the northern bioretention filter profile.
- General modifications to both bioretention basins' outlet details.

Engineer -Creek Realignment

- General minor changes to creek plan alignment, dimensions and specifications, refer creek design report.

2.3. AMENDED PROJECT DESCRIPTION

2.3.1. Description of the Development

SSD-9667 seeks consent for:

- Concept proposal comprising:
 - Establishment of up to 165,500 sqm of gross floor area, comprising 157,600 sqm for general industrial, light industrial, warehouse and distribution land uses, and 7,900 sqm for ancillary office; and
 - Conceptual development levels, footprints and building envelopes for Lots 1-7, road layout, parking, site access and landscape design.
- Stage 1 works for:
 - Demolition of existing structures on-site;
 - Remediation of the site;
 - Site preparation and bulk earthworks;
 - Construction of road access and installation of essential infrastructure services;
 - Provision of flood and stormwater management infrastructure works; and
 - Subdivision of the site into eight Torrens title lots.

2.3.2. Concept Proposal

The concept development scheme and proposed layout of the site is detailed on the concept masterplan prepared by Nettleton Tribe (refer **Appendix B**). A reduced sized copy of the plan is provided at Figure 1.

The key features of the concept masterplan are summarised in Table 2.

Table 2 – Numeric Overview

Component	Area
Site area	39.38ha
Developable area (Lots 1 – 7)	29.36ha
Total Building Area	165,500m ²
On-Site Stormwater Detention (Lot 8)	2.15ha
Access Road Reserve	2.11ha

Figure 1 – Revised Concept Master Plan



Source: Nettleton Tribe

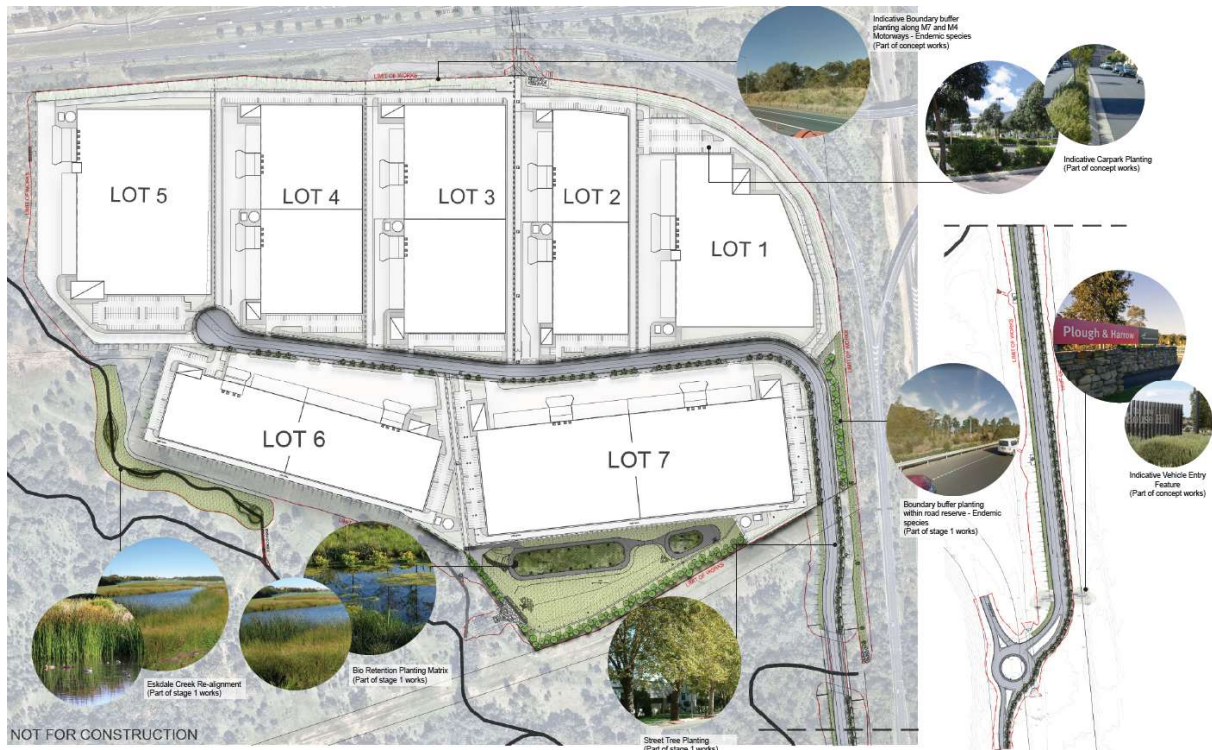
The concept proposal seeks to accommodate a total of 165,500 sqm of gross floor area across seven development lots, comprising 157,600 sqm for general industrial, light industrial, warehouse and distribution land uses, and 7,900 sqm for ancillary office. The areas and building footprints proposed for each lot are summarised in Table 3.

Table 3 – Proposed Lot Areas

Developable Lot	Lot Area	Warehouse Area	Office Area	Total Floor Area
Lot 1	41,270m ²	19,000m ²	1,000m ²	20,000m ²
Lot 2	34,141m ²	16,900m ²	800m ²	17,700m ²
Lot 3	41,112m ²	23,200m ²	1,200m ²	24,400m ²
Lot 4	38,686m ²	21,400m ²	1,000m ²	22,400m ²
Lot 5	44,193m ²	24,700m ²	1,300m ²	26,600m ²
Lot 6	38,406m ²	20,000m ²	1,000m ²	21,000m ²
Lot 7	55,829m ²	32,400m ²	1,600m ²	34,000m ²
TOTAL		157,600m²	7,900m²	165,500m²

The building footprints and built form on each of the proposed lots will be addressed within the future development applications. Urban Design Guidelines have been prepared to guide the siting and design of the future industrial buildings and were submitted with the EIS. Landscape plans have also been prepared to outline the landscape treatment of the future development lots, as well as the detailed works in Stage 1 (refer **Appendix C**). A reduced size copy of the landscape masterplan is provided at Figure 2.

Figure 2 – Revised Landscape Master Plan



Source: Site Image

The proposed land uses are defined under the Standard Instrument – Principal Local Environmental Plan as follows:

- **general industry** means a building or place (other than a heavy industry or light industry) that is used to carry out an industrial activity.
- **light industry** means a building or place used to carry out an industrial activity that does not interfere with the amenity of the neighbourhood by reason of noise, vibration, smell, fumes, smoke, vapour, steam, soot, ash, dust, waste water, waste products, grit or oil, or otherwise, and includes any of the following— (a) high technology industry, (b) home industry, (c) artisan food and drink industry.
- **warehouse or distribution centre** means a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made, and includes local distribution premises.
- **office premises** means a building or place used for the purpose of administrative, clerical, technical, professional or similar activities that do not include dealing with members of the public at the building or place on a direct and regular basis, except where such dealing is a minor activity (by appointment) that is ancillary to the main purpose for which the building or place is used.

2.3.3. Stage 1 works

This application also includes a detailed proposal for site preparation works to facilitate the commencement of the first stage of the business hub development, including:

- Demolition of existing structures on-site;
- Remediation of the site;
- Site preparation and bulk earthworks;
- Construction of road access and installation of essential infrastructure services;
- Provision of flood and stormwater management infrastructure works; and
- Subdivision of the site into eight Torrens title lots.

Each of the individual components of the first stage of works are described in further detail below.

Demolition

The buildings and structures associated with the former military use of the site are in a derelict and dilapidated state. All existing and remaining building elements and associated infrastructure are proposed to be removed from the site as part of the Stage 1 demolition works.

Remediation

Stage 1 works will include the remediation of the site to address the contamination identified in the Contamination Assessment Report. All remediation works will be undertaken in accordance with the recommendations for the management of the identified contamination in accordance with the specialist report and the final CMP.

Site Preparation and Bulk Earthworks

Stage 1 works will include necessary site preparatory works, including clearing of vegetation, establishing construction site access and implementation of construction management works. Bulk earthworks will also be undertaken to prepare the site for construction and establish site levels to facilitate the future stages of the development.

These works will also include the realignment of Eskdale Creek and introduction of a swampy meadow and chain of ponds connecting to Reedy Creek to minimise potential biodiversity impacts (refer to Creek Realignment Design Report at **Appendix M** for further details).

Access Road and Essential Infrastructure

The proposed access road, new roundabout intersection at Ferrers Road and the bridge crossing over Eastern Creek will be constructed as part of Stage 1 works. These works are detailed in the Civil Engineering Report and Civil Engineering Drawings submitted at **Appendix E** and **Appendix F**.

Essential utility service infrastructure services, including water, sewer, electricity and communications will also be delivered in accordance with the Civil Engineering Report as part of Stage 1 works.

Stormwater Management

The stormwater management infrastructure required to service the future industrial development will be delivered as part of the Stage 1 works. The proposed development lots will be graded to enable future stormwater runoff to be directed to sediment and erosion control basins at the downstream end of each individual lot, connecting via the local drainage system to the communal basin located on Lot 8. The Stage 1 works include temporary stormwater management infrastructure to manage stormwater runoff until the lots are further developed in subsequent stages of the proposal.

Subdivision

Stage 1 works include the subdivision of the site to create eight separate Torrens title lots that will accommodate the future stages of the development of the site as a business hub. The subdivision includes the dedication of land containing the access road as a public road and the creation of a separate lot (Lot 8) that will contain the stormwater management infrastructure that will service the development. The proposed Plan of Subdivision is provided at **Appendix H**.

3. PRELIMINARY ASSESSMENT

The correspondence received from DPIE dated 23 September 2019 included a list of additional matters identified that require further information and clarification. A review of these matters has been undertaken and a detailed response to each is provided in Table 4 and the following sections. For ease of reference the matters identified by DPIE are repeated in *Italics*.

Table 4 – Response to DPIE preliminary assessment

SUBMISSION	RESPONSE
1. Subdivision Layout and Access	
<p><i>The EIS and BDAR note that alternative access points to the site were considered to avoid and minimise impacts on native vegetation. Further information is requested regarding these alternatives including a more detailed evidence based justification for why these alternatives are not feasible.</i></p>	<p>A number of access options were previously considered as part of the due diligence process, with Ferrers Road deemed the most suitable;</p> <ol style="list-style-type: none"> 1. Access to Wallgrove Road via the existing M7 underpass 2. Access to Wallgrove Road via the SUEZ resource recovery centre 3. Access to Ferrers Road <p>Further information regarding why the remaining options from Wallgrove Road are not feasible is summarised below.</p> <p><i>Access to Wallgrove Road via the existing M7 underpass</i></p> <ul style="list-style-type: none"> • Swept path analysis was performed for a 25.0m articulated vehicle, which identified collisions with structural abutments/columns and surrounding constraints. Additionally, corner and intersection radii to perform the swept path movements are non-complaint with best industry practices and AUSTROADS design guidelines. • The width of the underpass from column to column is restricted to approx. 13m, considerably less than that of the minimum road width required by Blacktown City Council. An existing overland stormwater channel further constrains the width. • Would likely require the introduction of signalised intersection. Such an intersection treatment is unlikely to be supported by RMS. The limited distance to nearby intersections is expected to cause issues relating to queuing and traffic weaving. • Review of site survey completed in 2018 indicates that access opportunities would be limited by virtue of the apparent restricted head height at the existing underpass. Although the head height narrowly complies with relevant standard the height is inherently restrictive to larger non-standard/oversized vehicles.

