Amendment Report

Edge Estate

155-251 & 141-153 Aldington Road, Kemps Creek

Submitted to the Department of Planning and Environment
on behalf of FPI Developments NSW Pty Ltd

SSD-17552047

Ethos Urban

Prepared by Ethos Urban

9 November 2023 | 2230528

'Gura Bulga'

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.

'Dagura Buumarri'

Liz Belanjee Cameron

'Dagura Buumarri' – translates to Cold Brown Country. Representing Victoria.

'Gadalung Djarri'

Liz Belanjee Cameron

'Gadalung Djarri' – translates to Hot Red Country. Representing Queensland.

Ethos Urban acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We pay our respects to their Elders past, present and emerging.

In supporting the Uluru Statement from the Heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

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Contents

Figures

Tables

Appendices

Appendix		Author
A.	Updated Project Description	*Ethos Urban*
B.	Updated Statutory Compliance Table	*Ethos Urban*
C.	Updated Mitigation Measures	*Ethos Urban*
D.	Architectural Drawings	*Frasers Property*
E.	Site Survey	*Boxall*
F.	CIV Report	*Northcroft*
G.	Civil Drawings	*AT&L*
H.	Landscape Drawings	*Habit8*
I.	Mamre Road Precinct Development Control Plan	*Ethos Urban*
J.	Community and Stakeholder Participation Strategy	*SLR Consulting*
K.	Visual Impact Assessment	*Habit 8*
L.	Crime Risk Assessment	*Neal Consulting*
M.	Detailed Site Investigation	*JBS&G*
N.	Remediation Action Plan	*JBS&G*
O.	Geotechnical Investigations	*PSM*
P.	Civil Design Report	*AT&L*
Q.	Flood Impact Assessment	*Stantec*
R.	Water and Stormwater Management Plan	*AT&L*
S.	Erosion and Sediment Control Plan	*AT&L*
T.	Transport Management & Accessibility Plan	*Ason Group*
U.	Waste and Resource Recovery Management Plan	*Land & Groundwater Consulting*
V.	Construction Noise and Vibration Assessment	*Acoustic Works*
W.	Operational Noise Assessment	*Acoustic Works*
X.	Air Quality Impact Assessment	*Northstar Air Quality*
Y.	Biodiversity Impact Assessment	*Ecologique*
Z.	Weed Eradication and Dam Decommissioning Plans	*Ecologique*
AA.	Social Impact Assessment	*SLR Consulting*
BB.	Heritage Letter of Compliance	*Biosis*
CC.	Aboriginal Cultural Heritage Assessments	*Biosis, Austral Archaeology*
DD.	Heritage Reports	*Biosis, Artefact*

Appendix		Author
EE.	**Resilience & Hazards SEPP Assessment**	*Riskcon Engineering*
FF.	**Bushfire Assessment**	*Peterson Bushfire*
GG.	**Aeronautical Impact Assessment**	*Landrum & Brown*
HH.	**Service Infrastructure Assessment**	*Land Partners*
II.	**Ecologically Sustainable Development Report**	*Frasers Property*
JJ.	**BCA Design Compliance Report**	*MBC Group*
KK.	**Access Report**	*Ergon Consulting*
LL.	**Fire Engineering Statement**	*Affinity Fire Engineering*
MM.	**Transgrid Correspondence**	*Transgrid*
NN.	**Dexus Letter of Consent**	*Dexus*
OO.	**Atlis Consultation**	*Altis*
PP.	**Ultimate Lot 1 Car Park Outcome**	*Frasers Property*

Executive Summary

This Amendment Report has been prepared by Ethos Urban on behalf of FPI Developments NSW Pty Limited (Frasers Property) (the Applicant) in support of amendments to the Edge Estate State Significant Development Application (SSDA) (SSD-17552047) under clause 37 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation). The amended development comprises inclusion of additional land within the site and amendments to the proposed development. The amended development site is addressed as 155-251 & 141-153 Aldington Road, Kemps Creek and comprises three (3) additional lots being Lot 24 DP 255560, Lot 10 DP 253503 and Lot 34 DP 258949.

Since Public Exhibition of the SSDA in November 2021, the Applicant has acquired the two (2) lots to the immediate south of the exhibited development site. The Applicant has also reached an agreement with Dexus Wholesale Management Limited (Dexus) to include the lot to the immediate north of the exhibited development site to enable transitional earthworks between the two sites.

The amendments to the proposed development also include the reconfiguration of the exhibited development layout to incorporate the additional land to the south of the exhibited development site, resulting in an increase in developable lots from nine (9) to 14. The amendments also include the increase of warehouse and distribution centres from two (2) to eight (8).

Overview of the Proposed Amendments

The proposed amendments comprise the inclusion of additional land within the site and amendments to the proposed development. In summary, the amended development can be summarised as follows:

- Amendment to the site to include three (3) additional lots comprising:
  - Lot 24 DP 255560 (219-233 Aldington Road, Kemps Creek) and Lot 10 DP 253503 (235-251 Aldington Road, Kemps Creek) owned by Frasers Property; and
  - Lot 34 DP 258949 (141-153 Aldington Road, Kemps Creek) owned by Dexus, forming part of SSD-37222834.
- Amendment of the proposed development to include:
  - Reconfiguration and increase of the development lots from nine (9) to fourteen (14);
  - Increase in the number of warehouse and distribution centres from two (2) to eight (8) resulting in an increase in total Gross Floor Area (GFA) from 65,327m^2 to 153,343m^2; and
  - An additional local industrial road (Road 3) and extension of Road 2 further south to align with the amended site and lot layout.

An indicative perspective render of the amended development built form is provided in **Figure 1** below, with the amended development site area illustrated in **Figure 2** on the following page.

Figure 1 Indicative Perspective Render of a typical Warehouse and Distribution Centre

Source: Frasers Property

Figure 2 Amended Development Site Map

Source: Nearmap, Ethos Urban

Strategic Context

As outlined above, the amended development includes the addition of three (3) additional lots with the site area. The additional land remains generally consistent in character with the exhibited development site.

The strategic context of the amended development remains generally unchanged with the site identified for industrial purposes. Notably, since Public Exhibition of the SSDA, the Mamre Road Precinct (MRP) Stormwater Scheme Plan (SSP) was released in December 2022. It presents the indicative regional stormwater infrastructure proposed by Sydney Water in the Mamre Road Precinct.

An analysis of alternatives was considered prior to proceed with the amendment development including withdrawal of the SSDA, proceed with the exhibited development and proceed with an alternative amended development. Ultimately, the amended development as described in this Amendment Report was identified as representing the most contextually appropriate and represented the highest and best use of the site.

Amended Development Description

The amendments to the project description included within the exhibited EIS is provided below with additions as a result of the proposed amendments shown in ***bold italics*** and deletions in ~~**bold strikethrough**~~:

- Demolition of existing dwelling houses and associated outbuildings;

- Bulk earthworks involving dam dewatering, cut and fill works and pad construction***, including transitional earthworks between the site and Lot 34 DP 258949***;
- Vegetation clearing;
- ~~**Nine**~~ ***Fourteen***-lot Torrens title subdivision;
- Proposed construction of internal public access roads of 24.0m and 25.~~**2**~~ ***6***m wide and connections to existing and future local roads;
- Stormwater and drainage works including construction of ~~**three**~~ ***four*** on-site detention and bio-retention basins;
- Construction of retaining walls ***across the site*** ~~**along the northern, eastern and southern Site boundaries, the southern boundary of Lot 9, eastern boundary of Lots 2 and 3 and the northern boundary of Lot 5**~~;
- Construction of interim acoustic barriers;
- Landscaping and street tree planting;
- Infrastructure comprising civil works and utilities servicing; and
- Construction of ~~**one**~~ ***eight*** warehouse and distribution centres ~~**with two portions on Proposed Lot 9**~~ with a total gross floor area of ~~**65,327**~~ ***153,343***m^2.

Statutory Context

The statutory context of the amended development remains generally unchanged. The amended development remains permissible with development consent in the IN1 General Industrial zone and meets the zone objectives.

Community Engagement

Through the Public Exhibition of the SSDA in November 2021, a total of 12 submissions were received. This included eleven (11) submissions from government agencies and one (1) submission from Dexus with no submissions from members of the public received.

Since public exhibition of the SSDA in late-2021, the Applicant has undertaken consultation with key relevant stakeholders, including:

- Department of Planning and Environment;
- Transgrid;
- Sydney Water;
- Transport for NSW;
- Dexus; and
- Atlis.

The Applicant will continue to consult with the relevant stakeholders. Following formal acceptance of this Amendment Report, the DPE will exhibit it on the NSW Major Projects Website and invite submissions from government agencies, organisations and the public.

Assessment of Impacts

This Amendment Report provides an assessment of any additional environmental impacts as a result of the proposed amendments. The key considerations involve the impact of the inclusion of additional land and additional development as a result of the proposed amendments.

Earthworks

The amended development earthworks comprise the most contextually and economically appropriate design in consideration of the design requirements. Whilst boundary retaining walls to the north, south and west are required, they are minimised and located outside of the public domain. Due to the steep topography, some walls are more than 10m high along the northern boundary. The interface design with the adjoining Dexus development has been considered to ensure the most economical and environmentally sustainable solution is achieved.

The amended development comprises the establishment of building pads for Lot 9-14 that will be subject to future built form DAs. This enables earthworks across the site under one DA rather than fragmenting the works which are interconnected across multiple DAs. It also enables the bulk earthworks to be completed in one phase that is the most economic and sustainable method consistent with the objects of the EP&A Act to promote the orderly and economic use and development of land.

Stormwater Management

The MRP SSP identifies naturalised trunk drainage lines to be located within the Transgrid easement draining north to south along Aldington Road (eastern trunk drainage line) and on the western portion of the site drainage east to west (western trunk drainage line).

Eastern Trunk Drainage Line

The eastern trunk drainage line is proposed to run through the Transgrid easement along the eastern portion of the site through four (4) detention basins (Basin A-D) connected via stormwater culverts that will connect to the south of the site. Through consultation with Transgrid, it was determined that the provision of open trunk drainage lines within the easement was not permitted because it would impact the easements future capability to host transmission lines with the requirement for structure pads approximately every 400m.

The proposed detention basins connect via culvert pipes are supported by Transgrid as they allow for the provision of structure pads for transmission line tower approximately every 400m.The Applicant has consulted with Sydney Water in relation this solution, who in principle support the design as the proposed basins can achieve the same outcome and make an open trunk drainage channel redundant.

Western Trunk Drainage Line

The MRP SSP indicates that the western trunk drainage line is to be located along the border of Lot 27 and 28 DP 255560. The amended development proposes the western trunk drainage line to run parallel on the north side of Road 1 which is between approximately 100-150m south of the indicative MRP SSP location.

The proposed location of the western trunk drainage line represents a significantly better outcome than the indicative location under the MRP SSP. The proposed location enables the trunk drainage line to be located adjacent to Road 1 which results in public infrastructure being located adjacent to each other enabling easier access for maintenance. It also provides a setback from Road 1 to the proposed Warehouse 2 (Lot 2), which with the proposed landscaping, will form a landscape buffer. It also enables a more efficient development layout that provides greater warehouse floorspace contributing to employment generation, the objectives of the MRP and constitutes orderly and economic development under the objects of the EP&A Act.

Altis and Frasers Property have been collaborating regarding the realignment of the trunk drainage channel that traverses the sites, with Atlis intending to lodge a modification to the SSD-1764189 following approval. The Applicant is currently in the process of consulting with Sydney Water regarding the alignment of the western trunk drainage line.

Visual Impact

Taking into consideration the surrounding topography, agricultural uses, industrial zoning under the Industry and Employment SEPP and future development and infrastructure, the Landscape and Visual Impact Assessment concludes that on average, the impact on the surrounding area from the amended development is judged to be of medium significance.

Three (3) viewpoints are judged to result in major/moderate visual impact significant, while one (1) viewpoint is judged to have major visual impact significant. The site benefits from the Transgrid easement along Aldington Road in particular that provides a large setback with a strong landscape foreground shielding the development from the road. The amended development mitigates visual impact through the planting of tall native canopy trees, screening shrubs and groundcovers. Following maturity, these planted buffers will provide a dense screen to help to soften and screen the development.

It is concluded that the amended development will result in an acceptable visual impact given the evolving surrounding context of the area for industrial use with the proposed landscaping effectively mitigating any significant visual impact.

Justification

Having regard to the design of development, strategic and statutory context, stakeholder views, likely impacts of the development, suitability of the site and the public interest, the carrying out of the development is justified for the following reasons:

- The amended development is permissible with consent, meets the objectives and complies with the provisions of the Industry and Employment SEPP;

- The amended development is consistent with the desired future character of the area and relevant strategic planning documentation, including the Greater Sydney Region Plan and Mamre Road Precinct Structure Plan;
- The amended development will deliver large-format warehouse and distribution centres to meet current market demands for warehouse floorspace enabling the creation of a more efficient logistics supply chain enabling consumers and businesses to receive goods faster;
- The amended development will align with the needs of modern tenant and business requirements, supporting the long-term potential and objectives of the locality including WSA;
- The amended development is estimated to contribute to the creation of 360 direct construction jobs and 550 direct operational jobs per annum as well as total value-add to the economy of $231.2 Million for construction and $304.4 Million per annum during operation;
- The development will deliver large-format warehouse and distribution centres to meet current market demands for warehouse floorspace enabling the creation of a more efficient logistics supply chain enabling consumers and businesses to receive goods faster;
- The amended development will not result in adverse environmental impacts, with the inclusion of appropriate mitigation measures that will minimise any potential impact of the development; and
- The amended development is suitable for the site and in the public interest.

1.0 Introduction

This Amendment Report has been prepared by Ethos Urban on behalf of FPI Developments NSW Pty Limited (Frasers Property) (the Applicant) in support of an amendment to the Edge Estate State Significant Development Application (SSDA) (SSD-17552047) under clause 37 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation). The amended development comprises inclusion of additional land within the site and amendments to the proposed development.

The inclusion of additional land comprises Lot 24 DP 255560 and Lot 10 DP 253503 (219-251 Aldington Road, Kemps Creek) to the immediate south of the exhibited development site as a result of Frasers Property acquiring these sites. It also comprises Lot 34 DP 258949 (141-153 Aldington Road, Kemps Creek) to the immediate north of the exhibited development site as a result of an agreement being reached with Dexus Wholesale Management Limited (Dexus) to allow for transitional earthworks between the two future development sites.

The amendments to the proposed development include the reconfiguration of the exhibited estate layout to incorporate the additional land to the south of the exhibited development site, resulting in an increase in developable lots from nine (9) to fourteen (14). The amendments also include the increase of warehouse and distribution centres from two (2) to eight (8) in response to increased market demand and progress of regional infrastructure to support the development since the SSDA was publicly exhibited in November 2021.

This Amendment Report has been prepared in accordance with the '*State significant development guidelines – preparing an amendment report'* prepared by the Department of Planning and Environment (DPE). It is based on the Architectural Drawings prepared by Frasers Property (**Appendix D**) and other supporting technical information appended to the report (see Table of Contents). It should also be read in conjunction with the exhibited Environmental Impact Statement (EIS) dated October 2021 and its supporting documentation.

The Amendment Report intends to inform the consent authority, community and stakeholders about the amended development. It also includes an environmental impact assessment of the amended development, including its social, economic and environmental impacts, mitigation measures and benefits.

1.1 Background

The Edge Estate (previously known as the '155-217 Aldington Road Estate') received Secretary's Environmental Assessment Requirements (SEARs) on 12 May 2021 and went on Public Exhibition on 5 November 2021.

As exhibited, SSD-17552047 sought approval for the following development:

- Demolition of existing dwelling houses and associated outbuildings;
- Bulk earthworks involving dam dewatering, cut and fill works and pad construction;
- Vegetation clearing;
- Nine-lot Torrens title subdivision;
- Proposed construction of internal public access roads of 24.0m and 25.2m wide and connections to existing and future local roads;
- Stormwater and drainage works including construction of three on-site detention and bio-retention basins;
- Construction of retaining walls along the northern, eastern and southern Site boundaries, the southern boundary of Lot 9, eastern boundary of Lots 2 and 3 and the northern boundary of Lot 5;
- Construction of interim acoustic barriers;
- Landscaping and street tree planting;
- Infrastructure comprising civil works and utilities servicing; and
- Construction of one warehouse and distribution centre with two portions on Proposed Lot 9 with a total building area of 65,327m^2.

The SSDA came off Public Exhibition on 6 December 2021 with a subsequent Response to Submissions prepared by the Applicant and issued to the DPE in February 2023. It is noted that the Response to Submissions has not been formally accepted or published by the DPE who subsequently responded with matters for additional consideration by the Applicant.

Since then, Frasers Property has acquired the two lots to the immediate south of the exhibited application site to be included within the site. Frasers Property has also reached agreement with Dexus to include their land, to the

immediate north of the exhibited application site, to enable transitional earthworks across the two sites. Due to the nature of the amendments, the majority of the submissions made on the exhibited development fall away with the amendments largely resolving the matters raised or making them redundant. Further, the amended development will enable opportunity for further submissions during the subsequent re-exhibition of the SSDA.

Edge Estate represents a 74.4 hectare (ha) industrial estate across two sites within the Mamre Road Precinct being Edge North (99-111 Aldington Road, Kemps Creek) and Edge South (155-251 Aldington Road, Kemps Creek).

The Amended Application relates to Edge South and comprises a 63.2 ha site that includes a 14 lot industrial development along the western side of Aldington Road. An indicative aerial perspective render of the complete Edge South Estate is provided in **Figure 3**. This SSDA, as amended, includes estate-wide bulk earthworks, construction and operation of eight (8) warehouse and distribution centres with the remaining six (6) lots residual and subject to future built form Development Applications (DAs).

Figure 3 Indicative Aerial Perspective Render – Edge South

Source: Frasers Property

1.2 Applicant Details

The details of the Applicant are presented in **Table 1** below.

Table 1 Applicant Details

Applicant:	**FPI Developments NSW Pty limited**
Address:	Level 2/1C, Homebush Bay Drive, Rhodes NSW 2138
ABN:	89 648 326 676

1.3 Overview of the Amendments

The proposed amendments comprise inclusion of additional land within the site and amendments to the proposed development. In summary, the amended development can be summarised as follows:

- Amendment to the site to include three (3) additional lots comprising:
  - Lot 24 DP 255560 (219-233 Aldington Road, Kemps Creek) and Lot 10 DP 253503 (235-251 Aldington Road, Kemps Creek) owned by Frasers Property; and
  - Lot 34 DP 258949 (141-153 Aldington Road, Kemps Creek) owned by Dexus, forming part of SSD-37222834.
- Amendment of the proposed development to include:
  - Reconfiguration and increase of the development lots from nine (9) to fourteen (14);
  - Increase in the number of warehouse and distribution centres from two (2) to eight (8) resulting in an increase in total Gross Floor Area (GFA) from 65,327m^2 to 153,343m^2; and
  - An additional local industrial road (Road 3) and extension of Road 2 further south to align with the amended site and lot layout.

As aforementioned, the inclusion of additional land comes as a result of Frasers Property acquiring adjoining land to the south of the exhibited application site and the inclusion of the adjoining lot to the north (owned by Dexus) to enable transitional earthworks to occur across the two development sites. The amendments to the proposed development are a result of the changed context since public exhibition in November 2021 and responds to feedback received to date through consultation with government agencies.

The proposed amendments are outlined within the Architectural Drawings prepared by Frasers Property included at **Appendix D**.

1.4 Objectives of the Development

The objectives of the exhibited development were set out in Section 3.1 of the EIS for SSD-17552047. The objectives of the amended development remain substantially the same as the exhibited development with additions to the exhibit objectives shown in ***bold italics*** and deletions shown in ~~**bold strikethrough**~~:

- Construct a new warehouse and logistics hub comprising ~~**nine**~~ ***fourteen*** industrial allotments and ***eight*** warehouse or distribution centre***s*** ~~**at proposed Lot 9**~~ with a ***total*** building area of ~~**65,327m^2**~~ ***153,343m^2***;
- Provide an employment-generating land use and improve access to jobs for residents of the immediate community and wider locality;
- Design the Site to achieve a viable economic return;
- Ensure minimal environmental and amenity impact by providing suitable mitigation measures where required, to minimise any unforeseen impacts arising in the future;
- Ensure ongoing compliance with all operational legislative requirements; and
- Ensure development is compatible with surrounding development and the regional and local context.

The development, as amended, will continue to set out to achieve these objectives.

2.0 Strategic Context

This section identifies key strategic matters relevant to the assessment of the Amended Application, including any changes to the site's features, strategic context and other development in the surrounding area. This section also provides an analysis of feasible alternatives that were considered in light of the amended development.

2.1 Site Location and Context

The site location and context as set out in Section 2.2 of the exhibited EIS remains substantially the same. The amended site remains within the Penrith Council Local Government Area (LGA) as well as within the Mamre Road Precinct (MRP). The surrounding locality remains of a rural nature, however, through the recent approvals within the MRP and the construction of M12 Motorway and Western Sydney International Airport (due to open in 2026, there is a changing context surrounding the site. A site location and context map of the amended site is provided in **Figure 4** below.

Figure 4 Site Location and Context Map

Source: Nearmap, Ethos Urban

2.2 Key Features of the Site and Surrounds

As aforementioned, the proposed amendments include the addition of three adjoining allotments. The site, as amended, is illustrated in **Figure 5** and described in **Table 2** on the following page, with the additional land shown in **bold text**.

The amended site includes two lots (219-251 Aldington Road) to the south of the exhibited site. This is a result of Frasers Property acquiring these properties. The amended site also includes the addition of one lot (141-153 Aldington Road) to the immediate north of the exhibited site. This site is owned by Dexus and forms part of SSD-32722834. The inclusion is to enable earthworks and retaining walls to transition across the two sites.

As a result of the inclusion of the three additional lots, the total site area is 734,748.38m^2 or 632,887m^2 (excluding Dexus' site). The additional land (as illustrated in **Figure 5**) is consistent with the exhibited site, containing farm dams, small structures and largely cleared of any vegetation.

Table 2 Amended Site Description

Lot and DP	Address	Area	Landowner
Lot 34 DP 258949	**141-153 Aldington Road**	**101,209.32m²**	Dexus
Lot 33 DP 258949	155-167 Aldington Road	101,232.65m²	Frasers Property
Lot 28 DP 255560	169-181 Aldington Road	101,262.26m²	
Lot 27 DP 255560	183-197 Aldington Road	101,291.4m²	
Lot 26 DP 255560	199 Aldington Road	25,474.52m²	
Lot 25 DP 255560	201-217 Aldington Road	101,289.12m²	
Lot 24 DP 255560	**219-233 Aldington Road**	**101,430.83m²**	
Lot 10 DP 253503	**235-251 Aldington Road**	**101,558.28m²**	
Total		**734,748.38m²**	

Figure 5 Amended Development Site Map

Source: Nearmap, Ethos Urban

2.2.1 Topography

The topography of the amended site remains contextually consistent with the exhibited site. The site includes an approximate 50m difference in topography from the northern end of the site sloping down to the southern end of the site. The highest point of the site is approximately RL 101 on Lot 34 DP 258949 (141-153 Aldington Road) in the north of the site. The lowest point of the site is approximately RL 48 in the south-west of the site. Refer to the Site Survey prepared by Boxall at **Appendix E**.

2.2.2 Easements

The amended site, consistent with the exhibited site, contains only one easement for electrical transmission lines to the benefit of Transgrid. The easement, approximately 60m in width, continues in a parallel direction across the additional land. Refer to the Site Survey prepared by Boxall at **Appendix E**.

2.2.3 Surrounding Development

The site's surrounding context currently remains generally comparable to the time of Public Exhibition of the SSDA. Currently, the site's surrounding context includes rural residential allotments to the north and south with a large portion acquired by future developers.

To the east on the opposing side of Aldington Road are rural residential allotments that form part of the 200 Aldington Industrial Estate (SSD-10479) which was approved in May 2023. All existing structures on the site have been demolished, with vegetation clearing and bulk excavation due to begin shortly. Also to the east along Aldington Road is the BAPS Temple (DA17/1247) located at 230-242 Aldington Road and currently under construction.

To the west of the site is Aspect Industrial Estate by Mirvac (SSD-10448), which was approved in May 2023, with earthworks largely complete and warehouses under construction.

A detailed summary of surrounding development within the Mamre Road Precinct is provided in **Section 2.4**.

2.3 Strategic Context

2.3.1 Overview

The strategic context of the site, as set-out in Section 2.5 and 4.3 of the exhibited EIS, included the following strategic framework:

- *A Metropolis of Three Cities – Greater Sydney Region Plan* prepared by the then Greater Sydney Commission (GSC);
- *Western City District Plan* prepared by the then GSC;
- *Western Sydney Aerotropolis Plan* prepared by the Western Sydney Planning Partnership.
- The objectives of then *State Environmental Planning Policy (Western Sydney Employment Area) 2009*; and
- *Mamre Road Precinct Structure Plan* prepared by the DPE.

The proposed development, as exhibited, remains consistent with the strategic context demonstrated within the EIS. The proposed development as amended will continue to establish the Mamre Road Precinct as the foremost area for high-quality industrial developments and industrial employment, through delivering additional industrial floorspace in direct response to the well-publicised shortfall and delays in delivery of industrial land in Western Sydney.

2.3.2 Mamre Road Precinct Stormwater Scheme Plan

In December 2022, Sydney Water released the MRP Stormwater Scheme Plan (SSP) along with a Stormwater Management Framework for Aerotropolis and Mamre Road Precincts. These documents provided a refined regional trunk drainage infrastructure plan which provided a greater level of definition to the preliminary locations within the MRP Development Control Plan (DCP).

The SSP presents indicative regional trunk drainage infrastructure proposed by Sydney Water in the Mamre Road Precinct. The SSP was developed in line with NSW Government planning requirements and includes measures that would ensure development in the precinct complies with the waterway health targets outlined in the MRP DCP.

The SSP (as illustrated in **Figure 6**) shows the following proposed naturalised trunk drainage lines within the site:

- A 25-30m wide channel (approximately 680m long) that would generally drain north to south through the Transgrid easement adjacent to Aldington Road.
- A 20m wide channel (approximately 190m long) that would generally drain east to west across the western boundary of the site towards the adjacent Access Logistics Estate at 904-928 Mamre Road.

A description of the amended developments regional stormwater infrastructure provided in **Section 3.4.1** with an assessment provided in **Section 6.5**.

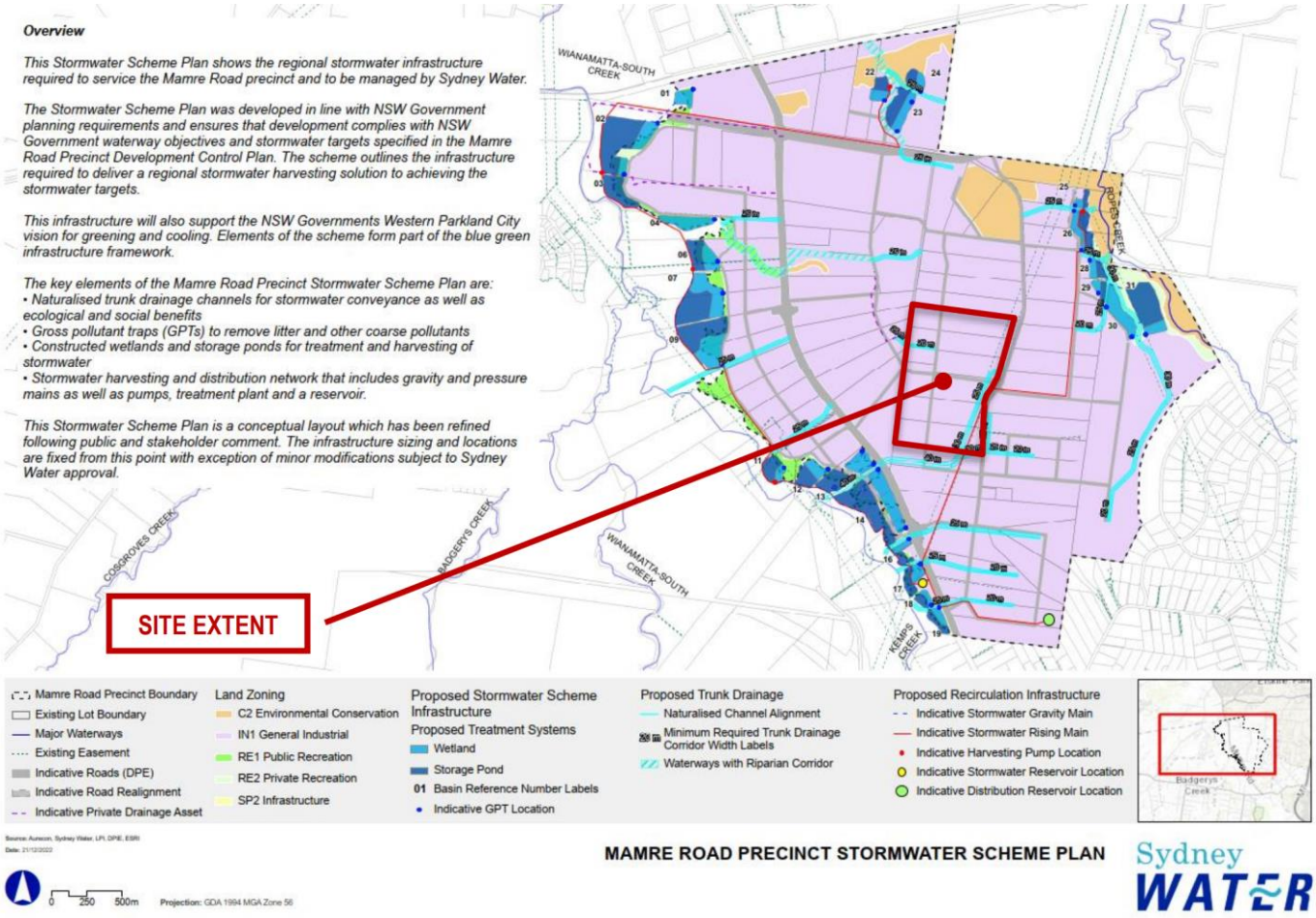


Figure 6 Mamre Road Precinct Stormwater Scheme Plan Overview

Source: Sydney Water, edits by AT&L

2.4 Cumulative Impacts

Since the exhibition of the SSDA in November 2021, additional development with the MRP has been approved and proposed. A current summary of the surrounding development within the MRP is illustrated in **Figure 7** and detailed in **Table 3** following.

The cumulative impacts associated with the identified projects are considered under the relevant issues in **Section 6.0** and within the corresponding technical reports appended to this Amendment Report.

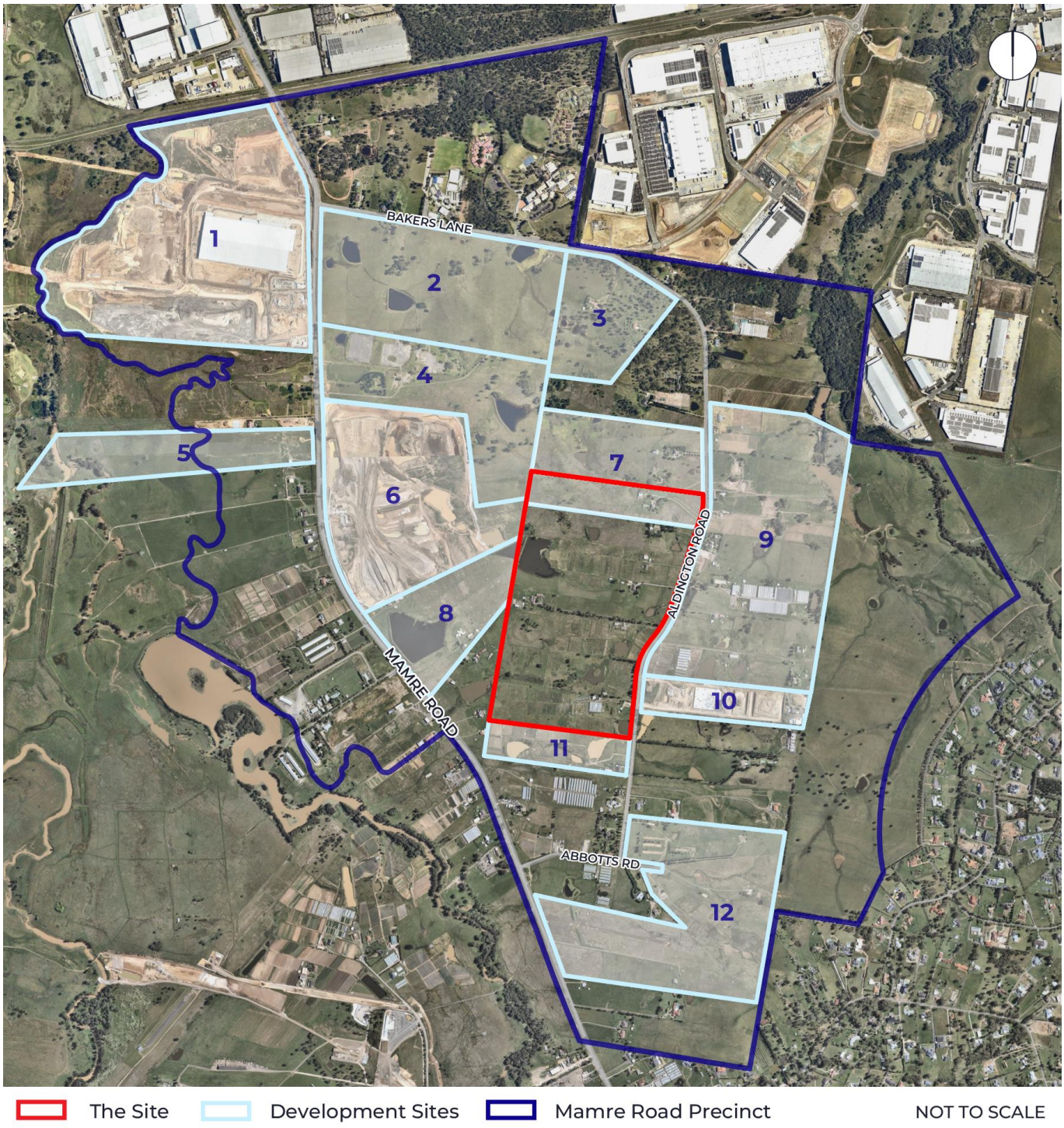


Figure 7 Mamre Road Precinct Development Map

Source: Nearmap, Ethos Urban

Table 3 Mamre Road Precinct Development Summary

No.	Development	Description	Status
1	**Kemps Creek Warehouse, Logistics and Industrial Facilities Hub (SSD-9522)** 657-769 Mamre Road, Kemps Creek	Development of a warehouse, logistics and industrial facilities hub including construction and operation of eight warehouses comprising 162,355m^2 of floor space, 744 parking spaces and 21-lot Torrens Title Subdivision (over two stages).	**Approved**

2	**Summit at Kemps Creek (SSD-30628110)** 702-752 Mamre Road, Kemps Creek	Concept masterplan for an industrial estate comprising eight buildings for warehouse and distribution, and general industrial use. Subdivision of the site into three (3) lots and detailed Stage 1 consent is sought for site preparation, earthworks, infrastructure works and construction of three of the buildings, and the associated site road network and access infrastructure.	**Prepare EIS**
3	**1-51 Aldington Road Estate (SSD-22595032)** 1-51 Aldington Road, Kemps Creek	Site preparation works including demolition of all existing structures and bulk earthworks in development areas, subdivision of the site into three development lots and an environmental conservation lot, construction and use of a warehouse of approximately 24,710m^2 within Lot 1 and construction and use of a warehouse of approximately 18,600m^2 within Lot 2.	**Prepare EIS**
4	**Yiribana Industrial Estate (SSD-10272349)** 754-770, 784-786 Mamre Road, Kemps Creek	Concept plan and stage 1 DA for an industrial estate. Stage 1 comprises two warehouses, site-wide bulk earthworks and retaining walls, an internal road network, storm water works, car parking, signage and landscaping.	**Approved**
5	**805 Mamre Road Kemps Creek Logistics (SSD-30871587)** 799-817 Mamre Road, Kemps Creek	Construction of an industrial logistics and distribution warehouse facility with 25,310m^2 of floor space, with associated office space (970m^2), vehicle loading and parking areas, road access and internal roads for use by a single operator.	**Prepare EIS**
6	**Aspect Industrial Estate (SSD-10448)** 788-882 Mamre Road Kemps Creek	Development seeks approval for earthworks, infrastructure and roads across the entire site, and the staged construction of warehouse and logistics facilities with associated car parking across 11 developable lots.	**Approved**
7	**Dexus Kemps Creek – 113-153 Aldington Road (SSD-32722834)** 113-153 Aldington Road, Kemps Creek	Concept proposal for an industrial estate comprising five (5) warehouse buildings and a stage 1 development comprising the construction of two (2) warehouses, demolition, bulk earthworks, internal roads, signage, stormwater infrastructure and subdivision.	**Prepare EIS**
8	**Access Logistic Park (SSD-17647189)** 884-928 Mamre Road, Kemps Creek	Demolition and bulk earthworks, 13-lot Torrens Title subdivision, construction of internal roads, infrastructure and utilities, construction and operation of warehouse 1 (27,800m^2) with associated offices, car parks, hardstands, and landscaping.	**Assessment**
9	**200 Aldington Road Estate (SSD-10479)** 106-228 Aldington Road, Kemps Creek	Staged development including a concept proposal and stage 1 development Application comprising estate-wide earthworks, infrastructure and services, construction, fit-out and operation of the stage 1 warehouse building.	**Approved**
10	**BAPS Temple (DA17/1247)** 230-242 Aldington Rd, Kemps Creek	Construction of a Place of Public Worship including Hindu Temple (Mandir), assembly hall, community kitchen & dining hall, monks residence, landscaped areas, internal roads, car parking & associated site works.	**Approved**
11	**Westgate, 253-267 Aldington Road (SSD-23480429)** 253-267 Aldington Road, Kemps Creek	Construction and operation of four (4) warehouse buildings with a total floor area of 44,600m^2. Site preparation works, including demolition, bulk earthworks, road construction, site servicing, on-site detention, landscaping and subdivision.	**Prepare EIS**

12	**Westlink Industrial Estate – Stage 1 (SSD-91308102)** 290-308 Aldington Road, 59-63 Abbotts Road, Kemps Creek	Staged construction of two (2) warehouse buildings with ancillary office space with a total floor area of approximately 81,642m^2, demolition, bulk earthworks, road construction, site servicing and stormwater works, landscaping and subdivision.	**Approved**
	Westlink Industrial Estate – Stage 2 (SSD-46983729) 1030-1064 Mamre Road, Kemps Creek	Site preparatory works, subdivision of the site into five individual lots with two being residual lots for future development, Construction of a new industrial estate at the site comprising two industrial allotments and a total gross floor area of approximately 40,720m^2 , including two new industrial warehousing buildings with ancillary offices across the two allotments.	**Prepare EIS**

2.5 Analysis of Alternatives

An analysis of alternatives was undertaken in Section 3.4 of the exhibited EIS. It included a 'do nothing' scenario, development on an alternative site and a different site configuration. In light of the amended development, a number of alternatives were considered, which are detailed in **Table 4** below.

