

STORMWATER QUALITY MONITORING PROGRAM– ADDENDUM

Moorebank Intermodal Precinct –
Precinct West South

23 OCTOBER 2024

Moorebank Intermodal Precinct – Precinct West South

EPBC 2011/6086 Approval, SSD 5066 Development Consent, SSD
7709 Development Consent and Complying Development Consent
230736/01

Stormwater Quality Monitoring Program – Addendum

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Report No

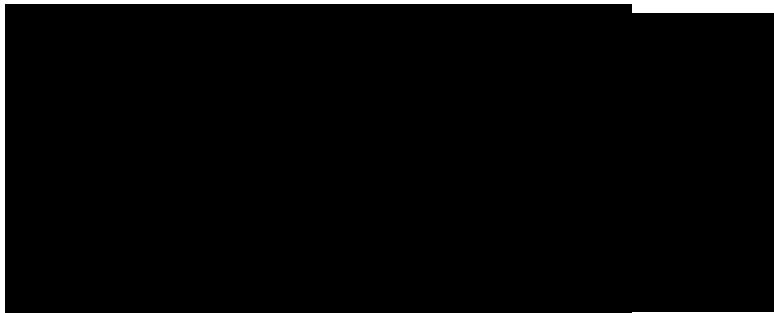
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Revisions

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01	07/06/2024	Draft for client review	██████████ ██████	██████████
02	23/10/2024	Final for issue	██████████	██████████

DECLARATIONS OF ACCURACY

LOGOS MLP Development Management PTY LTD (as joint approval holder)

In making this declaration, I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the *Environment Protection and Biodiversity Conservation Regulations 2000* (Cth). The offence is punishable on conviction by imprisonment or a fine, or both. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed

Full name

Organisation LOGOS MLP Development Management Pty Ltd (ACN: 649 469 778)

Date

2 December 2024

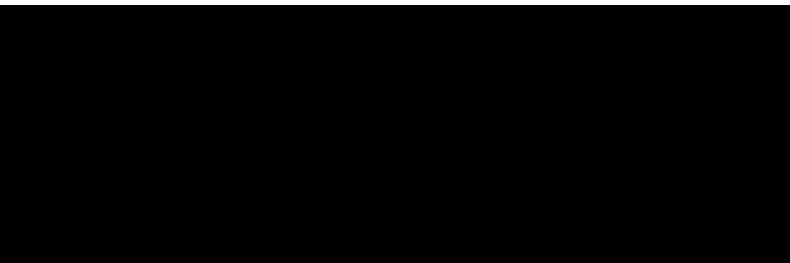
Qube Re Services (No. 2) (as joint approval holder)

In making this declaration, I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the *Environment Protection and Biodiversity Conservation Regulations 2000* (Cth). The offence is punishable on conviction by imprisonment or a fine, or both. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed

Full name

Organisation



Qube Re Services (No. 2) Pty Limited (ACN: 605 751 782)

Date

26/11/24

ACRONYMS AND DEFINITIONS

Acronym/Term	Meaning
Addendum	Stormwater Quality Monitoring Plan – Addendum
CoA	Conditions of Approval as detailed in the EPBC Act Approval EPBC 2011/6086
CoC	Conditions of Consent as detailed in the EP&A Act Development Consent SSD 5066
CZMP	Coastal zone management plan
DAWE	Department of Agriculture, Water and the Environment (formerly DotEE)
DCCEEW	Department of Climate Change, Energy, Environment and Water (formerly DotEE)
The Development	The five warehouses and associated landscaping and infrastructure on the MPW South site.
Development site	All operational areas of the MPW South Development
DPE	Department of Planning and Environment (formerly the Department of Planning, Industry and Environment)
DotEE	Department of the Environment and Energy merged with all functions of the Department of Agriculture (February 2020) to form the Department of Agriculture, Water and the Environment (DAWE)
DPHI	Department of Planning, Housing and Infrastructure
DPIE	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EP&A Act	Environmental Planning and Assessment Act 1979
EPBC Act 2011/6086 Approval	Commonwealth Approval (No. 2011/6086) granted in September 2016 under the Environment Protection and Biodiversity Conservation Act 1999, for the impact of the MPW Development on listed threatened species and communities (sections 18 and 18A of the EPBC Act) and Commonwealth action (sections 28 of the EPBC Act).
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
ESR	ESR Australia & New Zealand
MIP	Moorebank Intermodal Precinct
MPE	Moorebank Precinct East
MPW	Moorebank Precinct West
MPW Concept Development Consent	MPW Concept Development Consent (SSD 5066), granted by (the now) DPHI on 29 September 2014 for the development of an intermodal terminal facility including a rail link connecting the site to the Southern Sydney Freight Line, an intermodal terminal, warehousing and distribution facilities and a freight village.
Non-compliance	An occurrence, set of circumstances, or development that results in a non-compliance or is non-compliant with Development Consent SSD 7709 and SSD 10431 Conditions of Consent or EPBC Act Approval (EPBC 2011/6086) Conditions of Approval but is not an incident.
OEMP	Operational Environmental Management Plan
OSD	On-site detention basin
REMM	Revised Environmental Management Measures. These are the management and mitigation measures presented in the MPW Concept Plan Supplementary RtS (August 2017).