SUBMISSION	RESPONSE
	<p>Conclusion: Intersection is not viable due to the geometric constraints imposed by the restrictive nature of the existing M7 underpass.</p> <p><i>Access to Wallgrove Road via the SUEZ resource recovery centre</i></p> <ul style="list-style-type: none"> • With the introduction of new development traffic, the level of service for the intersection of Wallgrove Road and the Suez Access is significantly impacted. With a number of proposed upgrades, namely introduction of additional northbound lane on Wallgrove Road and westbound lane on Suez Access Road. Assuming these upgrades are physically possible, traffic modelling results continue to show significant queuing along the northbound lanes on Wallgrove Road as well as along the Suez Access Road. • Safety concerns for the approach sight distances and the standard requirements of B-Double vehicles. Existing abutment deck structure is noted to impede sight distance of trucks and the approach to the intersection. • Access via this route would also involve impacts to native vegetation including traversing through a 2.2 ha of Alluvial Woodland (PCT 835) which includes a moderately dense midstorey of the long-lived and relatively slow growing <i>Melaleuca decora</i>, which is uncommon within the Parklands. This option may result in a larger area of Alluvial Woodland being cleared when compared to access via Ferrers Rd. Access via the Suez Access Road would also involve two creek crossings (Reedy Creek and Eskdale Creek) and traversing previously filled areas of the Suez site which may have possible contamination issues. • The two creek crossings would require bridge structures and embankments in the floodplain. The locations of the embankments are within a more narrow (contracted width) of the floodplain in a zone of higher convective flow. Accordingly, there is high potential for impacts on the flow regime. <p>Conclusion: Upgrading the intersection to achieve satisfactory traffic performance is not viable due to the geometric constraints imposed by the restrictive nature of the existing M7 underpass and surrounds. Furthermore, this would not be preferable due to the associated ecological and flooding constraints.</p> <p><i>Relocation of access location from Due Diligence location</i></p> <p>Early investigations by the Trust determined a location for the access crossing generally at the midpoint of the</p>

SUBMISSION	RESPONSE
	<p>site, approximately 300 meters upstream of the M4 Western Motorway embankment.</p> <p>The M4 Western Motorway embankment and associated bridge structures over the Eastern Creek represent a key hydraulic structure that govern flooding within the Eastern Creek flood plain. The preliminary access location posed potentially problematic flood impacts, notably the division of existing flood storage as well as the issue regarding balancing the throttling of flows through two sets of bridge structures.</p> <p>Subsequent detailed engineering investigations determined better flooding outcomes are achieved by providing an access that mimics the current boundary conditions posed by the neighbouring topography and M4 infrastructure. Shifting the proposed access alignment immediately upstream of the existing M4 road and bridge structure, allows proposed hydraulic control structures to be designed to match capacity of the existing outlet by closely mimicking the bridge opening/ pier arrangement. The benefits of the proposed methodology are demonstrated in the results of a detailed flood investigation which proved the access could be provided and impacts to the flood plain typically confined to within the site boundaries with no significant impacts on adjacent and upstream/downstream property.</p>
2. Biodiversity	
<p><i>The Department notes that the proposed development would result in the clearing of approximately 10 ha of native vegetation. As per the comments from the Environment, Energy and Science Group (EES), it is requested that further details and justification regarding how the development has avoided native vegetation and minimised impacts is provided.</i></p>	<p>Through the upfront investigation and planning, the impact footprint has been reduced by WSPT as much as practicable whilst maintaining the economic feasibility of the development.</p> <p>The selection of the Light Horse Interchange site was based upon the relatively low ecological values of this site, as a result of historic vegetation clearing, and ongoing disturbance associated with grazing.</p> <p>Following selection of the Light Horse Interchange site, several revisions of the final impact footprint were undertaken. These revisions have included reducing the project footprint to avoid approximately 2.2 ha of Alluvial Woodland (PCT 835) which includes a moderately dense midstorey of <i>Melaleuca decora</i>, which is uncommon with the Western Sydney Parklands.</p> <p>Smaller revisions to the subject land boundary have also been undertaken during project planning, reducing the total subject land and development footprint area to 39.38 ha from 40.71 ha. The final subject land and impact footprint has also been reduced and located to avoid fragmentation and disconnection of bushland to retain large patches of bushland and ensure connectivity between these patches.</p> <p>A range of options have been explored for the site access including considerations of options to minimise impacts to native vegetation. Ultimately the nominated</p>

SUBMISSION	RESPONSE
	access from Ferrers road was determined to be the only viable option. Consequently, the access from Ferrer's Road has been designed and located immediately adjacent to the existing M4 Western Motorway to avoid additional fragmentation of the vegetation along the Eastern Creek corridor and avoid larger changes to the flooding regimes of Eastern Creek Floodplain.
3. Traffic	
<i>The traffic impact assessment (Appendix N) notes that an assessment of the construction traffic impacts has not been undertaken (pg. 5). It is requested that this assessment is undertaken in relation to the Stage 1 works.</i>	A preliminary Construction Traffic Management Plan (CTMP) was prepared separately by WSPT and included in the original submission. Notwithstanding, the Traffic Impact Assessment has been updated to include high-level CTMP principles. Further detailed / specific management measures are expected to be deferred to future CTMP documentation.
4. Flooding, Stormwater and Earthworks	
<i>The EIS identifies that approximately 905,000m³ of fill is to be imported (pg. 49). The civil engineering plans show filling of up to 6 m across parts of the site. Further explanation and justification is required for the extent of filling proposed given the difference between the building pad levels and the 1 % AEP flood levels.</i>	The difference between the 1% AEP flood levels and the proposed development's Pad levels is attributed to the on-site stormwater detention (OSD) storage requirements requested by Blacktown City Council. Council requested during the pre-lodgement meeting that the OSD storage within the communal water management basin must be founded above the 1% AEP flood level at the basin location. OSD storage calculations yielding approx. 15,600m ³ , the water level in the basin during larger design storm event is situated approx. 2m above neighbouring flood levels outside the OSD basin. Areas of development are also required to drain through the in-ground stormwater system over 800m to the communal water management basin. Taking into hydraulic losses occurring along the extensive in-ground system, and the governing downstream water levels set by OSD requirements, pad levels were set at the proposed level to ensure the pads can drain effectively with no impact to any future development's freeboard immunity.
<i>The site survey (Appendix D) provides contours demonstrating the fall across the site. It is requested that the plan is updated with spot levels for ease of comparison with the pad levels shown on the civil engineering plans.</i>	A revised Site Survey Plan has been prepared by Boxall and is provided at Appendix A .
5. Visual Impact	
<i>The visual impact analysis (Appendix S) considers views to the site from the north and west from both motorways. Due to the extent of earthworks and retaining structures proposed, it is requested that a visual impact analysis is undertaken from the east and south of the site.</i>	The Visual Impact Analysis has been updated by Nettleton Tribe and is included at Appendix K .

SUBMISSION	RESPONSE
6. Project Description	
<i>Clarification is required regarding the proposed land uses. The EIS has varying descriptions of the development including an 'industrial business hub' (Executive Summary pg. iii), 'industrial and light industrial...including advanced manufacturing, freight and logistics and warehouse and distribution facilities' (Executive Summary pg. iv) whilst the project description (Chapter 2 pg. 13) does not include this level of detail. A consolidated project description is required with land uses nominated as per the standard instrument definitions.</i>	Refer Section 2.3 of the RtS report.
<i>The project description (Chapter 2, pg. 13) should include all works proposed, including those outside of the site boundary such as any intersection upgrades.</i>	Refer Section 2.3 of the RtS report.
7. Statutory Context	
<i>An assessment of the proposed development against all applicable clauses within SEPP (WSP) 2009 should be provided. This includes Clause 13 which requires that the proposed development has a neutral or beneficial impact on the quality of water in nearby bulk water supply infrastructure.</i>	Further assessment of the proposed development against SEPP (WSP) 2009 is provided at Section 5.2 of the RtS report.
8. Aboriginal Cultural Heritage Assessment Report (ACHAR)	
<i>Please note that EES have advised that they are intending to provide a submission regarding the ACHAR (Appendix T). This submission will be forwarded to you once it has been received.</i>	Noted. The EES submission regarding the ACHAR was received on 1 November 2019. A revised ACHAR has been prepared by Extent Heritage Advisors and is provided at Appendix L .
9. Consultation	
<i>The Department notes that Council has objected to the proposed development and several agencies have raised issues. It is requested that the Applicant meet with Council and the relevant agencies to resolve the outstanding issues prior to lodging a Response to Submissions.</i>	<p>WSPT met with Council officers on 5 November 2019 to discuss the issues raised. The outcomes are documented within Section 4.1 of the RtS report.</p> <p>A meeting was held between WSPT, Environmental Earth Sciences (consultant) and the NSW EPA on 25-Oct 2019. The outcomes of the meeting are documented within Section 4.5 of the RtS report.</p> <p>Meetings were held with TfNSW (RMS) on 19 Dec 2019 and TfNSW (RMS) and Westlink M7 on 10 Jan 2020. The outcomes of the meetings are documented within Section 4.6 and 4.7 of the RtS report.</p>

4. SUBMISSIONS

The following sections provide a detailed response to the issues raised by the various agencies and other stakeholders in each of the submissions received. Further discussion and detail are provided in the supporting technical documentation appended to this RtS report. For ease of reference the matters raised by the various agencies and other stakeholders are repeated in italics under each section.

Note: the submissions provided by the following agencies did not raise any issues that require further response or action by the proponent. Accordingly, these are not discussed further in this RtS report.

- Department of Primary Industries
- Fire and Rescue NSW
- Heritage Council of NSW
- Rural Fire Service
- Sydney Water
- Water NSW

4.1. BLACKTOWN CITY COUNCIL

Table 5 provides a response to the issues raised in the submission provided by Blacktown City Council dated 10 September 2019. Note: a meeting was held with Blacktown City Council on 5 November 2019. At this meeting a number of the matters raised in their submission were resolved and this is noted in the response table below.

Table 5 – Response to Blacktown City Council submission

SUBMISSION	RESPONSE
<u>Planning matters</u>	
<ol style="list-style-type: none"> 1. <i>The comments made in all strategic documents, including the Greater Sydney Regional Plan and Central City District Plan, are too general in nature and need to explain how they have been addressed in this proposal.</i> 2. <i>The EIS should specify the objectives and priorities in the strategic plans that the EIS complies with.</i> 3. <i>The Urban Design Guidelines adopts the RMS traffic rates where the parking rates should be the same as that applied in Eastern Creek Precinct Stage 3 (across Wallgrove Road) which is 1 space per 100 sqm of GFA up to 7500 sqm and for greater than 7500 sqm it is 1 space per 200 sqm for that part of the floor space that is over 7500 sqm.</i> 4. <i>Consequently, we are unable to support a masterplan for buildings that nominate floor spaces for building footprints that have not been the subject of detailed assessment, especially as the building footprints are based on the parking rates in the EIS.</i> 	<ol style="list-style-type: none"> 1. Refer Section 5.1 of the RtS report for supplementary assessment / commentary. 2. As above. 3. The revised Traffic Impact Statement (refer Appendix I) provides surveys of eight comparable industrial developments to establish the effective parking rate of operable developments within the Western Sydney Employment Area. The surveys demonstrated a mean and standard deviation of 1 space per 403m² and 1 space per 241m² respectively. Accordingly, based on the methodology adopted in the RMS Guide, the “middle range” car parking rate based on the surveys would be in the order of 1 space per 350m². These rates are consistent with those established by the RMS Guide and indeed suggest that a reduction in overall car parking is justified in comparison to the parking rates provided in the Blacktown City Council DCP. Furthermore, these rates are consistent with other relevant and recently approved developments within the broader area,