Table 4 Analysis of Alternatives

Alternative	Analysis
Withdrawal of the SSDA	The amended development is within a similar context of the exhibited development with the amendment of the SSDA representing a more appropriate planning outcome. The withdrawal of the SSDA and lodgement of new DA would fail to meet the objectives of the development. Specifically, this would fail to create or delay an employment-generating development that provides in-demand warehouse floorspace. Further, if the SSDA was withdrawn, the site would remain vacant until such time in future that it is developed for another industrial-related development.
'Do nothing' and proceed with the Exhibited Development	Proceeding with the exhibited development would represent a worse outcome. The inclusion of the additional land acquired by Frasers Property to the south of the exhibited development site represents the opportunity to complete estate-wide bulk earthworks and infrastructure simultaneously as opposed to being subject to a separate DA. The inclusion of Dexus' land to the immediate north of the exhibited development site also enables transitional earthworks between two future development sites, which the exhibited development did not provide for. The amended development provides an opportunity to develop additional warehouse floorspace and create additional development-ready lots in an area that has been identified for future industrial development. The amended development also responds to the shortfall in warehouse floorspace currently present in the greater Sydney region enabling future supply, increasing the efficiency of greater Sydney's logistical supply chain. The amended development also responds to the change in context between late-2021 (when the EIS was exhibited) and the present. Since Public Exhibition, the planning of regional infrastructure within the MRP has progressed enabling greater certainty in relation to development capacity. Key regional infrastructure beyond the MRP has also progressed including the new Western Sydney International Airport due to open in 2026 and M12 Motorway due to open prior to the opening of the airport. For these reasons, the option to proceed with the originally proposed development was dismissed in favour of the amended development that is more appropriate given the current context and improved outcomes.
Alternative Amended Development	Alternative designs and solutions to the amended estate layout and design as well as the proposed buildings pad levels were considered throughout the design development of the amended development. The amended layout and design has considered feedback received to date to resolve issues and provide improved outcomes. The amended development, including the proposed built form, civil and landscape design achieve a contextually appropriate outcome consistent with the desired future character of the area.

3.0 Amended Development Description

This section comprises a detailed description of the amended development in comparison to the development as exhibited in November 2021.

The amended development comprises a reconfiguration and increase in development lots from nine (9) to fourteen (14). It also comprises an increase in the number of warehouse and distribution centres from two (2) to eight (8) resulting in an increase in total GFA from 65,327m^2 to 153,343m^2.

3.1 Amended Project Description

The amendments to the project description included within the exhibited EIS is provided below with additions as a result of the proposed amendments shown in ***bold italics*** and deletions in ~~**bold strikethrough**~~:

- Demolition of existing dwelling houses and associated outbuildings;
- Bulk earthworks involving dam dewatering, cut and fill works and pad construction***, including transitional earthworks between the site and Lot 34 DP 258949***;
- Vegetation clearing;
- ~~**Nine**~~ ***Fourteen***-lot Torrens title subdivision;
- Proposed construction of internal public access roads of 24.0m and 25.~~**26**~~m wide and connections to existing and future local roads;
- Stormwater and drainage works including construction of ~~**three**~~ ***four*** on-site detention and bio-retention basins;
- Construction of retaining walls ***across the site*** ~~**along the northern, eastern and southern Site boundaries, the southern boundary of Lot 9, eastern boundary of Lots 2 and 3 and the northern boundary of Lot 5**~~;
- Construction of interim acoustic barriers;
- Landscaping and street tree planting;
- Infrastructure comprising civil works and utilities servicing; and
- Construction of ~~**one**~~ ***eight*** warehouse and distribution centres ~~**with two portions on Proposed Lot 9**~~ with a total gross floor area of ~~**65,327**~~ ***153,343***m^2.

The amended project description is also provided at **Appendix A**. The amended development is outlined within the Architectural Drawings prepared by Frasers Property included at **Appendix D**.

The amended development is also outlined in the Civil Drawings prepared by AT&L included at **Appendix G** and Landscape Drawings prepared Habit8 included at **Appendix H**.

A comparison of the exhibited and amended site plan is provided in **Figure 8** and **Figure 9** on the following page.

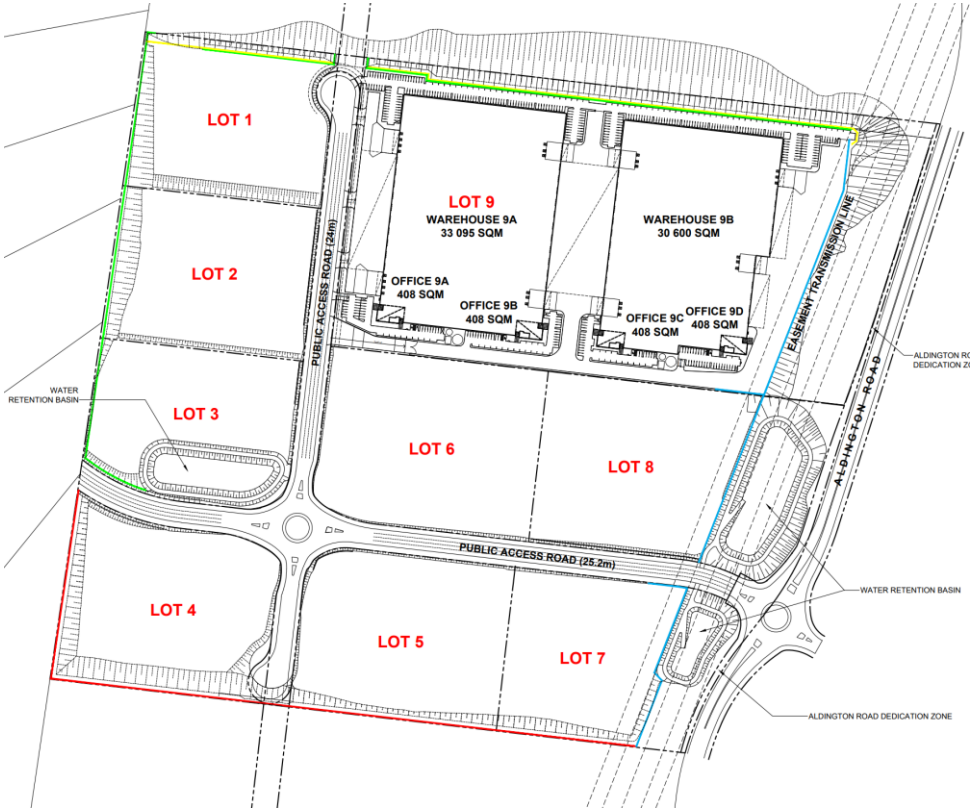


Figure 8 Exhibited Site Plan

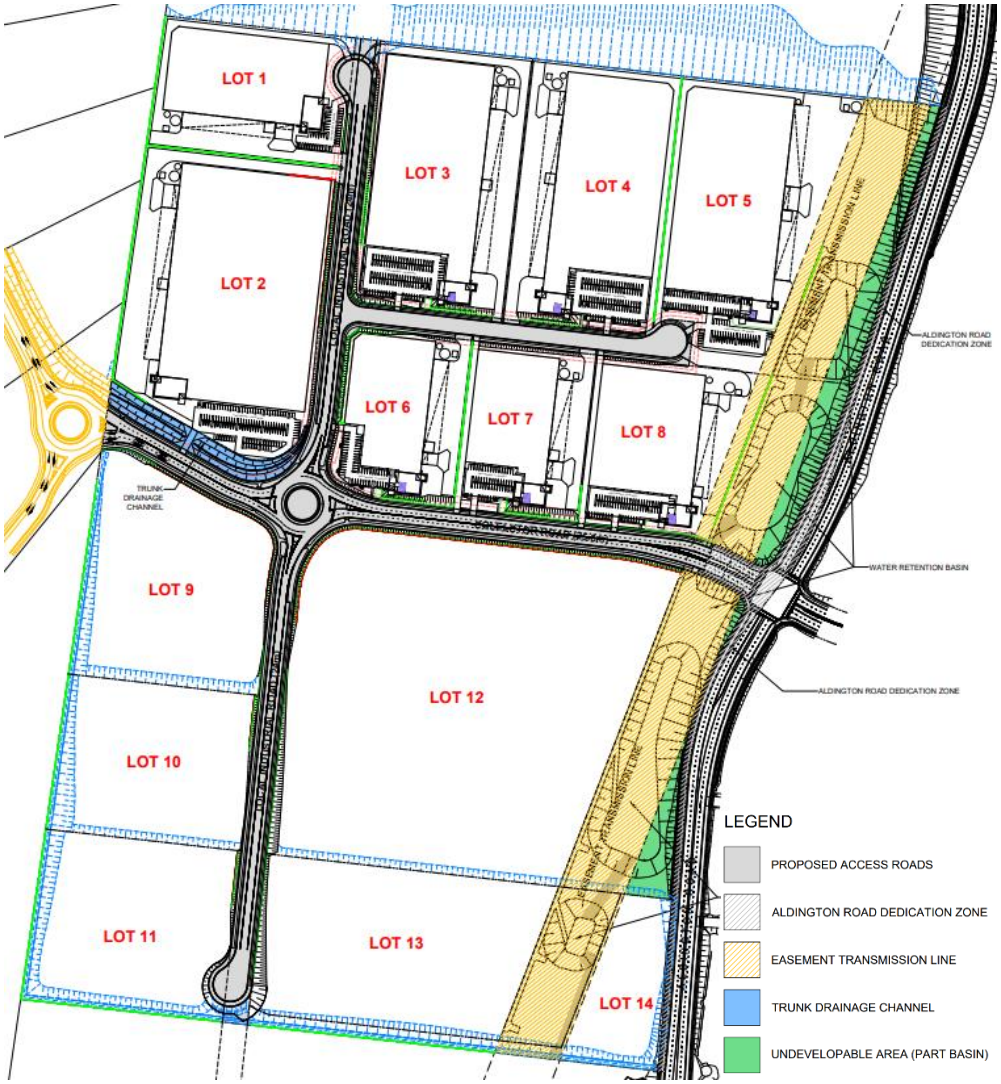


Figure 9 Amended Site Plan

Source: Frasers Property

3.2 Key Development Information

A comparison of the key details of the development as exhibited and as amended are outlined in **Table 5** below.

Table 5 Key Development Information – Exhibited and Amended

Component	Description	
	Exhibited	**Amended**
Site Area	430,202m^2	734,748.38m^2 (632,887m^2 excluding Dexus' land).
Estate Area	430,202m^2	632,887m^2 (excluding Dexus' land).
Legal Description	• Lot 33 DP 258949 • Lot 28 DP 255560 • Lot 27 DP 255560 • Lot 26 DP 255560 • Lot 25 DP 255560	• **Lot 34 DP 258949** • Lot 33 DP 258949 • Lot 28 DP 255560 • Lot 27 DP 255560 • Lot 26 DP 255560 • Lot 25 DP 255560 • **Lot 24 DP 255560** • **Lot 10 DP 253503**
Proposed Land Uses	*Warehouse or distribution centres*	*Warehouse or distribution centres*
Developable Lots	9	14
Warehouses	2	8
Gross Floor Area	• Warehouse 9A = 33,911m^2 • Warehouse 9B = 31,416m^2 • **Total = 65,327m^2**	• Warehouse 1 = 12,325m^2 • Warehouse 2 = 32,768m^2 • Warehouse 3 = 24,317m^2 • Warehouse 4 = 24,217m^2 • Warehouse 5 = 22,787m^2 • Warehouse 6 = 11,413m^2 • Warehouse 7 = 11,103m^2 • Warehouse 8 = 14,413m^2 **Total = 153,343m^2**
Building Height	14.6m	14.6m (18.1m where undercroft parking is provided).
Landscape Area	N/A	120,118m^2 (18.98%)
Permeable Area	N/A	62,604m^2 (21.8%)
Trees Planted	690	2,566
Canopy Cover	20,700m^2 (4.8%)	100,240m^2 (15.54%)
Construction Hours	• Monday to Friday 7am to 6pm • Saturday 8am to 1pm • No work on Sundays or public holidays	• Monday to Friday 7am to 6pm • Saturday 8am to 1pm • No work on Sundays or public holidays
Operational Hours	24 hours, 7 days a week	24 hours, 7 days a week
Construction Jobs	143	360
Operational Jobs	228	550
Capital Investment Value	$86,655,103 (excl. GST)	$281,322,290 (excl. GST). Refer to the CIV Report prepared by Northcroft (**Appendix F**).

3.3 Site Preparation Works

3.3.1 Demolition and Vegetation Removal

The amended development still seeks consent for demolition of all existing structures and removal of all existing vegetation, which will contribute to the enabling of the proposed bulk earthworks. The proposed demolition of all existing structures and removal of all existing vegetation is extended to the additional site area.

The additional site area includes houses, out-buildings and farms structures and vegetation including sparsely located trees and exotic grasslands. The Tree Removal and Demolition Plan (DA-A103) of the Architectural Drawings (**Appendix D**) has been amended to reflect the proposed demolition and vegetation removal.

3.3.2 Farm Dam Decommissioning

The amended development still seeks consent for the decommissioning of existing farm dams. As a result of the inclusion of the two additional lots to the south of the exhibited site area, a further two (2) farm dams require decommissioning.

The Dam Decommissioning Management Plan (**Appendix Z**) has been amended to include procedures that must be undertaken in the planning, preparation and implementation of farm dams within the subject land and addresses relevant legislation, permits and approvals.

3.3.3 Remediation

The amended development still seeks consent for the remediation of the site to enable the proposed bulk earthworks. The Remediation Action Plan prepared by JBS&G (**Appendix N**) has been amended to reflect the amended site area. It identifies an additional area that contains asbestos within a structure and asbestos containing material (ACM) within surficial soils or affixed to stockpiled concrete slabs (refer to **Figure 10**). The overall remediation strategy remains substantially the same with the exhibited site also containing similar types of contamination.

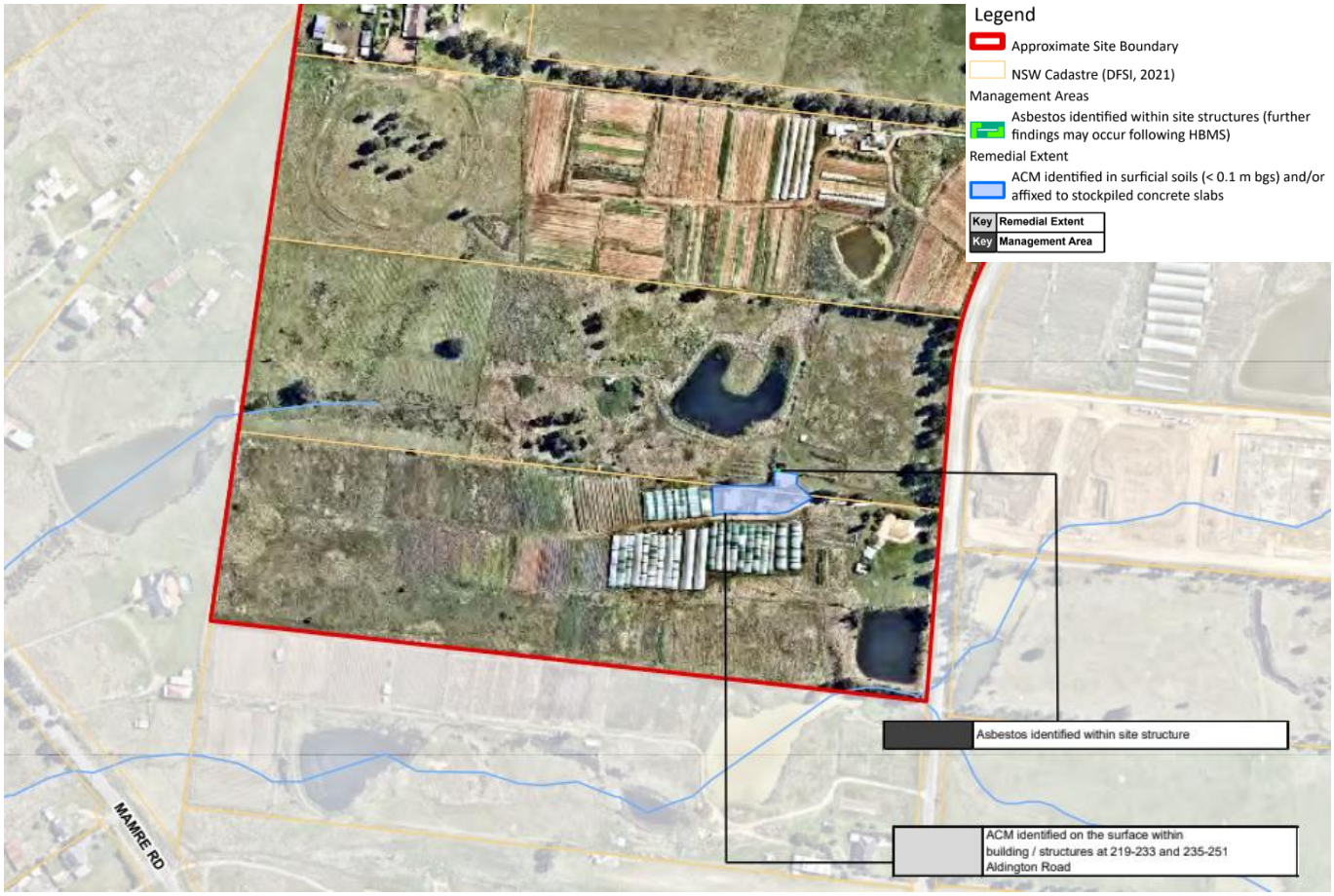


Figure 10 Remedial Extent of the Additional Land

Source: JBS&G

3.3.4 Bulk Earthworks

The amended development comprises configuration of the bulk earthworks as result of the inclusion of additional land and amendments to the proposed development. The amended bulk earthworks plan is provided in **Figure 11**, outlines the proposed cut and fill extent across the site as well as bulk earthworks levels.

As outlined in **Table 6**, the cut and fill balance of the amended development remains consistent with the exhibited development. Due to the inclusion of additional land the volume of cut and fill required has increased by approximately 500,000m^3.

Table 6 Bulk Earthworks Cut and Fill Balance

Item	Exhibited	Current
Stripping of existing topsoil	- 96,913m^3	+ 65,917m^3
Excavation of existing creeks and dams (to be exported from site)	- 15,000m^3	- 15,000m^3
Net Cut (including topsoil stripping)	- 739,432m^3	- 1,318,580m^3
Net Fill	+ 779,582m^3	+ 1,296,848m^3
Balance	**- 25,149m^3 (import)**	**+ 29,185m^3 (import)**

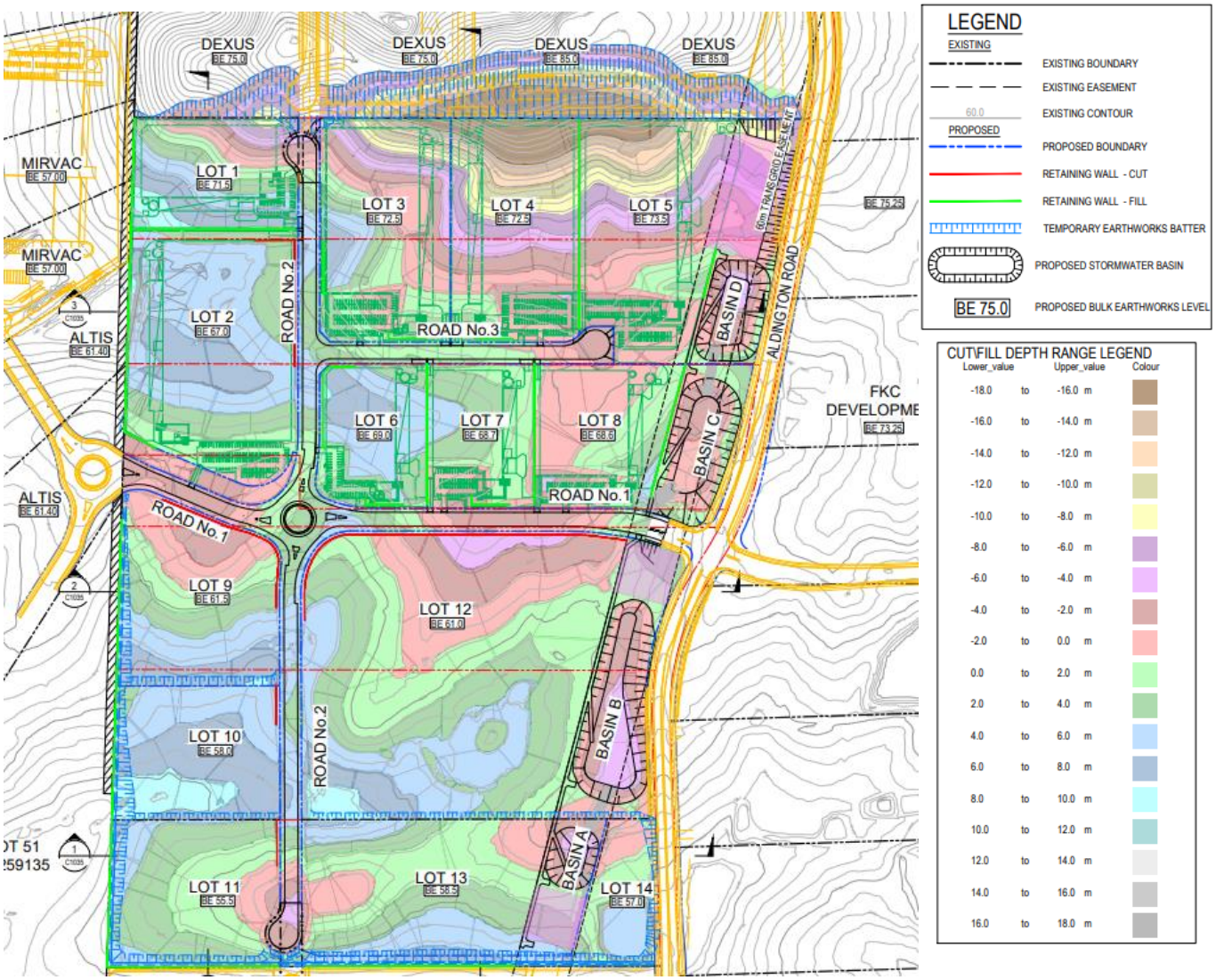


Figure 11 Amended Bulk Earthworks Plan

Source: AT&L

3.3.5 Retaining Walls

Similarly to the bulk earthworks described above, the amended development includes reconfigured retaining walls across the site. The location and description of the retaining walls of the amended development is outlined on the Retaining Wall General Arrangement Plans (20-776-C1080, C1081 and C1082) within the Civil Drawings (**Appendix G**).

The amended development includes retaining walls that vary in height along the internal lot boundaries. It also includes retaining walls along the northern, western and southern boundaries of the site which are illustrated on the Typical Boundary Sections (20-776-C1013, C1014 and C1015) of the Civil Drawings (**Appendix G**) and described in the following sections. No retaining walls are proposed along the eastern frontage to Aldington Road.

Northern Boundary

Along the northern boundary to the Dexus' site, a batter is proposed as an interim measure until the Dexus' site is developed. A Dexus Letter of Consent is provided at **Appendix NN** and outlines the commitment of both Frasers Property and Dexus in completing the works along the common boundary. A section of the proposed temporary batter and ultimate retaining wall (outlined in yellow) is provided in **Figure 12**. The batter comprises a 3-in-1 slope, grass lined swale as the plateau of the batter and rock lined swale as the toe of the batter.

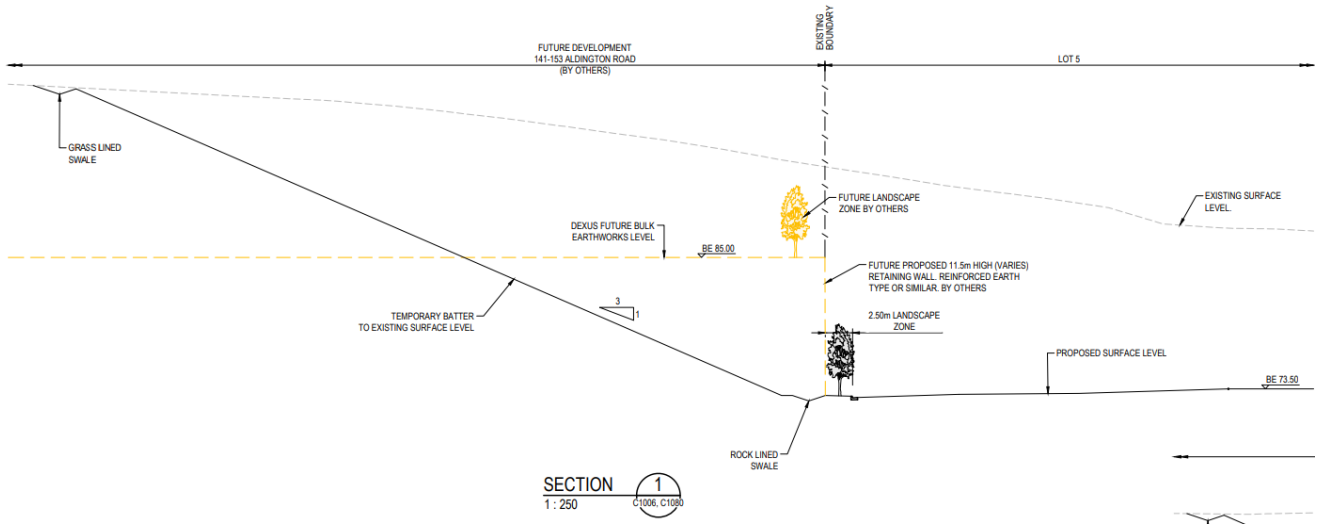
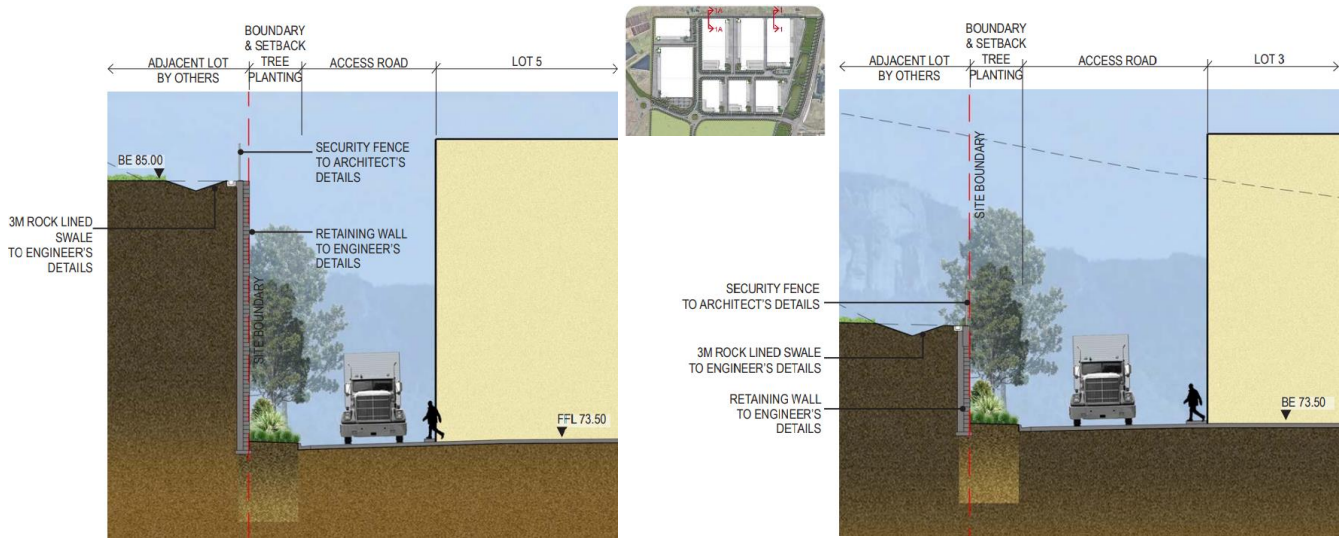


Figure 12 Section of Earthworks transition between Frasers Property and Dexus Site

Source: AT&L

The future retaining wall is located between two private property boundaries and does not adjoin the public domain. It ranges from approximately 11m to the eastern end of the boundary to 3.5m on the western end of the boundary with landscape sections of the ultimate northern boundary design provided in **Figure 13** below.



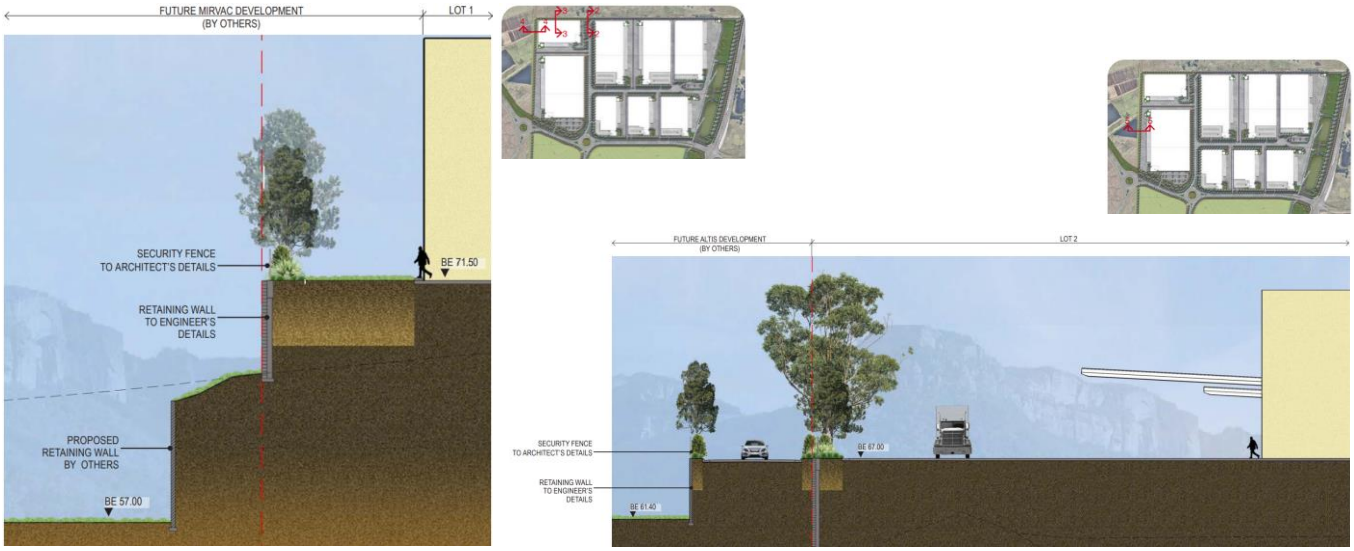
Section 1 *Section 1A*

Figure 13 Northern Boundary Retaining Wall – Landscape Sections

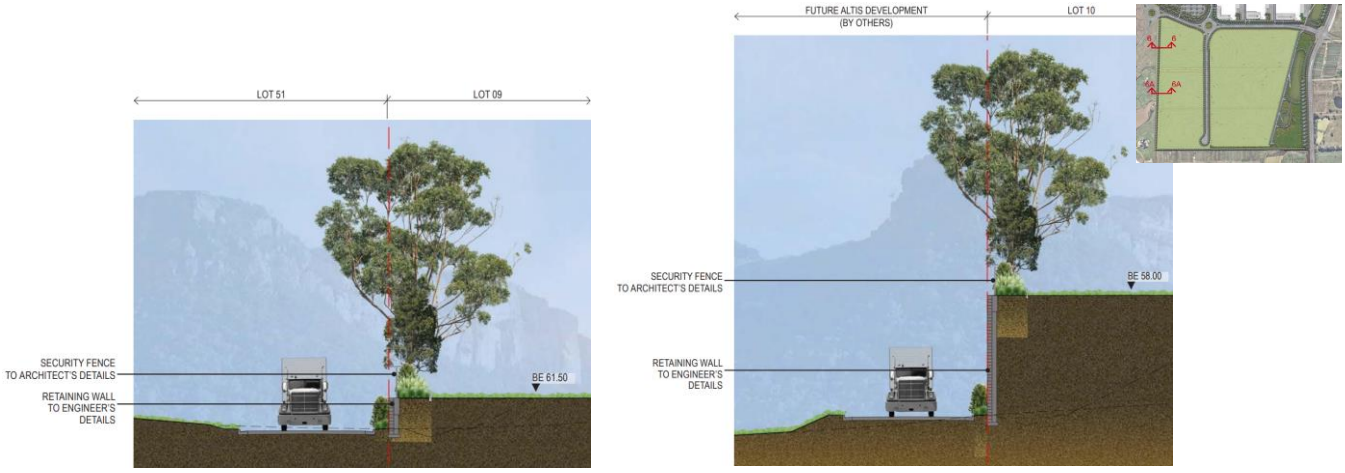
Source: AT&L

Western Boundary

The amended development comprises retaining walls along the western boundary adjoining Mirvac's and Altis's industrial estates to the west of the site. As illustrated in the landscape boundary sections in **Figure 14**, the northern end of the western boundary comprises an approximate 6m retaining wall that ties into Mirvac's proposed stepped retaining wall (section 4). The boundary along Lot 2 is on-grade to enable access to the dedicated freight line from Lot 2 (section 5). To the south of the collector road (Road 1) is a fill retaining wall that increases in height to Altis' site (Section 6/6A).



