



DOC17/287430-04

Ms Nikki Matthews  
Planning Officer, Industry Assessments  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

By email: [Nikki.Matthews@planning.nsw.gov.au](mailto:Nikki.Matthews@planning.nsw.gov.au)

Dear Ms Matthews

**Altis Warehouse and Logistics Hub (SSD 7173) – MOD 3**

I am writing in relation to your request for comments on the application by Altis Property Partners Pty Ltd (the Proponent) to modify the existing consent for a warehouse and logistics hub at 585-649 Mamre Road, Orchard Hills, which was received by the Environment Protection Authority (EPA) on 27 July 2018.

The modification application (SSD 7173 MOD 3) seeks consent for the following:

- realignment of the Estate Drainage Channel; and
- extension of the Lot 5 earthworks to include the importation of 34,000 m<sup>3</sup> of fill, up to the boundary of the approved on-site detention basin.

The EPA notes that Proponent has not identified how the proposed channel realignment, which is within the South Creek catchment, addresses the sustainability directions within the *Western City District Plan* (Greater Sydney Commissions, March 2018). For example, planning priorities W12 and W13 which relate specifically to South Creek.

The EPA further notes that under the *Protection of the Environment Operations Act 1997*, “waste disposal (application to land)” is a scheduled activity and requires an environment protection licence. Resource recovery exemptions for consumers of waste, such as importers of fill, are available under the *Protection of the Environment Operations (Waste) Regulation 2014*; however, the Proponent has not identified any relevant resource recovery exemptions for the proposed importation of fill.

Accordingly, the EPA recommends that the Proponent be required to:

- specify the proposed water quality targets for the proposed channel realignment, consistent with the NSW Water Quality Objectives. Generic percentage load reduction targets are not supported by the EPA as these do not reflect contemporary integrated water cycle management and are unlikely to improve the health of South Creek; and
- clarify how it will meet its waste obligations in relation to the proposed importation of fill, including by updating any fill importation protocol or similar.

Please contact Alex McGuirk on 9995 6571 or at [alex.mcguirk@epa.nsw.gov.au](mailto:alex.mcguirk@epa.nsw.gov.au) if you require any further assistance.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Mark Carey', is positioned above the printed name.

**MARK CAREY**  
**A/Unit Head Sydney Industry**  
**Environment Protection Authority**

9 August 2018