Acronym/Term	Meaning
RtS	Response to Submissions
SDDR	Stormwater Development Design Report
SIOMP	Stormwater Infrastructure Operation and Maintenance Plan
SQMP	Stormwater Quality Monitoring Program
SSD	State significant development

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1 INTRODUCTION

1.1 Development Ownership

In 2022, LOGOS joined the ESR group of companies and since August 2024, the LOGOS and ESR operations have been integrated to now operate under the name ESR Australia & NZ (ESR). The applicant/ approval holder entity remains unchanged at this stage until further notice and references to LOGOS and LOGOS authored documents and/or plans may continue and remains relevant where LOGOS and ESR are used interchangeably.

1.2 Moorebank Intermodal Precinct Overview

The Moorebank Intermodal Precinct (MIP), operated by ESR (formerly LOGOS), is an integral component of the freight, ports and transport strategies of both the Commonwealth and NSW governments and is located approximately 27km south-west of the Sydney Central Business District and 26km west of Port Botany within the Liverpool Local Government Area.

The MIP aims to streamline the freight logistics supply chain from port to store, deliver savings to businesses and consumers, and help service the rapidly growing demand for imported goods in south-west Sydney. On completion, MIP will move 1.55 million shipping containers annually by rail instead of road. It will also feature Australia's largest purpose-built warehouse and distribution precinct serviced by the latest automated technology which will see driverless shuttle carriers collect and transport containers around the precinct to be processed, unpacked and stored on site prior to distribution.

The MIP is divided into the Moorebank Precinct West (MPW) and Moorebank Precinct East (MPE) developments.

MPW Stage 2 is located to the north of MPW South (the Development) and includes operation of a multi-purpose Intermodal (freight) Terminal facility, rail link connection, warehousing and a freight village. The MPW Stage 2 Operational Environmental Management Plan (OEMP) and sub-plans were approved by:

- the Commonwealth Department of Climate Change, Energy, Environment and Water (DCCEEW) in accordance with Condition of Approval (CoA) 4 of the EPBC 2011/6086 Approval
- the NSW Department of Planning, Industry and Environment (DPIE) in accordance with Condition of Consent (CoC) C7 of the MPW Stage 2 (SSD 7709) Development Consent.

Operations on MPW Stage 2 commenced after these plans were approved.

1.3 Addendum Purpose

This Stormwater Quality Monitoring Plan (SQMP) – Addendum (this Addendum) has been prepared to provide a detailed monitoring program for the impacts of stormwater quality during operation of the Development and meet the relevant conditions of the applicable development approvals and consents. This Addendum is an addendum to the MPW Stage 2 SQMP and forms a sub-plan to the MPW South OEMP – Addendum.

This Addendum addresses:

- the relevant conditions of the EPBC 2011/6086 Approval issued under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act)
- the relevant conditions of the MPW – Concept and Stage 1 (State Significant Development (SSD) 5066) Development Consent
- the relevant conditions of the MPW Stage 2 (SSD 7709) Development Consent
- the relevant conditions of the Complying Development Consent (CDC) 230736/01 issued under the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (TISEPP).