Section 4 *Section 5*



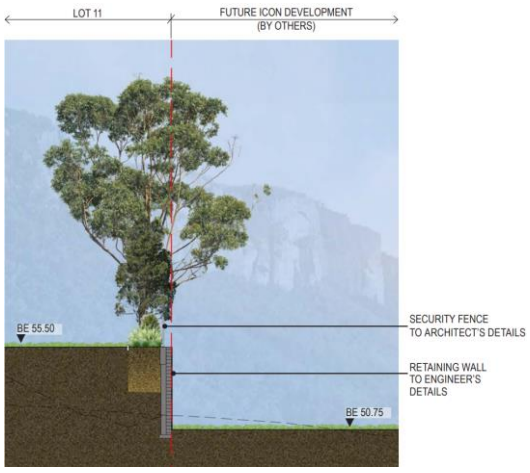
Section 6 *Section 6A*

Figure 14 Western Boundary Retaining Wall – Landscape Sections

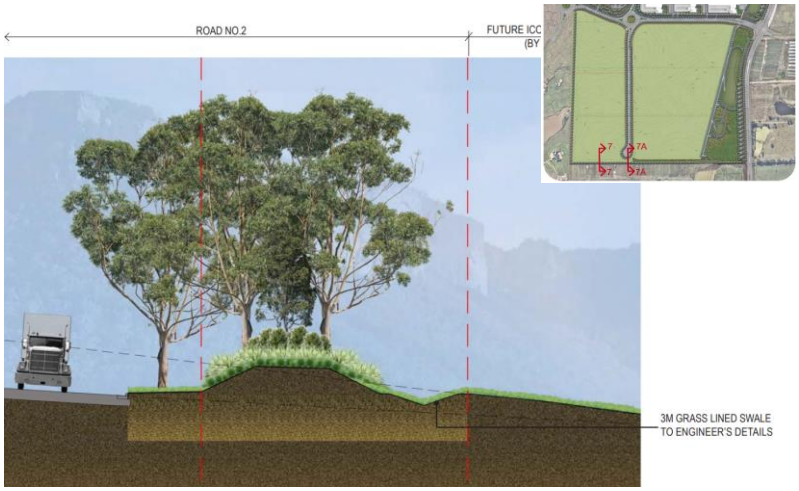
Source: AT&L

Southern Boundary

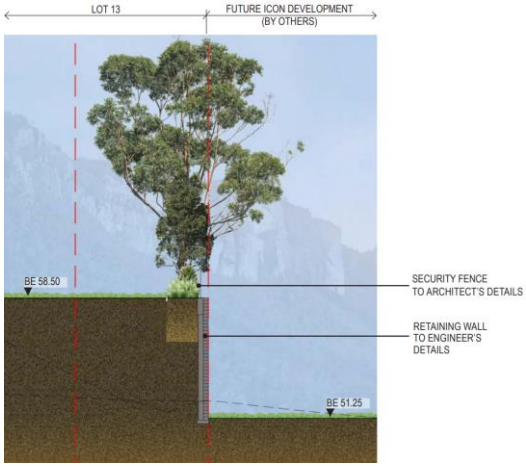
The amended development comprises retaining walls along the southern boundary adjoining Icon industrial estate to the south of the site. As illustrated in the landscape boundary section in **Figure 15**, the proposed fill retaining walls range up to 6.5m with the proposed cul-de-sac to be on-grade.



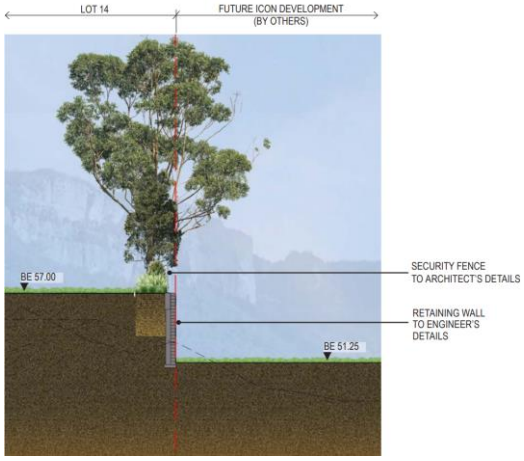
Section 7



Section 7A



Section 8



Section 9

Figure 15 Southern Boundary Retaining Wall – Landscape Sections

Source: AT&L

3.4 Site Servicing and Utilities

3.4.1 Stormwater Management

This section describes the proposed stormwater management of the amended development including the proposed post-development catchment and both stormwater quality and quantity management strategies. It is supported by Water and Stormwater Management Plan (WSMP) prepared by AT&L included at **Appendix R**.

Stormwater Infrastructure

The exhibited development comprised three (3) detention basins with two (2) located within the TransGrid easement fronting Aldington Road and one (1) located on Lot 3 (now known as Lot 2) that formed part of the trunk drainage infrastructure.

As outlined in **Section 2.3.2**, the MRP SSP has been released since the exhibition of the SSDA which included a more resolved version of the regional trunk drainage infrastructure proposed by Sydney Water in the Mamre Road Precinct. The MRP SSP outlined naturalised trunk drainage lines to be located within the Transgrid easement draining north to south along Aldington Road (eastern trunk drainage line) and on the western portion of the site drainage east to west (western trunk drainage line).

The eastern trunk drainage line is proposed to run through the Transgrid easement along the eastern portion of the site through four (4) detention basins (Basin A-D) that are connected via stormwater culverts that will connect to the south of the site. The western trunk drainage line is proposed to run adjacent to Road 1 and is positioned further to the south of the indicative location under the SSP.

For further discussion and assessment of the stormwater quality management strategy, refer to **Section 6.5.3**.

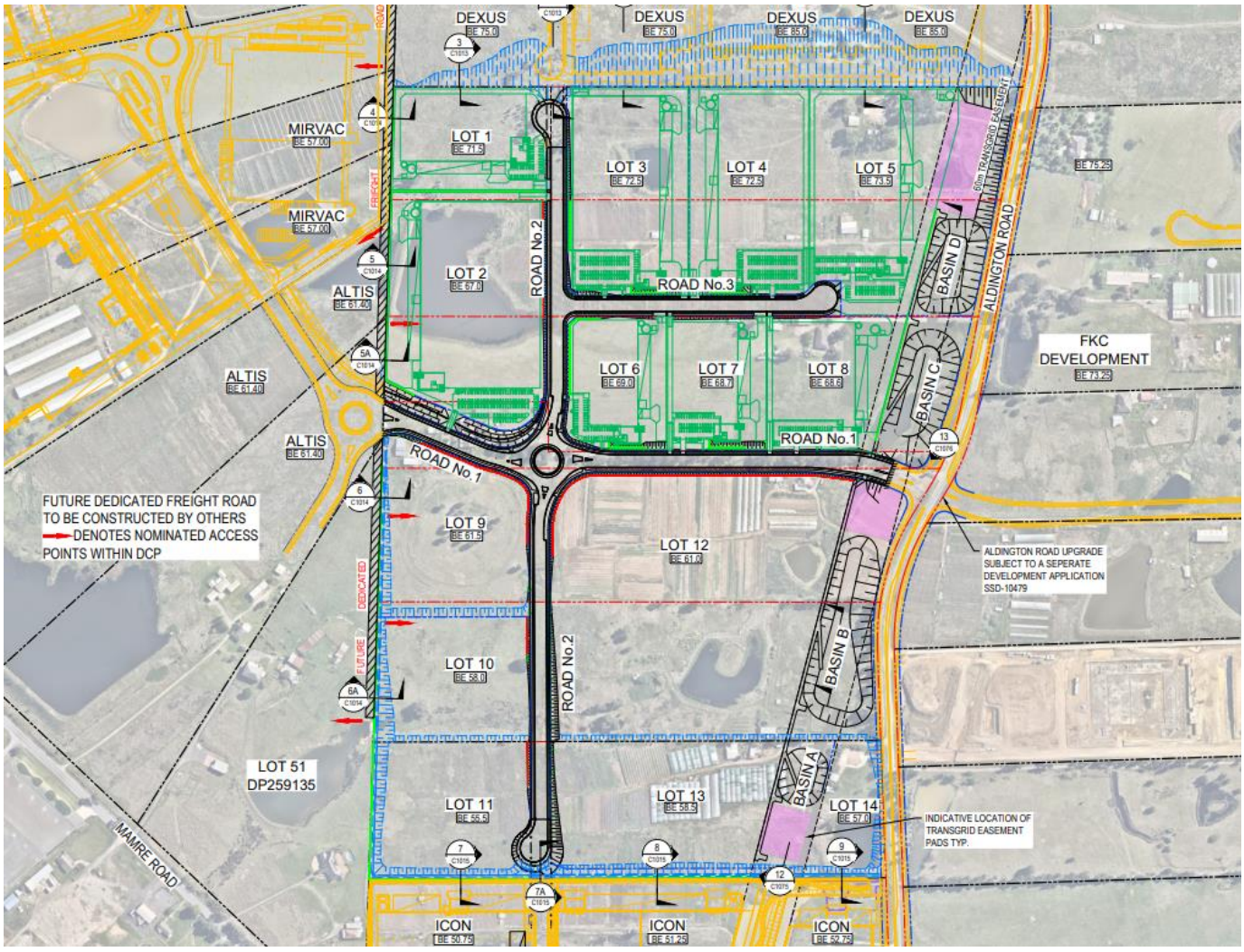


Figure 16 Amended General Arrangement Plan

Source: AT&L

Post-Development Catchments

A post-development catchment plan (20-776-C1065 and C1066) has been prepared by AT&L with the Civil Drawings (**Appendix G**) based on the amended bulk earthworks and is provided in **Figure 17** below. It comprises four (4) points of stormwater discharge from the site as described in **Table 7** following.

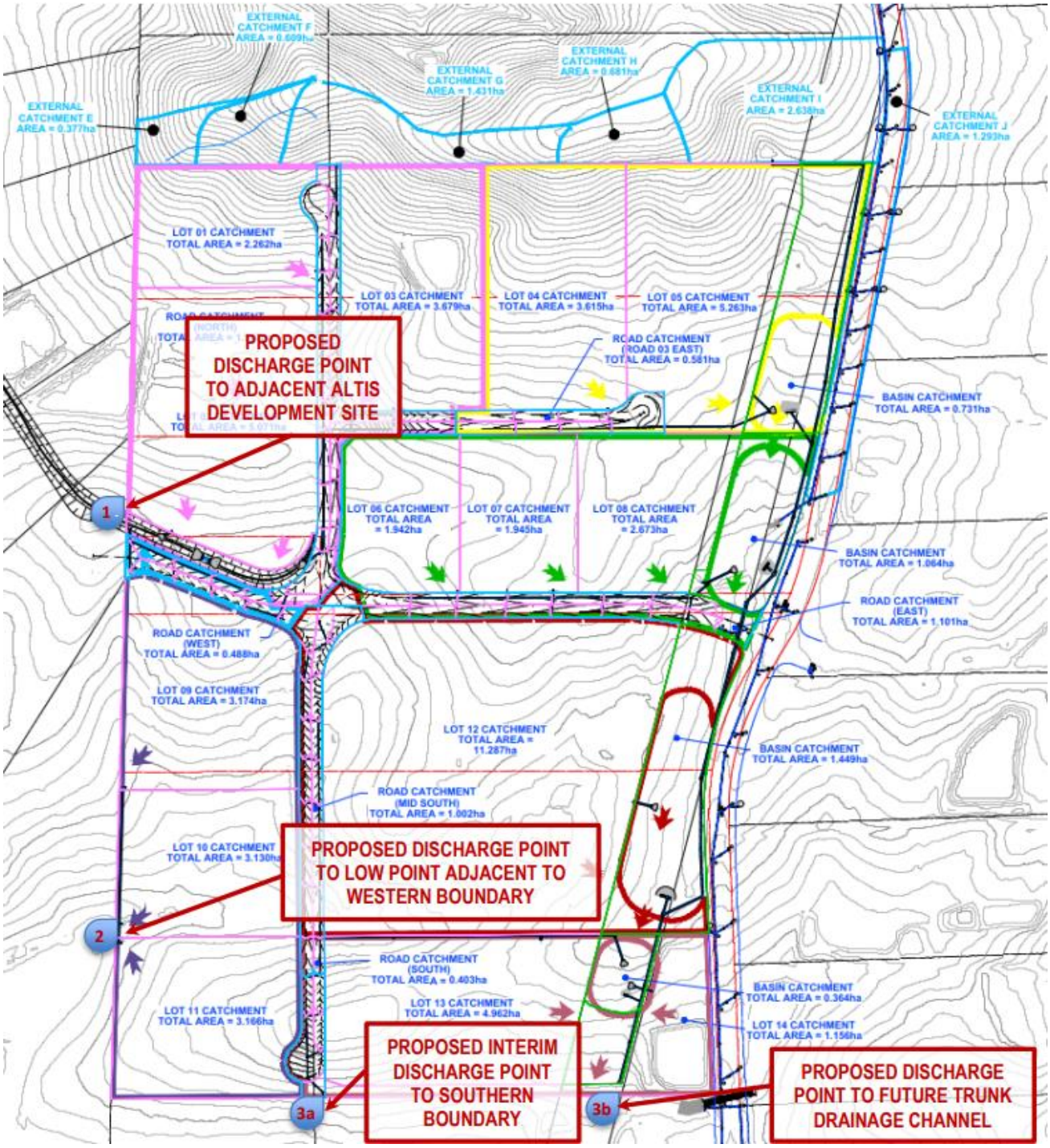


Figure 17 Proposed Post-Development Catchments

Source: AT&L

Table 7 Description of Post-Development Catchments

Discharge	Description
1	At the western boundary and towards the proposed Altis development (SSD-1764189) through the proposed trunk drainage channel. As outlined in **Appendix OO**, Altis and Frasers Property have been collaborating regarding the realignment of the trunk drainage channel that traverses the sites, with Atlis intending to lodge a modification to the SSD-1764189 following approval.
2	At the western boundary between proposed Lot 10 and Lot 11. Discharge to this point will be via an open channel and level spreader with appropriate outlet scour protection.
3a	At the southern boundary adjacent to proposed Road 2. In the interim, discharge at this point will be via an open channel and level spreader with appropriate outlet scour protection. This portion of the site will discharge towards the proposed Icon Oceania development (SSD-23480429). Ultimately, stormwater drainage will connect to an extension of Road 2 beyond the southern boundary of the site.
3b	At the southern boundary within the Transgrid easement. In the interim, discharge at this point will be via a level spreader with appropriate outlet scour protection. Ultimately, trunk drainage within the adjacent Icon Oceania site (SSD-23480429) will convey surface water runoff discharged at this point.

Source: AT&L

Stormwater Management Staging

The amended development proposes to connect to the MRP SSP once delivered. In advance of delivery of the MRP SSP, the WSMP presents an interim WSUD Strategy that will satisfy the stormwater quality, quantity (peak flow attenuation) and flow volumes targets outlined in the MRP DCP.

The ultimate arrangement will incorporate estate-based measures such as GPTs, estate-wide detention basins and detention tanks. These measures would be managed and maintained by the Applicant, with inspection and maintenance requirements. The MRP SSP will incorporate measures to manage stormwater quality and volume across the MRP and will be managed and maintained by Sydney Water.

Interim Arrangement

In advance of delivery of a regional stormwater scheme within the MRP, an interim stormwater management plan has been developed that will support the amended development.

The interim stormwater management plan is devised into (2) development phases, described as follows:

- **Phase 1** – Including the development of Lot 2 and supporting civil infrastructure; and
- **Phase 2** – Including the development of Lots 1 to 8 inclusive and supporting civil infrastructure.

The Phase 1 and Phase 2 interim stormwater management plans are illustrated in **Figure 18** and **Figure 19** on the following page. They include interim measures to address the operational stormwater quality as described in **Table 8** below.

Table 8 Stormwater Quality Management Strategy

Management Measure	Phase 1	Phase 2
Rainwater Tanks	Rainwater tank (or tanks) on proposed lot 2 to meet at least 80% demand for non-potable water (toilet flushing and landscape irrigation)	Rainwater tank (or tanks) on proposed Lots 1 to 8 inclusive to meet at least 80% demand for non-potable water.
Gross Pollutant Traps	On Lot 2	On Lots 1 to 8 inclusive
Detention Basins and Tanks	Basins A, B, C and D (within the Transgrid easement adjacent to Aldington Road) Tank on Lot 2	Basins A, B, C and D (within the Transgrid easement adjacent to Aldington Road) Tanks on Lots 1, 2 and 3
Sediment Basins	Oversized sediment basins with on-lot irrigation on Lot 1 and Lots 3-14 inclusive.	Oversized sediment basins with on-lot irrigation on Lots 10, 11, 13 and 14.
Stormwater Retention / Evaporation Ponds	-	Retention ponds to be incorporated on: • Lot 9 for storage and transfer of stormwater for irrigation of Lots 10-11. • Lot 12 for storage and transfer of stormwater for irrigation of Lots 13-14.

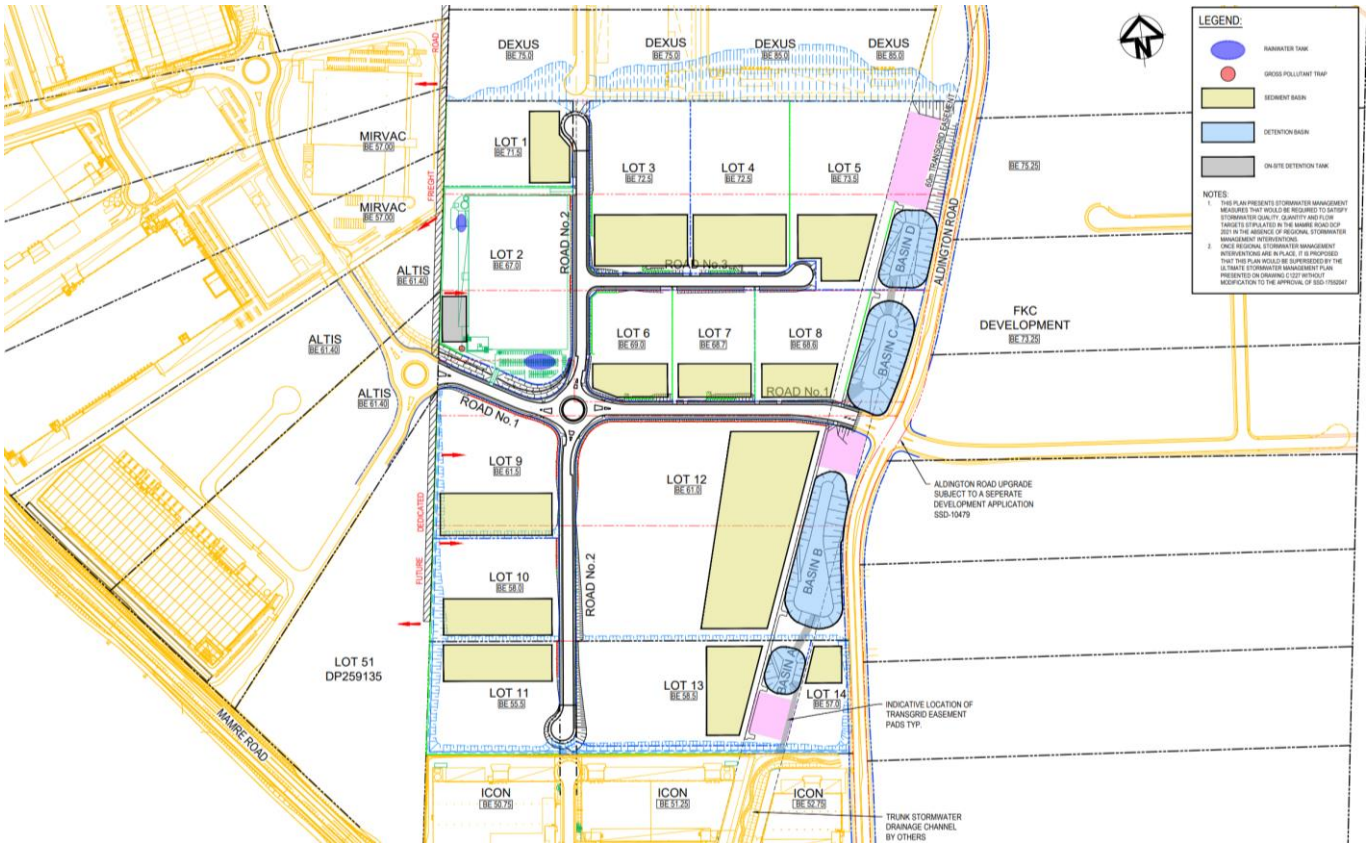


Figure 18 Phase 1 – Interim Stormwater Management Plan

Source: AT&L

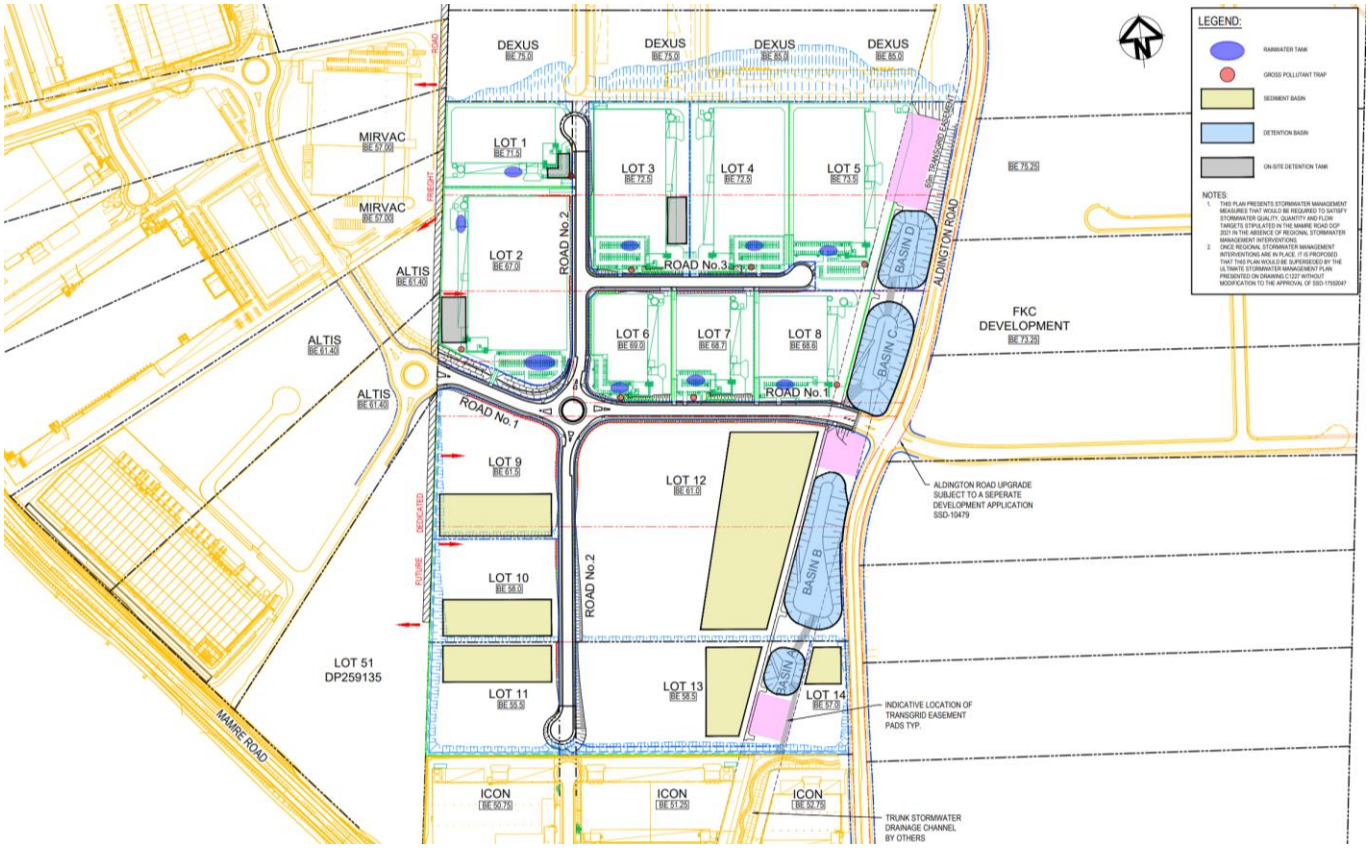


Figure 19 Phase 2 – Interim Stormwater Management Plan

Source: AT&L

Ultimate Arrangement

The ultimate stormwater management arrangement involves stormwater from the site discharging to the planned stormwater management measures presented on the MRP SSP (refer to **Section 2.3.2**). Based on the amended site plan and proposed bulk earthworks plan, a summary of the extent of the site that will discharge to future MRP SSP measures is described in **Table 9** below.

Table 9 Ultimate Post-Development Stormwater Catchments

Matter	North-West Catchment	South-Eastern Catchment	South-Western Catchment
Development	• Lots 1, 2 and 3; • Road 1 (west of roundabout); • Road 2 (north of roundabout); and • Road 3 (part)	• Lots 4, 5, 6, 7 and 8; • Lots 12, 13 and 14 • Road 1 (east of roundabout); and • Road 2 (south of roundabout)	• Lots 9, 10 and 11
Site Discharge Location	Proposed trunk drainage channel located on the western side of the site parallel to Road 1.	Series of detention basins within the site future trunk drainage channel within the adjacent site at 253-267 Aldington Road (subject to assessment under SSD-23480429)	Existing low point along the western site boundary through property at 930-966 Mamre Road.
Ultimate Location	**'North-west' cluster of wetlands and storage ponds (01-04)**	**'South-west' cluster of wetlands and storage ponds (13-14)**	**'South-west' cluster of wetlands and storage ponds (13-14)**

Source: AT&L

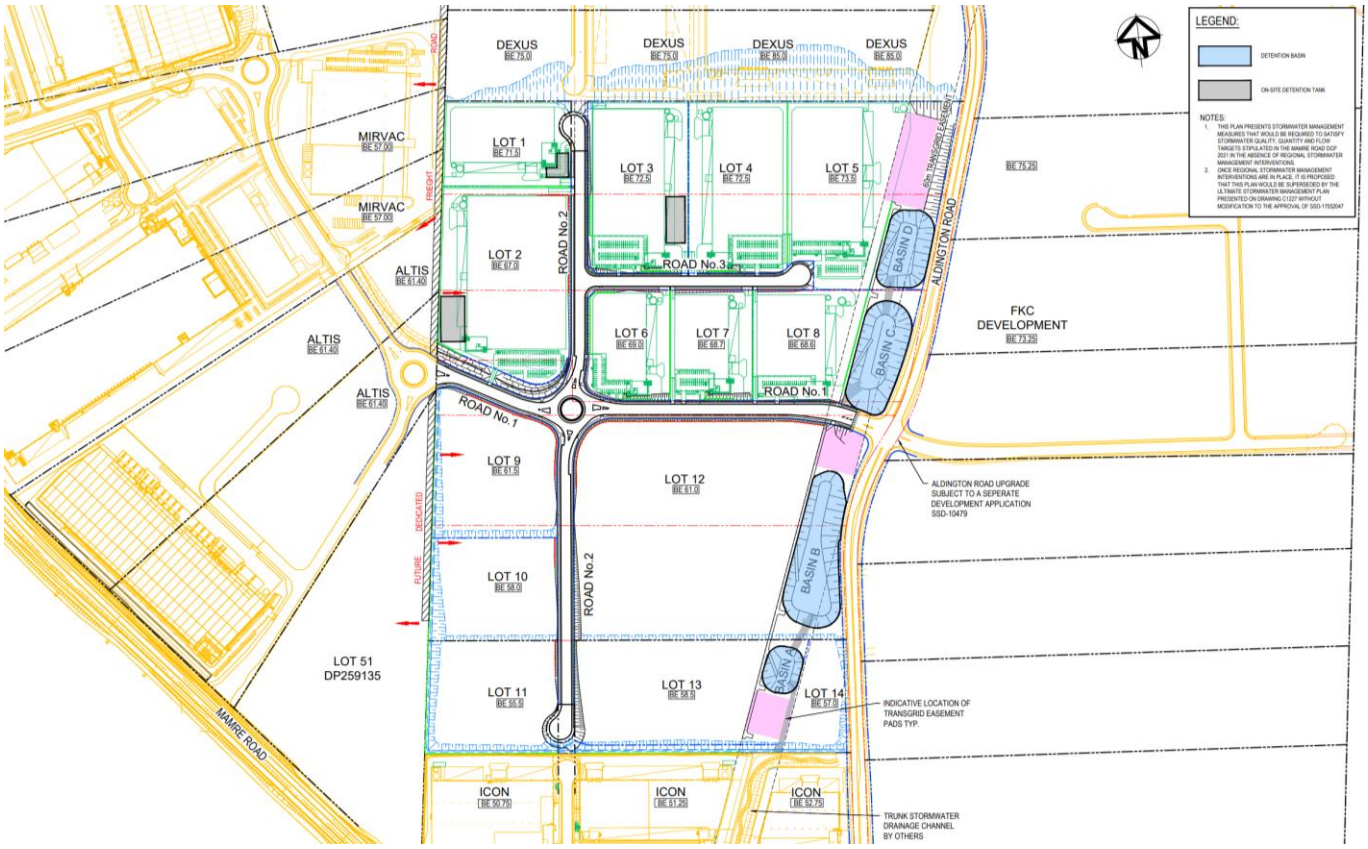


Figure 20 Ultimate Stormwater Management Plan

Source: AT&L

Stormwater Quality Management Strategy

As aforementioned, in advance of delivery of the MRP SSP, the WSMP presents an interim WSUD strategy that will include measures to satisfy the stormwater quality targets. These measures will be divided into two (2) phases as described above and outlined in **Table 8**. For a detailed description of the parameters for each of the stormwater management measures refer to the WSMP (**Appendix R**).

The ultimate arrangement will incorporate estate-based measures such as GPTs, estate-wide detention basins and detention tanks. These measures would be managed and maintained by the Applicant with inspection and maintenance requirements. The MRP SSP will incorporate measures to manage stormwater quality and volume across the MRP and will be managed and maintained by Sydney Water.

Stormwater Quantity Management Strategy

A stormwater quantity management strategy for the amended development has been prepared in reference to the MRP DCP and the MRP SSP. A summary of the stormwater quality management strategy is provided in **Table 10**.

Table 10 Key Detention Basin and Tank Parameters

Item	Catchment	Discharge
Basin A	• Lot 13 • Lot 14	Discharge 3b – Trunk drainage line located within the Transgrid easement.
Basin B	• Lot 12	Discharge 3b – Trunk drainage line located within the Transgrid easement.
Basin C	• Lot 6 • Lot 7 • Lot 8 • Road 1 – east of the roundabout	Discharge 3b – Flows up to 1% AEP to discharge to proposed trunk drainage line located within the Transgrid easement. Emergency overflow towards sag in Road 1 and ultimately towards Basin B.
Basin D	• Lot 4 • Lot 5	Discharge 3b – Flows up to 1% AEP to discharge to proposed trunk drainage line located within the Transgrid easement. Emergency overflow towards Basin C.
Lot 1 OSD Tank	Roof and hardstand surfaces on Lot 1.	Proposed stormwater drainage system on the western side of Road 2.
Lot 2 OSD Tank	Roof and hardstand surfaces on Lot 2.	Proposed trunk drainage channel between Lot 2 and Road 2.
Lot 3 OSD Tank	Roof and hardstand surfaces on Lot 3.	Proposed stormwater drainage system on the northern side of Road 3.
Lot 9 OSD Tank (subject to future built form DA)	Roof and hardstand surfaces on Lot 9.	Inter-allotment drainage line through Lot 10.
Lot 11 OSD Tank (subject to future built form DA)	Roof and hardstand surfaces on Lot 11.	Inter-allotment drainage line through Lot 10.

Source: AT&L

3.4.2 Road Network

Internal Road Network

The internal road network (as illustrated in **Figure 21**) has been amended from the exhibited development to:

- Include an additional local industrial road (Road 3);
- Realign the western portion of Road 1 to reflect the amended roundabout location and design proposed by Altis under SSD-1764189; and
- Extend Road 2 further south to the amended site boundary.

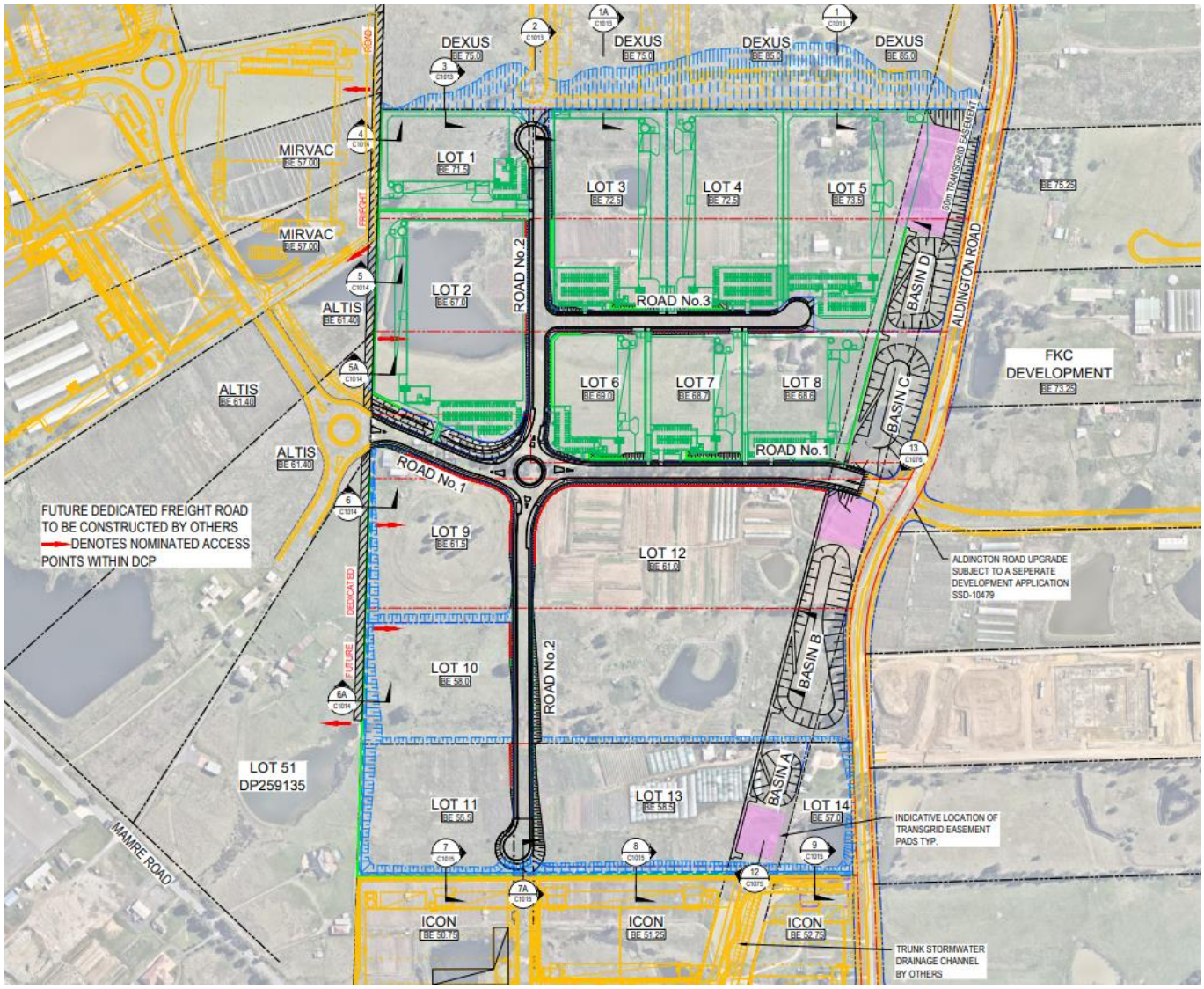


Figure 21 Amended General Arrangement Plan

Source: AT&L

As per the exhibited development, a cul-de-sac to Dexus' site to the north is proposed in the interim until Dexus's development is complete. The following changes to the detailed design of the road are as follows:

- Road 1 has been amended from 25.2m to 25.6m in width as a result of an increase in the parking lane by 0.2m on each side; and
- Road 2 remains substantially the same with only minor changes to the street reserve gradient.