<p>5. <i>There is insufficient detail about the building footprints, including how access to docks by B-double trucks will be provided. The indicative footprints represent an overdevelopment of each site. We are only prepared to support a subdivision masterplan provided the driveways and car parking are consistent with the reciprocal rights of way.</i></p> <p>6. <i>This proposal covers Stage 1 and so more information is required as to what will be in Stage 2 and how it fits in with the Masterplan.</i></p> <p>7. <i>More information is required on the approval process for the construction and use of each building and who will be the consent authority.</i></p> <p>8. <i>The building concept plan is not clear about what appear to be ramps. More information is required on the ramps proposed in front of each warehouse as indicated on the Concept Masterplan.</i></p>	<p>including the industrial precincts of Oakdale South, Oakdale West, and Calibre.</p> <p>4. The adoption of a minimum rate of 1 space per 300m² GFA for warehouse floorspace and 1 space per 40m² for office floorspace is considered appropriate and sustainable and is consistent with both the RMS Guidelines and State planning policies. The proposed minimum rates will also enable the required flexibility in the design of future developments whilst still ensuring that parking is provided to accommodate both the current and future parking requirements of tenants. The specific car parking requirements for each lot/building within the site would be considered in more detail at the relevant DA stages. However, based on the current master plan, these rates can be readily satisfied.</p> <p>5. A review of the turning paths for a B-Double truck has been provided for each loading dock within each site. From these turning paths we are able to justify that a B-Double is able to forward into each site, reverse into the loading docks and exit the site in a forward direction. Please note however that it is unlikely that B-Doubles will be required to reverse into the docks and the rear trailer is usually removed from the truck prior to reversing.</p> <p>The handstands at Lot 6 and 7 have been adjusted to provide additional landscape frontage. B-double turning paths are shown on the Engineering plan 18652_CC_C608.</p> <p>6. The future industrial buildings, ancillary offices and associated facilities and site works will be subject to separate future development applications (DAs). The shared path connection between the estate road and Westlink M7 shared path will be completed as part of a future stage.</p> <p>7. The approval process for each subsequent stage of works will be dependent upon the scope of work proposed and its associated cost. It is noted that Schedule 2, Clause 5 of <i>State Environmental Planning Policy (State and Regional Development) 2011</i> specifies that development on land within the Western Parklands with a capital investment value of more than \$10 million is State Significant Development for which the Minister for Planning is the consent authority. For development with a capital investment value less than \$10 million it is expected that Council will be the consent authority.</p> <p>8. The ramps identified in the plans are for recessed docks. Recessed docks are</p>
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	<p>commonly used and allow a vehicle up to a semi articulated size to reverse back to the building so the body of the trailer is level with the floor of the industrial building. A dock leveller positioned on the dock assists with the levelling to enable smooth transition of goods on and off. The level difference tends to be between 1.2 to 1.5m in depth, thus the ramp is used to transition the grades to the hardstand.</p>
<u>Traffic matters</u>	
<ol style="list-style-type: none"> 1. <i>It is noted that the largest heavy vehicle to service the future lots is B-Double. Vehicular access to individual lots must cater for the manoeuvring of B-Doubles. A condition of Consent should be imposed requiring compliance with AS 2890.1 and AS 2890.2 prior to the issue of a Construction Certificate.</i> 2. <i>It is noted that the Emergency Access Road is proposed to be 6 m wide. This complies with the minimum carriageway width required by NSW Fire & Rescue.</i> 3. <i>It is noted that all access roads will be constructed to a carriageway width of 15.5m which complies with Blacktown City Council's Development Control Plan.</i> 4. <i>All carpark and loading area access should be constructed in full compliance with the appropriate Australian Standards, specifically AS 2890.1 and AS 2890.2. Swept path analysis for individual hardstand (paved area for heavy vehicle parking) must be undertaken during future stages to accompany the design development of that future built form on each lot, at that time.</i> 5. <i>It is noted that the trip generation rates used in the report are based on the RMS TDT13/04a data, which is acceptable.</i> 6. <i>SIDRA analysis for various intersections indicated excessive delays at the GWH / Doonside Road / Brabham Drive intersection. The report suggested an additional 70 m lane should be provided on the north approach (Doonside Road) to the GWH, to be dedicated as a left-turn only lane. That lane has improved the operational performance of the intersection. A concept design needs to be developed, including costing. The proponent for this development should pay all costs of their suggested improvement works.</i> 	<ol style="list-style-type: none"> 1. As per Item 5 of the Planning Matters, the sites cater for the turning movements of B-Doubles and the site layout and grades will be designed in accordance with AS2890.1 and AS2890.2. 2. Noted. 3. Noted. 4. It is understood that all carpark and loading areas must be designed in accordance with AS2890.1 and AS2890.2 at future development stages for each lot. It should be noted that the Masterplan has been designed taking into account the requirements of AS2890.1 and AS2890.2. 5. Noted. 6. Ason Group have undertaken revised modelling following additional detailed traffic and pedestrian surveys (in response to TfNSW comments) at the intersection of Doonside Drive / Great Western Highway. This revised analysis has determined that the previously identified upgrade is NOT required to support this development. With no requirements to upgrade that intersection, the need for a concept design becomes redundant. Refer to the Traffic Impact Assessment provided at Appendix I for further commentary. 7. Refer to Items 3 and 4 in Planning Matters for commentary regarding parking rates. 8. The proposed pedestrian and cyclist access path incorporate the design principles of Western Sydney Parklands Design Manual, specifically Section 7 -Tracks. Material options, finish and widths are proposed to be finalised with close co-ordination between the Architect, Blacktown City Council and WSPT. <p>A shared pedestrian and cyclist access path have been designed from Wallgrove Road and Ferrers Road including the new access road within the subdivision. The shared path from Ferrers Road and along the estate road will be completed as part of</p>

<ol style="list-style-type: none"> <i>Parking should be provided in accordance with the Blacktown City Council Development Control Plan 2015.</i> <i>Shared pedestrian and cyclist access from Wallgrove Road and Ferrers Road should be provided, including the new access road for this development. Shared paths should comply with the latest State Government guideline(s).</i> 	<p>stage 1 works. The shared path connection between the estate road and Westlink M7 will be completed as part of a future stage in conjunction with the development of Lots 1 and 2.</p>
<p><u>Drainage matters</u></p>	
<p>Operational Strategy</p> <ol style="list-style-type: none"> <i>On the proposed subdivision plan, Lot 8 contains the On-site Stormwater Detention (OSD) basin and water quality bioretention. Please advise who will own and maintain this, as Council will not accept ownership or maintenance. Is this to be community title or owned outright by Western Sydney Parklands?</i> 	<ol style="list-style-type: none"> It is proposed that the OSD basin and water quality bioretention will be privately maintained. It should be noted that the OSD basin, water quality systems and maintenance access to these systems have been designed in accordance with Council's requirements.
<p>Flooding</p> <ol style="list-style-type: none"> <i>Provide the TufLOW model used to analyse the flooding on the site.</i> <i>The provided flood report does not show minor contours to make a proper assessment. Provide at minimum minor 0.2 m contour levels across the 'Change in Peak Flood Level' for both the 1 % and the Extreme Event. The current impact flood maps show major contours only of 1 m.</i> <i>In chapter 4 of the flood report it is noted that 'The access road linking the development lots to Ferrers Road across the Eastern Creek floodplain has a minimum 1 %AEP flood immunity'. Please provide 1 % flood contours in the vicinity of the access road to confirm this. A continually rising route has not been provided - on the contrary, 2 sag locations are evident from the long section and plans.</i> <i>The M4 is considered a major flood evacuation route from Western Sydney. Provide additional modelling to demonstrate no adverse impact over the M4 in a 1:500 year ARI event.</i> 	<ol style="list-style-type: none"> The TUFLOW model has been provided at Appendix G. The Flood Report has been updated to show 200mm flood contours. The bridge access from Ferrers Road to the subdivision has been designed above the 1% AEP flood level in Eastern Creek. Sag points were required in the road but given the proposed subdivision levels and the existing Ferrers Road levels, it was not possible to have suitable grades in the road and bridge with a continuous rising route from the site. Having said this, the site and access routes are situated well above the 1% AEP flood level and therefore the two sags are not considered to be an adverse treatment of the access road. The plans have been updated to show these flood contours. Flood modelling of the 500-year ARI event has been undertaken and it has been established that there are no adverse impacts on the M4 as the as a result of the development in so far as the M4 has flood immunity in the 500-year ARI event.
<p>On-site Stormwater Detention (OSD)</p> <ol style="list-style-type: none"> <i>Provide orifice details.</i> <i>Show the bench OSD floor to invert of orifices and pipes on the OSD section provided. Refer to Council's WSUD drawings.</i> 	<ol style="list-style-type: none"> Orifice details have now been provided on the Civil Drawings (refer Appendix F). The OSD floor, orifice inverts and pipes are now shown on the Civil Drawings (refer Appendix F). The OSD orifice outlets have been changed from three 450mm diameter pipes to three 675mm voids and the three 900mm