This Addendum has been prepared for submission to DCCEEW under CoA 21 of the EPBC 2011/6086 Approval.

This Addendum was developed in reference to the following documents:

- Moorebank Intermodal Terminal Project Environmental Impact Statement (Parsons Brinkerhoff, October 2014), Chapter 16 – Hydrology, groundwater and water quality
- Moorebank Intermodal Terminal Response to Submissions Report (Parsons Brinkerhoff, May 2015), Chapter 6 - Response to Community Submissions
- Moorebank Intermodal Terminal Supplementary Response to Submissions Report (Parsons Brinkerhoff, August 2015), Chapter 5.9 – Hydrology, groundwater and Chapter 7 Revised environmental management measures
- MPW Stage 2 OEMP
- MPW Stage 2 SQMP
- MPW South OEMP – Addendum.
- MPW South Stormwater Infrastructure Operation Maintenance Plan (SIOMP) - Addendum.

This program should be read in conjunction with the MPW South OEMP – Addendum and MPW South SIOMP – Addendum

1.4 Objectives and Targets

The objectives and targets for this Addendum are the same as those in Section 1.1 of the MPW Stage 2 SQMP:

- Provide a program for monitoring stormwater and water quality
- Identify monitoring sites and parameters
- Define sampling procedure and other requirements
- Establish baseline water condition prior to operation
- Include review and management requirements.

The approach to addressing these objectives and targets is informed by the relevant conditions of the approvals and consents.

1.5 Consultation

CoC B38 of the MPW Stage 2 (SSD 7709) Development Consent requires the MPW Stage 2 SQMP to be prepared in consultation with Liverpool City Council and the NSW Environment Protection Authority. This has been addressed in Section 1.2 of the MPW Stage 2 SQMP.

There is no further need for consultation for this Addendum.

1.6 Document Structure

The structure of this Addendum is:

- **Section 1** provides a brief overview of the MIP and the purpose, objectives and targets, and application of this Addendum. It also describes requirements for consultation (if any).
- **Section 2** provides a summary of the activities being undertaken during operation of the Development.
- **Section 3** outlines the statutory requirements and obligations which need to be fulfilled during operation of the Development in relation to the monitoring of stormwater quality.
- **Section 4** describes the stormwater quality monitoring requirements for the Development.
- **Section 5** describes the sampling methodology analysis technique for the Development's stormwater quality monitoring
- **Section 6** provides an outline of the baseline data to which the stormwater quality will be monitored against
- **Section 7** provides the method by which the monitoring of stormwater quality may be improved upon during the operation of the Development.

This addendum has been structured to be consistent with the other MPW South sub-plan addenda, as appropriate.

2 DEVELOPMENT DESCRIPTION

The Development comprises Warehouses S1, S2, S3, S5 and S6, located within the southern portion of the MPW footprint. The operation of the Development also includes ancillary infrastructure, namely car parking, landscaping, signage and lighting. Bushmaster Avenue provides truck and car access to the Development site.

The warehouses have been approved to operate 24 hours per day, 365 days per year. Heavy and light vehicles would access the warehouses via the main site access off Moorebank Avenue and Bushmaster Avenue, light vehicles would park in the allocated parking area adjacent to each warehouse and heavy vehicles would progress to the truck loading/unloading areas alongside each warehouse. Containers would be transferred directly to the warehouses from the rail terminals located to the east of the Development site.

The future tenant(s) for the warehouses are currently unknown, and so further details on future warehouse operations, for example chemical, fuels and/or dangerous goods handling and storage, are currently not available.

The Development site is shown in Figure 2-1. Figure 2-2 shows an aerial view of the MPW South warehouses.

Figure 2-2 Aerial view of Warehouses S1, S2, S3, S5 and S6 (LOGOS 2023)



3 STATUTORY REQUIREMENTS

The operation of the Development is required to comply with all relevant development approvals and consents legislation, permits, and licences applicable to the Development site. Where updated or revised versions of guidelines, protocols, standards or policies, or a replacement of these are available, the most recent versions would be reviewed and their applicability to this Addendum determined.