The new Road 3 includes the same design specifications as Road 2. Detailed sections of Road 1 and Road 2/3 are provided below in **Figure 23** and **Figure 22** respectively.

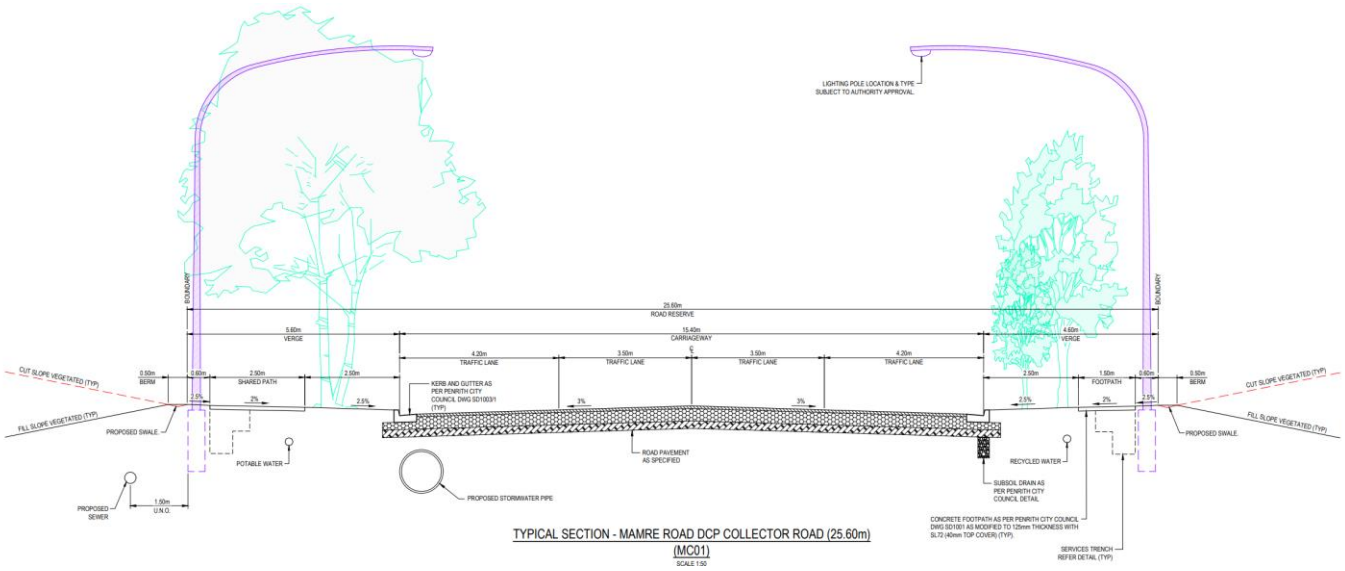


Figure 22 Road 1 – Typical Section

Source: AT&L

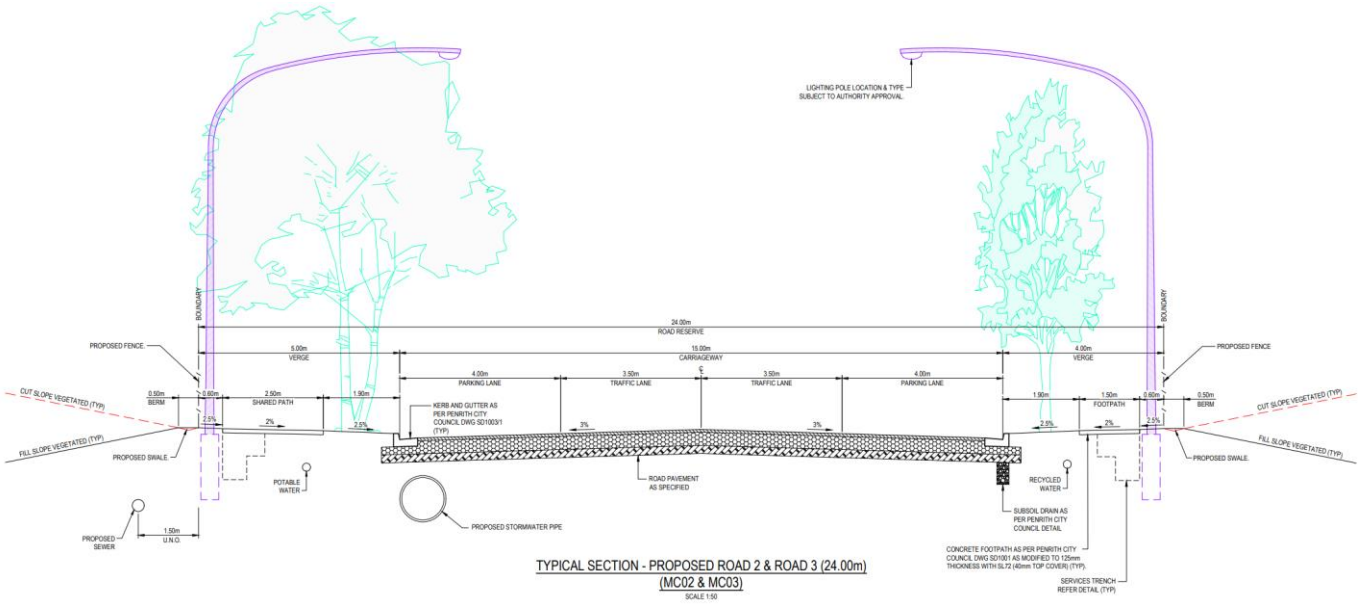


Figure 23 Road 2 and 3 – Typical Section

Source: AT&L

External Road Network

The amended development will connect to the external road network via a future signalised intersection along Aldington Road. In response to no staging strategy being established by government agencies, a landowners group for the Aldington Road upgrades has been established and known as Land Owners Group East (LOG-E).

LOG-E are in negotiation with the DPE and Penrith City Council to contribute to transport upgrades consistent with the road network described in the MRP DCP. This includes the upgrade and signalisation of the Mamre Road intersection at Mamre Road. It also includes the widening of Aldington Road and Abbotts Road which requires the dedication of LOG-E owned land along the road frontages. This involves construction of new signalised intersections on Aldington Road, including one which will form the main access to the Edge Estate.

The upgrades are proposed to be undertaken as part of Planning Agreements with NSW Government and Penrith City Council, respectively. The Planning Agreements are in advanced stages of negotiations and are expected to be executed by the end of 2023, with construction to commence early 2024.

The adopted Aldington Road Civil Works Package prepared by AT&L on behalf of LOG-E is included at **Appendix G** with the Roadwork Plan for the intersection to the amended development provided in **Figure 24**.

The amended development also connects to Altis' development to the west via the east-west collector road (Road 1), which has been aligned with Altis' proposed roundabout design. As aforementioned, the amended development will also connect to Dexus' site to the north via Road 2 once Dexus' development is complete.

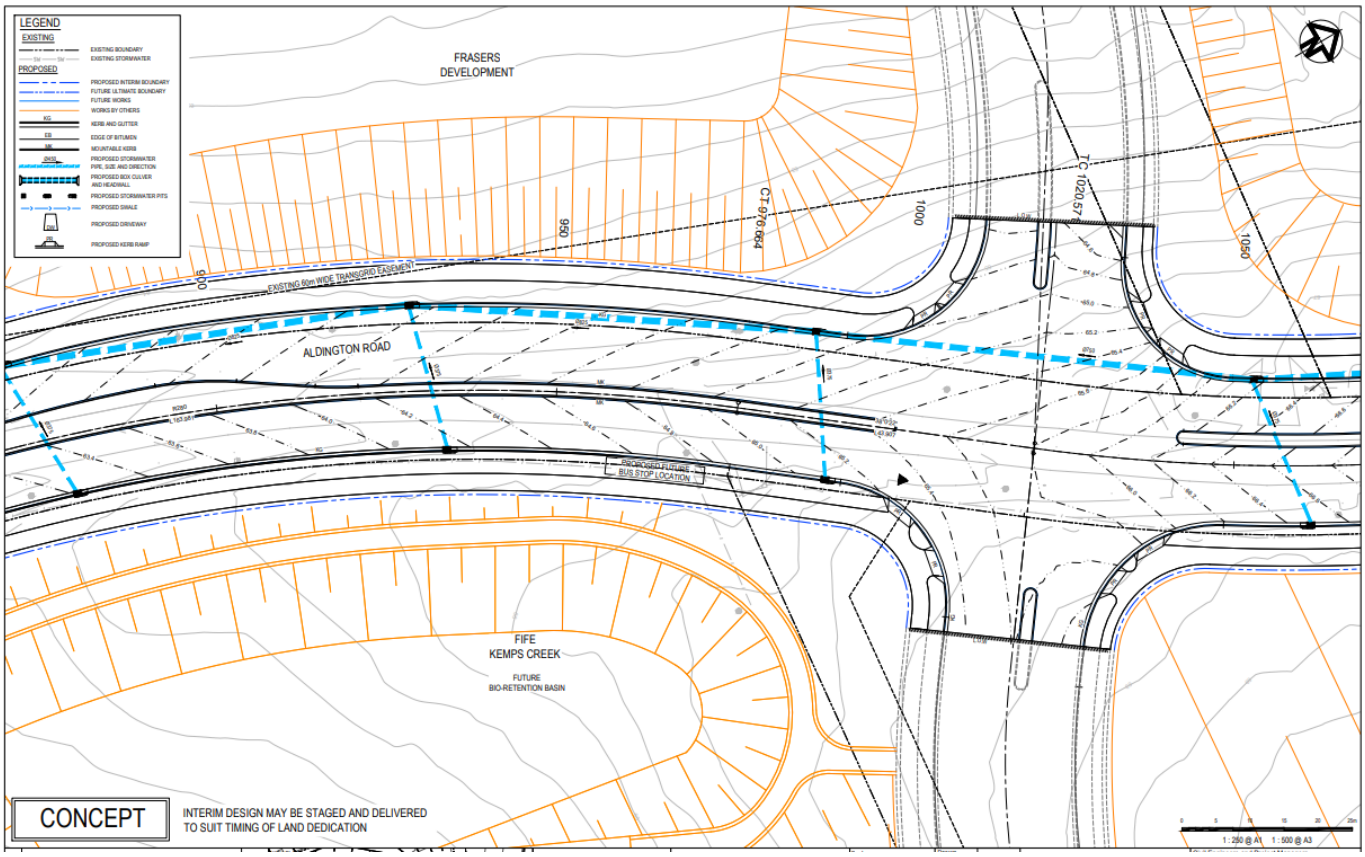


Figure 24 Collector Road (Road 1) and Aldington Road Intersection Roadworks Plan

Source: AT&L

Dedicated Freight Corridor

The amended development proposes to connect to the Dedicated Freight Corridor which is established in the MRP DCP. The Dedicated Freight Corridor is located on the western side of the western site boundary.

The Dedicated Freight Corridor Drawings prepared by AT&L are included at **Appendix G**. As illustrated in **Figure 25** below, the amended development will connect to the Dedicated Freight Corridor on Lot 2, 9 and 10.

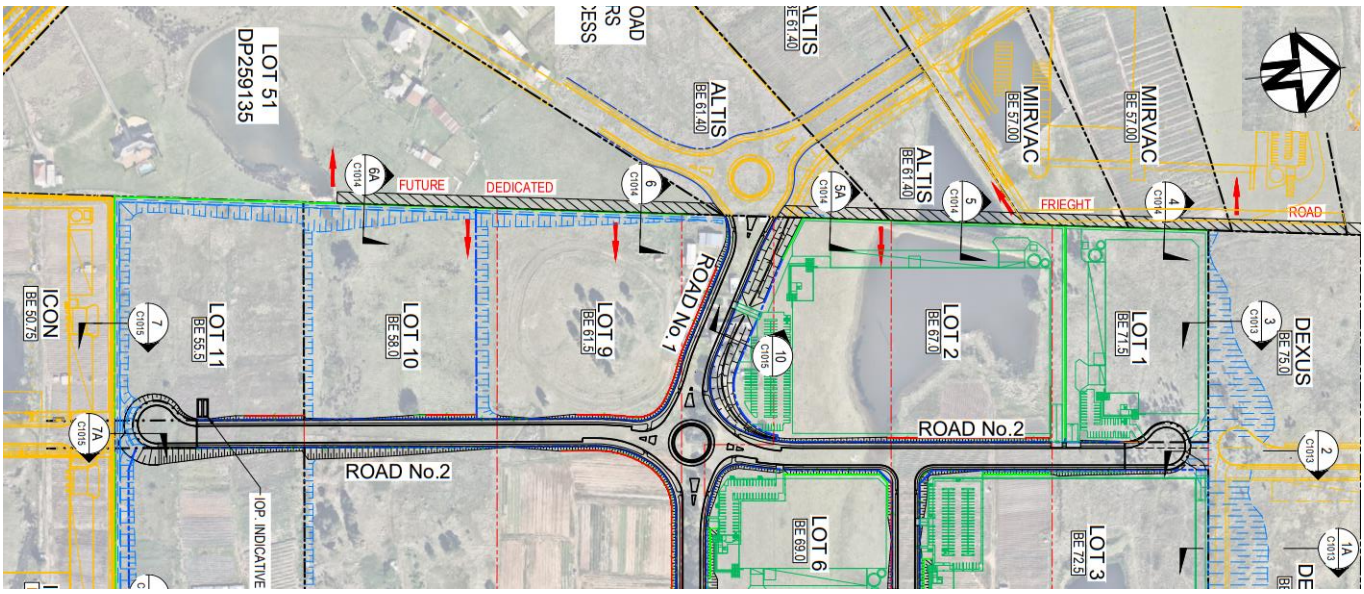


Figure 25 General Arrangement Plan – Dedicated Freight Corridor

Source: AT&L

3.4.3 Transgrid Easement

The amended development includes drainage basins, landscaping, Road 1 and hardstand area for Lot 5 and 8 within the 60m wide Transgrid easement area. The amended General Arrangement Plan (**Figure 21**) includes indicative locations for Transgrid easement pads shaded in pink. The Applicant has consulted with Transgrid (refer to **Appendix MM**), who is supportive of the proposed civil design presented within the Civil Drawings (**Appendix G**).

3.5 Subdivision

The amended development, as a result of the inclusion of additional land, amendments to the proposed development and inclusion of Road 3, has been reconfigured and increased from nine (9) to fourteen (14) development lots.

An amended Lot Subdivision Plan (DA-A102) has been prepared by Frasers Property within the Architectural Drawings (**Appendix D**) and is provided in **Figure 26**. A detailed description of the exhibited and amended development subdivision is provided in **Table 11** following.

Figure 26 Amended Lot Subdivision Plan

Source: Frasers Property

Table 11 Lot Subdivision Comparison

Lot	Exhibited Lot Area	Current Lot Area
Lot 1	27,355m^2	22,612m^2
Lot 2	27,766m^2	55,005m^2
Lot 3	27,127m^2	36,784m^2
Lot 4	31,841m^2	36,162m^2
Lot 5	30,426m^2	60,219m^2
Lot 6	33,271m^2	19,338m^2
Lot 7	30,658m^2	19,447m^2
Lot 8	43,236m^2	37,440m^2
Lot 9	141,281m^2	35,091m^2
Lot 10	-	27,956m^2
Lot 11	-	31,075m^2
Lot 12	-	127,492m^2
Lot 13	-	49,166m^2
Lot 14	-	15,893m^2
Proposed Access Roads	31,372m^2	50,047m^2
Aldington Road Dedication Zone	4,869m^2	9,160m^2
Total	**430,202m^2**	**632,887m^2**

3.6 Use Activities and Operation

3.6.1 Use and Activities

The amended development still constitutes development for the purposes of *Warehouse or distribution centres*. The proposed warehouse and distribution centres will operate 24 hours 7 days a week at a regional and national scale. The office space on each lot will support the operation of each warehouse and constitutes an ancillary use.

It is noted that the fit-out of the office space is proposed, however, the proposed warehouse and distribution centres constitute 'spec-warehouses' with no fit-out proposed with it being subject to a separate future approval process. Further discussion regarding legal definition and permissibility of the proposed uses is included at **Section 4.2**.

3.6.2 Construction and Operation Hours

The proposed construction hours remain unchanged:

- Monday to Friday 7am to 6pm;
- Saturday 8am to 1pm; and
- No work on Sundays or public holidays.

The proposed hours of operation for the estate and each individual building also remain unchanged being 24 hours a day, 7 days a week.

3.7 Built Form and Layout

3.7.1 Overview

The amended development includes an increase in the proposed number of warehouse and distribution centres to be built from two (2) to eight (8). As a result of the increase in warehouse and distribution centre, the total GFA has increased from 65,327m^2 to 153,343m^2.

The built form as amended is located on the northern portion of the site and connects to either the collector road (Road 1) or the local industrial roads (Roads 2/3). Each lot comprises segregated light and heavy vehicle entrances and is designed to address the primary frontage with the ancillary office space and car parking positioned along the primary frontage.

Lots 2, 6, 7 and 8 include light vehicle access from Road 1 and ancillary office space that address Road 1, while heavy vehicle access is at the rear of site via Road 2 or 3. The remaining Lot 1, 3, 4 and 5 also include segregated light and heavy vehicle access with ancillary office space that address the primary frontage along Road 2 and 3.

The amended development also includes the addition of undercroft car parking on Lot 3, 4, 5, 6, 7 and 8 that utilises the transitioning bulk earthworks levels.

An excerpt of the amended development site plan is provided in **Figure 27** below that illustrates the layout of the proposed built form.

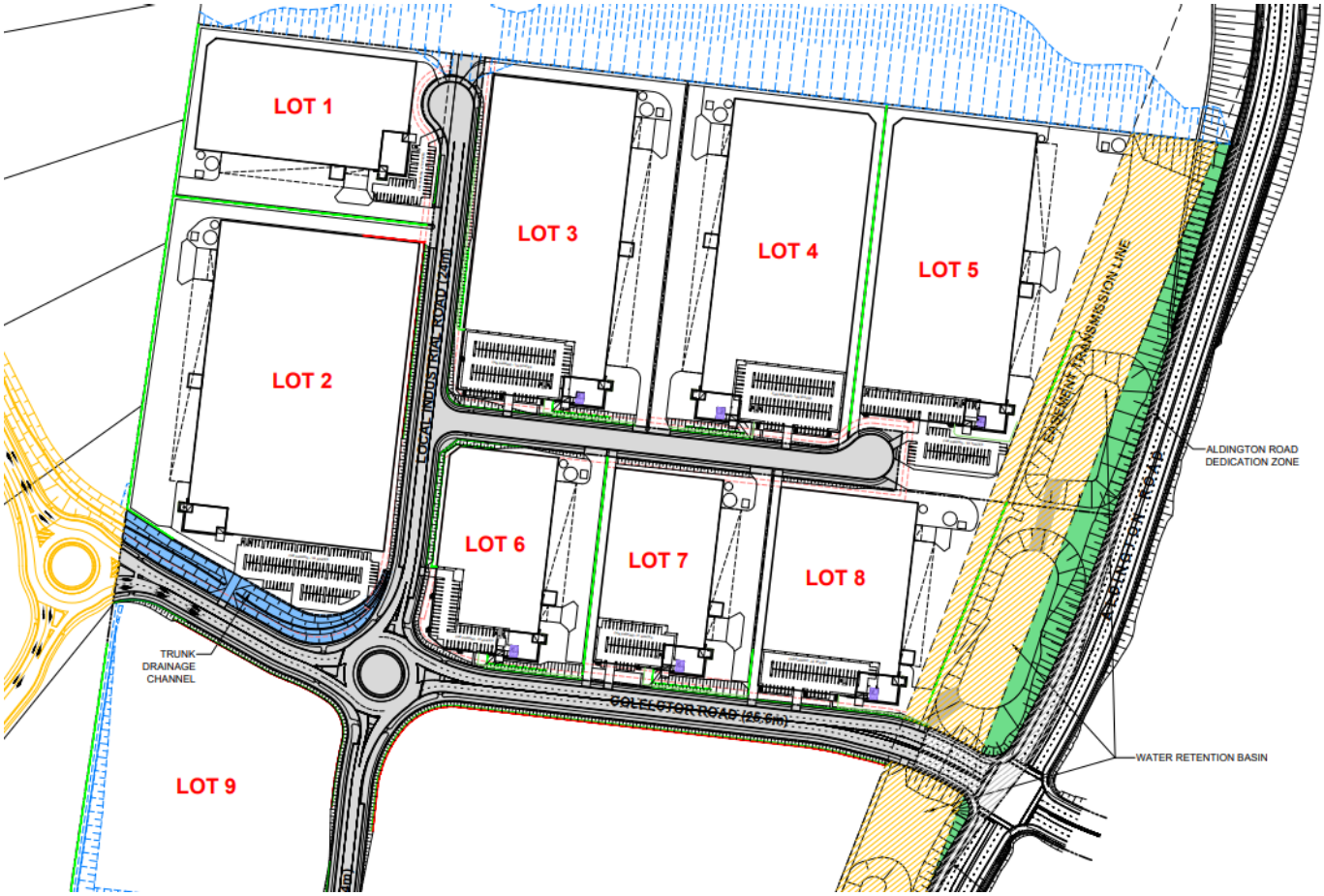


Figure 27 Amended Site Plan – Built Form

Source: Frasers Property

Perspective renders that depict the typical built form of the amended development are provided in **Figure 28** and **Figure 29** respectively on the following page. Following that are the elevation drawings of Warehouse 2 (**Figure 30** to **Figure 33**) that depict the typical built form.

Figure 28 Indicative Perspective Render of a typical Warehouse and Distribution Centre

Source: Frasers Property

Figure 29 Perspective Render of a typical ancillary Office

Source: Frasers Property

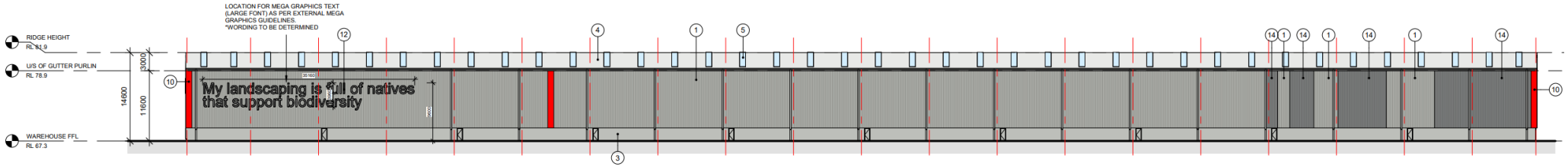


Figure 30 East Elevation – Warehouse 2

Source: Frasers Property

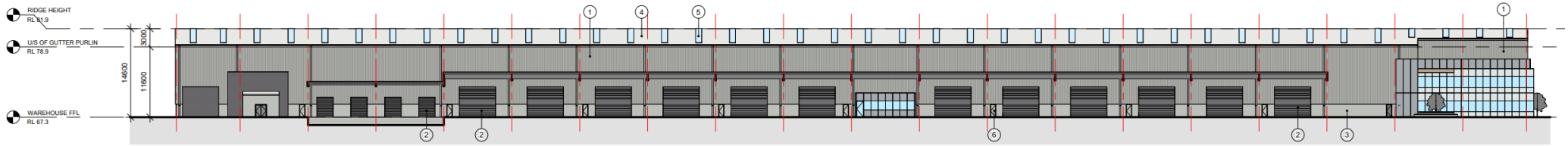


Figure 31 West Elevation – Warehouse 2

Source: Frasers Property

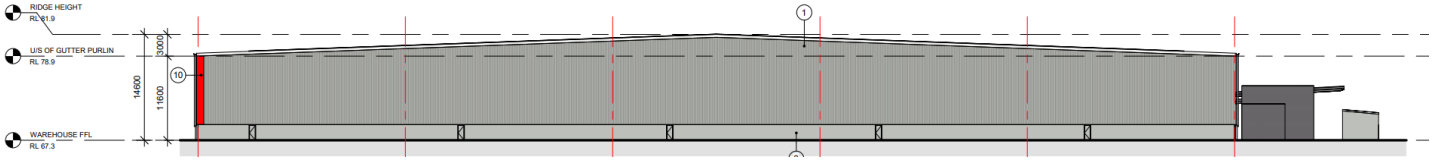


Figure 32 North Elevation – Warehouse 2

Source: Frasers Property

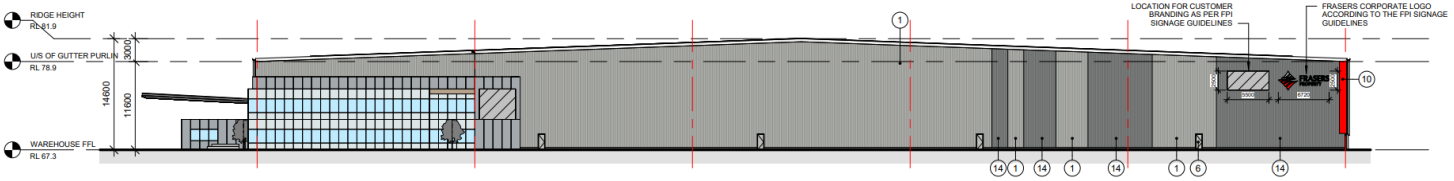


Figure 33 South Elevation – Warehouse 2

Source: Frasers Property

3.7.2 Detailed Overview

A detailed overview of the amended developments eight (8) warehouse and distribution centres is provided in **Table 12** below.

Table 12 Detailed Built Form Overview

Warehouse	Component	Description
Warehouse 1	**Site Area**	22,612m^2
	Gross Floor Area	• Warehouse = 11,710m^2 • Office = 515m^2 • Dock Office = 100m^2 Total = 12,325m^2
	Car Parking	41 spaces
	Loading Docks	10 (7 on-grade, 3 recessed)
	Building Height	14.6m
Warehouse 2	**Site Area**	55,005m^2
	Gross Floor Area	• Warehouse = 31,610m^2 • Office = 988m^2 • Dock Office = 100m^2 Total = 32,768m^2
	Car Parking	135(133 required)
	Loading Docks	16 (12 on-grade, 4 recessed)
	Building Height	14.6m
Warehouse 3	**Site Area**	36,784m^2
	Gross Floor Area	• Warehouse = 23,210m^2 • Office = 1,007m^2 • Dock Office = 100m^2 Total = 24,317m^2
	Car Parking	106
	Loading Docks	17 (13 on-grade, 4 recessed)
	Building Height	• 14.6m along the eastern and northern elevation; and • 18.1m along western and southern elevation where undercroft parking is provided.
Warehouse 4	**Site Area**	36,162m^2
	Gross Floor Area	• Warehouse = 23,110m^2 • Office = 1,007m^2 • Dock Office = 100m^2 Total = 24,217m^2
	Car Parking	105
	Loading Docks	17 (13 on-grade, 4 recessed)
	Building Height	• 14.6m along the western and northern elevation; and • 18.1m along eastern and southern elevation where undercroft parking is provided.

Warehouse	Component	Description
Warehouse 5	**Site Area**	60,219m^2
	Gross Floor Area	• Warehouse = 21,680m^2 • Office = 1,007m^2 • Dock Office = 100m^2 Total = 22,787m^2
	Car Parking	100
	Loading Docks	16 (12 on-grade, 4 recessed)
	Building Height	• 14.6m along the eastern and northern elevation; and • 18.1m along western and southern elevation where undercroft parking is provided.
Warehouse 6	**Site Area**	19,338m^2
	Gross Floor Area	• Warehouse = 10,800m^2 • Office = 513m^2 • Dock Office = 100m^2 Total = 11,413m^2
	Car Parking	52
	Loading Docks	9 (7 on-grade, 2 recessed)
	Building Height	• 14.6m along the eastern and northern elevation; and • 18.1m along western and southern elevation where undercroft parking is provided.
Warehouse 7	**Site Area**	19,447m^2
	Gross Floor Area	• Warehouse = 10,490m^2 • Office = 513m^2 • Dock Office = 100m^2 Total = 11,103m^2
	Car Parking	51
	Loading Docks	9 (6 on-grade, 3 recessed)
	Building Height	• 14.6m along the eastern and northern elevation; and • 18.1m along western and southern elevation where undercroft parking is provided.
Warehouse 8	**Site Area**	37,440m^2
	Gross Floor Area	• Warehouse = 13,800m^2 • Office = 513m^2 • Dock Office = 100m^2 **Total = 14,413m^2**
	Car Parking	62
	Loading Docks	9 (7 on-grade, 2 recessed)
	Building Height	• 14.6m along the eastern and northern elevation; and • 18.1m along western and southern elevation where undercroft parking is provided.

3.8 Landscaping

The amended development includes a revised landscape design that is detailed within the Landscape Drawings prepared by Habit8 included at **Appendix K**.

The amended landscape site plan is provided in **Figure 34** which illustrates and describes the revised landscaping across the site with further consideration given to the planting across the site including the Transgrid easement, along the Aldington Road frontage, on-lot and within the street reserves.

The amended development, including the increase in number of warehouse and distribution centres and revied landscape design has enabled the total number of trees to be planted to increase significantly to 2,566 trees compared to 690 trees as exhibited.

As outlined in **Table 13**, this results in a tree canopy coverage of 15.58% across the entire site, noting that Lots 9-13 are still yet to be developed and will include further additional planting. It is noted that Lots 9-13 will be planted with grass in the interim until developed.

Table 13 Landscape Area and Tree Canopy Coverage

Item	Area	Percentage
Landscape Area	117,542m^2	18.57%
Canopy Coverage	100,260m^2	15.84%

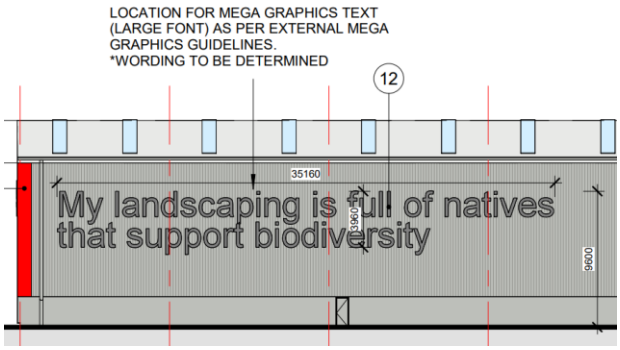
Figure 34 Amended Landscape Site Plan

Source: Habit8

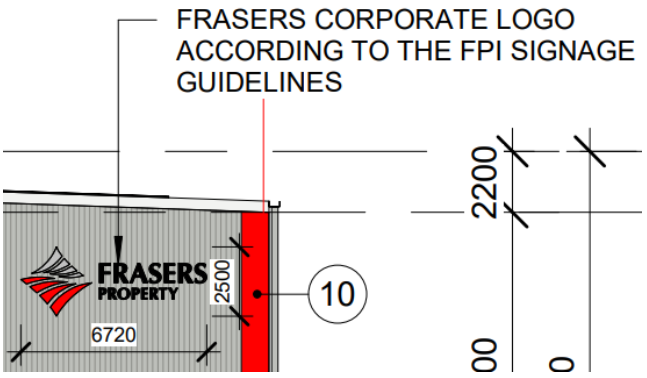
3.9 Signage

The amended development comprises signage on each warehouse located on the façade for the purpose of business identification. The proposed signage, as amended, is generally consistent with that exhibited. However, pylon signage is now not included as part of the Amended Application.

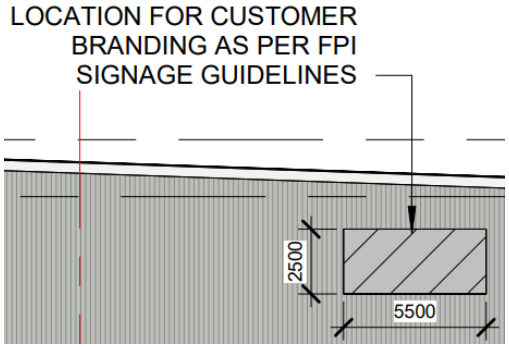
The amended developments proposed signage types are illustrated in **Figure 35** below with a detailed description of the signage provided in **Table 14** following.



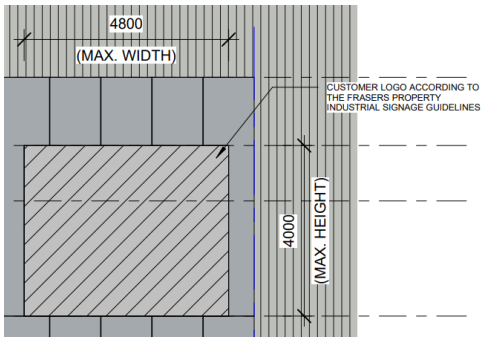
Mega Graphic



Frasers Logo



Tenant Warehouse Signage



Frasers Office Signage

Figure 35 Warehouse Signage Extract

Source: Frasers Property

Table 14 Signage Details

Warehouse	Description	Elevation	Dimensions (height x width) (mm)	Signage Zones	Illumination
Warehouse 1	Frasers Logo	East	2,500 x 6,720	No	Yes
	Tenant Warehouse Signage	East	2,500 x 5,000	Yes	Yes
	Tenant Office Signage	East	2,900 x 3,600	Yes	Yes
Warehouse 2	Frasers Logo	South	2,500 x 6,720	No	Yes
	Tenant Warehouse Signage	South	2,500 x 5,500	Yes	Yes
	Tenant Office Signage	South	4,800 x 4,000	Yes	Yes
	Mega Graphic	East	3,960 x 35,160	Yes	No
Warehouse 3	Frasers Logo	South	2,500 x 6,720	No	Yes
	Tenant Warehouse Signage	South	2,500 x 5,500	Yes	Yes
	Tenant Office Signage	South	4,800 x 4,000	Yes	Yes
	Mega Graphic	West	3,960 x 35,160	Yes	No

Warehouse	Description	Elevation	Dimensions (height x width) (mm)	Signage Zones	Illumination
Warehouse 4	Frasers Logo	South	2,500 x 6,720	No	Yes
	Tenant Warehouse Signage	South	2,500 x 5,500	Yes	Yes
	Tenant Office Signage	South	4,800 x 4,000	Yes	Yes
Warehouse 5	Frasers Logo	East	2,500 x 6,720	No	Yes
	Tenant Warehouse Signage	South	2,500 x 5,500	Yes	Yes
	Tenant Office Signage	South	4,800 x 4,000	Yes	Yes
Warehouse 6	Frasers Logo	South	2,500 x 6,720	No	Yes
	Tenant Warehouse Signage	South	2,500 x 5,500	Yes	Yes
	Tenant Office Signage	East	2,900 x 3,600	Yes	Yes
Warehouse 7	Tenant Warehouse Signage	South	2,500 x 5,500	Yes	Yes
	Tenant Office Signage	East	2,900 x 3,600	Yes	Yes
	Mega Graphic	South	2,660 x 23,560	Yes	No
Warehouse 8	Frasers Logo	East	2,500 x 6,720	No	Yes
	Tenant Warehouse Signage	South	2,500 x 5,500	Yes	Yes
	Tenant Office Signage	East	2,900 x 3,600	Yes	Yes

3.10 Staging and Delivery

The amended development will be constructed in one stage and does not constitute staged development as defined under section 4.22 of the EP&A Act. This amended development seeks consent for the development of eight (8) warehouse and distribution centres located on Lots 1-8 with future development on Lots 9-14 subject to future DAs.