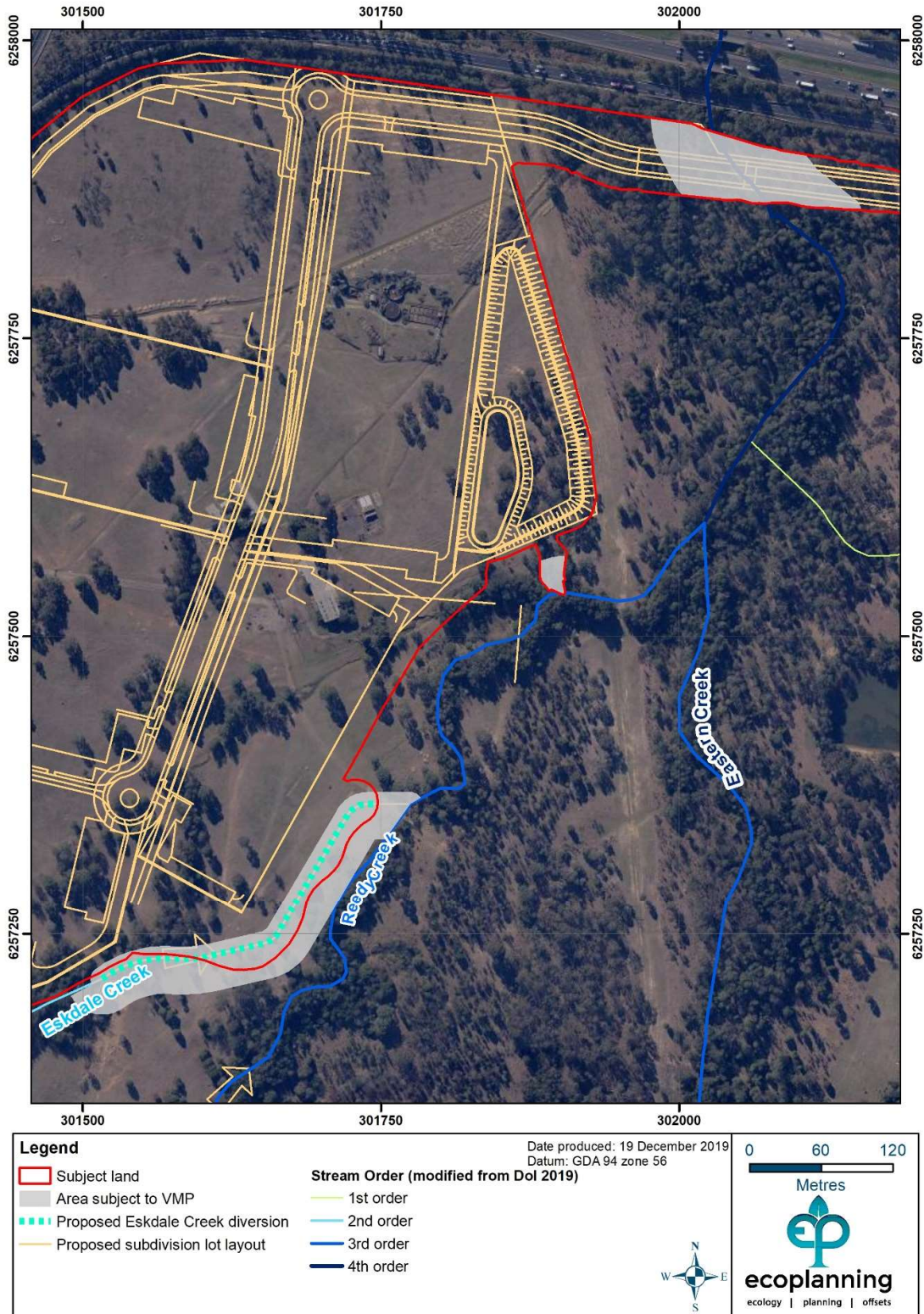
<p>8. <i>The OSD orifice outlets (450 mm void and the 900 mm dia. pipe) should be changed so that the 450 mm voids are to be upgraded to three dia. 675 mm pipes and the dia. 900 mm pipes upgraded to three 1050 mm pipes.</i></p>	<p>diameter pipes to three 1050mm diameter pipes.</p>
<p>WSUD</p> <p>9. <i>Provide the MUSIC model used to achieve the water treatment targets and water conservation reuse for the site.</i></p> <p>10. <i>Provide Gross Pollutant Trap (GPT) calculations. This can be provided by the manufacturer - contact ROCLA for further information. The GPT should be designed for a minimum 6 month flow (75% of the 1 year ARI) and must contain an oil baffle. The device is sized to ensure the Treatment Flow Rate matches or exceeds the 6 month flow, but only direct the 3 to 4 months flow to the basin. Show levels on the provided GPT detail including weir level. Show section views of the GPT. The provided GPT drawings are to be incorporated as part of the stormwater concept plans.</i></p> <p>11. <i>Council does not approve of treatment pit inserts within Council roads (to be dedicated) such as pit P-1 and others. Detail how the roads are being treated as no MUSIC model or report accounts for this.</i></p> <p>12. <i>In the Civil Engineering report, chapter 6, it is noted that a bioretention size of 2,620 sqm is required. However only 2,420 sqm in bioretention area has been provided.</i></p> <p>13. <i>In the MUSIC model (civil engineering report, Chapter 6, Figure 6.6) it does not account for any bypass, although the catchment and OSD spreadsheet for the site shows bypass areas.</i></p> <p>14. <i>Provide section drawings with details of the northern bioretention (400 sqm).</i></p> <p>15. <i>The submerged zone of the bioretention is to be at minimum with the 2 year flood level.</i></p> <p>16. <i>The southern bioretention is to be designed as per Council's WSUD drawings for large systems. This will require 4 upflow pits with permeable concrete pipes as per sheet 3 of A(BS)175M.</i></p> <p>17. <i>Water quality is required for the new road access from Ferrers Road.</i></p> <p>18. <i>Provide an electronic version of the MUSIC model.</i></p>	<p>9. The MUSIC model is provided at Appendix G.</p> <p>10. Given the difficulties in achieving sufficient depth from the GPT to the basin, and also lifting the outlet of the GPT above the extended detention zone of the bioretention basin, we were unable to provide a GPT. Additionally, the treatable flow rate requested by Council engineers is in excess of commercially available prefabricated GPTs. We are now proposing to provide a custom designed graduated trash rack and siltation trap in place of the previously proposed Rocla CDS3030 GPT for the south basin inlet. The diversion weir directing flow to the graduated trash rack has been sized to divert the 3-month ARI storm event to the graduated trash rack and siltation trap. Details of the weir, graduated trash rack and siltation trap are included on the Civil Drawings, refer to 18652_SSDA_C107 and 18652_SSDA_C201.</p> <p>11. Pit inserts (Ocean Guards) were previously included for pits within roads that were not able to drain to the bioretention basins. On the basis of the advice from Council, we are now proposing single GPTs for each outlet based on a best practice approach rather than meeting specific target removal rates. We believe this option provides the best balance between the ease of maintenance for Council and the best outcome from an ecological perspective. Specification for the different GPTs has been shown in the revised design report and revised civil drawings as well as information regarding the specific catchments and GPT treatable flow rates found in the civil engineering report appendices.</p> <p>12. There appeared to be a typographical error in the reporting of the size of the bioretention basins. The basin sizes have been altered since the original submission due to the inclusions of site bypass into the model. The revised bioretention basin specifications are discussed in the revised Civil Engineering Report and shown on the Civil Engineering Drawings. It is proposed that a total surface area of 2675m2 of bioretention filter is provided. The area of bioretention has been increased to compensate for additional bypass (western</p>

	<p>and northern overland flow swales) now included into the MUSIC model.</p> <p>13. The MUSIC model has been updated such that the overland flow path that was previously included as bypass is now included in the model. The overland flow path has been modelled as a grass lined swale which provides a portion of the treatment and the bioretention basin has been upsized to compensate for the partial treatment of the overland flow path.</p> <p>14. Drawings have now been updated to show sections through both the north and south bioretention basin.</p> <p>15. The submerged zone of the bioretention basin is lifted above the 2-year ARI flood level.</p> <p>16. The bioretention system has been amended to show eleven up flow pits and permeable (slotted) concrete pipes as per Council's requirements (Sheet 3 of A(BS)175M). The specification and spacing of the pits and pipes, although non-standard, have been designed in accordance with Council's WSUD standard drawings. It is noted further detailed design is required to finalise upflow pit levels to achieve even distribution of stormwater throughout the bioretention basin.</p> <p>17. GPTs have been provided for the new access road from Ferrers Road. As stated in Item 11 above, we are proposing single GPTs for each outlet based on a best practice approach rather than meeting specific target removal rates. We believe this option provides the best balance between the ease of maintenance for Council and the best outcome from an ecological perspective.</p> <p>18. An electronic copy of the revised MUSIC model is provided at Appendix G.</p>
<p><i>Drainage</i></p> <p>19. <i>The proposal to divert the creek will need a separate report to outline the design, access for maintenance and the design parameters used.</i></p> <p>20. <i>GPT eductor truck requires a max 3% parking grade for access and cleaning of the GPT.</i></p> <p>21. <i>GPT levels and method of sizing is required.</i></p> <p>22. <i>The bioretention volume up to the EDD is not to be part of the OSD volume.</i></p>	<p>19. A design report for creek re-alignment of Eskdale Creek has been provided with this response which outlines the design, access and maintenance requirements of the creek realignment.</p> <p>20. The access tracks from the internal access road to the GPTs and bioretention systems have been designed to cater for the turning movements for an 8.8m medium rigid truck as discussed with Council in the meeting held on 5 November 2019. These allow for the truck to enter and leave the water quality treatment zones in a forward direction. Access tracks from Lot 8 have also now been provided to allow service vehicles to access the proposed creek re-</p>

<p>23. <i>Provide the OSD spreadsheet electronically.</i></p> <p>24. <i>The outlet invert from the GPT to the bioretention is to be greater than the bioretention Extended Detention Depth (EDD). The diversion weir for both GPTs is to be designed for the 3 to 4 months flow.</i></p> <p>25. <i>The proposed maintenance paths are not adequate. Show turning paths on the proposed maintenance access tracks to the GPTs, OSD and the proposed bioretentions. A 9 m service truck will need to be simulated.</i></p> <p>26. <i>The 1050 mm pipe carrying the overland flows from the M7 underpass discharges to the former Eskdale Creek line as noted on Dwg. No. C107. This should be discharging to the realigned creek location.</i></p> <p>27. <i>The 1200 mm dia. pipe running from pit L-10 to the northern bioretention in Dwg. No. C105 will be registered as an easement. Consider a 3.0 m wide easement and its potential to affect any nearby structures, especially adjacent to pit L-4. No structure is permitted on easements.</i></p>	<p>alignment. Turning paths have been provided on the new civil engineering drawing 18652_SSDA_C609.</p> <p>21. The GPTs have been designed based on the catchment areas draining to them in accordance with the Council requirements concerning treatable flow rates. In some instances, the previously proposed GPTs have been replaced with trash racks, siltation traps and diversion weirs. GPT catchment information, treatable flow rates and specified units/flow rates have been included in the revised engineering report within depth calculations included in the report appendices.</p> <p>22. The bioretention volumes up to the extended detention depth (EDD) have not been included in the OSD volume.</p> <p>23. A copy of the OSD spreadsheet has been included with this submission, refer appendices of civil engineering report.</p> <p>24. Due to site constraints, we propose to substitute the GPT with a graduated trash rack and siltation trap. As such the inlet from the flow through the graduated trash rack and siltation trap is appropriately situated to hydraulically drive the bioretention surcharge system. The diversion weir and outlet culvert to bioretention has been sized to accommodate the 3-month flow from the major southern subdivision catchment.</p> <p>25. As per Item 20 above, the access tracks from the internal access road to the GPTs and bioretention systems have been designed to cater for the turning movements for an 8.8m medium rigid truck as discussed with Council in the meeting held on 5 November 2019. These allow for the truck to enter and leave the water quality treatment zones in a forward direction. Turning paths have been provided on updated engineering drawings.</p> <p>26. In order to provide the best outcome from a biodiversity perspective, the 1050mm diameter pipe will remain shown connected to the former alignment of Eskdale Creek which is to be retained. This was agreed in our meeting with Council on 5 November 2019.</p> <p>27. It is understood that the proposed 1200mm diameter pipe draining from Pit L-10 to the bioretention basin will be required to be in an easement. The pipe has been relocated to the east to be located further away from the future building within the development site.</p>
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<u>Section 7.11 matters</u>	
<p><i>The proposed development is not on land subject to any Section 7.11 Contributions Plan in Blacktown. As such, the developer is to provide all local infrastructure required to meet the demand of its development in terms of Traffic and Transport impacts and Water Management (quantity and quality) to mitigate downstream impacts.</i></p>	<p>Noted.</p>
<u>Ecology</u>	
<ol style="list-style-type: none"> <i>All mitigation measures included in Section 6.3 of the BOAR are recommended to be placed as a condition of consent of the development. Additionally, the revegetation and management of the retained vegetation is to be detailed in a Vegetation Management Plan (VMP) or similar. In particular, the VMP is to include the details for the revegetation of the Vegetated Riparian Zones (VRZ) for Reedy Creek and Eskdale Creek, which are outside of the WSPT Plan of Management - Bushland Corridor areas.</i> <i>A print-out from the BAM Calculator should be attached to the BOAR.</i> 	<ol style="list-style-type: none"> WSPT accepts the recommendations included in section 6.3 of the BDAR to form part of the conditions of consent. This would include the requirement for appropriate Vegetated Riparian Zones (VRZs) to be established along Eastern Creek, Reedy Creek and Eskdale Creek. This would occur as part of a Vegetation Management Plan (VMP) which would apply to areas shown in Figure 3 below. The VMP and VRZs will protect and enhance habitat for flora and fauna, including the identified corridor extending along Eastern Creek, while also protecting the hydrological processes of these creeks. A credit report generated from the BAM Calculator is provided at Appendix J.
<u>Environmental Health matters</u>	
<p><i>A Site Audit Statement must be prepared for the site, which can be conditioned: A Site Audit Statement is to be obtained from a NSW Environment Protection Authority accredited Site Auditor. The Site Audit Statement must confirm that the site has been remediated in accordance with the approved Remediation Action Plan and that the site is suitable for the proposed use.</i></p>	<p>Noted. A Site Audit Statement is to be provided prior to the release of a Construction Certificate.</p>

Figure 3 – Areas to be managed in accordance with a Vegetation Management Plan



4.2. JEMENA

Jemena recommends that a Safety Management Study be convened to workshop the impacts to the proposed development activities during the demolition, construction and operation phases on the high pressure pipeline within the development scope area.

Response: A Hazards and Risk Assessment was previously prepared and submitted with the EIS. A Safety Management Study can be completed prior to commencement of work. This is consistent with the approach taken on the nearby Eastern Creek Business Hub. It is expected that a suitable condition of consent would be imposed.

4.3. ENDEAVOUR ENERGY

Table 6 provides a response to the matters raised in the submission provided by Endeavour Energy dated 3 September 2019.