3.1 Development Approvals

The Development was approved under both the EPBC Act and Environment Planning and Assessment Act 1979 (EP&A Act). The approval, consent and certificate granted under these acts include conditions relevant to operations and potential stormwater monitoring impacts as detailed below.

The EPBC 2011/6086 Approval for the MPW Concept was granted by DotEE (now DCCEE) in September 2016 and varied on 17 September 2019 and 22 April 2022. The operation of the Development will be consistent with the EPBC 2011/6086 Approval conditions. The EPBC 2011/6086 Approval refers to the Revised Environmental Management Measures (REMM) of the “finalised EIS” (i.e. the Moorebank Intermodal Terminal Plan Supplementary Response to Submissions (RtS), Parsons Brinckerhoff, August 2017).

The MPW Concept and Stage 1 (SSD 5066) Development Consent was granted on 3 June 2016. The CoC under Schedule 2 (Terms of Approval) are potentially relevant to the operations of the Development, although CoC under Schedule 3 (Stage 1 Early Works) and Schedule 4 (Future Development Applications) are not.

The MPW Stage 2 (SSD 7709) Consolidated Consent was approved on 11 November 2019 by the NSW Independent Planning Commission (IPC) and is predominately applicable to operations within the northern portion of the MPW Stage 2 Site. However, the SSD 7709 Consolidated Consent defines the MPW Stage 2 Site as including the area of the Development (Appendix 1 Figure 1 of SSD 7709). Therefore, SSD 7709 CoC that refer to the “site” may apply to operation of the Development.

CDC 230736/01 was issued for the Development under the TISEPP on 27 February 2024. The CDC included conditions relevant to the operation of the Development but not specifically related to stormwater monitoring requirements and this Addendum.

The compliance of this Addendum with the relevant conditions of the approval and consents is detailed in Appendix A.

3.2 Legislation

The regulatory framework relevant to the operation of the Development is documented in Appendix F of the MPW Stage 2 OEMP. This framework identifies relevant legislative instruments, their key objectives and their application to the Development.

This register will be revised and updated in conjunction with the management review outlined in Section 6 of the MPW South OEMP – Addendum or when there has been a change to relevant legislation.

3.3 Permits and Licences

Permits and licences relevant to operations are detailed in Appendix B of the MPW Stage 2 OEMP. This register is revised and updated in conjunction with the management review outlined in Section 6 of the MPW South OEMP – Addendum, or when there has been a change to relevant legislation.

Compliance conditions relating to items listed on this register are incorporated into the MPW South OEMP – Addendum and the sub-plan addenda, where relevant.

A summary of the key permits and licences applicable to operations of the Development is provided in Section 3.3 of the MPW South OEMP – Addendum.

3.4 Guidelines

This Addendum has been prepared in accordance with a list of guidelines and codes of practice as detailed in Appendix C of the MPW Stage 2 OEMP, including the *Environmental Management Plan Guidelines (Commonwealth of Australia, 2014)* and the *Environmental Management Plan Guideline – Guideline for Infrastructure Projects (DPE, 2020)*.

4 ENVIRONMENTAL MONITORING

The Development forms part of the catchment area discharging to stormwater infrastructure that has been identified within the MPW Stage 2 SQMP. The monitoring requirements outlined within that plan are applicable for the monitoring of stormwater related impacts for the Development.

As identified in the MPW South SIOMP – Addendum, the capacity of the MPW Stage 2 stormwater infrastructure has been designed to accommodate the Development and continue to meet the requirements applicable under that plan.

The following sections identify the monitoring requirements applicable to the Development. This Addendum should be read in conjunction with the MPW South SIOMP – Addendum.

4.1 Monitoring Locations

The monitoring locations for MPW Stage 2 are identified in Section 2.1 of the MPW Stage 2 SQMP.

The outlet relevant to monitoring the impacts of the Development (that is, operation of Warehouses S1, S2, S3, S5 and S6 and associated ancillary infrastructure) is Outlet 6 as shown in Figure 4-1. The operation in MPW South beyond the Development may require review of this Plan and introduction of monitoring from additional locations.