Due to the nature of the development it wis expected to be carried out over in two phases.:

- **Phase 1** – The first phase will include site preparation works and site servicing and utilities across the site to establish a building pad for each Lot. Due to the magnitude of cut and fill proposed and construction of retaining walls, this will form a significant part of the construction phase. This phase will include the construction of Basin's A-D as well as sediment basins of each residual lot. This phase will include the constriction of Warehouse 2 (Lot 2).
- **Phase 2** – The second phase will involve the construction of the remaining Warehouses 1, 3-8 (Lots 1, 3-8) and associated works.

A Construction Management Plan (CEMP)will be developed by the appointed contractor to manage on-site works and impacts. It will provide a detailed description of the phasing and delivery of the development.

4.0 Statutory Context

This Amendment Report supports an amendment to the Edge Estate SSDA (SSD-17552047) under clause 37 of the EP&A Regulation. This section provides an updated planning and environmental assessment of the amended development against the relevant statutory considerations.

This section is supported by an updated Statutory Compliance Table included at **Appendix B** that identifies all statutory requirements and where those requirements have been addressed in the Amendment Report.

4.1 Power to Grant Approval

The legislative pathway under which the consent is sought, why the pathway applies, and the relevant consent authority remain unchanged for the amended development, as outlined in **Table 15** below.

Table 15 Power to Grant Consent

Matter	Consideration
Declaration of State Significant Development	Development consent will be sought under 'Division 4.7 – Stage Significant Development' of the EP&A Act. Section 4.36(2) of the EP&A Act states that: *A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.* Schedule 1 of *State Environmental Planning Policy (Planning Systems) 2021* lists development that is declared State significant development. Clause 12 of Schedule 1 states: 1. *Development that has a capital investment value of more than the relevant amount for the purpose of warehouses or distribution centres (including container storage facilities) at one location and related to the same operation.* 2. *This section does not apply to development for the purposes of warehouses or distribution centres to which section 18 or 19 applies.* 3. *In this section—* *relevant amount means—* *a) for development in relation to which the relevant environmental assessment requirements are notified under the Act on or before 31 May 2023—$30 million, or* *b) for any other development—$50 million.* As the amended development is for the purposes of a Warehouse or distribution centres, the relevant environmental assessment requirements were notified under the Act before 31 May 2023 and it has warehouse and distribution centre with a cost in excess of $30 Million (refer to **Appendix F**), it is still declared SSD.
Consent Authority	Section 4.5 of the EP&A Act and Section 2.7 of the *State Environmental Planning Policy (Planning Systems) 2021* stipulate that the consent authority is the Minister for Planning and Public Spaces (or the Department of Planning and Environment as their delegate) unless the development triggers the matters set out in Section 2.7(1) in which case the consent authority will be the Independent Planning Commission.

4.2 Permissibility

The permissibility of the amended development remains unchanged considering the proposed land uses and land zoning remains unchanged, as outlined in **Table 16** below.

Table 16 Permissibility

Matter	Consideration
Land Use	The amended development constitutes a *Warehouse and distribution centre* as defined under the Standard Instrument. The *Office premises* use is
Land Zoning	The site is zoned IN1 General Industrial under the *State Environmental Planning Policy (Industry and Employment) 2021*.
Permissibility	The *Warehouse and distribution centres* use is permissible with consent under the IN1 zone. The ancillary Office Premises use is permissible with consent as it constitutes an ancillary use to the

	proposed Warehouse or distribution centre use. Further, the development includes the use of *Roads* within the site which are permissible with consent under the IN1 zone.

4.3 Other Approvals

The other legislative approvals required in addition to development consent under Division 4.7 of the EP&A Act for the amended development remain unchanged as outlined in **Table 17** below.

Table 17 Other Approvals

Matter	Consideration
Approvals not required for SSD	Section 4.41 of the EP&A Act stipulates that certain authorisations are not required for State significant development. The amended development does not trigger any of the approvals that would otherwise be required if the development was not State significant under section 4.41 of the EP&A Act.
Consistent Approvals	Section 4.42 of the EP&A Act stipulates that certain authorisations cannot be refused if they are necessary for carrying out State significant development. The amended development does not trigger any additional approvals under Section 4.42 of the EP&A Act that stipulates that certain authorisations cannot be refused if they are necessary for carrying out State significant development. The amended development, similarly to the exhibited development, requires approval for the proposed collector and local industrial roads (Roads 1, 2 and 3) as well as the driveway crossovers under the *Roads Act 1993* from Penrith City Council.

4.4 Pre-Conditions to Exercise the Power to Grant Consent

The pre-conditions to be fulfilled by the consent authority before exercising their power to grant consent to the amended development are identified and considered in **Table 18** below.

Table 18 Pre-Conditions to Exercising the Power to Grant Consent

Matter	Consideration
Biodiversity Conservation Act 2016	Since the exhibition of the SSDA, the site (as amended) has been certified as Urban Capable Land under The Cumberland Plain Conservation Plan (CPCP) and the preparation of a Biodiversity Development Assessment Report (BDAR) is not required. This Amendment Report is accompanied by a Biodiversity Impact Assessment Report prepared by Ecologique (**Appendix Y**).
State Environmental Planning Policy (Transport and Infrastructure) 2021	Section 2.121 of *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP) requires the consent authority to provide the RMS with written notice of the development application for developments considered a 'traffic generating activity'. The amended development is a 'traffic generating activity' as it is for a Warehouse or distribution centre with a Site area of more than 8,000sqm.
State Environmental Planning Policy (Industry and Employment) 2021	*State Environmental Planning Policy (Industry and Employment) 2021* (Industry and Employment SEPP) sets out planning controls for signage. Section 3.6 stipulates that a consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied that: • The signage is consistent with the objectives of the SEPP; and • The signage satisfies the assessment criteria specified in Schedule 5 of the SEPP. The amended development signage (as described in **Section 3.9**) is consistent with the objectives of Chapter 3 of the Industry and Employment SEPP with an assessment of the proposed signage against Schedule 5 provided within the updated Statutory Compliance Table (**Appendix B**).
State Environmental Planning Policy (Resilience and Hazards) 2021	Section 4.6 of *State Environmental Planning Policy (Resilience and Hazards)* 2021 (Resilience and Hazards SEPP) stipulates that a consent authority must not consent to the carrying out of development unless: • It has considered whether the land is contaminated, and if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out; and • If the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is suitable that the land will be remediated before the land is used for that purpose.

The Remediation Action Plan prepared by JBS&G (**Appendix N**) has been amended to incorporate the amended land within the site and confirms that the site can be made suitable for the proposed development. For further discussion refer to **Section 6.3**.

4.5 Mandatory Matters for Consideration

The key matters that the consent authority is required to consider in deciding whether to grant consent to the amended development are identified and considered in **Table 19**. A comprehensive list of the mandatory matters for consideration are provided with the Statutory Compliance Table at **Appendix B**.

Table 19 Mandatory Matter for Consideration

Legislation	Matters for Consideration
Environmental Planning & Assessment Act 1979	The amended development is consistent with the objects of the EP&A Act as it: • Will result in the increased economic welfare of the community through the creation of more jobs, while mitigating any potential social impacts. • Will facilitate the ecological sustainable development of the site, with economic, environmental and social consideration integrated into the amended development; • Constitutes the orderly and economic development of the site delivering in demand warehouse floorspace within a dedicated industrial precinct while also facilitating earthworks across the site to enable further future warehouse floorspace; • Promotes good design, with the amended development layout, landscaping, built form and external façade presenting a resolve solution that will contributing to the creation of amenity; • Will promote the proper construction and maintenance of the building with Frasers Property aiming to create a high quality warehouse development for future tenants; and • Has provided and will continue to provide the opportunity for the local community and stakeholders to participate in consultation of the development.
Environmental Planning and Assessment Regulation 2021	Section 37 of the EP&A Regulation stipulates the provisions relating to the amendment of a DA. It outlines the applicant may, at any time before a DA is determined, apply to the consent authority for an amendment to the development application. A formal request to amend the SSDA was submitted to the DPE on 22 September 2023. This Amendment Report has been prepared in accordance with the *State Significant Development Guidelines* and contains details of the changes to enable the consent authority to compare the amended development with the development originally proposed.
State Environmental Planning Policy (Industry and Employment) 2021	The site falls under the stipulation of Chapter 2 of the Industry and Employment SEPP. An assessment of the amended development against the relevant provisions of the Industry and Employment Sepp provided with the Statutory Compliance Table (**Appendix B**).
Mamre Road Precinct Development Control Plan	An assessment of the amended developments compliance with the MRP DCP is provided at **Appendix I**.

5.0 Stakeholder Engagement

This section outlines the consultation undertaken and feedback received since the Public Exhibition of the SSDA. It is supported by a Community and Stakeholder Participation Strategy prepared by SLR Consulting included at **Appendix J**.

The community and stakeholder engagement undertaken prior to the exhibition of the SSDA in November 2021 is outlined in Part E of the exhibited EIS. The Public Exhibition of the SSDA in November 2021 enabled submissions from the public, organisations and government agencies. A total of 12 submissions were received, with eleven (11) submissions from government agencies and one (1) submission from Dexus with no submissions from members of the public received.

An initial Submissions Report was prepared and submitted to DPE in February 2023 that responded to the matters raised in the Public Exhibition of the SSDA, however has not been formally accepted by DPE. As such, given this Amendment Report outlines the changes to the development (largely in response to those original 12 submissions received) it is considered that the exhibition of this Amendment Report will obtain revised submissions, at which point any required Submissions Report will be prepared.

Since Public Exhibition, the Applicant has taken on feedback received from the submissions and undertaken further consultation with the key relevant stakeholders for the amended development. A summary of consultation undertaken since the Public Exhibition of the SSDA is outlined in **Table 20** below.

Table 20 Summary of Consultation since Public Exhibition

Stakeholder	Engagement Carried Out	Feedback Received
Department of Planning and Environment	The Applicant has had ongoing engagement with the Industry Assessment team at the DPE in relation to the amendment of the SSDA as well as the broader key matters for resolution in relation to the SSDA.	The DPE, in principle, have supported the submission of an amended application for the SSDA.
Transgrid	The Applicant has had ongoing consultation and dialogue with Transgrid in relation to the easement that runs across the western portion of the site. Particular discussion has been had regarding the trunk drainage line that is designated to be placed within the Transgrid easement under the MRP SSP.	Correspondence from February 2023 with Transgrid has been included at **Appendix MM**. It outlines that Transgrid does not permit the provision of an open trunk drainage channel within the easement as it will impact the easement's future capability to host a transmission line. It also reiterates Transgrid's previous approval for the provision of stormwater basins within the easement with allowance for transmission line structure pads approximately every 400m. Refer to correspondence dated June 2022 at **Appendix MM**.
Sydney Water	The Applicant has had ongoing meetings with Sydney Water in relation to the regional stormwater infrastructure specified under the SSP on the site.	Sydney Water in principle supports the provision of drainage basins connected via stormwater pipes within the Transgrid easement connected as the proposed basins can achieve the same outcome and make an open trunk drainage channel redundant. Consultation with Sydney in relation to the western trunk drainage line is on-going. For further discussion refer to **Section 6.5.3**.
Transport for NSW	Frasers Property has had ongoing consultation with Transport for NSW (TfNSW), most recently as August 2023. A meeting was held with TfNSW in early 2023 to discuss the proposed dedicated freight corridor.	TfNSW is supportive of the proposed dedicated freight corridor design included at **Appendix G**.

Stakeholder	Engagement Carried Out	Feedback Received
	The Applicant has also had further consultation since Public Exhibition as part of the LOG-E meetings with TfNSW.	
Dexus	The Applicant has had ongoing engagement with Dexus – the adjoining landowner to the north of the site (SSD-32722834). Discussion have particularly been in relation to the related shared boundary items including earthworks levels, retaining walls and the future local industrial road connection between the two sites	A letter of consent prepared by Dexus and is provided at **Appendix NN**. It outlines Dexus' consent for the amended development to comprise transitional earthworks across the two sites. It also outlines the commitment for the Frasers Property and Dexus to share relevant documentation relating to the works described above and agree to act in good faith to negotiate a commercial cost sharing agreement for works relating to the common boundary.
Altis	The Applicant has had ongoing consultation with Altis – the adjoining landowner to the west (SSD-17647189). Discussions have particularly been in relation to the related shared boundary items including earthworks levels, retaining walls, dedicated freight road connection, collector road connection and trunk drainage connection between the two sites.	The Applicant has aligned the western portion of the collector road (Road 1) in accordance with Altis road and roundabout design. As outlined in **Appendix OO**, Altis confirms that it has been collaborating with the Applicant in relation to the realignment of the Sydney Water trunk drainage channel that traverses the sites with Altis is to submit a modification to SSD-17647189 following approval. The Applicant will continue to consult with Altis on this matter.

The Applicant will continue to consult with the relevant stakeholders. Following formal acceptance of this Amendment Report, the DPE will exhibit it on the NSW Major Projects Website and invite submissions from government agencies, organisations and the public.

Once the exhibition period is complete, DPE may require the Proponent to prepare a Submissions Report in response to the matters raised during exhibition period. The Applicant will continue to liaise with the DPE and stakeholders during the assessment to address matters that may arise.

6.0 Assessment of Impacts

This section provides a detailed summary of the findings of any further assessment of the impacts of the proposed amendments. It includes any updated mitigation measures proposed as well as an updated consolidated mitigation measures table at **Appendix C**.

6.1 Urban Design and Visual

6.1.1 Urban Design

Layout and Landscaping

The amended development, as illustrated in **Figure 34**, results in an improved urban design outcome through a further resolved and considered site plan and landscaping.

The addition of Road 3 and the increase in number of warehouses proposed completes the northern portion of the site resulting in a more holistic and resolved approach to the urban design of the proposed industrial estate. It also enables an increase in tree planting from 690 to 2,566 trees resulting in a greater tree canopy cover contributing to the reduction of the urban heat island effect.

The addition of Road 3 also enables the further separation of light and heavy vehicles and positions office space facing the primary frontage of each lot.

Figure 36 Landscape Site Plan

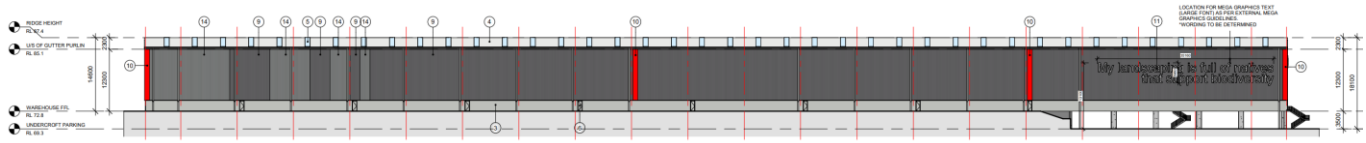
Source: Habit8

Design Quality

The materials and quality of the amended development remains substantially the same to the exhibited development with further enhancements and variation to the amended development.

As illustrated in **Figure 37** and **Figure 38**, the amended development includes the provision for undercroft parking on portions of the lots to accommodate and better manage the level transitions across the site.

The warehouses comprise a Colorbond façade in either 'shale grey' (**Figure 37**) or 'windspray' (**Figure 38**) colours. The ancillary office space (refer to **Figure 39**) includes pre-finished solid aluminium cladding with glazed curtain wall with ceramic frit pattern and timber feature battens,

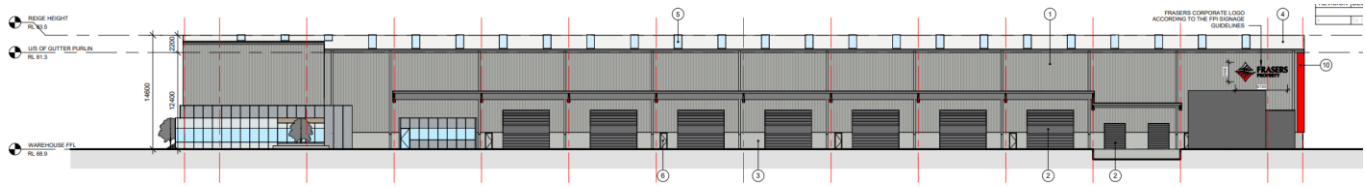


West Elevation

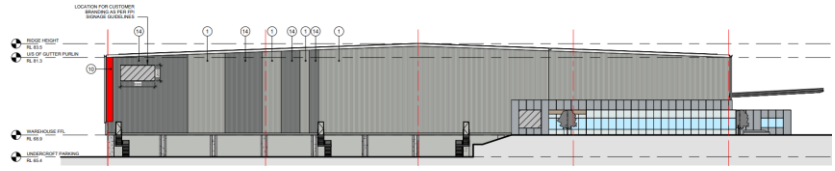
South Elevation

Figure 37 Warehouse 3 – West and South Elevations

Source: Frasers Property



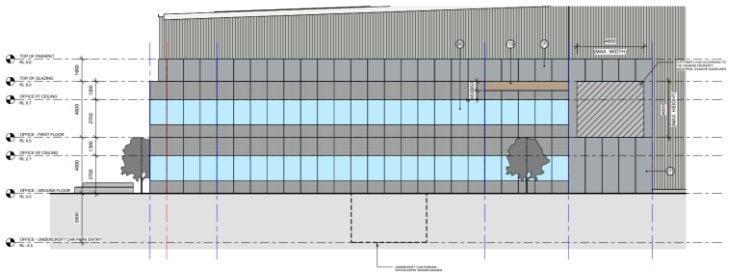
East Elevation



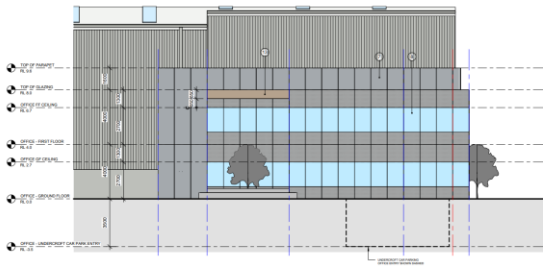
South Elevation

Figure 38 Warehouse 8 – East and South Elevations

Source: Frasers Property



South Elevation



East Elevation

Figure 39 Warehouse 3, 4 and 5 – South and East Elevations

Source: Frasers Property

6.1.2 Visual Impact

The Landscape and Visual Impact Assessment (LVIA) prepared by Habit8 (included at **Appendix K**) has been amended to represent the amended site and development and include at . The methodology and criteria used remain consistent with the exhibited development.

Viewpoints

The location and overall number of viewpoints has been amended to reflect the current surrounding context with the location of the selected viewpoints provided in **Figure 40** below.

	GROUND RL	14m HT
VIEW A	RL 55.00	
VIEW B	RL 44.00	
VIEW C	RL 68.00	
VIEW D	RL 79.00	
VIEW E	RL 83.00	RL 97.00
VIEW F	RL 100.00	
VIEW G	RL 60.00	
VIEW H	RL 58.00	
VIEW I	RL 51.00	
VIEW J	RL 45.00	

Figure 40 Visual Impact Viewpoint Locations

Source: Habit8

Visual Impact Assessment

A summary of the visual impact assessment for the amended site and development is provided in **Table 21** on the following page.

Table 21 Visual Impact Assessment Summary

Viewpoint A – Aldington Rd in front of Lot 9 (Looking North)	
Baseline	
Year 0	
Year 15	
Approx. Distance from Site	175m
View	Viewed at approx. RL 57.00, looking north.
Visual Receptor Sensitivity	**Medium** – View is not promoted or recorded in any published sources and may be typical of the views experienced from a given receptor. Road users on main routes (Motorway/Freeway/Highway)
Magnitude of Change	**Low** – The proposed development will form a minor constituent of the view being partially visible or at sufficient distance to be a small component. Oblique views at medium or long range with a small horizontal/vertical extent of the view affected.
Significance of Visual Impact	**Minor**

Viewpoint B – Mamre Rd in front of Lot 51 (looking north east)	
Baseline	
Year 0	
Year 15	
Approx. Distance from Site	163m
View	Viewed at approx. RL 46.00, looking north east towards the site
Visual Receptor Sensitivity	**Medium** – View is not promoted or recorded in any published sources and may be typical of the views experienced from a given receptor. Single storey farm houses, road users on main routes (Motorway/Freeway/Highway).
Magnitude of Change	**Very High** – There would be a substantial change to the baseline, with the proposed development creating a new focus and having a defining influence on the view. Direct views at close range with changes over a wide horizontal and vertical extent.
Significance of Visual Impact	**Major/Moderate**

Viewpoint C – Aldington Road in front of Lot 27 (Looking North)	
Baseline	
Year 0	
Year 15	
Approx. Distance from Site	10m
View	Viewed at approx. RL 70.00, looking north
Visual Receptor Sensitivity	**Medium** – View is not promoted or recorded in any published sources and may be typical of the views experienced from a given receptor. Road users on main routes (Motorway/Freeway/Highway)
Magnitude of Change	**Very High** – There would be a substantial change to the baseline, with the proposed development creating a new focus and having a defining influence on the view. Direct views at close range with changes over a wide horizontal and vertical extent.
Significance of Visual Impact	**Major/Moderate**

Viewpoint D – Aldington Rd in front of Lot 33 (looking south	
Baseline	
Year 0	
Year 15	
Approx. Distance from Site	10m
View	Viewed at approx. RL 81.00, looking south-west towards the site.
Visual Receptor Sensitivity	**Medium** – View is not promoted or recorded in any published sources and may be typical of the views experienced from a given receptor. Road users on main routes (Motorway/Freeway/Highway)
Magnitude of Change	**Medium** – The proposed development will form a new and recognizable element within the view which is likely to be recognized by the receptor. Direct or oblique views at medium range with a moderate horizontal and/or vertical extent of the view affected.
Significance of Visual Impact:	**Moderate/Minor**

Viewpoint E – Aldington Rd in front of Lot 35 (looking south west)	
Baseline	
Year 0	
Year 15	
Approx. Distance from Site	263m
View	Viewed from 14m above ground level (RL 97.00) looking South West towards the site.
Visual Receptor Sensitivity	**Medium** – View is not promoted or recorded in any published sources and may be typical of the views experienced from a given receptor. Road users on main routes (Motorway/Freeway/Highway)
Magnitude of Change	**Low** – The proposed development will form a minor constituent of the view being partially visible or at sufficient distance to be a small component. Oblique views at medium or long range with a small horizontal/vertical extent of the view affected.
Significance of Visual Impact	**Minor**

Viewpoint F – Lot 34 Aldington Rd (Looking South)	
Baseline	
Year 0	
Year 15	
Approx. Distance from Site	50m
View	Viewed at approx. RL 102.00, looking south towards the site.
Visual Receptor Sensitivity	**High** – View of clear value but may not be formally recognized e.g. framed view of high scenic value from an individual private dwelling or garden. It may also be inferred that the view is likely to have value e.g. to local residents. Views from the secondary living space of residential properties and recreational receptors where there is some appreciation of the landscape e.g. views over land
Magnitude of Change	**Very High** – There would be a substantial change to the baseline, with the proposed development creating a new focus and having a defining influence on the view. Direct views at close range with changes over a wide horizontal and vertical extent.
Significance of Visual Impact	**Major**

Viewpoint H – Corner of Holloway St & Dalley Ave, Pagewood (Pagewood Public School)

Baseline	
Year 0	
Year 15	

Approx. Distance from Site	57m
View	Viewed at approx. RL 60.00 looking north-east towards the site.
Visual Receptor Sensitivity	**Medium** – View is not promoted or recorded in any published sources and may be typical of the views experienced from a given receptor. Single storey farm houses, road users on main routes (Motorway/Freeway/Highway).
Magnitude of Change	**Very High** – There would be a substantial change to the baseline, with the proposed development creating a new focus and having a defining influence on the view. Direct views at close range with changes over a wide horizontal and vertical extent.
Significance of Visual Impact	**Major/Moderate**

Discussion

Taking into consideration the surrounding topography, agricultural uses, industrial zoning under the Industry and Employment SEPP and future development and infrastructure, the LVIA concludes that on average, the impact on the surrounding area from the amended development is judged to be of medium significance.

The LVIA determines that development will have a high impact on residential dwellings, although it is noted that this only represents a small minority of properties with a large portion of the surrounding properties being acquired for future industrial uses, as intended through the 2020 rezoning.

The LVIA judges Viewpoints B, C and H as resulting in major/moderate visual impact significance. Viewpoint B and H represents the views from the south-west of the site, these views will be mitigated through the planting of tall native canopy trees, screening shrubs and groundcovers. Following maturity, these planted buffers will provide a dense screen to help to soften and screen the development.

Viewpoint C illustrates the northern boundary wall between the site and Dexus' site to the north. It shows that the retaining wall is visible at Year 0, it is in the context of the remaining development and by Year 5 it is largely screened by the proposed landscaping along Aldington Road. The site benefits from the Transgrid easement along Aldington Road in particular that provides a large setback with a strong landscape foreground shielding the development from the road.

The LVIA judges Viewpoint F as resulting in major visual impact significance and represents the site as viewed from Dexus' site. It is noted that Dexus' has now acquired each of the sites included as part of SSD-32722834 and as such do not represent residential receivers and is subject to significant change with future industrial development designated to occur on the site.

In conclusion, the amended development will result in an acceptable visual impact given the evolving surrounding context of the area for industrial use with the proposed landscaping effectively mitigating any significant visual impact.

6.2 Safety, Security and Crime Prevention

The Crime Risk Assessment (CRA) prepared by NEAL Consulting has been amended to represent the amended development and is included at **Appendix L**.

Based on the recognised methodology, statistical crime research, and a physical inspection of the intended site of the amended development, the CRA concludes that the Crime Risk Opportunity for the site is 'High' (based on a high rating level for the Penrith LGA and a high-risk rating for the suburb of Kemps Creek). Based upon an assessment of the Architectural Drawings, a CPTED rating of 'low' has been returned for this development.

6.2.1 Mitigation Measures

The updated mitigation measures in relation to safety, security and crime prevention are outlined in **Table 22** below.

Table 22 Updated Mitigation Measures – Safety, Security and Crime Prevention

Impact / Issue	Mitigation Measures
Crime Risk	• The Applicant will ensure the recommendations of the Crime Risk Assessment Report provided in Appendix L of the Amendment Report are incorporated into the development.

6.3 Contamination

The Detailed Site Investigation (DSI) and Remediation Action Plan (RAP) prepared by JBS&G have been updated to include the additional site area and are included at **Appendix M** and **N** respectively.

6.3.1 Methodology

The methodology of the DSI and RAP remain substantially the same as exhibited. As a result of the inclusion of the additional site area, an additional 80 soil samples have been taken across the site have been undertaken now resulting in the testing of a total of 518 locations

6.3.2 Existing Environment

The contamination extent of the exhibited site remains unchanged, while contamination is present on portions of the additional land included within the site.

Lot 24 DP 255560 (219-233 Aldington Road) was identified as containing a large pile of general waste on the south-eastern bank of the dam containing bricks, old machinery and timber. This area was mostly used to store scrap black plastic and irrigation pipes from the market gardens, and some empty bottles of fertilizer and half a pallet of 20kg bags of fertilizer. ACM was also identified on the ground surface, affixed to stockpiled concrete slabs (≈ 5 m^3), and within surficial soils.

Lot 10 DP 253503 (235-251 Aldington Road) was identified as containing multiple structures on the north-eastern portion of the site that appeared to be constructed of ACM.

6.3.3 Assessment of Impacts

The recommendations of the DSI remain unchanged as exhibited. A RAP has been undertaken by JBS&G (**Appendix N**) to document remediation and validation requirements to make the site suitable for the intended land use. An interim Asbestos Management Plan (AMP) will be implemented to mitigate risks under the WHS regulations until the site is remediated and a Hazardous Building Material Survey of site structures will be undertaken prior to demolition.

The extent of remediation required as part of the amended development is illustrated in **Figure 41** and **Figure 42** on the following page. It shows the extent of remediation required on the additional land which comprises ACM identified in surficial soils and affixed to stockpiled concrete slabs in the residential/buildings areas at 219-233 and 235-251 Aldington Road. The ACM was identified as being below the adopted health criteria but represents an aesthetic issue.

The proposed remedial plan remains consistent with that under the exhibited EIS. The RAP includes the addition of an unexpected finds protocol as part of its recommendations which is included within the updated contamination mitigation measures in the following section.

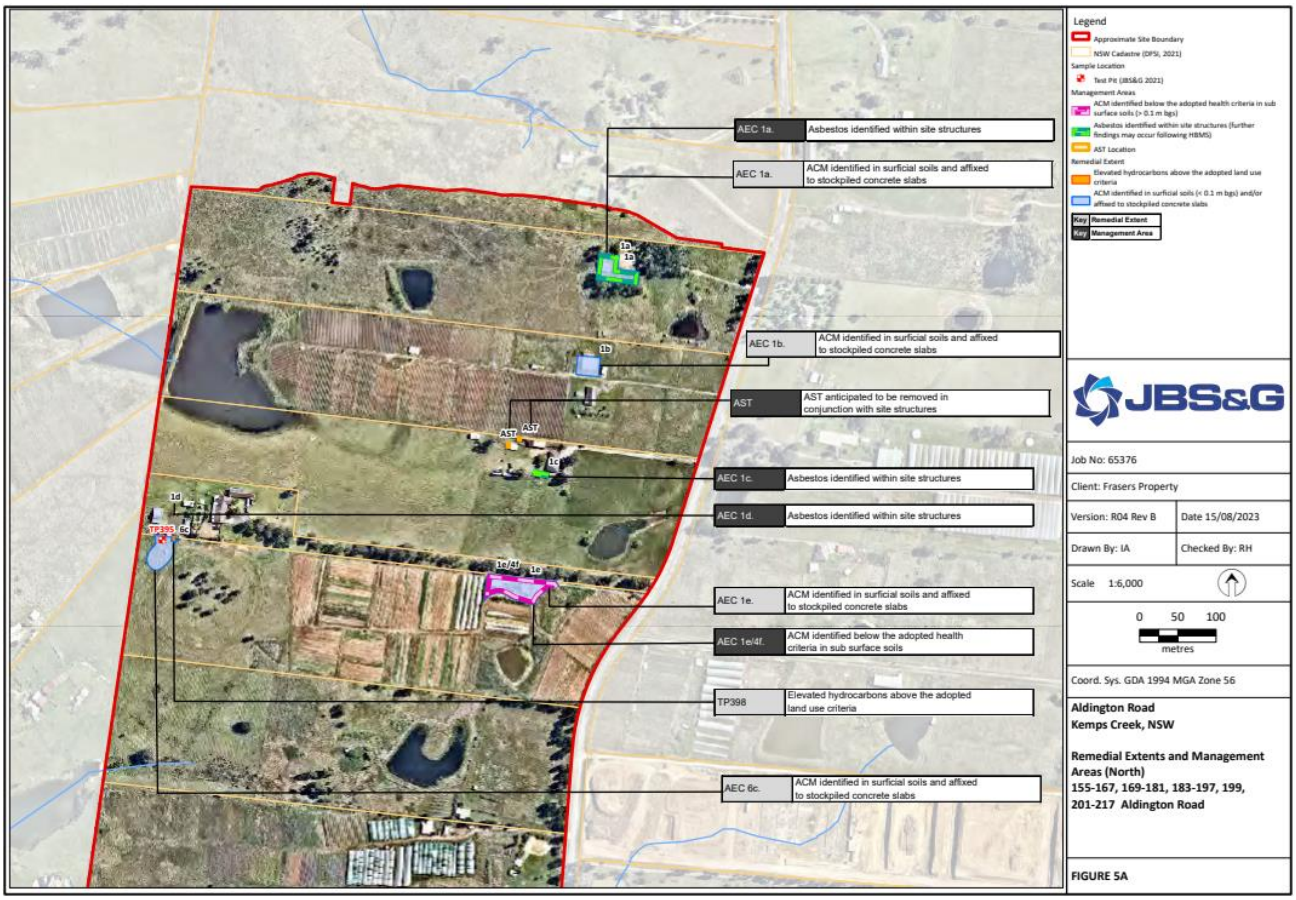


Figure 41 Remedial Extents and Management Areas (North)

Source: JBS&G

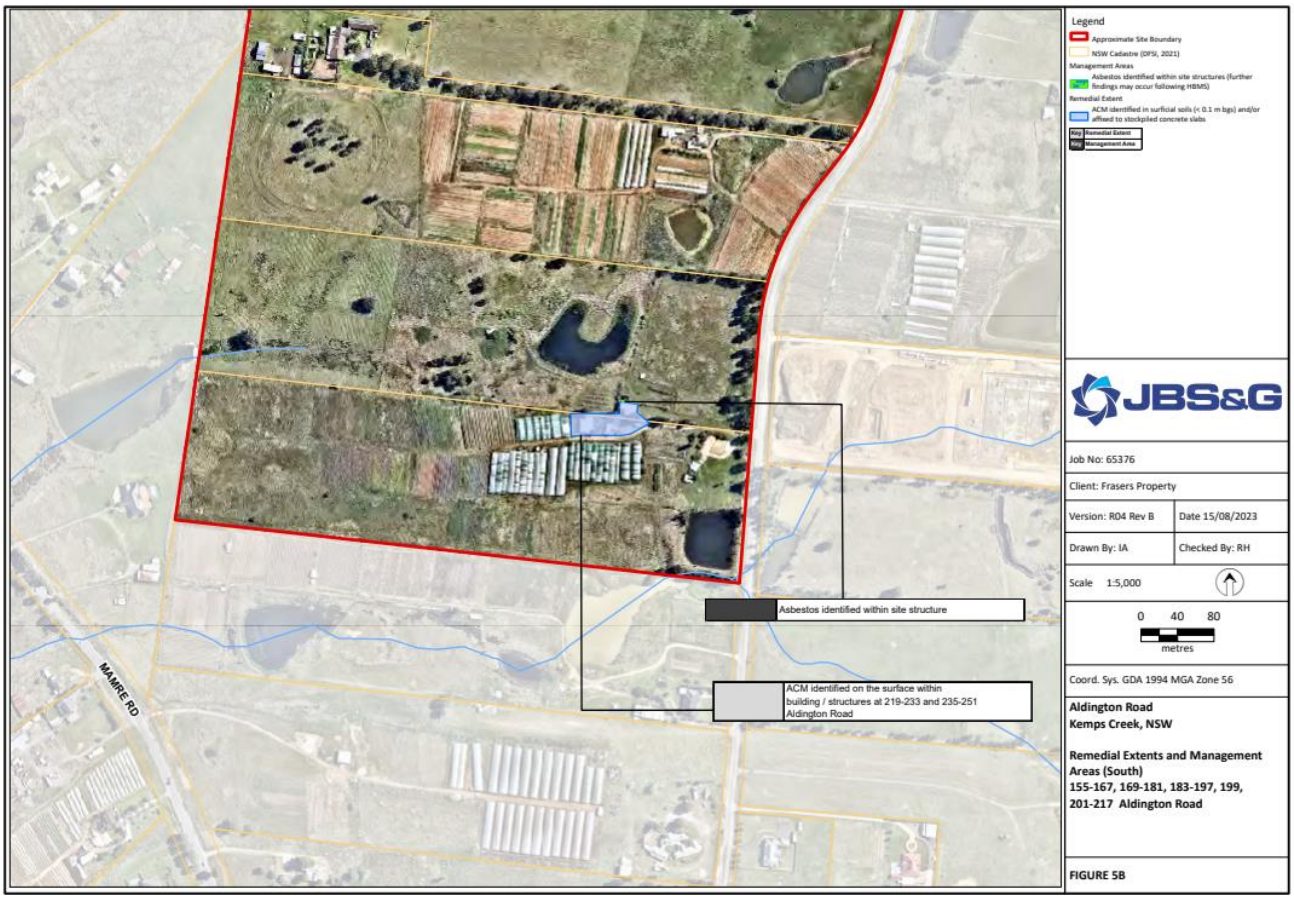


Figure 42 Remedial Extents and Management Areas (South)

Source: JBS&G

6.3.4 Mitigation Measures

The updated mitigation measures in relation to contamination are outlined in **Table 49** below.