Table 6 – Response to Endeavor Energy submission

SUBMISSION	RESPONSE
<u>Property services</u>	
<i>The existing easement for 11 kV (constructed at 22 kV) high voltage overhead power lines needs to be included in the Draft Plan of Subdivision.</i>	The draft Plan of Subdivision has been updated by Landpartners and is provided at Appendix H .
<i>The proposed easement for 132 kV high voltage overhead power lines needs to be created/registered as part of the subdivision.</i>	The draft Plan of Subdivision has been updated by Landpartners and is provided at Appendix H . It is intended that the proposed easement will be created as part of the subdivision.
<u>Recommendations and comments</u>	
Comments provided re network capacity / connection, urban network design, bushfire, flooding and drainage, easement management / network access, earthing, prudent avoidance, vegetation management, dial before you dig, asbestos, public safety, etc.	The Civil Engineering Report (refer Appendix E) has been updated to further elaborate on engineering matters relating to electricity supply to the development. Preliminary advice from the Level 3 ASP, Ultegra, is presented in the Civil Engineering Report, including; likely method of power supply. The comments provided in Endeavour Energy's letter are noted and future detailed design will be conducted in consideration of those comments.

4.4. ENERGY, ENVIRONMENT AND SCIENCE

Table 7 provides a response to the issues raised in the submission from Energy, Environment and Science dated 9 September 2019. A supplementary submission regarding the ACHAR was provided by EES on 1 November 2019. A detailed response to this submission, along with the finalised ACHAR has been prepared by Extent Heritage Advisors and is provided at **Appendix L**.

Table 7 – Response to Energy, Environment and Science submission #1

SUBMISSION	RESPONSE
<i>The EIS and accompanying reports include different information on the size of the site and the developable area.</i>	<p>The total site area subject to this SSD is 39.38ha.</p> <p>The total developable area of Lots 1 – 7 is 29.36ha.</p>
<u>Bushland Corridor</u>	
<i>EES recommends the Concept Masterplan is amended to remove Lot 8 (where the bio-retention basin is proposed to be located) from the development footprint and that Lots 6 and 7 are reconfigured. As Lot 8 and potentially part of Lots 6 and 7 appear to retain intact Alluvial Woodland and under-scrubbed Alluvial Woodland which is contiguous with the remnant vegetation to the south of the site (see Figure 3.2 of BOAR), it is recommended that Lot 8 is included as part of the Bushland Corridor and that Lots 6 and 7 are reconfigured and the native vegetation within these lots is included in the Bushland Corridor. The bioretention should be relocated closer to the proposed lots 1-5.</i>	<p>Through the upfront investigation and planning, the impact footprint has been reduced by WSPT as much as practicable whilst maintaining the economic feasibility of the development.</p> <p>The selection of the Light Horse Interchange site was based upon the relatively low ecological values of this site, as a result of historic vegetation clearing, and ongoing disturbance associated with grazing.</p> <p>Following selection of the Light Horse Interchange site, several revisions of the final impact footprint were undertaken. These revisions have included reducing the project footprint to avoid approximately 2.2 ha of Alluvial Woodland (PCT 835) which includes a moderately dense midstorey of <i>Melaleuca decora</i>, which is uncommon with the Western Sydney Parklands. Smaller revisions to the subject land boundary have also been undertaken during project planning, reducing the total subject land and development footprint area to 39.38ha from 40.71ha. The final subject land and impact footprint has also been reduced and located to avoid fragmentation and disconnection of bushland to retain large patches of bushland and ensure connectivity between these patches.</p> <p>A range of options have been explored for the site access including considerations of options to minimise impacts to native vegetation. Ultimately the nominated access from Ferrer's road was determined to be the only viable option. Consequently, the access from Ferrer's Road has been designed and located immediately adjacent to the existing M4 Western Motorway to avoid additional fragmentation of the vegetation along the Eastern Creek corridor and avoid larger changes to the flooding regimes of Eastern Creek Floodplain. Further discussion regarding the options investigated are detailed under DPIE item number 1 (refer Section 3 of the RtS report).</p>

SUBMISSION	RESPONSE
<u>Avoid and minimise impacts to biodiversity</u>	
<p><i>EES recommends all attempts are made to:</i></p> <ul style="list-style-type: none"> <i>reduce the footprint of the development on the site to avoid/minimise the clearing of native vegetation and widen the Bushland Corridor, and fully justify any unavoidable impacts</i> <i>remove horse and cattle agistment from the native vegetation that is to be retained as the BA states this is keeping the vegetation from regenerating outside of the riparian corridors (see section 1.2, page 3 of BA)</i> <i>retain isolated native paddock trees in the proposed subdivision and street layout.</i> 	<p>Each of these matters are addressed as follows:</p> <ul style="list-style-type: none"> WSPT has reduced the impact footprint as much as practicable through upfront investigation and planning, while maintaining the economic feasibility of the development. The current agistment of horse and cattle would cease as part of the proposed development. Isolated native paddock trees within the footprint of the proposed subdivision cannot be retained due to the cut and fill required across the development area.
<p><i>A Vegetation Management Plan (VMP) needs to be prepared which provides details on how the corridors are to be protected and restored. If the development is approved a condition of consent should be included which requires a VMP to be prepared and implemented.</i></p>	<p>Agree. A VMP is to be prepared as a condition of consent. This will include appropriate Vegetated Riparian Zones (VRZs) along Eastern Creek, Reedy Creek and Eskdale Creek. The VMP and VRZs will protect and enhance habitat for flora and fauna, including the identified corridor extending along Eastern Creek, while protecting the hydrological processes of these creeks.</p>
<u>Watercourses and Riparian Corridors</u>	
<p><i>EES notes a patch of remnant native vegetation occurs between Reedy Creek and Eastern Creek outside the eastern boundary of the site. EES seeks clarification as to whether this patch of native vegetation is proposed to be protected and managed in perpetuity and included as part of the Bushland Corridor. EES recommends it is protected and included in the Bushland Corridor and if necessary that the bushfire requirements on the site are amended to ensure this vegetation is protected.</i></p>	<p>The area of remnant native vegetation between Reedy Creek and Eastern Creek occurs outside the eastern boundary of the site and does not form part of the current proposal, except for those areas which would be managed as part of the VMP for Vegetated Riparian Zones in accordance with the <i>NSW Water Management Act 2000</i> and as shown in Figure 3.</p> <p>Areas between Reedy Creek and Eastern Creek outside the eastern boundary of the site would be managed in accordance with the broader WSPT Plan of Management and would not form part of the development footprint or VMP associated with the proposed Business Hub.</p>
<p><i>EES recommends:</i></p> <ul style="list-style-type: none"> <i>existing native vegetation along Eastern Creek and Reedy Creek is protected especially as it is in very good and good condition</i> <i>the Bushland Corridor along Eastern Creek is as wide as possible as it provides a north south corridor connection within the Western Sydney Parklands</i> <i>the riparian corridors are rehabilitated where this is required with fully structured local provenance native vegetation from the</i> 	<p>Each of these matters are addressed as follows:</p> <ul style="list-style-type: none"> Areas of existing native vegetation along Eastern Creek and Reedy Creek will be managed and protected by the VMP. The Bushland Corridor along Eastern Creek outside the site boundary will continue to be managed in accordance with the WSPT Plan of Management under the Bushland Management – Central Parklands contract and would not form part of the development footprint or the VMP

SUBMISSION	RESPONSE
<p><i>relevant local native vegetation community or communities that occur at the site</i></p> <ul style="list-style-type: none"> • <i>a Vegetation Management Plan (VMP) is prepared and implemented for the rehabilitation of the riparian corridors.</i> 	<ul style="list-style-type: none"> • The VMP will include principles for rehabilitating the riparian corridors with local provenance native vegetation • A VMP will be prepared and implemented for the rehabilitation of the riparian corridors.
<p><i>For clarity, the proponent needs to provide a scaled plan which locates: the site boundary; the development footprint; the top of highest bank along the creeks; the riparian corridor widths proposed along Eastern Creek, Reedy Creek and the realigned Eskdale Creek (measured from the top of the highest bank); the Bushland Corridor; Asset Protection Zones; and existing native vegetation.</i></p>	<p>The figures within the updated BDAR (Appendix J) include scaled plans detailing the site boundary, development footprint, riparian corridor widths, regional corridors and existing native vegetation.</p> <p>The bushfire protection measures are detailed separately within the Bushfire Assessment prepared and lodged with the EIS as Appendix W.</p>
<p><u>Realignment of Eskdale Creek</u></p>	
<p><i>Prior to realigning and filling the existing Erskdale Creek, if the creek is flowing or it retains pools of water at the time of the proposed works, adequate details and mitigation measures need to be provided and implemented to protect and manage impacts on:</i></p> <ul style="list-style-type: none"> • <i>native fauna known to occur or that potentially inhabit the creek (including measures to relocate any water dependent fauna)</i> • <i>the downstream environment including measures to mitigate impacts on the instream habitat and downstream water quality.</i> 	<p>Details regarding the proposed diversion and filling of Eskdale Creek would be included as part of the Vegetation Management Plan (VMP) to be prepared as a condition of consent.</p> <p>Assessment of riparian vegetation, creek channel condition and Key Fish Habitat identified that Eskdale Creek was unlikely to sustain viable long-term populations of fish due to its highly degraded state, intermittent flow and lack of complex habitat. Nonetheless, the realigning and filling the existing Eskdale Creek to be detailed within the VMP would include measures to avoid impacts to native fauna and downstream environments.</p>
<p><u>Bridge Crossing</u></p>	
<p><i>EES recommends alternative solutions are considered to avoid constructing the proposed bridge crossing for the primary access to the site.</i></p> <p><i>If access to the site must be provided at this location, EES recommends the bridge is designed to maintain and improve riparian/terrestrial connectivity along Eastern Creek and the design includes the following:</i></p> <ul style="list-style-type: none"> • <i>the bridge is an elevated structure and it spans the full width of the riparian corridor to avoid or reduce the need to clear and/or disturb remnant native vegetation along the creek</i> • <i>the design maximises light and moisture penetration under the structure to encourage native plant growth, for example the bridge could include a grate in the structure</i> • <i>a gap is provided between the new bridge crossing and the existing crossing of the M4</i> 	<p>Refer to justification of proposed access via Ferrers Road provided in Section 3 of the RtS report.</p> <p>The bridge over Eastern Creek has been designed to consider the requirements of vehicles accessing the proposed development, flooding constraints and to minimise the footprint of the bridge (to minimise impacts to native vegetation).</p> <p>A bridge spanning the entire riparian corridor would have traffic/roads implication. WSPT have imitated the length of the M4 bridges adjacent.</p> <p>The future detailed design of the bridge will consider opportunities to further maximise light and moisture penetration under the structure to encourage native plant growth where practical.</p> <p>The location of the proposed bridge over Eastern Creek is separated from the existing crossing on the M4 motorway by approximately 40 m which would allow for light and moisture penetration between and under the two structures.</p>