Outlet 6 is the outlet that On-Site Detention Basin (OSD) 6 discharges to the Georges River through. OSD 6 is designed to collect, filter and discharge stormwater collected from Catchment 6 within the MPW Stage 2 site as described in the MPW South Stormwater Detailed Design Report (SDDR) – Addendum and shown below in Figure 4-2.

Figure 4-1 Monitoring Locations for the Development



Figure 4-2 Outlet 6, OSD 6 and Catchment 6



4.2 Assessment Criteria

The assessment criteria for water quality monitoring are shown in Section 2.2 of the MPW Stage 2 SQMP and in Table 4-1.

Table 4-1 Water Quality Monitoring Criteria

Pollutant	Trigger Level
Water Sample (Wet sites)	
Total Suspended Solids (TSS)	50 mg/L
Total Phosphorous (TP)	50 µg/L
Total Nitrogen (TN)	500 µg/L
Dissolved metals (standard 19 relevant to aquatic assessment)	Variable: see ANZECC 95% freshwater guidelines
Total Petroleum Hydrocarbons (TPH), BTEX (benzene, toluene, ethylbenzene, trimethylbenzenes and three xylene isomers) hydrocarbons	Variable: see ANZECC 95% freshwater guidelines

Note: Trigger levels for phosphorous and nitrogen are based on the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (2018). As there are no trigger levels for TSS in the ANZECC Guidelines (only turbidity), the trigger level for TSS has been based on the Managing Urban Stormwater: Soils and Construction (Landcom 2004).

In the event that the monitoring criteria identified in Table 4 1 Water Quality Monitoring Criteria's exceeded at Outlet 6, an investigation into the source of the pollution will be undertaken to determine if the source is related to the operation of the Development.

5 SAMPLING METHODOLOGY AND ANALYSIS

5.1 Surface Water

Section 3.1 of the MPW Stage 2 SQMP outlines the process for surface water quality sampling, including how often it will be sampled and how the results will be analysed. It also outlines the sampling procedures that apply including organisation of samples, the sampling equipment and quality assurance procedures.

These processes and procedures remain applicable for surface water sampling undertaken for the Development.

6 BASELINE DATA

6.1 MUSIC Modelling

The MPW South SDDR – Addendum included revised MUSIC modelling that confirmed the existing MPW Precinct stormwater treatment train met the required reduction objectives for the proposed MPW South warehouse facilities.

The treatment train discharging into OSD 6 will receive and treat runoff from catchment areas that include the Development. The results of the revised MUSIC modelling are shown in Table 6-1.

Table 6-1 MUSIC Analysis Results for OSD 6 (MPW South SDDR – Addendum)

Parameter	Source	Residual Load	% Reduction	Target Met
Flow (ML/yr)	402	388	3.4	NA
TSS (kg/yr)	73000	8740	88	Y
TP (kg/yr)	145	41	71.7	Y
TN (kg/yr)	914	421	53.9	Y
Gross Pollutants (kg/yr)	10200	0	100	Y

Stormwater quality modelling results demonstrate that the use of the stormwater treatment system in the treatment train of OSD 6 would achieve the required pollutant load reductions identified in Section 4.2.

6.2 Georges River

The Development lies within the catchment area of the Georges River. The water quality objectives adopted for stormwater from the Development discharging into the Georges River are consistent with the water quality performance targets required under the MPW Stage 2 (SSD 7709) Development Consent as both the Development and MPW Stage 2 utilise precinct-wide end-of-line stormwater infrastructure.

Water quality objectives are based on the Georges River Estuary Coastal Zone Management Plan (CZMP) and NorBe (Neutral of Beneficial Effect) to assess stormwater management objectives including the protection of downstream aquatic environments. Water quality performance objectives are summarised in Table 6-2. These performance targets remain applicable for the Development as it utilises precinct-wide stormwater infrastructure that forms part of MPW Stage 2.

The water quality performance targets under the MPW Stage 2 (SSD 7709) Development Consent adequately cover the requirements outlined in the Georges River Estuary CZMP. The Development will be required to meet these targets.