Table 23 Updated Mitigation Measures – Contamination

Impact / Issue	Mitigation Measures
Asbestos Management	• An AMP/ARCP with an asbestos register to document the location, condition and relevant applicable controls required to be implemented during works involving asbestos;
Unexpected Finds	• An unexpected finds protocol (UFP) will be developed and implemented prior to commencement of works. The UFP will provide a protocol for management of any unexpected finds encountered during the remediation/redevelopment of the site; and
Work Health and Safety	• A WHSP to document the procedures to be followed to manage the risks posed to the health of the remediation workforce.

6.4 Geotechnical Investigation

The Geotechnical Investigation prepared by PSM has been updated to reflect the amended development and included at **Appendix O**. In addition, Interim Geotechnical Design Advice and a Bulk Earthworks Specification Report has also been prepared by PSM and included at **Appendix O**.

6.4.1 Methodology

The Geotechnical Investigation has been updated to incorporate due diligence investigations undertaken in 2021 for both the additional lots to the south of the exhibited development site (219-233 and 235-251 Alington Road). It has also been updated to include reference borehole information from Dexus' site (141-153 Aldington Road) and incorporate further investigations of 155-217 Aldington Road undertaken in 2021.

The Interim Geotechnical Design Advice is based on both the Geotechnical Investigation and Bulk Earthworks Specification Report. The Bulk Earthworks Specification Report has been prepared based on the proposed earthworks, as outlined on the Civil Drawings (**Appendix G**).

6.4.2 Existing Environment

A summary of the findings of the updated Geotechnical Investigation are outlined in **Table 24** below.

Table 24 Geotechnical Conditions

Matter	Description
Subsurface conditions	The subsurface conditions identified during borehole testing included: • Topsoil between depths of 0-0.5m being the thickest at 235-251 Aldington Road due to agricultural activity; • Fill between depths of0-0.2m; • Residual (clay) between depths of 0.1-2.3m; • Bedrock A between depths of 0.4-3.05m; and • Bedrock B between depths of 2.7-14m.
Groundwater	The following groundwater observations were made: • Minor water seepage: - 3m in depth at 155-217 Aldington Road; - 1.4-2m in depth at 219-233 Aldington Road; and - 2.1m in depth at 235-251 Aldington Road. • Major water seepage: - 2.4m in depth at 219-233 Aldington Road located within/near an old creek.
Salinity	The salinity assessment identified the majority of the site as being 'non-saline' with four (4) samples classified as being 'moderately saline' and one (1) being 'slightly saline'.

Source: PSM

6.4.3 Assessment of Impacts

The Geotechnical Investigation outlined that excavation of all materials would be capable of being carried out with conventional earthmoving equipment, however, the presence of medium-hard strength sandstone in 'Bedrock B' may require rock breaking equipment.

The Bulk Earthworks Specification Report outlines the required filling, cutting and testing specification required for the bulk earthworks taking into account the results of the geotechnical investigation. The Interim Geotechnical Advice outlines design advice for site classification and surface movement, foundations, permanent and temporary batters, excavation support and pavement. They demonstrate that the proposed bulk earthworks can be suitably undertaken and achieved to a high standard.

6.5 Soil and Water

An assessment of the amended development in regard to the matters of soil and water is provided in the following sections.

6.5.1 Earthworks and Retaining Walls

The Civil Design Report has been updated to reflect the amended development and is included at **Appendix P**, it is supported by the Civil Drawings at **Appendix G**. The proposed earthworks (as described in **Section 3.3.4**) have been revised in response to the amended development.

As outlined in **Section 2.2.1**, the amended development site is characterised by steep undulating topography with an approximate 50m difference from the north (highest point) to the south (lowest point) of the site. The intent of the amended development is to establish large building pads to enable large-format warehouse and distribution centres, consistent market requirements to supply the current demand for warehouse floorspace in the greater Sydney region.

This constitutes the orderly and economic development of the site and will contribute towards addressing the industrial floorspace shortage within the greater Sydney region and increasing the efficiency of Sydney's logistical supply chain to benefit consumers and encourage further economic activity.

To summarise, the cut and fill requirements within the site have been defined through multiple iterations and careful consideration of the following:

- Undulating topography within the Mamre Road Precinct resulting in the requirement for extensive cut and fill operations to allow the development to facilitate economic development and provide flexibility to cater for the range of industrial customer requirements.
- The provision of connectivity to adjoining lands and managing existing upstream catchment flows.
- Avoiding retaining walls fronting Aldington Road and mitigating retaining walls fronting internal public road reserves.
- Mitigating extensive cut in bedrock sub-surface units.
- Meeting the requirements for the site to cater for IN1 – General Industrial employment which requires large flexible allotments given market demands.

The proposed earthworks, as part of the amended development, comprise the most contextually and economically appropriate design in consideration of the above requirements. Whilst boundary retaining walls to the north, south and west are required, they are minimised and located outside of the public domain. Due to the steep topography, some walls are more than 10m high along the northern boundary. Interface design with the adjoining Dexus development in the north has also been considered to ensure the most economical and environmentally sustainable solution is achieved.

The amended development comprises the establishment of building pads for Lot 9-14 that will be subject to future built form approvals. This enables earthworks across the site under one DA rather than fragmenting the works which are interconnected across multiple applications. It also enables the bulk earthworks to be completed in one phase that is the most economic and sustainable method consistent with the objects of the EP&A Act to promote the orderly and economic use and development of land.

Section 2.40 of the Industry and Employment SEPP stipulates the objectives and what the consent authority must consider when assessing proposals relating to earthworks. As such, an assessment of the proposed earthworks as part of the amended development is provided in **Table 25** below.

Table 25 Assessment against section 2.40 'Earthworks' of the Industry and Employment SEPP

Provision	Assessment
(1) The objectives of this section are as follows—	
(a) to ensure that earthworks for which development consent is required will not have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land,	The proposed earthworks will not have a detrimental impact as outlined in this Amendment Report and supporting technical appendices. The proposed earthworks will facilitate the intended use of the site under the 2020 MRP rezoning, consistent with the objectives of the IN1 zone. As aforementioned, the proposed civil design has considered all

Provision	Assessment
	relevant factors to create the most appropriate civil design for the amended development.
(b) to allow earthworks of a minor nature without separate development consent.	Not applicable.
(2) Development consent is required for earthworks unless—	
(a) the work is exempt development under this Chapter or another applicable environmental planning instrument, or	Development consent is required for the proposed earthworks.
(b) the work is ancillary to other development for which development consent has been given.	
(3) Before granting development consent for earthworks, the consent authority must consider the following matters—	
(a) the likely disruption of, or detrimental effect on, existing drainage patterns and soil stability in the locality,	The proposed stormwater management strategy has been designed in accordance with the proposed bulk earthworks plan and the MRP SPP requirements. For discussion of stormwater management refer to **Section 6.5.3**. This Amendment Report is accompanied by an Erosion and Sediment Control Plan which is discussed in **Section 6.5.4** and will be implemented to maintain soil stability on the site and along common property boundaries.
(b) the effect of the proposed development on the likely future use or redevelopment of the land,	The proposed earthworks will enable the future development of the entire site for its intended use under the MRP rezoning. The requirement for large building pads come as a result of market demand for large format warehousing type built form, of which there is a significant undersupply of in the Sydney region. The proposed earthworks will not affect the likely future use or redevelopment of the land, rather it will support future development through creation of residual building pads ready for future warehouses.
(c) the quality of the fill or the soil to be excavated, or both,	Geotechnical investigations have been undertaken to determine the quality of fill. A Remediation Action Plan has been prepared to ensure any contaminated material of the site is appropriately dealt with. The source of fill will be consistent with the imported fill requirements set out in section 3.2.1 of the Bulk Earthworks Specification Report (**Appendix O**). For further discussion refer to **Section 6.3** and **6.4**.
(d) the effect of the proposed development on the existing and likely amenity of adjoining properties,	The proposed earthworks will not have a detrimental impact on adjoining properties. As outlined in **Section 2.4**, the site's surrounding context is undergoing a significant change in character with similar development surrounding the site now approved and under construction.
(e) the source of fill material and the destination of excavated material,	As outlined in **Section 3.3.4**, the amended development requires the import of 29,185m^3 of fill. The source of fill will be consistent with the imported fill requirements set out in section 3.2.1 of the Bulk Earthworks Specification Report (**Appendix O**).
(f) the likelihood of disturbing relics,	Based on the Aboriginal and non-Aboriginal heritage investigations, it is considered unlikely to disturb any relics. Refer to **Section 6.12** and **6.13**.
(g) the proximity to and potential for adverse impacts on a waterway, drinking water catchment or environmentally sensitive area,	The amended development will not have any impact on waterways. In relation to biodiversity, the site has been certified-urban capable land under the Cumberland Plain Conservation Plan. Refer to **Section 6.10**.
(h) appropriate measures proposed to avoid, minimise or mitigate the impacts of the development,	As aforementioned, the proposed civil design has considered all relevant factors to create the most appropriate civil design for the amended development. All earthworks will be undertaken with the Bulk Earthworks Specification Report (**Appendix O**).

Provision	Assessment
(i) the proximity to and potential for adverse impacts on a heritage item, an archaeological site, or a heritage conservation area,	The impact of the amended development has been adequately assessed in regard to Aboriginal and non-Aboriginal heritage with impact assessed as acceptable. Refer to **Section 6.12** and **6.13**.
(j) the visual impact of earthworks as viewed from the waterways.	As aforementioned, the amended civil design has considered all relevant factors to create the most appropriate civil design for the amended development. The amended development includes significant landscape planting throughout the estate but also along the Aldington Road frontage that results in a high amenity presentation of the development to Aldington Road.

6.5.2 Flooding

A Flood Impact Assessment (FIA) has been prepared by Stantec and included at **Appendix Q** to determine the flooding impact from the amended development. The assessment of flooding under the conditions of the amended development was undertaken by modifying the local TUFLOW model of Benchmark Conditions to represent the amended bulk earthworks and development.

The modelling depicts negligible adverse impacts on flood levels and flood velocities downstream of the site in the 2 yr ARI, 5 yr ARI, 100 yr ARI, 200 yr ARI, 500 yr ARI and PMF events. The FIA also demonstrates compliance with the MRP DCP, as outlined in the MRP DCP Compliance Table (**Appendix I**).

6.5.3 Stormwater Management

Consistency with the Mamre Road Precinct Stormwater Scheme Plan

As outlined in **Section 2.3.2**, the MRP SSP has been released since the exhibition of the SSDA which included a more resolved version of the regional trunk drainage infrastructure proposed by Sydney Water in the Mamre Road Precinct. The MRP SSP identifies naturalised trunk drainage lines to be located within the Transgrid easement draining north to south along Aldington Road (eastern trunk drainage line) and on the western portion of the site drainage east to west (western trunk drainage line).

Eastern Trunk Drainage Line

The eastern trunk drainage line is proposed to run through the Transgrid easement along the eastern portion of the site through four (4) detention basins (Basin A-D) that are connected via stormwater culverts that will connect to the south of the site. Through consultation with Transgrid, it was determined that the provision of open trunk drainage lines within the easement was not permitted because it would impact the easements future capability to host transmission lines with the requirement for structure pads approximately every 400m.

The proposed detention basins connected via culvert pipes are supported by Transgrid as they allow for the provision of structure pads for transmission line towers approximately every 400m (refer to the pink shaded areas in **Figure 43**). Correspondence with Transgrid is provided at **Appendix MM**.

The Applicant has consulted with Sydney Water in relation to this solution, who in principle support the design as the proposed basins can achieve the same outcome and make an open trunk drainage channel redundant.

Western Trunk Drainage Line

The MRP SSP indicates that the western trunk drainage line is to be located along the border of Lot 27 and 28 DP 255560 (refer to **Section 2.3.2**). The amended development proposes the western trunk drainage line to run parallel on the north side of Road 1 which is between approximately 100-150m south of the indicative MRP SSP location.

The proposed location of the western trunk drainage line (refer to **Figure 43**) represents a significantly better outcome than the indicative location under the MRP SSP. The proposed location enables the trunk drainage line to be located adjacent to Road 1 which results in public infrastructure being located adjacent to each other, providing easier access for maintenance. It also provides a setback from Road 1 to the proposed Warehouse 2 (Lot 2), which with the proposed landscaping, will form a landscape buffer. It also enables a more efficient development layout that provides greater warehouse floorspace contributing to employment generation, the objectives of the MRP and constitutes orderly and economic development under the objects of the EP&A Act.

Altis and Frasers Property have been collaborating regarding the realignment of the trunk drainage channel that traverses the sites, with Atlis intending to lodge a modification to the SSD-1764189 following approval (refer to

Appendix OO). The Applicant is currently in the process of consulting with Sydney Water regarding the alignment of the western trunk drainage line.

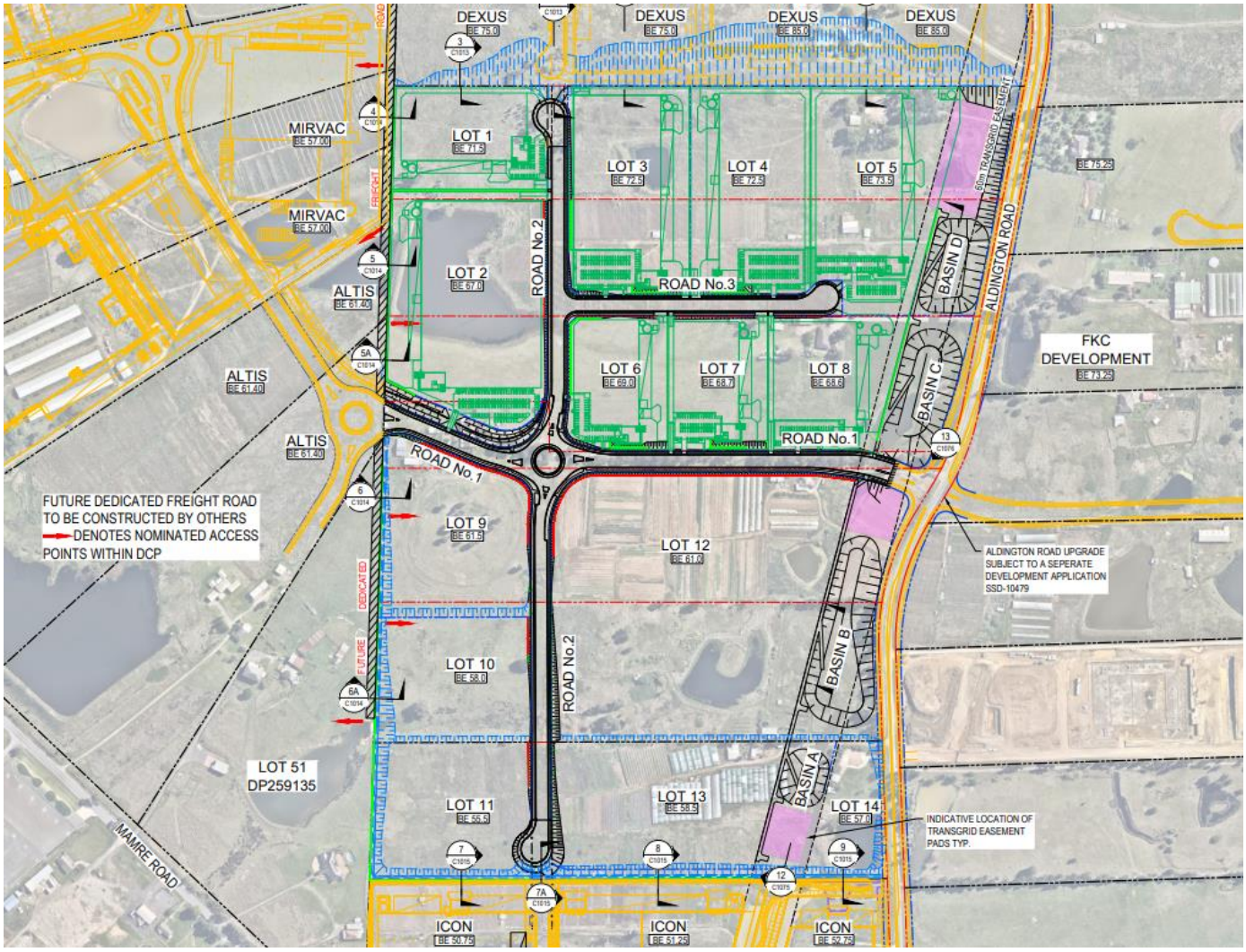


Figure 43 Amended General Arrangement Plan

Source: AT&L

Stormwater Management Strategy Performance Assessment

The proposed stormwater management strategy was outlined in **Section 3.4.1**. A summary of the performance assessment of the proposed stormwater management strategy including stormwater quality, quantity and flow volume is provided in the following sections.

Stormwater Quality

The proposed stormwater treatment train has been modelled using the MUSIC software package (Version 6.3). The MUSIC model of the proposed stormwater management strategy has been created to simulate post-development mean annual loads and treatment train effectiveness. MUSIC model parameters including rainfall and evaporation, rainfall-runoff and source node pollutant generation are consistent with the parameters adopted in the *MUSIC Modelling Toolkit – Wianamatta* (NSW DPE, 2021).

MUSIC models were created to simulate post-development mean annual loads under the two (2) interim phase scenarios. Source nodes for each of the proposed lots have been adopted based on typical large-scale industrial land uses, including those depicted for Lots 1 to 8 inclusive.

MUSIC model results presented as mean annual loads at the receiving node indicate that the adopted stormwater quality target reductions are achieved for Phase 1 and Phase 2, and are provided below in **Table 26** and **Table 27** respectively.

Table 26 Summary of MUSIC modelling results against stormwater quality targets – Phase 1

Parameter	Source – Post-Development	Residual Load Post-Development	Reduction (%)	Mean annual load (post-treatment) (kg/ha/yr)	DCP Target Option 2 (allowable mean annual load)
TSS (kg/yr)	11,021.1	2,097.1	81	33.4	< 80.0 kg/ha/yr
TP (kg/yr)	20.8	10.2	50.7	0.16	< 0.3 kg/ha/yr
TN (kg/yr)	176.3	130.3	26.1	2.08	< 3.5 kg/ha/yr
Gross Pollutants (kg/yr)	1,865.9	64.5	96.5	1	< 16.0 kg/ha/yr

Source: AT&L

Table 27 Summary of MUSIC modelling results against stormwater quality targets – Phase 2

Parameter	Source – Post-Development	Residual Load Post-Development	Reduction (%)	Mean annual load (post-treatment) (kg/ha/yr)	DCP Target Option 2 (allowable mean annual load)
TSS (kg/yr)	26,029.4	2,578.9	90.1	41.1	< 80.0 kg/ha/yr
TP (kg/yr)	47.5	14.6	69.3	0.23	< 0.3 kg/ha/yr
TN (kg/yr)	406.9	182.6	55.1	2.91	< 3.5 kg/ha/yr
Gross Pollutants (kg/yr)	5,029.6	64.6	98.7	1	< 16.0 kg/ha/yr

Source: AT&L

The MUSIC model results outlines the amended development stormwater management strategy measures under the Phase 1 and Phase 2 development scenarios will satisfy the Option 2 DCP target, which specify allowable mean annual loads from the development.

Under the ultimate arrangement, stormwater quality management measures would be incorporated into the regional stormwater management scheme to be designed, delivered and operated by Sydney Water.

Stormwater Quantity

In order to assess the amended development, DRAINS modelling software has been used to calculate the Hydraulic Grade Line (HGL) of the proposed estate wide stormwater network, including pits, pipes, overland flow paths and detention basins.

The pre-development and post-development flow rates, generated by hydrologic and hydraulic modelling in DRAINS, for a range of events between and including the 50% AEP and 1% AEP design storm events at the discharge points from the site are provided in **Table 28** below. It is noted that these peak flows under both predevelopment and post-development conditions include flows from external catchments that discharge through the site.

Table 28 Pre-Development and Post-Development Peak Flow Rates from the Amended Development

Design Storm Event	Pre-Development Peak Flow Rate (m^3/s)			Post-Development Peak Flow Rate (m^3/s)			
	Discharge Pt. 1	Discharge Pt. 2	Discharge Pt. 3	Discharge Pt. 1	Discharge Pt. 2	Discharge Pt. 3a	Discharge Pt. 3b
50% AEP	0.66	1.05	0.21	0.68	0.83	0.06	1.70
20% AEP	1.17	2.00	0.36	0.9	1.17	0.09	2.17
10% AEP	1.50	2.52	0.48	1.06	1.39	0.11	2.52
5% AEP	2.20	3.53	0.68	1.25	1.61	0.13	2.91
1% AEP	3.72	6.14	1.15	1.82	2.01	0.21	4.03

Source: AT&L

The DRAINS model results demonstrate that the post-development peak flow rates would generally be less than or equal to pre-development peak flow rates for a range of storm events between (and including) the 50% AEP and 1% AEP design events.

Based on the assessment of stormwater quantity described above, the stormwater drainage system and series of detention basins and tanks as proposed would satisfy the development controls relating to stormwater quantity management.

Stormwater Flow Volume

MUSIC model results demonstrating performance of the proposed stormwater management measures against the stormwater flow targets are presented in **Table 29** (Phase 1) and **Table 30** (Phase 2)

Table 29 Summary of MUSIC model results against stormwater flow targets – Phase 1

Parameter	Result	DCP Target	DCP Target Compliance	
			DCP Option 1 (MARV Approach)	DCP Option 2 (Flow Duration Curve Approach)
Mean annual runoff volume (ML/ha/yr)	1.06	2	Yes	N/A
95%ile flow (L/ha/day)	15,978	3,000 - 15,000	N/A	No
90%ile flow (L/ha/day)	4,983	1,000 – 5,000	Yes	Yes
75%ile flow (L/ha/day)	353	100 – 1,000	N/A	Yes
50%ile flow (L/ha/day)	45.7	5 – 100	Yes	Yes
10%ile flow (L/ha/day)	0.21	0	No	N/A
Cease to flow	8%	10% - 30 %	N/A	No

Source: AT&L

Table 30 Summary of MUSIC model results against stormwater flow targets – Phase 2

Parameter	Result	DCP Target	DCP Target Compliance	
			DCP Option 1 (MARV Approach)	DCP Option 2 (Flow Duration Curve Approach)
Mean annual runoff volume (ML/ha/yr)	1.80	2	Yes	N/A
95%ile flow (L/ha/day)	29,399	3,000 - 15,000	N/A	No
90%ile flow (L/ha/day)	4,906	1,000 – 5,000	Yes	Yes
75%ile flow (L/ha/day)	197	100 – 1,000	N/A	Yes
50%ile flow (L/ha/day)	16.3	5 – 100	Yes	Yes
10%ile flow (L/ha/day)	0	0	Yes	N/A
Cease to flow	13.1%	10% - 30 %	N/A	Yes

Source: AT&L

The results presented demonstrate the proposed stormwater management measures that will be implemented under the Phase 1 and Phase 2 interim arrangements will satisfy the stormwater flow targets for the site.

6.5.4 Erosion and Sediment Control

A separate Erosion and Sediment Control Plan (ESCP) has been prepared by AT&L and included at **Appendix S** and is supported by the Civil Drawings at **Appendix G**. The exhibition application included discussion and assessment of the ESCP within Section 4 of the Water Cycle Management Strategy.

The potential source of pollution and impacts remain consistent with the exhibited application. In response to the amended development, the ESCP drawings have been updated to reflect the amended development as outlined in **Figure 44** below.

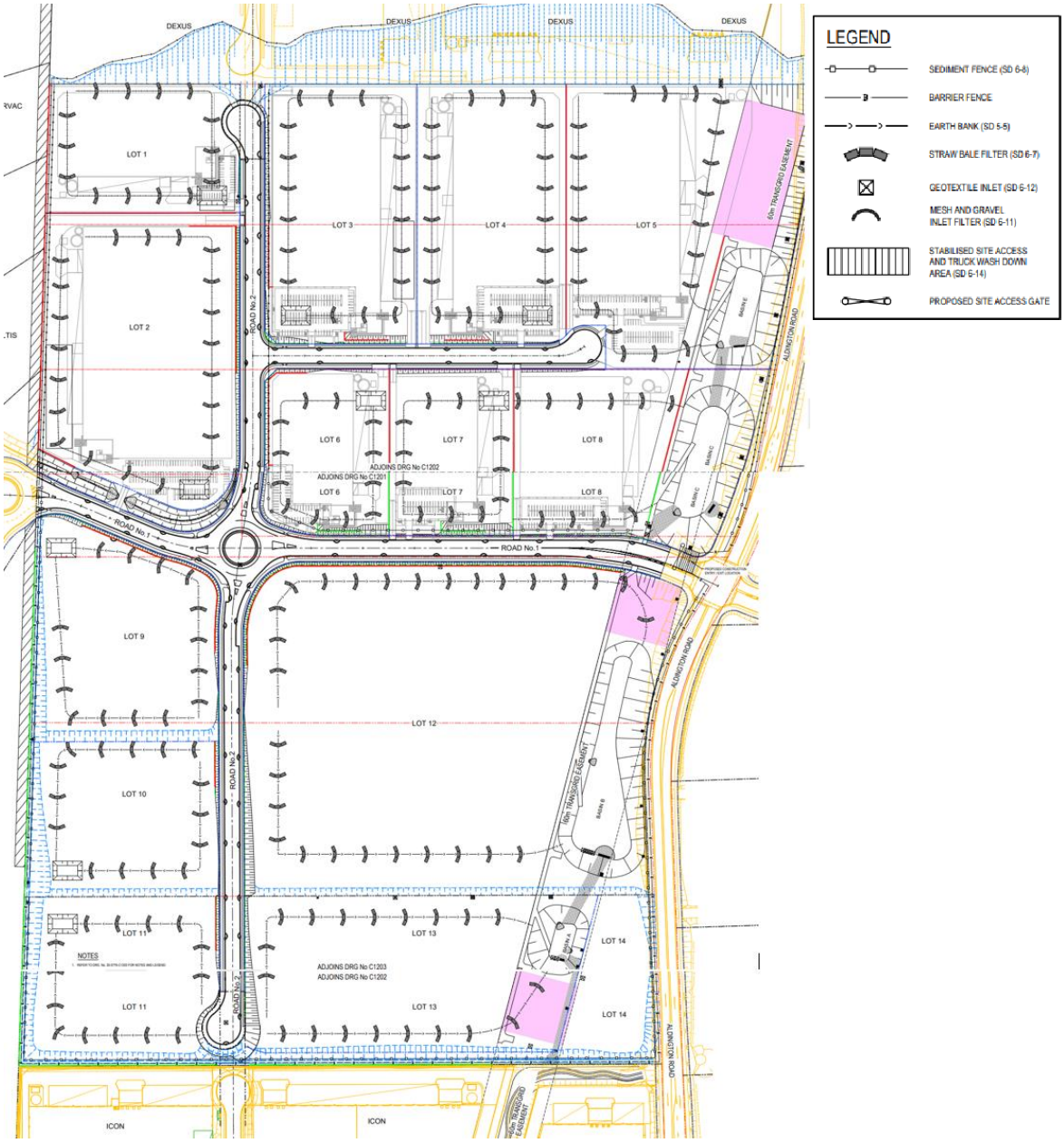


Figure 44 Erosion and Sediment Control Plan (20-776-C1201 to C1203)

Source: AT&L

6.5.5 Mitigation Measures

The updated mitigation measures in relation to soil and water are outlined in **Table 31** below.

Table 31 Updated Mitigation Measures – Soil and Water

Impact / Issue	Mitigation Measures
Stormwater Maintenance	An Inspection and Maintenance Plan will be prepared and lodged with the construction certificate for the subdivision works once final design details and the extent and layout of all proposed water management measures is confirmed. It is anticipated that the Inspection and Maintenance Plan

Impact / Issue	Mitigation Measures
	would be prepared using current best practice guidance such as Water sensitive urban design inspection and maintenance guidelines (Penrith City Council, 2022) and would describe: • The functional components of each water management measure. • Expertise required to inspect, maintain and (where necessary) repair or replace components. • Minimum required frequency of inspection, repair or replacement activities. • Inspection and maintenance forms that list all necessary activities and contain a record of activities completed.
Erosion and Sediment Control Maintenance	The Contractor will be required to inspect the Site after every rainfall event and at least weekly, and will: • Inspect and assess the effectiveness of the ESCP and identify any inadequacies that may arise during normal work activities or from a revised construction methodology. • Construct additional erosion and sediment control works as necessary to ensure the desired protection is given to downstream lands and waterways. • Ensure that drains operate properly and to affect any repairs. • Remove spilled sand or other materials from hazard areas, including lands closer than 5 metres from areas of likely concentrated or high velocity flows especially waterways and paved areas. • Remove trapped sediment whenever less than design capacity remains within the structure. • Ensure rehabilitated lands have affectively reduced the erosion hazard and to initiate upgrading or repair as appropriate. • Maintain erosion and sediment control measures in a fully functioning condition until all construction activity is completed and the Site has been rehabilitated. • Remove temporary soil conservation structures as the last activity in the rehabilitation. • Inspect the sediment basin during the following periods: - During construction to determine whether machinery, falling trees, or construction activity has damaged and components of the sediment basin. If damage has occurred, repair it. - After each runoff event, inspect the erosion damage at flow entry and exit points. If damage has occurred, make the necessary repairs. - At least weekly during the nominated wet season (if any), otherwise at least fortnightly; and - Prior to, and immediately after, periods of 'stop work' or Site shutdown. • Clean out accumulated sediment when it reaches the marker board/post and restore the original volume. Place sediment in a disposal area or, if appropriate, mix with dry soil on the Site. • Do not dispose of sediment in a manner that will create an erosion or pollution hazard. • Check all visible pipe connections for leaks, and repair as necessary. • Check all embankments for excessive settlement, slumping of the slopes or piping between the conduit and the embankment, make all necessary repairs. • Remove the trash and other debris from the basin and riser; and • Submerged inflow pipes must be inspected and de-silted (as required) after each inflow event.
Sediment Basin Maintenance	The proposed development site contains 'Type F' soils, or soils that contain a significant proportion of fine grained (33% or more of finer than 0.02mm) and require a much longer residence time to settle. Stormwater within the settling zone is to be drained or pumped out within 5 days (design time), if the nominated water quality targets can be met, to the satisfaction of the superintendent. Flocculation should be employed where extended settling is likely to fail to meet the objectives within the 5-day period. Flocculation is when flocculating agents are applied to the sediment basins causing the colloidal particles to clump into larger units or 'floc' that can either settle in a reasonable time or be filtered.
Erosion and Sediment Control Performance Assessment	As required by IECA Appendix B (2018), ongoing review of sediment basin performance will need be carried out throughout the construction phase of the development. As noted in IECA Appendix B, 'sediment basins are not designed to achieve a specific water quality; rather, they are designed to either capture and treat a specific volume of runoff, or to treat discharges up to a specified peak flow'. Considering this, site specific water quality management practices such as those suggested in IECA Appendix B will need to be implemented by the Contractor responsible for implementation of the ESCP. Demonstration of adaptive management practices and decision-making processes will provide greater certainty that all reasonable and practicable actions are being undertaken to minimise potential impacts associated with release of sediment laden water from the site.

6.6 Traffic and Transport

The Transport Management & Accessibility Plan (TMAP) prepared by Ason Group has been updated in accordance with the amended development and is included at **Appendix T**.

6.6.1 Parking Requirements

Car Parking

The car parking required, as established in the MRP DCP, and the proposed car parking spaces for the amended development is outlined in **Table 32** below.

Table 32 Car Parking Spaces Requirement and Proposed

Warehouse	Requirement	Proposed
Warehouse 1	54	41
Warehouse 2	132	135
Warehouse 3	105	106
Warehouse 4	104	105
Warehouse 5	100	100
Warehouse 6	51	52
Warehouse 7	50	51
Warehouse 8	61	62
Total	**658**	**652**

Source: Ason Group

The proposed car parking for the amended development remains generally consistent with the requirements of MRP DCP. Warehouse's 2-8 meet the MRP DCP requirement, while Warehouse 1 has a temporary shortfall of 13 spaces due to the turning head proposed in an interim outcome until such time as Road 02 continues through to the Dexus site to the north. Once the road is extended, the turning head will be removed, and the remaining car parks constructed – this is intended to be a staged approach to the delivery of Warehouse 1 and the Lot 1 works.

The proposed parking provision results in a minor shortfall overall with the proposed parking provision across the site and on each lot providing an appropriate number of vehicular spaces having regard to the activities proposed on the land, the nature of the locality and the intensity of the use.

Bicycle Parking

In regard to bicycle parking, as per the requirements of the MRP DCP, 130 bicycle spaces would be required across the site with each warehouse required to have the following spaces:

- Warehouse 1 – 10 spaces;
- Warehouse 2 – 30 spaces;
- Warehouse 3 – 21 spaces;
- Warehouse 4 – 21 spaces;
- Warehouse 5 – 20 spaces;
- Warehouse 6 – 9 spaces;
- Warehouse 7 – 8 spaces; and
- Warehouse 8 – 12 spaces.

The amended development will provide the above bicycle parking spaces.

6.6.2 Traffic Impact Assessment

Traffic Generation

The amended development's adopted trip rates remain unchanged. As a result of the increase in GFA, the traffic generation of the development has increased, as outlined in **Table 33** below.

Table 33 Traffic Generation

Period	GFA	Rate per 100m²	Trips
Daily Trips		2.91	4,461
Local Road AM Peak (7am – 8am)		0.23	353
Local Road PM Peak (4pm – 5pm)	153,285m³	0.24	368
Site Maximum Generation Rate (All Vehicles)		0.26	399
Site Maximum Generation Rate (Heavy Vehicles)		0.07	107

Source: Ason Group

Ultimate Road Network Assessment

With regard to the ultimate road layout and intersection configuration, it is notable that development of the site was considered within the MRP modelling assessment. It is understood that the assumptions that underpinned this modelling assessment was as follows:

- The majority of land use will take the form of a large format industrial warehousing;
- The land was separated into smaller land parcels for the purposes of identifying any constraints which will impact the developable GFA;
- The sub-precinct in which the Site lies was assumed to be able to accommodate a GFA which represented 55% of the total site area; and
- Trip rates adopted included a level of conservatism to allow for more intensive uses that may be located in the MRP, which are permissible under the land use zoning.