SUBMISSION	RESPONSE
<i>motorway to assist in allowing light and moisture penetration under the two structures.</i>	
<u>Site Landscaping</u>	
<i>EES notes the planting schedule proposes to plant exotic London Plane Trees in the street planting. EES recommends the planting schedule is amended and a diversity of local native provenance species are planted in the street planting and the development lots (rather than plant exotic or non-local natives).</i>	The Planting Schedule has been amended to include a diversity of local native species (refer Appendix C).
<i>The Landscape Plan shows turf is proposed to be planted around the bio-retention basins. It is recommended a diversity of local native of local native provenance species is planted within the basins and surrounding the bio-retention basins (rather than turf) except where access is required for maintenance.</i>	This comment conflicts with Blacktown City Councils Water Sensitive Urban Design (WSUD) Standard Drawings which show that OSD basins, particularly the internal-facing batters of the basins, should be turfed. The areas around the bio-retention basin are currently, and remain, documented as turfed areas in accordance with Blacktown City Councils WSUD Drawings.
<u>Urban Tree Canopy</u>	
<p><i>EES recommends that to assist in mitigating the urban heat island effect at the site and improve the urban tree canopy and local habitat that the development:</i></p> <ul style="list-style-type: none"> <i>first avoids removing the trees from the site where possible</i> <i>replaces any removed trees at a ratio greater than 1: 1</i> <i>replaces the trees with local provenance native plant species from the native vegetation community which once occurred in this locality to enhance local biodiversity, rather than use non-local native or exotic plants</i> <i>uses advanced and established local native trees preferably with a plant container pot size of 100 litres or greater</i> <i>provides sufficient area/space to allow the trees to grow to maturity</i> 	<p>Section 5.1 of the BDAR discusses the actions taken to avoid and minimise impacts to native vegetation including avoiding removing vegetation where possible. Within the development footprint, retention of native trees would not be possible due to the bulk earthworks required including importation of fill.</p> <p>Replacement of removed trees at a ratio of 1:1 within the project footprint would not be feasible with the proposed development. However, all Cumberland Plain Woodland to be removed from the site will be offset on a like for like basis as outlined in the BDAR. Additionally, the WSPT POM 2030 identifies strategic directions including the provision of an additional 250 ha of bushland corridors (total to 1,606 ha) which would include revegetation works which would contribute to mitigation of the heat island effect.</p> <p>Landscaping of the proposed development would include locally native tree representative of the vegetation communities which would have previously occurred across the site.</p> <p>Pot sizes will be selected based on the conditions for establishment.</p> <p>Areas of the subject land to be managed in accordance with the Vegetation Management Plan (refer Figure 3) would involve assisted natural regeneration and revegetation. Planting and revegetation of areas to be managed in accordance with the VMP would be detailed within the VMP, although would likely include planting of tube stock (young plants) so that plants are hardy</p>

SUBMISSION	RESPONSE
	and suited to the local conditions. Establishment of tube stock will be ensured through ongoing management with supplementary planting likely to occur to account for the attenuation of plantings.
<u>Mitigation Measures</u>	
<p><i>EES recommends the biodiversity mitigation measures included in section 8 of the EIS (page 79) are amended to include the following:</i></p> <ul style="list-style-type: none"> <i>• Prior to commencement of any works on the site, native vegetation that is to be retained must be clearly marked with temporary fencing to ensure that there is no unnecessary removal of vegetation. The fencing must be regularly checked and maintained throughout the construction phase</i> <i>• The landscaped areas and areas to be revegetated and enhanced must use a diversity of local provenance species (trees, shrubs and groundcovers) from the native vegetation communities that occur, or once occurred, on the site</i> <i>• Any native trees that are required to be cleared from the site shall be salvaged (for example tree hollows and tree trunks which are greater than approximately 25-30cm in diameter and 3m in length) and placed in the riparian corridors, Bushland Corridor, landscape areas etc to enhance habitat</i> <i>• Remnant native vegetation that is required be removed from the site, especially juvenile plants shall be translocated to the riparian corridors, Bushland Corridor and landscape areas</i> <i>• The topsoil from areas of native vegetation that are to be cleared for the development shall be collected and used in the riparian corridors and revegetation areas</i> <i>• Seed from any native plants to be removed shall be collected and used in the riparian corridors, Bushland Corridor and landscape areas</i> <i>• Any trees that are to be planted at the site shall use advanced and established local native species from the relevant vegetation communities which occur on the site, preferably with a minimum tree height of 2-2.5 metres and /or plant container pot size of 100 litres to mitigate the removal of trees and the habitat they provide</i> 	<p>The BDAR has been amended to include the requested mitigation measures including fencing of retained vegetation, areas subject to the VMP will be revegetated and enhanced with a diversity of local provenance species, any significant trees to be cleared will be salvaged for use within the areas to be managed as part of the VMP, translocation of propagules, topsoil and significant vegetation from areas to be cleared will be undertaken as directed by the VMP.</p> <p>The seven hollow-bearing trees identified as being removed as part of the proposed development would be replaced either through salvage and mounting of hollow branches, or nest boxes at a ratio of 1:1.</p> <p>As discussed above, replacement of all trees to be removed at a ratio of 1:1 would not be feasible with the planned future use of the site. However, all Cumberland Plain Woodland to be removed from the site will be offset on a like for like basis as outlined in the BDAR and extensive planting and revegetation is planned for the parklands as detailed in the WSPT POM 2030.</p> <p>Landscaping of the proposed development would include locally native tree representative of the vegetation communities which would have previously occurred across the site.</p>

SUBMISSION	RESPONSE
<ul style="list-style-type: none"> Any trees that are to be removed from the site are replaced at a ratio greater than 1: 1 to mitigate the urban heat island effect Any tree hollows to be removed are to be replaced at a ratio greater than 1: 1. 	
<p><u>Recommended Conditions</u></p>	
<p>If the SSD is approved EES recommends the following are included as conditions of consent:</p> <ol style="list-style-type: none"> A Vegetation Management Plan shall be prepared to protect and restore the riparian corridors along Eastern Creek, Reedy Creek and the realigned Erskdale Creek. The plan should include: <ul style="list-style-type: none"> a scaled plan which locates the watercourses; top of highest bank; existing native vegetation along the creeks; the riparian corridor widths proposed along Eastern Creek, Reedy Creek and the realigned Erskdale Creek (measured from the top of the highest bank); the boundary of the site; the development footprint and proposed Asset Protection Zones details on the native vegetation communities and plant species that currently occur along Eastern Creek, Reedy Creek and Erskdale Creek details on the local native provenance plant species (trees, shrubs and groundcovers) to be planted - a diversity of local native species should be planted include details on the location and number of trees and other plants that are proposed to be planted specify that plants are to be propagated from locally sourced seeds to ensure genetic integrity. The landscape plan for the site shall use a diversity of local native provenance trees, shrubs and groundcover species (rather than exotic species or non-local native species) from the native vegetation community which once occurred in this locality. The Landscape Plan shall include details on: <ul style="list-style-type: none"> the native vegetation community (or communities) that once occurred in the locality a list of local provenance tree, shrub and groundcovers to be used in the landscaping the quantity and location of plantings 	<ol style="list-style-type: none"> As outlined in Section 6.3.4 of the BDAR a VMP is to be prepared as a condition of consent which includes the Vegetated Riparian Zones of Eastern Creek, Reedy Creek and the realigned Erskdale Creek and as shown in Figure 3. The VMP would include all proposed inclusions. The VMP would also detail proposed salvage and re-use of high value and suitable hollow-bearing trees and the translocation of high value and suitable propagules and significant vegetation from areas to be cleared. The Landscape Plan has been updated with native trees (refer Appendix C). Pot sizes will be chosen based on conditions for establishment. As discussed above, replacement of all trees to be removed at a ratio of 1:1 would not be feasible with the planned future use of the site. However, all Cumberland Plain Woodland to be removed from the site will be offset on a like for like basis as outlined in the BDAR. Where native trees are considered to be high value and suitable, we will relocate to realigned creek. Pot sizes will be chosen based on conditions for establishment.

SUBMISSION	RESPONSE
<ul style="list-style-type: none"> ○ the pot size of the local native trees to be planted ○ the area/space required to allow the planted trees to grow to maturity <p>3. Trees removed by the development shall be replaced at a ratio greater than 1: 1.</p> <p>4. Native trees to be removed are salvaged and used in the riparian corridor to enhance habitat including tree hollows and tree trunks (greater than approximately 25-30cm in diameter and 3m in length).</p> <p>5. The landscaping shall use advanced and established local native trees preferably with a plant container pot size of 100 litres, or greater to increase urban tree canopy cover.</p>	

4.5. ENVIRONMENT PROTECTION AUTHORITY

Table 8 provides a response to the issues raised in the submission provided by the Environment Protection Authority (EPA) dated 12 September 2019.

Table 8 – Response to Environment Protection Authority submission

SUBMISSION	RESPONSE
Noise	
<p><i>To avoid the potential for occupants to exceed recommended project trigger noise levels the following specific operational noise condition is recommended:</i></p> <p><i>Mechanical plant and equipment must be selected, installed and operated both individually and cumulatively within the Light Horse Interchange Business Hub (SSD 9667), so that the operational noise levels from the entire development do not exceed the Project Noise Trigger levels identified in Table 18 of the EIS.</i></p>	<p>Agree. It is expected that a suitable operational noise condition will be included in the development consent.</p>
Contaminated Lands	
<p><i>The Contamination Assessment has considered that the site is suitable for the proposed commercial development pending that the management recommendations are followed. However, management recommendations have not been prepared and included in the EIS and therefore the EPA does not consider that the suitability of the site has been determined.</i></p> <p><i>The applicant is required to engage a NSW EPA accredited site auditor to provide a Section A site audit statement (SAS) and accompanying site audit report (SAR) certifying suitability of the land for the proposed land use. By engaging a site auditor to</i></p>	<p>A Remediation Action Plan (RAP) has been prepared by Environmental Earth Sciences and is provided at Appendix D.</p> <p>A meeting was held between WSPT, Environmental Earth Sciences (consultant) and the NSW EPA on 25-Oct 2019. Environmental Earth Sciences demonstrated at the meeting that further intrusive works were not necessary to inform a robust RAP to manage contamination.</p> <p>Parties agreed at the meeting that following the preparation of a RAP and submission for final SSD application that the contamination management conditions will be satisfied as there will be a plan to</p>

SUBMISSION	RESPONSE
<p><i>provide a Section A SAS, the site auditor will review the adequacy of the investigations, unexpected finds protocol, any remedial works or management plan required and confirm suitability of the land use.</i></p> <p><i>The EPA recommends the following to be addressed in a Response to Submissions:</i></p> <ol style="list-style-type: none"> <i>1. The applicant to conduct more detailed investigation.</i> <i>2. The applicant to prepare an asbestos management plan, a plan to manage risk of unexploded ordnance (UXO), a remediation action plan (RAP), and an unexpected finds protocol (UFP).</i> <i>3. The UFP must include a detailed procedure for identifying and dealing with unexpected finds. The applicant must ensure that the procedure includes details of who will be responsible for implementing the unexpected finds procedure and the roles and responsibilities of all parties involved.</i> <i>4. The applicant to engage an EPA accredited site auditor to review the adequacy of the investigations, UFP, UXO related assessments, any remedial works or management plan required and confirm that the land can be made suitable for the proposed use.</i> 	<p>make the site suitable for the proposed use. The RAP was to include a protocol for managing unexpected finds (UFP), unexploded ordnance (UXO) and contain an Asbestos Management Plan (AMP).</p> <p>Site Auditor involvement discussed in the meeting, as Council suggested that the site audit could be made a condition of consent. NSW EPA considered this to be an appropriate way forward.</p> <p>Besides management of known and unexpected contamination, the RAP also recommends a general Construction Environmental Management Plan (CEMP) be prepared to mitigate against potential environmental hard during proposed construction outside of the remediation activities.</p>

4.6. ROADS AND MARITIME SERVICES

Table 9 provides a response to the issues raised in the submission provided by Roads and Maritime Services (RMS) dated 16 September 2019. Note: a meeting was held between TfNSW, Westlink M7, and WSPT on Friday 10 January 2020. At this meeting a number of the matters raised in the RMS submission were resolved and this is noted in the response table below.