Table 6-2 Water Quality Performance Targets

Item	Georges River Estuary CZMP 2013	SSD 7709 CoC B15
TSS	85%	85%
TP	60%	65%
TN	45%	45%
Gross Pollutant	90%	-

7 REVIEW AND IMPROVEMENT

This Addendum will be submitted to DCCEEW for information under CoA 21 of the EPBC 2011/6086 Approval prior to the commencement of operation of the Development.

This Addendum will be reviewed annually, as a minimum (until all areas are operational), which may lead to revision of the document.

Under CoA 21 of the EPBC 2011/6086 Approval, the revised document can be submitted to DCCEEW for information if implementing the plan would not be likely to have a new or increased impact. CoA 21 to 25 of the EPBC 2011/6086 Approval detail the process for review and implementation of the revised documents following submission to DCCEEW.

Continual improvement is achieved through constant evaluation and review of the effectiveness of the program, and adjustment and improvement of the OEMP and project environmental outcomes.

This program will be updated as required based on:

- Outcomes from inspections, as outlined in Section 5 of the MPW South SIOMP – Addendum
- Changes to the precinct-wide environmental management requirements
- Changes to procedures and/or scope of works after an incident or potential incident
- Design or operational changes
- Opportunities for improvement identified as part of an investigation or non-compliance report
- Material complaints.

A monitoring and maintenance schedule has been provided to monitor the stormwater system condition for the Development and is detailed in Section 4.3 of the MPW South SIOMP – Addendum. The results of the monitoring and inspection will be provided via maintenance reports and during operation, the updated program would be reviewed and approved in accordance with these reports and the process detailed in MPW South OEMP – Addendum.

APPENDIX A – APPROVALS AND CONSENT COMPLIANCE MATRIX

CoA/CoC	Requirement	Section	How Addressed
EPBC 2011/6086 Approval			
9	Sections of the CEMP and OEMP relating to water must be prepared by a suitably qualified expert and must:	This Addendum	This Addendum has been prepared by suitably qualified experts from Aspect Environmental with reference to the SDDRs prepared by Costin Roe Consulting.
	a) Be consistent with the Water Quality, Stormwater and Flooding Provisional Environmental Management Framework (2 July 2014), provided at Appendix O to the finalised EIS	This Addendum	This Addendum is consistent with Section 6.1.3 of the Water Quality, Stormwater and Flooding Provisional Environmental Management Framework which details management controls to be implemented during the operation phase.
	b) Incorporate all measures 9A to 9AG from Table 7.1 of the finalised EIS that are described as ‘mandatory’	Sections 4 and 5	REMM 9X and 9AD apply to operations, but REMM 9AD is not relevant to this Addendum. REMM 9A-9B, 9E-9H, 9J-9W, 9Y, 9AA-9AC and 9AG do not apply to operations.
	c) explain how all measures 9A to 9AG from Table 7.1 of the finalised EIS that are described as ‘subject to review’ have been addressed	NA	REMM 9AE applies to operations but is not relevant to this Addendum. REMM 9C, 9I, 9Z and 9AF do not apply to operations.
	d) be approved by the Minister or a relevant New South Wales regulator.	NA	This Addendum, SQMP – Addendum and the SIOMP – Addendum will be submitted to DCCEEW under CoA 21. The LTEMP was approved by (then) DAWE on 26/10/21.

CoA/CoC	Requirement	Section	How Addressed
REMM			
9X	A stormwater treatment system would be implemented, incorporating sedimentation and bio-filtration basins upstream of the stormwater detention basins.	This Addendum Sections 4 and 5 MPW South SIOMP – Addendum	Sections 4 and 5 of this Addendum outline monitoring requirements to assess the efficacy of the stormwater system in treating stormwater runoff from the Development during operations. The stormwater treatment system used by the Development is detailed in the MPW South SIOMP – Addendum.
SSD 5066 Development Consent			
	There are no conditions relevant to stormwater monitoring for the Development.		
SSD 7709 Development Consent			
	There are no conditions relevant to stormwater monitoring for the Development.		
CDC 230736/01 and TISEPP Chapter 6			
	The CDC did not include conditions relevant to the monitoring of the stormwater system during the operation of the Development.		