In regard to the amended development, it is assumed that 55% of the site area represented developable GFA with the estate area being 632,887m², this equates to a GFA of 348,088m². The amended development currently provides for a GFA of 153,285m².

As such, the amended development is within the assumptions that would have been made for the site with the MRP modelling assessment. The assessment undertaken for the MRP DCP has already determined the road layout and intersection capacity requirements for the assessment years of 2031 and 2036, on the basis of a precinct-wide cumulative assessment. As such, further assessment of the site with consideration to the ultimate road network, is not deemed necessary.

Noting that development is not currently proposed across the whole site, further applications will need to reconsider the consistency with the MRP modelling assessment at that stage.

Interim Road Network Assessment (2026)

The road network which was adopted for the LOG-E modelling assessment (reported in the LOG-E Modelling Memo), forms part of the relevant applications either currently under consideration or those which have been approved by DPE, as shown in **Figure 45**.

It is noted the consent for the Westlink Industrial Estate – Stage 1 and 200 Aldington Road Estate specifically reference the following key intersection for future assessment requirements:

- Mamre Road / Abbotts Road;
- Aldington Road / Abbotts Road; and
- Aldington Road / Site Access.

These are the key intersections that the Proposal will have the most direct impact. As such, interim upgrades are included within the LOG-E VPA.

The key inputs into the 2026 assessment comprised:

- Approximately 990,215m² of the total GFA within the MRP;
- Trip rates as provided by TfNSW;

- The road network as currently proposed. That is, completely consistent with either the current SSD applications, approved intersection layouts or current VPA offers; and
- Internal MRP road network assumed to be delivered by 2026.

Within the LOG-E modelling assessment, traffic generation assumptions for each of the relevant sites was included. For the site, a peak hour trip generation of 402 veh/hr in the AM peak and 419 veh/hr in the PM peak was adopted.

In reference to **Table 33**, the forecast trip generation for the amended development, based on the TfNSW provided trip rates, represents 87% of the modelled trip generation in the AM and PM peak hours for the site. As such, the amended development is therefore within the thresholds assessed for the LOG-E model.

The 2026 Intersection performance modelling demonstrates that all intersections and movements operate within acceptable thresholds in the assessment year of 2026. It is therefore evident that, subject to the upgrades currently proposed by LOG-E, the amended development is acceptable from a traffic generation perspective.

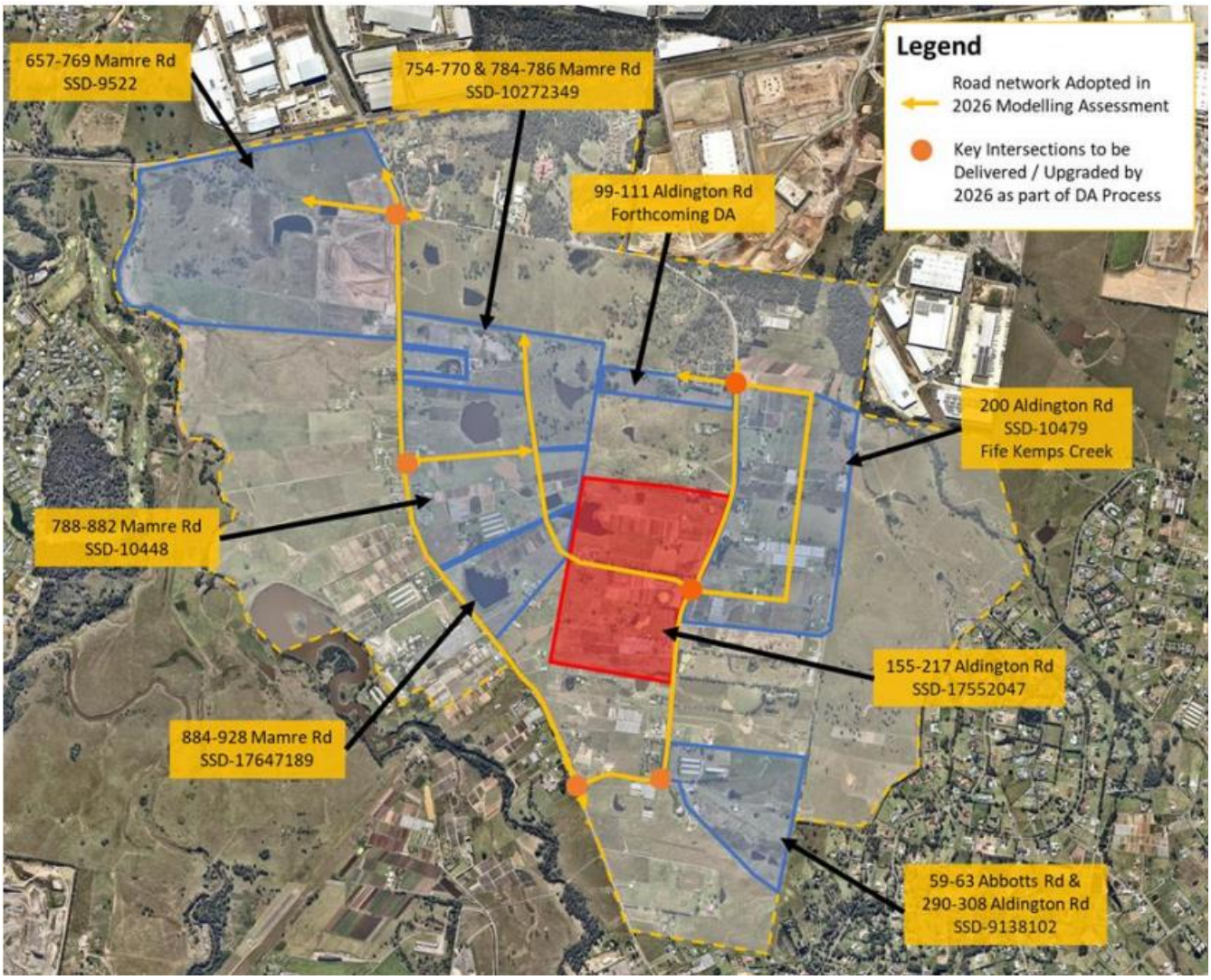


Figure 45 2026 Interim Modelling Assessment Road Network

Source: Ason Group

Trip Rate Comparison

While the LOG-E modelling assessment demonstrated that a trip generation of the Site of 402 veh/hr in the AM peak and 419 in the PM peak is acceptable, it is noted that this was based on the TfNSW provide trip rates, and not the surveyed average. Therefore, consideration to the GFA that could be achieved on the site has been provided should the surveyed trip rates be adopted.

The assessment detailed in the LOG-E Modelling Memo has established the volume of trips that the road network can accommodate. More specifically, the volumes assumed for the Site in the LOG-E model represented an assumed GFA of 174,572m^2, based on adoption of the TfNSW trip rates (utilised in **Table 33**).

Table 34 2026 Site Trip Generation – TFNSW Trip Rate

Period	Trip Rate (per 100m²)	Modelled Trips	GFA (m²)
AM	0.23	402	174,572
PM	0.24	419	

Source: Ason Group

As demonstrated by a comparison of the TfNSW trip rates and the surveyed trip rates (Table 6 and Table 7 of the TIA), it is evident that a level of conservatism has been provided for within the rates provided by TfNSW. While this is suitable for strategic level assessment, it is noted that the current Proposal has been developed with specific users in mind, which are warehouse and logistics businesses.

Therefore, it is deemed entirely appropriate to consider adoption of the surveyed trip rates, with the sites included in the survey being of a similar nature to the uses that will occupy the warehouses of the Proposal.

Considering the trips assumed for the site within the LOG-E model (**Table 35**) as being achievable by the modelling assessment, a comparison of the total GFA achievable has been undertaken. A comparison for the PM peak (being the most critical) of the trip rate provided by TfNSW, alongside the surveyed trip rates is provided in **Table 35** below.

Table 35 PM Peak Trip Generation Comparison

Source	PM Permissible Site Trips	Daily Trip Rate (per 100m²)	GFA (m²)
TfNSW	419	0.24	174,572
Surveyed		0.18	261,875
Difference			**+87,303**

Source: Ason Group

The TMAP therefore concludes that the adoption of the surveyed trip rate would suggest that up to 260,000m² of GFA could be achieved on the Site by 2026. As such, the amended development GFA is acceptable from a traffic generation perspective.

6.7 Waste Management

The Waste and Resource Recovery Management Plan prepared by LG Consult has been updated to align with the amended development and is included at **Appendix U**. As a result of the amended development the waste generation of the project has increased. The updated waste generation for demolition and construction, and operation are outlined in the following sections.

6.7.1 Demolition and Construction Waste

The updated estimated volumes of demolition and construction waste generated are outlined below in **Table 36** and **Table 37** respectively.

Table 36 Updated Estimated Demolition Waste

Waste Type	Recycling	Disposal
Timber	-	300m^3
Concrete	650m^3	-
Bricks/Pavers	550m^3	-
Metal	60m^3	-
Glass	-	20m^3
Furniture	-	50m^3
Fixtures and Fittings	-	20m^3
Floor Coverings	-	30m^3
Garden Organics	2,000m^3	-
Residual Waste	-	170m^3
Total	**3,260m^3**	**600m^3**

Source: LG Consult

Table 37 Updated Estimated Construction Waste

Waste Type	Reuse	Recycling	Disposal
Excavated Material	1,318,50m^3	-	-
Green Waste	-	<40m^3	-
Bricks/Pavers	-	-	<10m^3
Tiles	-	-	<5m^3
Concrete	-	-	<20m^3
Plasterboard	-	-	<10m^3
Metal	-	<20m^3	-
Timber	-	<40m^3	-
Other Waste	-	-	<10m^3
Packaging	-	<20m^3	-
Containers	-	<5m^3	-
Paper/Cardboard	-	<10m^3	-
Total	**1,318,580m^3**	**<135m^3**	**<55m^3**

Source: LG Consult

The amended development will provide adequate storage for construction waste with waste/recycling storage locations assigned during the demolition and construction works. It is expected that up to approximately 34 x 2,000 L bins will be required over the course of the demolition phase and approximately 28 x 2,000 L bins over the course of the construction phase.

6.7.2 Operational Waste

The updated estimated volumes of operational waste generated are outlined in **Table 38** below.

Table 38 Updated Estimated Operational Waste

Waste Type	Recycling	Disposal
Other Waste	-	<18m^3
Packaging	<7m^3	-
Containers	<4m^3	-
Paper/Cardboard	<7m^3	-
Total	**<18m^3**	**<18m^3**

Source: LG Consult

Designated waste storage areas will be provided within or adjacent to the loading dock areas of Lots 1 to 8 warehouse facilities where the recycling bins, garbage skips, plastic and cardboard compactors will be stored prior to collection. The amended development is expected to either require 1 x 2,100 L General Waste and 1 x 2,100 L Recycling Waste (Warehouse 1, 2, 4, 5, 6, 7, 8) or 2 x 2,100 L General Waste, 2 x 2,100 L Recycling Waste (Warehouse 2) that require weekly connection.

6.7.3 Mitigation Measures

The updated mitigation measures in relation to waste management are outlined in **Table 39** below.

Table 39 Updated Mitigation Measures – Waste Management

Impact / Issue	Mitigation Measures
Demolition and Construction Waste Reduction	Waste-type-specific reduction measures will be employed during demolition and construction stages, with the following specific procedures: • Applying practical building designs and construction techniques; • Appropriate sorting and segregation of demolition and construction wastes to ensure efficient recycling of wastes; • Selecting construction materials taking into consideration to their long lifespan and potential for reuse; • Ordering materials to size and ordering pre-cut and prefabricated materials; • Reuse of formwork (where possible); • Planned work staging; • Reducing packaging waste on-site by returning packaging to suppliers where possible, purchasing in bulk, requesting cardboard or metal drums rather than plastics, requesting metal straps rather than shrink wrap and using returnable packaging such as pallets and reels; • Careful on-site storage and source separation; • Subcontractors informed of site waste management procedures; and • Coordination and sequencing of various trades.
Demolition and Construction Waste Reuse	The anticipated beneficial reuses of demolition and construction waste are summarised as follows: • All solid waste timber, concrete, tiles and rock that cannot be reused or recycled will be taken to an appropriate facility for treatment to recover further resources or for disposal to landfill in an approved manner; • All asbestos, hazardous and/or intractable wastes are to be disposed of in accordance with SafeWork Authority and EPA requirements; • Portable, self-contained toilet and washroom facilities will be provided at the site and will be regularly emptied and serviced by a suitably qualified contractor;

Impact / Issue	Mitigation Measures
	• Provision for the collection of batteries, fluorescent tubes and other recyclable resources will be provided onsite to enable off-site recycling; • Drink container recycling should be provided onsite or these items sorted offsite for recycling at an appropriately licensed facility; • All garbage will be disposed of via a council approved system; and Opportunities for materials exportation and reuse with other local construction operations will be investigated.
Operational Waste Reduction	Waste-type-specific reduction measures will be employed during development operation, with the following specific procedures: • Provision of take back services to clients to reduce waste further along the supply chain; • Re-work/re-packaging of products prior to local distribution to reduce waste arising; • Review of packaging design to reduce waste but maintain 'fit for purpose'; • Investigating leased office equipment and machinery rather than purchase and disposal; • Establish systems with in-house and with supply chain stakeholders to transport products in re-useable packaging where possible; • Development of 'buy recycled' purchasing policy; • Flatten or bale cardboard to reduce number of bin lifts required; and • Providing recycling collections within each of the offices and tearooms (e.g. plastics, cans and glass).
Operational Waste Reuse	The anticipated beneficial reuses of operational waste are summarised as follows: • Cardboard, paper, plastic, glass, cans and pallets and containers will be reused/recycled offsite; • Provision for the collection of batteries, fluorescent tubes and other recyclable resources will be provided on site to enable off-site recycling; • All waste materials that cannot be reused or recycled will be taken to an appropriate facility for treatment to recover further resources or for disposal to landfill in an approved manner; • Waste oil (if any) used in equipment maintenance will be recycled or disposed of in an appropriate manner; and Opportunities for materials exportation and reuse with other local industrial operations will be investigated. This will have two benefits: minimising energy through reduction of material reprocessing, encouraging material reuse.
Waste Classification	• All liquid and non-liquid wastes generated during development construction works (if any) shall be classified in accordance with the requirements of NSW EPA (2014) Waste Classification Guidelines, Part 1: Classifying Waste.
Waste Transporting	All wastes removed from the site shall be transported in accordance with relevant road and transportation regulatory requirements. Where required (depending on the classification of the wastes), appropriately licensed transport contractors shall be used. The appointed transporters shall be responsible for ensuring they are appropriately licensed to: • Carry the particular type of waste; and • Transport the materials to an appropriately licensed facility.

6.8 Noise and Vibration

The Construction Noise and Vibration Assessment (CNVA) (**Appendix V**) and Operational Noise Assessment (ONA) (**Appendix W**) prepared by Acoustic Works have been updated to reflect the current surrounding conditions and the amended development.

6.8.1 Construction Noise and Vibration

The Construction Noise and Vibration Assessment (CNVA) (**Appendix V**) prepared by Acoustic Works has been updated to reflect the current surrounding conditions and the amended development.

Receivers and Noise Monitoring

In order to accurately capture the current surrounding environment, the identified construction receivers have been updated and are described in **Table 40** below and illustrated in **Figure 46** following.

Table 40 Updated Construction Noise Receiver Descriptions

Receiver ID	Description
1	Single and two storey residential dwellings are located adjacent the western site boundary from 864-928 Mamre Road, with SSDs lodged to demolish one of these and construct industrial warehousing estates.
2	A single storey residential dwelling is located adjacent the eastern site boundary at 930-966 Mamre Road, with the land recently purchased for an industrial development.
3	A single storey residential dwelling is located adjacent the southern site boundary at 253- 267 Aldington Road, with an SSD lodged to demolish the dwelling and construct part of an industrial warehousing.
4	A Hindu temple (7A) and monks' residence (7B) are located to the south east of the site at 230-242 Aldington Road.

Source: Acoustic Works

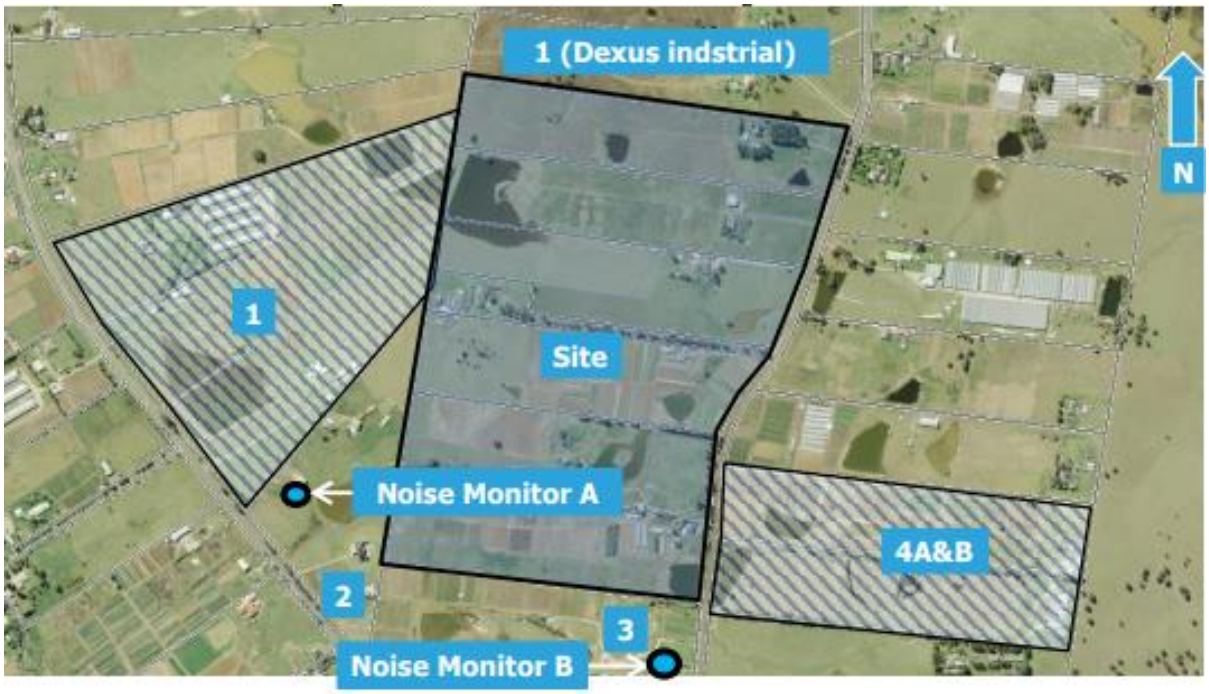


Figure 46 Updated Construction Noise Receiver Locations

Source: Acoustic Works

Noise Criteria

The background ambient background noise levels remain unchanged. It is noted that the noise criteria and relevant policies remain generally unchanged, however due to the amended development and amendment to receivers some additional criteria has been incorporated. The selected noise sources emission also remain unchanged from the exhibited assessment.

Predicted Construction Noise Impact

The construction noise levels remain generally consistent with the exhibited assessment. Earthworks and construction activities would potentially be above the noise affected level of 48dBA at the nearest receivers but are predicted to comply with the highly affected noise limit of 75dBA LAeq 15min at each of the receiver locations.

It is noted that the calculations assume that all noise sources are operating simultaneously, at the closest point to the receiver in each case. In practice, this will generally not occur as processes will be either spread over the site or occur on different days. The predicted noise levels represent the expected worst-case noise emissions due to site works. Appropriate mitigation measures are outlined in **Section 6.8.3** that will minimise construction noise.

Predicted Vibration Impacts

The predicted vibration impacts remain unchanged. Based on the separation distance to the nearest receiver locations and ground composition to the southern receiver (253-267 Aldington Road), the maximum vibration level due to earthwork and base build is expected to be less than 2-3mm/s, which is predicted to comply with the criteria. Appropriate mitigation measures are outlined in **Section 6.8.3** that will minimise vibration impacts during construction.

6.8.2 Operational Noise and Vibration

The Operational Noise Assessment (ONA) (**Appendix W**) prepared by Acoustic Works has been updated to reflect the current surrounding conditions and the amended development with a summary of the updated assessment provided in the following sections.

Receivers and Noise Monitoring

In order to accurately capture the current surrounding environment, the identified operational receivers have been updated and are described in **Table 41** and illustrated in **Figure 47** following. The additional sensitive receivers and residential zones surrounding the site included with the exhibited assessment (receivers A-N) remain unchanged.

Table 41 Updated Operational Noise Receiver Descriptions

Receiver ID	Description
1	A two storey residential dwelling is located adjacent the northern site boundary at 141 Aldington Road, which will be demolished as part of this SSD for the proposed transitional earthworks for proposed industrial warehousing.
2	Earthworks for proposed industrial warehousing is located adjacent to the western site boundary from 826-862 Mamre Road.
3	Single and two storey residential dwellings are located adjacent the western site boundary from 864-928 Mamre Road, with SSDs lodged to demolish one of these and construct industrial warehousing estates.
4	A single storey residential dwelling is located adjacent the eastern site boundary at 930-966 Mamre Road, with the land recently purchased for an industrial development.
5	A single storey residential dwelling is located adjacent the southern site boundary at 253- 267 Aldington Road, with an SSD lodged to demolish the dwelling and construct part of an industrial warehousing.
6	Aldington Road separates the site from an approved industrial warehousing estate at 106- 228 Aldington Road.
7	A Hindu temple (7A) and monks' residence (7B) are located to the south east of the site at 230-242 Aldington Road.

Source: Acoustic Works

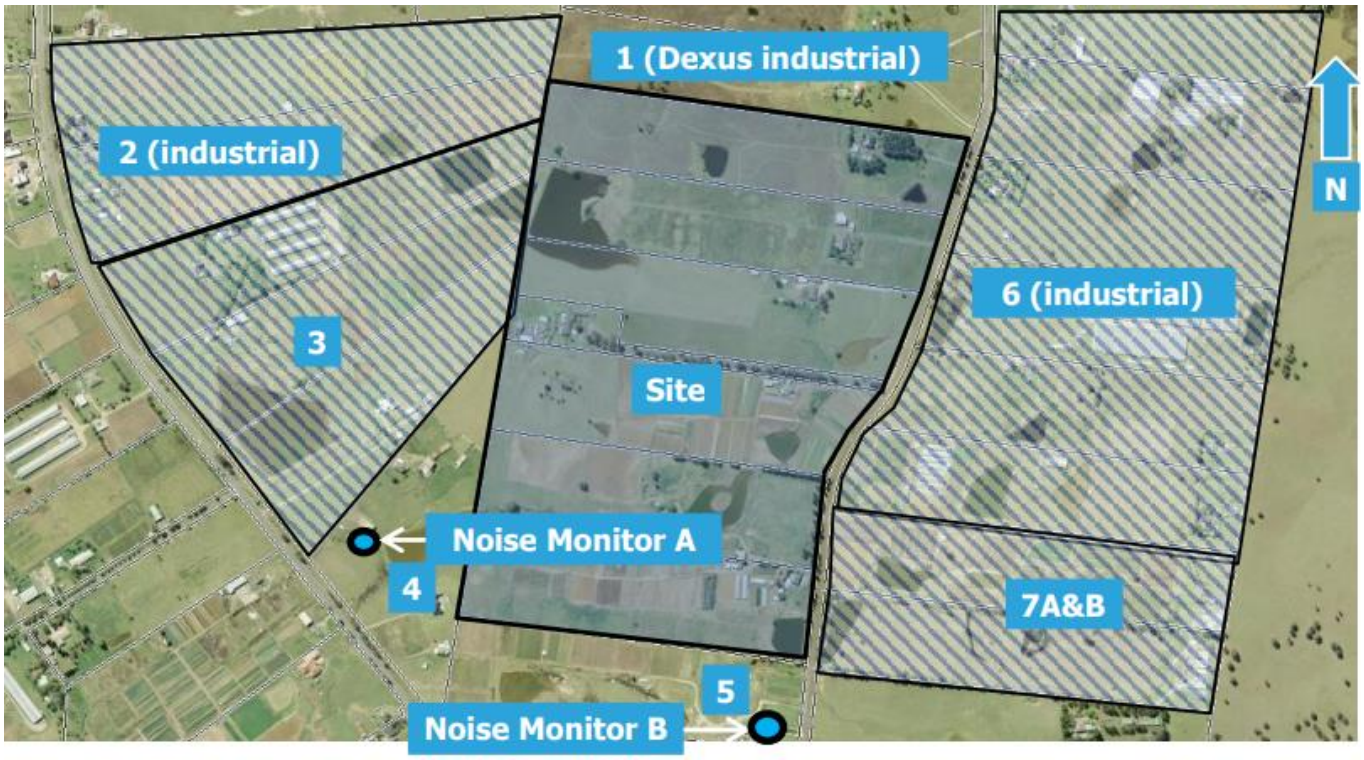


Figure 47 Updated Operational Noise Receiver Locations

Source: Acoustic Works

Noise Criteria

The background ambient background noise levels remain unchanged. It is noted that the noise criteria and relevant policies remain generally unchanged, however due to the amended development and amendment to receivers some additional criteria has been incorporated. The selected noise sources emission also remain unchanged from the exhibited assessment.

Predicted Operational Noise Impact

As a result of the amended development and amended receivers, the predicted operational noise impact assessment has been updated and is summarised in the following sections.

Closest Receivers – Unmitigated

The updated predicted cumulative noise impacts for the closest receivers (receivers 1-7) are provided in **Table 42**. It represents a scenario that does not include interim noise barriers and noise mitigation measures as outlined in **Section 6.8.3** to demonstrate that the inclusion of interim noise barriers along the southern and south-west boundary appropriately mitigate the noise impacts until the surrounding residents are vacant or developed.

Table 42 Project Specific Noise Levels (Receivers 1 to 7) – Unmitigated

Receiver	Project Specific Criteria Leq,15min dBA			Predicted Noise Impacts Leq,15min dBA		
	Day	Evening	Night	Day	Evening	Night
1	63	63	63	44	42	39
2	63	63	63	49	46	42
3	46	46	41	47	43	39
4	46	46	41	42	39	35
5	43	42	39	48	45	41
6	63	63	63	43	41	38
7A	33/43	33/43	33/43	27/37	24/34	21/31
7B	43	42	39	38	35	32

Source: Acoustic Works

The results illustrate that compliance with the cumulative impact criteria is predicted for all onsite activities at the closest receiver locations apart from receiver 5 located to the immediate south of the amended development site. The results illustrate that the noise impact from the amended development complies with the noise criteria of the BAPS Template (receiver 7).

Closest Receivers – Mitigated

The updated predicted cumulative noise impacts for the closest receivers (receivers 1-7) are provided in **Table 43**. It represents a scenario that includes interim noise barriers and noise mitigation measures as outlined in **Section 6.8.3** to demonstrate that the inclusion of interim noise barriers along the southern and south-west boundary appropriately mitigate the noise impacts until the surrounding residents are vacant or developed.

Table 43 Project Specific Noise Levels (Receivers 1 to 7) – Mitigated

Receiver	Project Specific Criteria Leq,15min dBA			Predicted Noise Impacts Leq,15min dBA		
	Day	Evening	Night	Day	Evening	Night
1	63	63	63	44	42	39
2	63	63	63	49	46	42
3	46	46	41	46	43	39
4	46	46	41	38	35	32
5	43	42	39	43	40	37
6	63	63	63	43	40	37
7A	33/43	33/43	33/43	37	34	31
7B	43	42	39	38	35	32

Source: Acoustic Works

The results of the noise impact on the closest receivers demonstrate compliance with the cumulative impact criteria during the proposed operating hours (24/7) assuming the mitigation measures outlined in **Section 6.8.3** are implemented, including interim noise barriers along the southern and south-west boundary of the amended development site.

Distance Receivers

The updated predicted cumulative noise impacts for the distance receivers (receivers A to N) are provided in **Table 44**. It represents a scenario that does not include interim noise barriers but does include standard noise mitigation measures (refer to **Section 6.8.3**) to demonstrate if the amended development impacts on established surrounding residential areas.

Table 44 Project Specific Noise Levels (Receivers A to N)

Receiver	Project Specific Criteria Leq,15min dBA			Predicted Noise Impacts Leq,15min dBA		
	Day	Evening	Night	Day	Evening	Night
A	16 (Internal) / 26 (External)			16/26	13/23	10/20
B	36	19	16	23	20	17
C	16 (Internal) / 26 (External)			13/23	11/21	7/17
D	16 (Internal) / 26 (External)			8/18	5/15	2/12
E	36	21	17	20	18	15
F	16 (Internal) / 26 (External)			7/17	5/15	1/11
G	21 (Internal) / 31 (External)			4/14	2/12	-/8

Receiver	Project Specific Criteria Leq,15min dBA			Predicted Noise Impacts Leq,15min dBA		
	Day	Evening	Night	Day	Evening	Night
H		16 (Internal) / 26 (External)		5/15	3/13	-/9
I		16 (Internal) / 26 (External)		8/18	6/16	2/12
J	36	26	21	23	20	17
K	36	26	21	20	18	15
L	36	26	21	18	16	13
M	36	26	21	12	9	6
N	31	26	21	22	19	16

Source: Acoustic Works

The results of the noise impact on receivers A to N demonstrate compliance with the cumulative impact criteria during the proposed operating hours (24/7) assuming the mitigation measures outlined in **Section 6.8.3** are implemented, excluding interim noise barriers.

Sleep Disturbance

The sleep disturbance assessment for the distant receivers has remained unchanged with the development predicted to comply with the noise criteria at all locations.

Road Traffic Noise

Traffic generated by the development is predicted to comply with the NSW Road Noise Policy criteria at all nearby residences except for those where the criteria are exceeded by existing traffic. Compliance is predicted with the Relative increase criteria for residential land uses.

6.8.3 Mitigation Measures

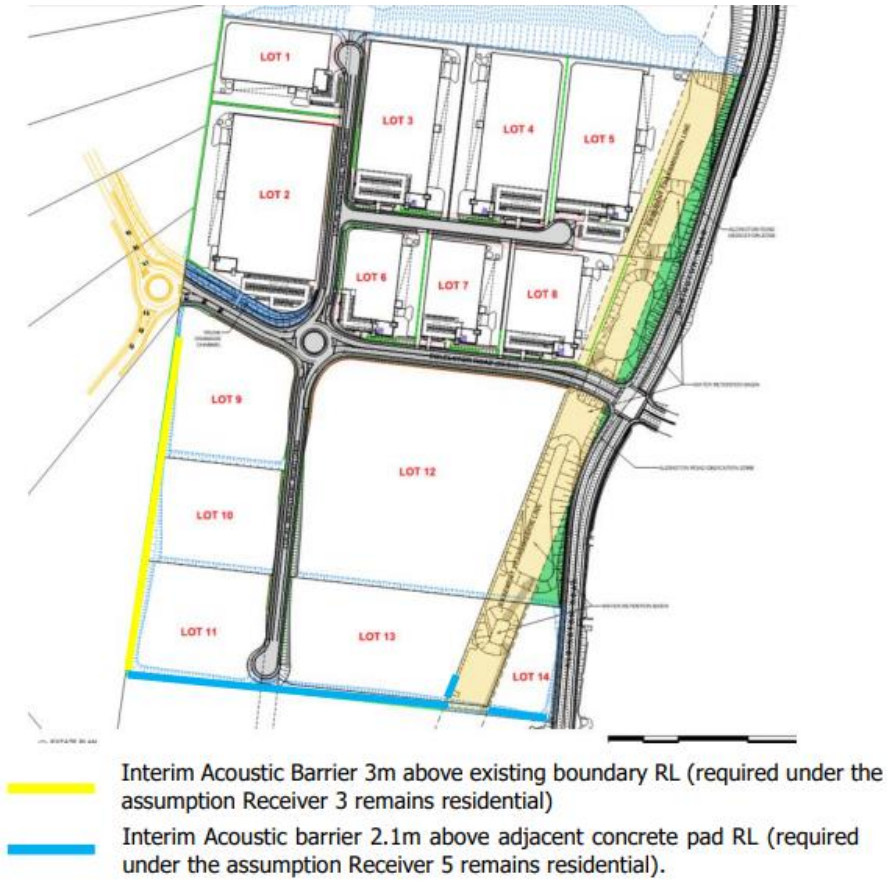
The updated mitigation measures in relation to noise and vibration are outlined in **Table 45** below.

Table 45 Updated Mitigation Measures – Noise and Vibration

Impact / Issue	Mitigation Measures
Construction	
Construction Noise Control	The following general acoustic treatments and management principles are to be implemented: • The conditioned construction hours would be as follows: Monday to Friday 7 am to 6 pm Saturday 8 am to 1 pm No work on Sundays or public holidays • If further noise mitigation is required, acoustic barriers around the perimeter of the site can be installed during the works. If further noise reductions are required, install additional screening around noise sensitive areas. • Workers or delivery trucks do not congregate at or outside the site before 7am. This is an important factor in managing noise from the site. • Assign the task of managing noise emissions to a person (the 'responsible person') that is likely to be present on-site most of the time that activity is occurring (usually the Site Manager). This person would be responsible for handling noise complaints, and ensuring that work does not commence before the specified allowable times. The name and contact details of the 'responsible person' should be displayed outside the principal construction office. • If complaints arise regarding noise, the complaint will be directed to the 'responsible person', who will determine the source of the noise, and take immediate steps to investigate further or mitigate the noise as required. This may involve moving the noise source further away from affected premises, replacing the equipment, installing high performance silencers, or in some cases, engaging a qualified acoustic consultant to provide specialist control advice. • The Responsible Person should notify the adjacent residential premises of the intention to commence work that may cause adverse impacts on surrounding residents. If plant is to be operated in close proximity to residential premises, the Responsible Person should advise the occupants of the premises the length of time that the plant will be in operation proximate to the property boundary.

Impact / Issue	Mitigation Measures
	• Any moveable plant (e.g. compressors) should be located as far as practical from the residential premises. • The Responsible Person maintain a record of complaints, which records the following details (refer to the example complaint record sheet in the appendix to this plan): - The time and date of lodgement of the complaint; - The name and telephone number of the complainant; - The nature of the complaint, including a description of the noise (e.g. likely noise source, duration of the noise event - is the noise continuous, or of a short duration); - The outcome of the investigation. • If a complaint is raised regarding a particular piece of plant, the plant shall be inspected for working condition, with particular attention given to the condition of engine covers or enclosures, and exhaust system. If machinery is in good condition, a high performance silencer should be installed.
Construction Noise Monitoring	• If required, short-term operator-attended noise measurements will be suitable for investigating 'spot-checks' of noise complaints in most situations. The methodology must establish the difference between the ambient noise level and the noise source being investigated and check for compliance. For ongoing noise complaints, we recommend long term noise monitoring at the nearest receiver locations with fortnightly reporting. • Equipment, parameters and procedures for measuring noise should be conducted in reference to the recommendations of the Construction Noise and Vibration Assessment.
Vibration Dilapidation Assessments	The following numbered locations in the below image must have a dilapidation assessment before works proceed. • 
Vibration Control	• To minimise exceedances, monitoring equipment shall include SMS alert to the site manager and project staff including the acoustic consultant. Where an alert indicates exceedance of the criteria, use of the onsite plant responsible for the vibration shall cease until the cause is identified and mitigated. Alternative construction methods may be required if problems are identified onsite.
Vibration Management	• Allowable construction hours as follows: Monday to Friday 7 am to 6 pm Saturday 8 am to 1 pm No work on Sundays or public holidays • Assign the task of managing vibration complaints or recorded exceedance of the criteria to a person (the 'responsible person') that is likely to be present on-site most of the time that activity is occurring (usually the Site Manager). This person would be responsible for handling vibration complaints and ensuring that work does not commence before the specified allowable times. The name and contact details of the 'responsible person' should be displayed outside the principal construction office. • If complaints arise regarding vibration, the complaint will be directed to the 'responsible person', who will determine the source of the vibration or engage the acoustic consultant to investigate immediately. This may involve moving the vibration source further away from affected premises, replacing the equipment, operating at a reduced speed, or excavating a ditch 0.5 metre wide and 1 metre deep between the receiver and the site.