Table 9 – Response to Roads and Maritime Services submission

SUBMISSION	RESPONSE
<p><i>1. Further information is required in relation to the impacts of the emergency access point and shared path.</i></p>	<p>The primary access route from Ferrer's Road has flood immunity up to 1/500yr flood event. Local fire emergency service has access to WSPT padlocks on gates. As part of the future development of each lot, site-based emergency management plans will include reference to the alternative emergency access point.</p> <p>Emergency vehicles are expected to access the site infrequently and therefore are anticipated to have negligible traffic impact on the surrounding road network.</p>
<p><i>2. Detailed plans are to be submitted detailing the treatment of the M7 boundary fence on Wallgrove Road. Drawing 18652_SSDA_EX01 states that the existing fences and gate will remain. Clarification is</i></p>	<p>Refer to updated Civil Drawing 18652_SSDA_EX01 provided at Appendix F. Note: these were tabled</p>

SUBMISSION	RESPONSE
<i>required in relation to the existing locked gate across the M7 access road.</i>	and agreed 'in principle' in the meeting with TfNSW and Westlink M7 on 10 January 2020.
<i>3. There is reference to a rock rubble drainage on Roads and Maritime / M7 land. WSPT is to clarify the extent of this work and who is to manage and maintain this asset and any resulting access issues.</i>	The proposed rock rubble drainage has been shifted to WSPT land. Minor earthworks and retaining wall to be constructed on motorway land to capture the existing overland stormwater.
<i>4. Further information is required in relation to the overall management of the access gates in relation to the Emergency Access Point.</i>	The proposed gate will generally be secured; opened as necessary for emergency vehicles. As part of the future development of each lot, site-based emergency management plans will include reference to the alternative emergency access point.
<i>5. Further information is required in relation as to how WSPT propose to manage, maintain and operate the share path asset on Roads and Maritime / M7 land.</i>	The proposed shared path is shown on the Civil Engineer Drawing 18652_SSDA_EX01 (refer Appendix F). The concept for the shared path was agreed 'in principle' with TfNSW and Westlink M7 at the meeting on 10 January 2020. It was discussed and agreed that WSPT will continue to consult with TfNSW and Westlink M7 during the detailed design phase. A Safety in Design review is expected to be incorporated into the detailed design phase. The ongoing management and maintenance of the assets will be confirmed by TfNSW.
<i>6. An additional left turn lane is proposed at the intersection of Great Western Highway / Doonside Road / Brabham Drive. The applicant is to provide concept civil design plans, TCS plans and swept path plans for the proposed signal work for further assessment.</i>	Ason Group have undertaken revised modelling following additional detailed traffic and pedestrian surveys (in response to TfNSW comments) at the intersection of Doonside Drive / Great Western Highway. This revised analysis has determined that the previously identified upgrade is NOT required to support this development. With no requirements to upgrade that intersection, the need for a concept design becomes redundant. Refer to the Traffic Impact Assessment provided at Appendix I for further commentary.

4.7. TRANSPORT FOR NSW

Table 10 provides a response to the issues raised in the submission provided by Transport for NSW (TfNSW) dated 12 September 2019. Note: a meeting was held between TfNSW, Westlink M7, and WSPT on Friday 10 January 2020. At this meeting a number of the matters raised in the TfNSW submission were resolved and this is noted in the response table below.

Table 10 – Response to Transport for NSW submission

SUBMISSION	RESPONSE
Shared path connection between the M7 cycleway and the site	
<i>The Applicant should clarify within the project description as to whether the proposal includes the construction of a cycleway link between the site and the M7 shared path. If there is no proposal to</i>	The shared path from Ferrers Road and along the estate road will be completed as part of stage 1 works. The shared path connection between the estate road and Westlink M7 will be completed as

SUBMISSION	RESPONSE
<i>complete the link, then it is recommended that the Applicant should include it within the project description.</i>	part of a future stage in conjunction with the development of Lots 1 and 2. Note during the meeting on 10 January 2020, TfNSW and Westlink M7 supported a connection to the M7 shared path.
Workplace Travel Plan – Site Development Applications	
<i>Subsequent site-specific development applications should be required to produce a Workplace Travel Plan and include the provision of bicycle facilities tailored for the end-user of the site.</i>	Noted. Future Development Applications will provide bicycle facilities tailored for the end-user.
Suitability of intersection analysis and survey data	
<i>It is recommended that DPIE request that the Applicant revise the intersection assessment to reflect recent changes to the network and in 2 years of growth in 2018-19.</i>	As recommended by TfNSW, the Traffic Impact Assessment (refer Appendix I) has been updated to include revised intersection counts and modelling scenarios of existing base (October 2019), future base (2036 EMME projections), and project case (2036 Base + Development). The results of the updated modelling for the future project case suggests that this intersection does not require any additional upgrades. Regarding the additional traffic from Eastern Creek Quarter and Sydney Zoo, it is noteworthy that the future base model (RMS EMME projections) are assumed to have incorporated a reasonable contingency for future traffic associated with these components.

4.8. WATER AND THE NSW NATURAL RESOURCES ACCESS REGULATOR

Table 11 provides a response to the issues raised in the submission provided by Water and the NSW Natural Resources Access Regulator (NRAR) dated 3 October 2019.

Table 11 – Response to Water and the NSW Natural Resources Access Regulator submission

SUBMISSION	RESPONSE
<i>Works on waterfront land are to be carried out in accordance with the Guidelines for Controlled Activities (2012)</i> https://www.industry.nsw.gov.au/water/licensingtrade/approvals/controlled-activities .	Noted.
<i>The riparian corridors should be protected and rehabilitated with fully structured local native riparian vegetation (trees, shrubs and groundcover species) at a density that would occur naturally.</i>	Noted.
<i>A Vegetation Management Plan should be required as part of the Conditions of Consent to provide further details on the stream realignment, riparian</i>	A VMP will be prepared as a condition of consent detailing the proposed stream realignment, riparian corridor management including details on planting

SUBMISSION	RESPONSE
<i>corridor management including details on vegetation species and planting densities, weed management techniques. These details should be provided for all works that are considered on waterfront land (within 40m of Eskdale Creek, Reedy Creek and Eastern Creek).</i>	densities and species in addition to weed management techniques. The VMP would apply to Vegetated Riparian Zones (VRZs) in accordance with <i>Guidelines for controlled activities on waterfront land Riparian corridors</i> and as shown in Figure 3.
Post Project Determination	
<i>The proponent should conduct follow up investigation of impact of hydrocarbon leak, especially the vertical impact and potential for local contamination of groundwater and provide the results to DPIE-Water.</i>	<p>The Remediation Action Plan (RAP) does have a process whereby validation of the Underground Storage Tank (UST) pit is required and will be undertaken. This validation assessment will inform if any additional investigation works are required to track-out hydrocarbon impact (both laterally and/or vertically if need arise) and will inform whether possible groundwater assessment may be required.</p> <p>This and any further actions required will take place at the time of demolition, with management of contamination risks expecting to occur well before the post-project stage. Pending groundwater monitoring is required post-project, these procedures will be appropriately documented with reference to applicable guidelines, reviewed by the Regulator (likely an independent NSW EPA accredited contaminated sites auditor) and implemented accordingly.</p>
<i>The proponent should undertake appropriate assessment, licencing requirements and due process for any dewatering activities, from either excavations or any future development of underground basements, prior to such activities taking place at any stage of the project development.</i>	<p>There may be some dewatering required for the UST pit remediation, however not anticipated to be a vast amount as the base of the tank pit is generally at a higher elevation than the expected surface of groundwater. Also, the tank pit was constructed totally within weathered Bringelly Shale that would act as an aquitard (inhibit lateral / vertical migration of groundwater). Any dewatering from the tank pit will likely involve disposing of hydrocarbon impacted water and will be managed by licensed liquid waste contractor, with documentation of disposal included in the Validation Report prepared by the remediation consultant.</p> <p>Any general construction dewatering at the site will be managed with the appropriate assessment, testing and licensing /permits prior to works.</p>

4.9. BLACKTOWN AND DISTRICT ENVIRONMENT GROUP INC

Two submissions were provided by the Blacktown and District Environment Group Inc, dated 23 September 2019 which raise concern regarding development within the Western Sydney Parklands, the proposed realignment of Eskdale Creek and potential biodiversity impacts.

Each of these matters has been addressed in detail within the original Environmental Impact Statement (EIS) and this RtS Report. The following comments are made in response to the matters raised within the submissions.

- **Development in Western Sydney Parklands:** the Western Sydney Parklands Plan of Management 2030 (**POM**) provides for the development of business hubs as a means of achieving sustainable financial outcomes for the ongoing operation and management of the Parklands. The areas identified for business development comprise areas of low environmental or recreational value, close to existing business or industrial areas and transport connections and equating to approximately 2% of the Parklands.

The proposed development is consistent and compatible with the WSPT criteria for a business hub as outlined on page 43 of the POM. The proposed development will deliver an ongoing revenue stream for the WSPT to support the operations of the Parklands and provide support for the maintenance and development of new and existing facilities. It will also deliver economic benefits and employment generation for Western Sydney and the Greater Sydney Region. This EIS confirms the suitability of the site for the proposed use and that the potential environmental impacts can be appropriately mitigated, minimised or managed to avoid any unacceptable impacts.

- **Biodiversity:** the Light Horse Interchange site was selected based on its relatively low ecological values, which resulted from historic vegetation clearing and ongoing disturbance associated with grazing. The updated BDAR (refer **Appendix J**) confirms the assessment has been completed in accordance with the *NSW Biodiversity Conservation Act 2016* using the Biodiversity Assessment Methodology (**BAM**).

The potential impacts have been assessed using the BAM calculator and off-set requirements calculated to achieve the 'no net loss standard'. The measures required to address the off-set calculation of 253 ecosystem credits and 93 species credits may include the retirement of like-for-like biodiversity credits generated from existing Biobank sites (under the BioBanking Scheme) and potentially new Biodiversity Stewardship Agreements.

Section 4.4 of this RtS Report provides a comprehensive response to each of the recommendations within the submission from the EES and the mitigation measures to be adopted to ensure the potential impacts of the proposed development are minimised and managed appropriately. This includes preparation of a VMP which includes the Vegetated Riparian Zones of Eastern Creek, Reedy Creek and the realigned Eskdale Creek.

- **Eskdale Creek:** the updated BDAR (refer **Appendix J**) and Creek Realignment Design Report (refer **Appendix M**) recognise that Eskdale Creek has been highly modified by historical land uses which have degraded the habitat associated with this watercourse. The channel condition and current landscape suggest the present alignment is the result of a historic realignment. Results of Rapid Riparian Appraisal indicate its current condition represents a significant departure from what would be considered an undisturbed waterway in a natural state.

The proposed realignment has been designed to provide a range of microhabitats to increase the overall habitat value of the watercourse and to increase biodiversity associated with the watercourse. The proposed mitigation measures will enable the potential impacts to be minimised and managed appropriately.

Detailed information has been provided regarding the proposed stormwater management system, including the proposed design, maintenance and ownership of the water quality bioretention. Updated civil drawings (**Appendix F**) and MUSIC model (**Appendix G**) have been prepared to demonstrate compliance with Council's requirements. **Section 4.1** of this RtS Report provides a detailed response to the relevant issues raised by Council regarding stormwater treatment and associated water quality treatment measures.

4.10. PUBLIC SUBMISSIONS

Three public submissions were received during the exhibition period. The submissions raised the same identified by the Blacktown and District Environment Group Inc, including:

- Proposed development within the Western Sydney Parklands.
- Realignment of Eskdale Creek and the biodiversity impacts associated with the proposal.
- Operational impacts on water quality.

The responses to the comments provided by the Blacktown and District Environment Group Inc in **Section 4.9** address each of the relevant matters addressed by the public submissions.

5. SUPPLEMENTARY ENVIRONMENTAL IMPACT ASSESSMENT

Additional matters raised requiring additional or supplementary environmental impact assessment:

5.1. STRATEGIC CONTEXT

Chapter 3 of the EIS provided an assessment of the proposed development against the relevant strategic planning policies and design guidelines identified in the SEARs. The submission provided by Blacktown City Council suggested the assessment was too general in nature and requested that the applicant specify the objectives and priorities in the relevant strategic plans that the proposal complies with. Accordingly, Table 12 provides a supplementary assessment of the proposal against the relevant strategic planning policies and design guidelines.

Table 12 – Strategic Context

Strategy	Description	Comment
Premier's Priorities	The NSW Premier has identified 12 priority areas essential for the growth and development of NSW. These include ensuring NSW has <i>"a strong economy, quality jobs and job security for workers of today and tomorrow"</i> .	The proposal will contribute to the achievement of the Premier's Priorities through the provision of new employment opportunities and business infrastructure that will contribute to the diversification of jobs available in Western Sydney.
Greater Sydney Region Plan: A Metropolis of Three Cities	The Greater Sydney Region Plan, A Metropolis of Three Cities, is the NSW Government's overarching strategic plan for growth and change in Sydney. It is a 20-year plan with a 40-year vision that seeks to transform Greater Sydney into a metropolis of three cities being the Western Parkland City, the Central River City and the Eastern Harbour City. It identifies key challenges facing Sydney including increasing the population to eight million by 2056, 817,000 new jobs and a requirement of 725,000 new homes by 2036. The objectives of the Greater Sydney Region Plan seek to expand and invest in economic development and business activity with focus on the Greater Parramatta and Western Sydney Airport areas.	The proposal is consistent with the strategic directions and objectives identified in the Greater Sydney Region Plan. Specifically, the proposal will assist in achieving Objective 16 and Objective 23 by creating employment opportunities in Western Sydney through the provision of industrial land that is able to utilise existing infrastructure such as the M7 and Western Motorway as well as capitalise on planning future infrastructure such as the Western Sydney International Airport and broader Western Sydney Employment Area.
Our Greater Sydney 2056: Central City District Plan	The Greater Sydney Commission has released six district plans encompassing Greater Sydney which will guide the delivery of the Greater Sydney Region Plan. The district plans set out the vision, priorities and actions for the development of each district.	The proposal is consistent with the objectives and outcomes identified in the Central City District Plan. Specifically, the proposal will assist in achieving Planning Priorities C10 and C11 as it will provide new investment, business opportunities and jobs within a strategic centre, maximising opportunities to attract advance manufacturing and innovation in

Strategy	Description	Comment
	<p>The development is located within the Central City District. The Central City District Plan is a 20-year plan to manage growth in the context of economic, social and environmental matters to achieve the 40-year vision of Greater Sydney. It is a guide to implementing the Greater Sydney Region Plan at a district level and is a bridge between regional and local planning.</p> <p>The District Plan contains planning priorities relating to infrastructure provision, establishing land use and transport structure, environmental protection and growing investment, business opportunities and jobs in strategic centres. It recognises the importance of industrial land supply within the Central River City and the Blacktown LGA, noting: <i>"In Blacktown Local Government Area, a major industry cluster of transport and logistics, storage, warehousing and distribution is developing. This cluster, together with more established industrial precincts, will capitalise on the growth of the Western Parkland and Central River cities"</i>.</p>	<p>industrial land with good access to existing and planned transport infrastructure.</p>
Future Transport Strategy 2056	<p>Future Transport 2056 is a 40-year strategy for the development and improvement of the NSW transport system. The vision for future transport is built on six outcomes: customer focused, successful places, a strong economy, safety and performance, accessible services and sustainability. These outcomes are intended to provide a guide for future investment, policy, reform and provision of services, as well as provide a framework to support a modern, innovative transport network</p>	<p>The proposal is generally consistent with the strategic outcomes identified in the Future Transport Strategy 2056. Specifically, the proposed development will connect to existing transport networks and enable adaptability to new technological advances in transport related to industrial and warehouse land uses.</p> <p>The site is adjacent to an established cluster of similar land uses with connectivity to the local road network and the M4 and M7 transport corridors. It is expected the primary land uses that will take place on the site will relate to freight delivery, management and logistics and associated business services that will be highly adaptable to future transport technological advances. The nature of the land uses proposed means access to the site will be primarily by motorised vehicular transport, however, provision is made in the design to enable access by alternative</p>

Strategy	Description	Comment
		transport means including pedestrian, bicycle and public transport.
<i>Our Blacktown 2036 Community Strategic Plan</i>	Our Blacktown 2036 contains the strategic visions and aspirations of Blacktown City Council that informs the growth and development of the local area. The strategic directions specified in the plan include planning for a smart and prosperous economy with the sustainable growth, attraction of investment and fostering local business and employment. The plan also expresses a desire to achieve quality environmental outcomes by minimising and reversing negative impacts on the natural and built environment.	The proposed development contributes to the identified strategic directions above as it will provide for business development, economic growth and job creation within the Blacktown LGA. The proposal will facilitate the development of the site while preserving, maintaining and improving natural environmental outcomes. The development also creates environmental benefits outside the site boundaries through its funding for the Western Sydney Parklands, benefitting the wider Blacktown City community.
<i>Western Sydney Parklands Plan of Management 2010</i>	The Western Sydney Parklands Plan of Management 2030 (POM) was adopted in December 2018 and provides for the development of business hubs within the Western Sydney Parklands as a means of achieving sustainable financial outcomes for the ongoing operation and management of the Parklands. The areas identified in the POM for business development comprise approximately 2% of the Parklands area. The sites are identified as having low environmental or recreational value and in proximity to existing business or industrial areas and transport connections.	<p>The proposed Light Horse Interchange Business Hub forms an important component of the self-funded model for the WSPT as provided in the POM. The proposed development of the site is consistent and compatible with the WSPT criteria for a business hub as outlined on page 43 of the POM.</p> <p>The proposed development will deliver an ongoing revenue stream for the WSPT to support the operations of the Parklands and provide support for the maintenance and development of new and existing facilities. It will also deliver economic benefits and employment generation for Western Sydney and the Greater Sydney Region. This EIS confirms the suitability of the site for the proposed use and that the potential environmental impacts can be appropriately mitigated, minimised or managed to avoid any unacceptable impacts.</p>

5.2. STATUTORY PLANNING FRAMEWORK

5.2.1. State Environmental Planning Policy (Western Sydney Parklands) 2009

Section 4.1 of the EIS provided an assessment of the proposal against the aims and matters for consideration outlined in *State Environmental Planning Policy (Western Sydney Parklands) 2009* (WSP SEPP). The EIS concluded that:

“...the proposed development is permitted with development consent in accordance with clause 11(2) of the WSP SEPP. The proposal complies with the aims of the Policy listed in clause 2 and satisfactorily addresses each of the relevant matters for consideration listed in clause 12. Accordingly, development consent may be granted in accordance with clause 4.38 of the EPA Act 1979.”

DPIE have requested that the RtS include an assessment of the proposed development against all applicable clauses within WSP SEPP. Accordingly, Table 13 provides a supplementary assessment of the proposal against the relevant clauses of WSP SEPP.

Table 13 – Compliance with the relevant clauses of SEPP WSP

Clause	Comment
2 – Aim of Policy	COMPLIES. Refer to Section 4.1 of the EIS for detailed assessment.
11 – Land Uses	COMPLIES. The proposed general industrial, light industrial, warehouse and distribution, and office land uses are permissible with consent within Western Parklands.
12 – Matters to be considered by the consent authority – generally	COMPLIES. Refer to Section 4.1 of the EIS for detailed assessment.
13 - Bulk water supply infrastructure not to be impacted	COMPLIES. There are no downstream catchments that could be affected nor bulk water supply infrastructure in the vicinity of the proposed works.
14A - Flood planning	COMPLIES. Refer to Section 6.4 of the EIS for detailed assessment.
15 – Heritage conservation	COMPLIES. Refer to Section 6.10 of the EIS for detailed assessment. Note: the site is not listed as an item of State or local heritage significance.
17A – Essential services	COMPLIES. The existing utility services are adequate and/or can be extended to accommodate the needs of the future development. Refer to Civil Engineering Report at Appendix E for further detail.
17B – Earthworks	COMPLIES. The proposed bulk earthworks will not have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land.

6. CONCLUSION

This Response to Submissions Report has been prepared on behalf of the Western Sydney Parklands Trust, the proponent for State Significant Development application number SSD18_9667. The application was lodged in July 2019 and is a Concept Development Application in accordance with Division 4.4 of Part 4 of the *Environmental Planning and Assessment Act 1979*. It seeks development consent for:

- Concept proposal comprising:
 - Establishment of up to 165,500 sqm of gross floor area, comprising 157,600 sqm for general industrial, light industrial, warehouse and distribution land uses, and 7,900 sqm for ancillary office; and
 - Conceptual development levels, footprints and building envelopes for Lots 1-7, road layout, parking, site access and landscape design.
- Stage 1 works for:
 - Demolition of existing structures on-site;
 - Remediation of the site;
 - Site preparation and bulk earthworks;
 - Construction of road access and installation of essential infrastructure services;
 - Provision of flood and stormwater management infrastructure works; and
 - Subdivision of the site into eight Torrens title lots.

The application was placed on public exhibition from 12 August 2019 to 11 September 2019. A total of 16 submissions were received from NSW government agencies and other stakeholders.

Minor amendments have been made to the proposal and further technical information has been provided in order to respond to the issues raised in the submissions. In addition, meetings have been held with Blacktown Council, the NSW EPA, TfNSW and Westlink M7 to discuss the matters raised and identify appropriate solutions.

The proposal as amended will not result in any unjustified impacts or effects on threatened species, populations or ecological communities or their habitats. Further, the proposal as amended will not result in any unreasonable impacts on or as a result of air quality, flood risk, bushfire risk, noise generation, waste generation, technological hazards or stormwater quality.

The proposed development is expected to result in positive social and economic impacts on the region as a result of employment generation and the provision of essential business infrastructure to support a robust economy and to satisfy economic demand. The proposal will provide a financial return for reinvestment in the ongoing management and development of the Parklands as a regional recreation, environmental and open space asset in accordance with the *Western Sydney Parklands Plan of Management 2030*.

Having regard for the biophysical, economic and social considerations, including the principles of ecologically sustainable development, the proposed development is justified for the following reasons:

- The proposed development is permissible with consent on the site under the provisions of *State Environmental Planning Policy (Western Sydney Parklands) 2009* and satisfactorily responds to the aims and matters for consideration listed within the SEPP.
- The proposal is consistent and compatible with the relevant strategic land use and transport policies and will deliver a substantial investment in Western Sydney with significant construction and ongoing employment opportunities close to a growing residential population.
- The proposed industrial subdivision has been sited and designed to satisfactorily address State and local environmental planning instruments and guidelines, including compliance with relevant local engineering, flooding and stormwater requirements.

- The environmental impacts associated with the demolition, construction and operational phases of the development have been comprehensively assessed and can be appropriately mitigated to avoid unacceptable impacts to the site or locality.
- The development will provide positive local, regional and national economic impacts through the provision of employment and essential business infrastructure.
- The site is suitable for the proposed use and will provide benefits to the region through its financial contribution towards the ongoing operation and management of the Western Sydney Parklands.
- The development can be adequately serviced by essential infrastructure without unreasonable demands on existing networks.
- Mitigation measures identified and documented in the EIS and supporting technical documentation are to be implemented to ensure potential environmental impacts are minimised and managed appropriately.
- The issues identified during the public exhibition period have been addressed in the final concept design and supporting technical documentation.

Based on the above matters, it is considered the proposed development is in the public interest and is recommended for approval.

DISCLAIMER

This report is dated 10 February 2020 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd's (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Western Sydney Parklands Trust (**Instructing Party**) for the purpose of Response to Submissions (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A SITE SURVEY PLAN

APPENDIX B CONCEPT MASTERPLAN

APPENDIX C LANDSCAPE PLAN

APPENDIX D REMEDIATION ACTION PLAN

APPENDIX E CIVIL ENGINEERING REPORT

APPENDIX F CIVIL ENGINEERING DRAWINGS

APPENDIX G FLOOD ASSESSMENT

APPENDIX H PLAN OF SUBDIVISION

APPENDIX I TRAFFIC IMPACT STATEMENT

APPENDIX J BIODIVERSITY DEVELOPMENT ASSESSMENT REPORT

APPENDIX K VISUAL IMPACT ANALYSIS

APPENDIX L ABORIGINAL CULTURAL HERITAGE ASSESSMENT REPORT

APPENDIX M CREEK REALIGNMENT DESIGN REPORT