Impact / Issue	Mitigation Measures
	• The Responsible Person should notify the adjacent residential premises of the intention to commence work that may cause adverse impacts on surrounding residents. If plant is to be operated in close proximity to residential premises, the Responsible Person should advise the occupants of the premises the length of time that the plant will be in operation proximate to the property boundary. • Any moveable vibrating plant (e.g. compressors) should be located as far as practical from the adjacent residential premises. • The Responsible Person maintain a record of complaints, which records the following details (refer to the example complaint record sheet in the appendix to this plan): - The time and date of lodgement of the complaint; - The name and telephone number of the complainant; · The nature of the complaint, including a description of the vibration (e.g. likely vibration source, duration of the event - is the vibration continuous, or of a short duration); - The outcome of the investigation. • If a complaint is raised regarding a particular piece of plant, the plant shall be inspected for working condition, with particular attention given to the condition of equipment operating components. If machinery is in good condition, attended vibration measurements shall be undertaken to determine the cause with recommendations provided by a qualified acoustic consultant to rectify the situation.
Maximum Vibration Levels	• Based on inspection of the surrounding buildings, the maximum allowable levels would be a peak particle velocity of 6mm/s. If monitors are installed onsite they shall be set to a maximum limit of 3mm/s to provide adequate warning and to avoid exceedances of the maximum noise limits.
Vibration Monitoring Procedure	To ensure the vibration monitoring is effective, the following is to be implemented for any vibration modelling: • All vibration monitors will be set to a maximum measurement interval of 5 minutes and record over the construction period commencing at 6am to 7pm every day. • The client shall provide a list of relevant construction staff (including mobile phone numbers) working on the project to be notified of exceedance of the nominated vibration levels. • All vibration monitors will be fitted with an internal SMS warning system (allow the unit to send SMS notification of vibration levels when the nominated level is exceeded). The SMS warning from the vibration monitors will go out to all staff who have provided their mobile numbers for use for notifications from the vibration monitor. • The vibration monitor will be set to provide vibration impact warnings at 2/3 of the criteria (10mm/s), this will allow staff to be notified of vibration levels and take a proactive approach before the criteria is exceeded. The Acoustic consultant will also have a minimum of 2 staff nominated on the warning system. • The vibration monitors will be installed with additional battery packs to extend the operation of the monitor to a minimum of 6 weeks with recharge. - Regardless of warning or notification, the vibration monitor will be downloaded on a monthly basis with a monthly report provided to the client, the report will be suitable for submission to council.
Procedure for measuring Vibration	• Vibration is required to be measured at any complainants property with the geophone located at the nearest point of the dwelling to the site. The geophone can be fixed to the ground using mounting spikes in line with the nearest point of the development or fixed directly to dwelling, note that relocation of the geophone may be required to be representative of the nearest location of works being conducted onsite. Note multiple vibration monitors (two) are recommended to avoid the need for relocating the geophone multiple times. • Measurements of construction vibration should be undertaken at the time(s) when the site is operating during the approved construction hours. If attended vibration measurements are required, they should be representative of the current maximum level of activity from the site, or at times when complaint has been received. • Any reporting should be concise. The minimum requirements to be included in a report are; - Date and duration of measurements. - Time of measurements or measurement period. - Person(s) performing measurements or placing equipment used for long term monitoring. - Equipment used for measurements. - Location of measurements including photos. - Measured values including graphed PPV for the period of monitoring. - Corrected values (where applicable). - Notes regarding vibrating sources. - Notes regarding any extraneous sources that may have influenced measurements.

Impact / Issue	Mitigation Measures
	- Detail of instrumentation and calibration. - Meteorological conditions. - Explanation of any high levels below the criteria including exceedances • Action taken for any exceedance including changes to site operations
Interim Noise Impact	• Acoustic barriers shall be constructed to the height and extent shown below. The barriers will vary for each stage of the project. The acoustic barriers should be constructed using either masonry, 9mm fibre cement sheet, Hebel, or other materials with a minimum surface density of 9kg/m2 and shall be free of gaps and holes. • All acoustic barriers walls are only required while the residential dwellings adjacent the site boundaries are occupied. As the surrounding dwellings are confirmed to have been purchased for future industrial development with SSDAs lodged over the land, the barriers may be of temporary construction on the condition the requirements outlined in the points above are met. When a given residential dwelling has been purchased for a further industrial development and is no longer occupied by residents, the corresponding acoustic barrier/retaining wall may be removed. Note that all receivers with the exception of Receivers 3 and 5 are predicted to satisfy the criteria without the need for acoustic barriers.  •
Minimum Building Construction	• Warehouses shall be constructed using concrete tilt walls to a height of 2.4m above pad level RL, with the remainder of the construction to use standard sheet metal construction.
Noise Allocation for Lots	• To determine the criteria for assessing an individual proposed use, we recommend applying the below formula at each receiver and for each time period. - Criteria = $PNTL_{period}$ + 10 log (A_{lot} /A_{total}) - Where: - $PNTL_{period}$ is the project noise trigger level as nominated in the ONA - A_{lot} is the lot area of the individual use being assessed - A_{total} is the total site area of the overall development • Once mechanical plant selection is finalised, an assessment by qualified acoustic consultant be conducted prior to installation to determine any requirements for acoustic treatments.

Impact / Issue	Mitigation Measures
Noise Complaints	• If noise complaints are received from nearby receivers, noise monitoring with audio shall be conducted for a period of 7 weeks, with a monitor placed onsite and at the receiver from which the complaint was received. The monitors shall record simultaneously, with attended measurements also conducted onsite and at the complaining receiver. The monitoring data and audio shall be examined by a suitably qualified person to verify that the offending noise originated at the site. If noise generated by the site has resulted in complaints, an acoustic assessment is conducted to determine suitable mitigation strategies and/or acoustic treatments.

6.9 Air Quality

The Air Quality Impact Assessment (AQIA) prepared by Northstar Air Quality has been updated with reference to the amended development and is included at **Appendix X**. The methodology for the updated AQIA remains unchanged with a summary of the changes to the existing environment and assessment of impacts provided in the following sections.

6.9.1 Existing Environment

In order to accurately capture the current surrounding environment, the AQIA receptors have been updated and illustrated in **Figure 48**. The AQIA identifies that a number of the identified industrial receptors are currently in the process of being developed and correspondingly, have been considered in this assessment.

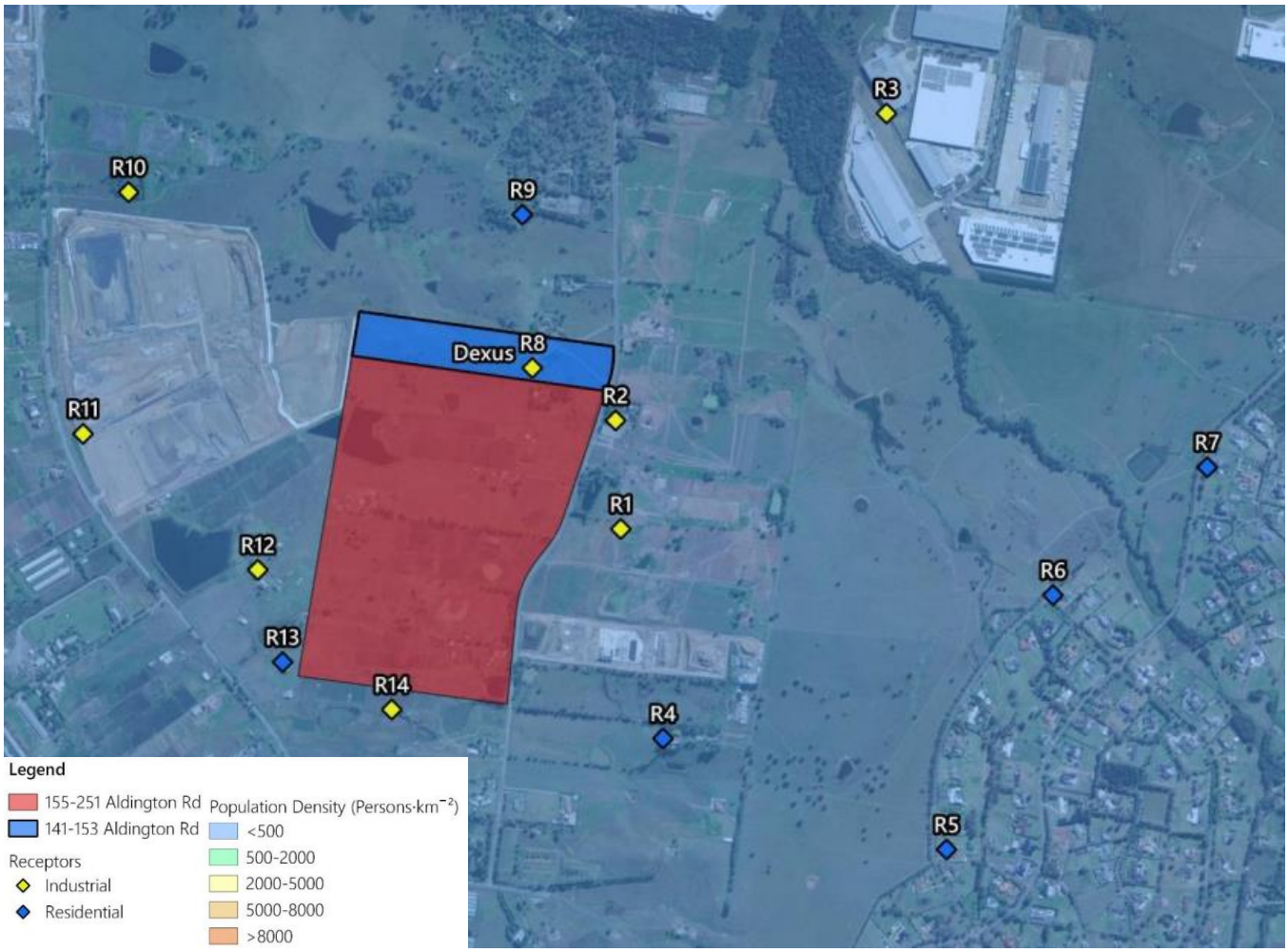


Figure 48 Updated Air Quality Impact Assessment Receptors

Source: Northstar Air Quality

6.9.2 Assessment of Impacts

An assessment of the updated construction and operational air quality assessment is provided in the following sections.

Construction Phase

The updated AQIA outlines the potential for cumulative impacts from the surrounding development, as identified in **Section 2.4** of this Amendment Report. A review of the documentation supporting the development applications for the identified proximate developments show that emissions during construction would be similar to those assessed for the amended development, which can be appropriately managed through considerate dust management measures to result in minimal impacts on the surrounding environment. Cumulative impacts with the Proposal associated with construction activities for any development would therefore be anticipated to be minor.

An updated assessment of the air quality risk from amended development during construction (using the same methodology as exhibited) is provided in **Table 46** below.

Table 46 Risk of Air Quality Impacts from Construction Activities (Pre-Mitigation)

Impact	Sensitivity of Area	Dust Emissions Magnitude					Preliminary Risk				
		Demolition	Earthworks	Construction	Track-out	Construction Traffic	Demolition	Earthworks	Construction	Track-out	Construction Traffic
Dust Soiling	Low	Large	Large	Large	Large	Large	Medium	Low	Low	Low	Low
Human Health	Medium	Large	Large	Large	Large	Large	High	Medium	Medium	Medium	Medium

Source: Northstar Air Quality

The updated assessment demonstrates an increased impact to that exhibited. It outlines a medium risk of adverse dust soiling impacts and a high risk of human health impacts during demolition. All other construction phase activities are associated with low risks of dust soiling impacts and medium risks of health impacts.

This assessment assumes that no mitigation measures are implemented. Given the size of the site, the distance to sensitive receptors and the activities to be performed, residual impacts associated with fugitive dust emissions from the development would be anticipated to be 'negligible', should the implementation of the mitigation measures (refer to **Section 6.9.3**) be performed appropriately.

Operational Phase

The impact of operational air quality from the amended development, in comparison to the exhibited development, is expected to be minimal. Considering both the isolated impact and cumulative impact, all air quality criteria are predicted to be achieved. In addition, the changing landscape of the surrounding environment, with residential locations being removed and land being developed as commercial/industrial uses, should ensure that the most sensitive locations would not be present in the future.

6.9.3 Mitigation Measures

The updated mitigation measures in relation to air quality are outlined in **Table 47** below.

Table 47 Updated Mitigation Measures – Air Quality

Impact / Issue	Mitigation Measures
Communications	• Develop and implement a stakeholder communications plan that includes community engagement before work commences on site. • Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environment manager/engineer or the site manager. • Display the head or regional office contact information. • Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the relevant regulatory bodies
Site Management	• Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken. • Make the complaints log available to the local authority when asked. • Record any exceptional incidents that cause dust and/or air emissions, either on- or offsite, and the action taken to resolve the situation in the log book. • Hold regular liaison meetings with other high-risk construction sites within 500 m of the site boundary, to ensure plans are coordinated and dust and particulate matter emissions are minimised. It is important to understand the interactions of the off-site transport/ deliveries which might be using the same strategic road network routes.
Monitoring	• Undertake daily on-site and off-site inspections where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the local authority when

Impact / Issue	Mitigation Measures
	asked. This will include regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100m of site boundary. • Carry out regular site inspections to monitor compliance with the dust management plan / CEMP, record inspection results, and make an inspection log available to the local authority when asked. • Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.
Preparing and Maintaining the Site	• Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible. • Erect solid screens or barriers around dusty activities or the site boundary that they are at least as high as any stockpiles on site. • Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period. • Avoid site runoff of water or mud. • Keep site fencing, barriers and scaffolding clean using wet methods. • Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below. • Cover, seed or fence stockpiles to prevent wind erosion.
Operating Vehicle/Machinery and Sustainable Travel	• Ensure all on-road vehicles comply with relevant vehicle emission standards, where applicable. • Ensure all vehicles switch off engines when stationary - no idling vehicles • Avoid the use of diesel or petrol-powered generators and use mains electricity or battery powered equipment where practicable. • Impose and signpost a maximum-speed-limit of 25 km·h-1 on surfaced and 15 km·h-1 on unsurfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate. • Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials. • Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).
Operations	• Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable Cust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems. • Ensure an adequate water supply on the site for effective dust/particulate matter suppression/ mitigation, using non-potable water where possible and appropriate. • Use enclosed chutes and conveyors and covered skips. • Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate. • Ensure equipment is readily available on site to clean any dry spillages, and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.
Waste Management	• Avoid bonfires and burning of waste materials.
Measures Specific to Demolition	• Soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where possible, to provide a screen against dust). • Ensure effective water suppression is used during demolition operations. Hand held sprays are more effective than hoses attached to equipment as the water can be directed to where it is needed. In addition, high volume water suppression systems, manually controlled, can produce fine water droplets that effectively bring the dust particles to the ground. • Avoid explosive blasting, using appropriate manual or mechanical alternatives. • Bag and remove any biological debris or damp down such material before demolition. • Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable.
Measures Specific to Construction	• Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place

Impact / Issue	Mitigation Measures
Measures Specific to Track-Out	• Use water-assisted dust sweeper(s) on the access and local roads to remove, as necessary, any material tracked out of the site. • Avoid dry sweeping of large areas. • Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport. • Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable. • Record all inspections of haul routes and any subsequent action in a site log book. • Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned. • Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable). • Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits • Access gates to be located at least 10 m from receptors where possible.

6.10 Biodiversity

A Biodiversity Impact Assessment Report has been prepared by Ecologique in support of the amended development and is included at **Appendix Y**. The exhibited SSDA included a Biodiversity Development Assessment Report (BDAR). However, following Public Exhibition, the final Cumberland Plain Conservation Plan (CPCP) and CPCP mapping was released with NSW approvals in place. Under the CPCP, the amended development site is identified as certified-urban capable land.

As such, no further biodiversity approvals are required before certified-urban capable land is to be developed. Notwithstanding this, the Biodiversity Impact Assessment Report has completed an assessment and provided updated mitigation measures as outlined in the following sections.

6.10.1 Legislative Context

A summary of legislation relevant to biodiversity matters relating to the site is outlined in **Table 48** below.

Table 48 Biodiversity Legislative Context Assessment

Legislation	Assessment
Environment Protection and Biodiversity Conservation Act 1999 **(EPBC Act)**	During the planning phase of SSD-17552047, a referral was made to the Australian Department of Climate Change, Energy, the Environment and Water (DCCEEW) for a decision on whether the proposed development constituted a controlled action under the EPBC Act. The referral included the additional parcels of land. Notification that the proposed development does not constitute a controlled action was received on 9 August 2021.
Biodiversity Security Act 2015 **(Biosecurity Act)**	The Biosecurity Act introduces the premise that biosecurity is a shared community responsibility and introduces the legally enforceable concept of a General Biosecurity Duty (GBD). The GBD means that any person dealing with a biosecurity risk must take measures to prevent, minimise or eliminate the biosecurity risk (as far as is reasonably practicable). Biosecurity risks relevant to SSD-17552047 include priority weeds, and aquatic pest fauna, and the potential introduction and spread of pathogens and disease. Mitigation of biosecurity risks are detailed within the SSD 17552017 Weed Eradication Management Plan and Dam Decommissioning Plan that are subplans to the Construction Environmental Management Plan (CEMP).
Biodiversity Conservation Act 2016 **(BC Act)**	The site is certified as urban capable land under the CPCP and does not require assessment under the BC Act and regulations.
Fisheries Management Act **(FM Act)**	The development will not impact on any fishery resources as defined under the FM Act, nor involve any activities that require approval under the FM Act. The rescue and relocation of fin fish during dam decommissioning requires a permit under Section 37 of the FM Act. The Dam Decommissioning Plan included at **Appendix Z** details the process and procedures for Dam Decommissioning.
Water Management Act 2000 **(WM Act)**	The WM Act is administered by DPE Water (formerly the Natural Resources Access Regulator or NRAR)and establishes an approval regime for activities within waterfront land, defined as the land 40m from the highest bank of a river, lake or estuary. For further discussion, refer to **Section 6.10.2** below.

Source: Ecologique

6.10.2 Watercourses

Existing Environment

NSW Hydro line spatial data indicates five (5) short stream lengths within the site comprising:

- One (1) 1st order stream of approximately 115m in length in the southwest corner of Lot 24 DP255560;
- Two (2) 1st order streams of approximately 8m and 10m in length, which enter the southeast corner of Lot 10 DP253503 under Aldington Road; and
- One (1) 2nd order stream, which flows from the mapped convergence of the above two (2) 1st order streams in Lot 10 DP253503. The mapped stream length is approximately 65m in length before flowing into the adjacent land to the south.

Assessment

The proposal is required to consider the WM Act, NRAR guidelines (2018) and the MRP DCP controls and the MRP SSP. As outlined in **Section 2.3.2**, the Stormwater Scheme Plan identifies the regional stormwater infrastructure required to service the Mamre Road Precinct and to be managed by Sydney Water.

The proposed channel was to be located in the Transgrid easement, and where a series of basins are proposed as part of the proposal's stormwater management measures. Transgrid has previously approved the proposal's basins but would not approve a 25 to 30m channel as it will impact on future structure pads (i.e., pads are generally 60m x 60m and are the entire width of the easement).

Consequently, the proposal's basins will serve to meet the objectives of the SSP, while also providing riparian habitat through native tree/large shrub and grassy under-storey plantings surrounding the basins and native sedges and grasses within the basins. The total area of riparian buffer zone required under the NRAR 2018 guidelines is an estimated 0.48 ha (i.e., 1,943m^2 from Lot 10 of DP 253503 and 2,875m^2 from Lot 24 of DP 255560). The riparian planting associated with the proposal's stormwater basins is approximately 1.0 ha, which provides double that required under the NRAR guidelines.

6.10.3 Mitigation Measures

The revised mitigation measures in relation to biodiversity are outlined in **Table 49** and form measures for mitigating construction impacts on biodiversity will be specified in a project-specific Construction and Environmental Management Plan (CEMP).

Table 49 Updated Mitigation Measures – Biodiversity

Impact / Issue	Mitigation Measures
Pre-Clearance Process	**Pre-clearance Surveys** Pre-clearing surveys are undertaken to provide a final check for presence of flora and fauna species and habitat on a site immediately before clearing begins. Pre-clearing surveys are required to: • Identify habitat features suitable for native fauna that will require clear felling supervision and which will require a two-stage clearance procedure; • Identify any threatened flora or fauna that may have that may have moved into the subject site since ecological surveys were conducted; • Provide input into determining appropriate clearance process, including: - Recording the details for all habitat features found in vegetation to be cleared (including where applicable: GPS location; species or type of habitat features), - Clearly marking habitat features that will require a two-staged clearing process, • Locate nearby habitat suitable for the release of fauna that may be encountered during the preclearing process; • Prepare constraints mapping and relevant induction materials; • Determine any additional management measures that may need to be incorporated into the Project's CEMP. **Marking habitat features** Generally, to minimise confusion over growing amounts of flagging tape generated by different surveys and the marking of habitat features that require a two-staged clearing process, certain colours will be used for specific purposes. The following colour coding system shall be used: • Red spray-painted X or red flagging tape = non-habitat trees to be cleared; and • Yellow or green spray-painted X or yellow or green flagging tape = habitat features to be cleared that require fauna spotting and staged clearing.
Clearance Process	**Single staged clearing** Where no areas of habitat have been identified in vegetation to be cleared, clearing can be undertaken in a single-stage process, and includes the under-scrubbing of non-habitat trees, shrubs and other vegetation using a combination of forestry harvester and excavator. Vegetation cleared during single-stage clearance shall not be stockpiled on-site as it may provide temporary habitat **Two-staged clearing** A two-stage clearing process is designed to enable fauna to feel secure whilst clearing occurs around their tree, and to allow them a chance to self-relocate at night to coincide with typical foraging behaviours of arboreal animals. During clearing, an experienced ecologist must be present for the clearing of any habitat features. Before the commencement of clearing works, local vets and or wildlife carers are to be notified.

Impact / Issue	Mitigation Measures
	• Stage 1 – Firstly, vegetation not identified during pre-clearance surveys as fauna habitat will be cleared. All vegetation around the habitat item will be cleared so that the fauna habitat item is isolated (as per single staged clearing). • Stage 2 – Secondly, identified habitat trees are left to stand overnight to allow resident fauna to voluntarily move from the area. Habitat trees are then cleared using the following protocols: - Trees will be gently agitated by machinery prior to clearing to encourage any animals remaining to leave the hollows; - An excavator will be used to start pushing the tree over. The excavator should have a grab mechanism that allows for the habitat tree to be lowered to the ground slowly, thus minimising the risk of injury or mortality to fauna; - The ecologist onsite will inspect all visible hollows for the presence of fauna following felling of the tree; - If fauna is present, the fauna rescue and release procedure is to be implemented; and - If salvageable, sections of the tree containing hollows are to be relocated to nearby bushland (as agreed to in consultation with Council). **Post-Clearance** Following clearing, a post-clearing assessment will be prepared and must include at minimum the following results: • Details of native fauna captured and relocated, injured, or deceased; • Photos of rescued fauna; • Number of habitat features felled and relocated; and • Analysis of the effectiveness of clearing and fauna rescue methods.
Fauna Rescue and Release Procedure	Fauna handling is to be only undertaken by the experienced ecologist on site or licenced wildlife carer. All fauna that are encountered during clearance works are to be identified and assessed by an ecologist with records of their health status detailed (e.g., released, self-relocated, transported to vet or WIRES). The acting ecologists must operate under the Scientific Licence under Part 2 of the BC Act and compliance with the PCA Act. The following procedure is relevant to the rescue/relocation and transport of fauna, instances where fauna is shocked, trapped, injured, or if eggs or juvenile fauna are discovered. • If fauna does not move out of the work area due to injury or other reasons, the health of the animal must be determined, and the decision based on the welfare of the animal and whether it is likely to survive on release. • Stress would be minimised through: - The use of soft containment and placement in a pet carrier or similar, - Animal retained in a quiet, warm location that is well ventilated, - Relevant vet/rescue agency contacted, and - Animal transported to vet/rescue agency. • Once the animal is delivered to the vet/rescue agency, they are responsible for the animal and any decisions regarding the care of the animal will be made by the vet/rescue agency.
Dam Decommissioning Management Plan (DDMP)	A DDMP has been prepared to guide the decommissioning of eight farm dams within the site. The DDMP details procedures that must be undertaken in the planning, preparation and implementation and addresses relevant legislation, permits and approvals.
Weed Eradication Management Plan (WEMP)	A WEMP has been prepared which details the procedure to identify, manage and control the potential for introduction and/or spread of weeds during the construction of the proposal and addresses the landowners General Biosecurity Duty (GBD) along with the MRP DCP controls with the respect to management of Weeds of National Significance.
Ameliorative Measures – Indirect Impacts	The proposal will ensure any indirect impacts are avoided, minimised and mitigated through the implementation of best management practices, which would include, but not be limited to: • Staging of construction to minimise material stockpiling, cleaning (water suppression) of access roads and speed restrictions for management of potential dust impacts; • Preparation and adherence to the following Construction Environmental Management Plan (CEMP) specialist sub-plans: - Erosion and Sediment Control Plan; - Dam Decommissioning Management Plan; and - Weed Eradication Management Plan.

6.11 Socio-Economic Impacts

6.11.1 Social Impact

The Social Impact Assessment prepared by SLR Consulting included at **Appendix AA** has been updated to align with the amended development. The outcomes and recommendations of this report generally remain unchanged with the amended development continuing to result in acceptable social impacts.

6.11.2 Employment Generation

In order to help quantify the economic impacts of the amended development, an analysis of the employment generation of the amended development has been undertaken by the Ethos Urban economics team and is set out in the following sections.

Approach

The estimates of employment and value added outlined in this report flow from Ethos Urban's proprietary input output (IO) model. This IO model is based on ABS National Accounts data and has been developed to comply with best practice guidelines. The modelling provides estimates of the following economic benefits that would result from the proposed scheme:

- **Construction Employment** – the total construction job-years supported by construction of the direct (onsite) and indirect (multiplier) job years supported over the construction period.
- **Ongoing Employment** – the direct and indirect full-time equivalent (FTE) jobs supported by the ongoing operations of activities supported by the proposed development once operational.
- **Value Added** – direct and indirect value added generated during the construction and operational phase of the project.

Value Added is defined as the wages, salaries, and supplements plus gross operating surplus (income earned by businesses) required in producing the extra output (construction investment and operating output/turnover). This represents the standard measure of economic contribution, that is, the increase in economic activity as measured by gross domestic product (GDP).

Construction Phase

It is estimated the construction cost required to realise the proposed development will be in the order of $281 million. This estimate is based on the Capital Investment Value Report prepared by Northcroft (**Appendix F**).

As outlined in **Table 50**, based on a construction cost of $281 million, the construction phase is expected to directly support employment of 360 job-years, and deliver a direct value-add to the economy of $65.1 million.

When the multipliers are taken into account, total national-wide economic effects over the construction period for the proposed development are forecast to be employment of 1,560 job-years., and a total direct value add to the economy of $231.2 million.

Table 50 Construction Phase Employment and Value Added

Category	Direct	Indirect	Total
Employment (FTE job-years)	360	1,200	**1,560**
Value Added ($M)	$65.1	$166.2	**$231.2**

Source: ABS, National Accounts 2020/21; ABS; Ethos Urban

Job-years – Number of FTE jobs supported over the construction period. i.e. if construction is over 10 years, 100 job-years is equivalent to 10 FTE jobs per year.

Operational Phase

An estimate of operational jobs that would be supported by the proposed development have been estimated with reference to workspace ratios outlined in the Greater Sydney Commissions Employment Lands Analysis, which highlights an employment ratio of one worker for every 280m^2 in Western Sydney.

As outlined in **Table 51**, based on the above, the 153,343m^2 of proposed industrial floorspace once complete and fully operational is expected to deliver the following (direct) benefits: FTE employment of ongoing 550 jobs and direct value-add to the economy of $158.7 million per annum.

When the multipliers are taken into account, total ongoing economy-wide effects are estimated at: FTE employment of 1,550 jobs supported and a total direct value-add to the economy of $304.4 million per annum.

Table 51 Operational Phase Economic Benefits (Annual)

Category	Direct	Indirect	Total
Employment (FTE)	550	1,000	**1,550**
Value Added ($M)	$158.7	$145.6	**$304.4**

Source: ABS, National Accounts 2020/21; ABS; Ethos Urban

6.11.3 Summary

In summary, the amended development will result in $65.1 million of direct value-add to the economy during construction and $158.7 million per annum during the operational phase. The amended development is estimated to result in a significant increase in employment generation.

The expected employment generation during the construction phase is predicted to increase from 143 to 360 jobs as a result of the amended development. While the expected employment generation during the operational phase is predicted to increase from 228 jobs to 550 jobs as a result of the amended development.

When the multipliers are taken into account, total direct value-add to the economy is estimated to be $231.2 million as a result of the construction and $304.4 million per annum during operation. On this basis, it can be concluded that amended development will significantly increase the positive economic effects from the development while the impact of any social impacts is minimal.

6.12 Aboriginal Cultural Heritage

A Heritage Letter of Compliance has been prepared by Biosis and included at **Appendix BB**. It provides clarification as to what Aboriginal and historical (non-Aboriginal) heritage assessments have been undertaken across the amended site area to date.

In summary, the following Aboriginal heritage assessments cover the amended development site and are included at **Appendix CC**:

- Aboriginal Cultural Heritage Assessment prepared by Biosis (dated 22 April 2022) – 155-251 Aldington Road, Kemps Creek;
- Archaeological Report prepared by Biosis - 155-251 Aldington Road, Kemps Creek;
- Aboriginal Cultural Heritage Assessment prepared by Austral Archaeology (dated 2 June 2022) – 113-153 Aldington Road, Kemps Creek; and
- Aboriginal Due Diligence Assessment prepared by Biosis (dated 21 April 2023) – Aldington Road and Abbotts Road, Kemps Creek

6.12.1 Existing Environment

An extensive search of the Aboriginal Heritage Information Management System (AHIMS) database was conducted on 17 August 2023. It identified three (3) sites within the site area which are described in **Table 52** below.

Table 52 AHIMS Sites within the Site

Site	AHIMS	Name	Type	Recorded by
155-251 Adlington Road, Kemps Creek	45-5-5578	Aldington Road Kemps Creek PAD 1	Artefact	Biosis
141-153 Aldington Road, Kemps Creek	45-5-5610	Aldington Road 04	Artefact	Austral
	45-5-5609	Aldington Road 03	Artefact	Archaeology

Source: Biosis

6.12.2 Assessment of Impacts

A summary of the assessment of each of the relevant assessment reports is provided in **Table 53** below.

Table 53 Summary of Aboriginal Cultural Heritage Assessment

Site	Summary of Assessment
155-251 Adlington Road, Kemps Creek	AHIMS 45-5-5578 was identified as having low scientific significance and will be impacted by the proposed development (Figure 1). Further testing and salvage of this site was not recommended. Artefacts associated with AHIMS 45- 5-5578/Aldington Road Kemps Creek are to be reburied in consultation with Registered Aboriginal Parties (RAPs).
141-153 Aldington Road, Kemps Creek	The assessment concluded that AHIMS 45-5-5608/Aldington Road 02, AHIMS 45-5-5609/Aldington Road 03, AHIMS 45-5- 5607/Aldington Road 04, AHIMS 45-5-5610/Aldington Road 01 each possessed low archaeological significance and would be directly impacted by the proposed development. No further archaeological investigation was recommended. However, as part of the conditions of consent, artefacts from AHIMS 45-5-5608/Aldington Road 02, AHIMS 45-5-5609/Aldington Road 03, AHIMS 45-5-5607/Aldington Road 04, AHIMS 45-5-5610/Aldington Road 01 were proposed to be reburied on site. The reburial location is to be determined in consultation with the proponent and RAPs. It was also recommended that works within Dexus' development footprint should not proceed until development consent had been granted and complied with where appropriate.

Source: Biosis

6.12.3 Mitigation Measures

The updated mitigation measures in relation to Aboriginal cultural heritage are outlined in **Table 54** below.

Table 54 Updated Mitigation Measures – Aboriginal Cultural Heritage

Impact / Issue	Mitigation Measures
Discovery of unanticipated Aboriginal objects	• All Aboriginal objects and Places are protected under the NPW Act. It is an offence to disturb an Aboriginal site without a consent permit issued by Heritage NSW, DPE (Heritage NSW) or SSD approval issued by DPE where the project is an SSD or a State Significant Infrastructure (SSI) project. If any unexpected Aboriginal objects be encountered during works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist. If the find is determined to be an Aboriginal object, the archaeologist will provide further recommendations. These may include notifying Heritage NSW and RAPs.
Long-term care agreement	• The establishment of a long term care agreement in consultation with RAPs will be developed in order to ensure the artefacts identified as part of this assessment are adequately cared for. RAPs have requested that artefacts be reburied on site. Frasers Property has recommended a location for reburial which will be provided to RAPs. The reburial will occur after the proposed works have been completed on site. This approach considers the principles of ESD and intergenerational equity and more importantly ensures that recovered artefacts are managed according to the wishes of RAPs.
Consultation with RAPs	• As per the consultation requirements, the Applicant will continue to inform RAPs about the management of Aboriginal cultural heritage sites within the study area throughout the life of the project.

6.13 Historical Heritage

As aforementioned, a Heritage Letter of Compliance has been prepared by Biosis (**Appendix BB**) which provides clarification as to what Aboriginal and historical (non-Aboriginal) heritage assessments have been undertaken across the amended site area to date.

In summary, the following non-Aboriginal (historical) heritage assessments cover the amended development site and are included at **Appendix DD**:

- Historical Heritage Report prepared by Biosis (dated 31 March 2022) – 155-251 Aldington Road, Kemps Creek;
- Non-Aboriginal Heritage Impact Assessment prepared by Artefact (dated May 2022) – 113-153 Aldington Road, Kemps Creek; and
- Statement of Heritage Impact prepared by Biosis (dated 20 April 2023) – Aldington and Abbotts Road, Kemps Creek.

6.13.1 Assessment of Impacts

A summary of the assessment of each of the relevant assessment reports is provided in **Table 55** below.

Table 55 Summary of Aboriginal Cultural Heritage Assessment

Site	Summary of Assessment
155-251 Adlington Road, Kemps Creek	A search of heritage databases was conducted to identify any heritage listings within the site that identified no heritage listed items in the study area. Background research identified that the study area formed a part of an initial land grant to Nicolas Bayly in 1810, which was then acquired by Richard Jones in 1826 following Bayly's death. The land was subsequently subdivided in 1891 but sales did not commence until the 1930s. The land was likely used for pastoral and agricultural uses during this time. Potential archaeological remains in the study area were likely to be associated with agricultural and domestic themes. Archaeological evidence associated with the agricultural theme within the study area may include agricultural marks and post holes; although, the high levels of disturbance from the continuous use of the study area since the 1970s for market gardening makes it unlikely for these remains to still be present or recognisable in the study area. The archaeological evidence associated with domestic themes include current residential and rural structures such as sheds and houses. Historical research and a field survey (12 April 2021) identified that the structures present had been constructed post 1970s and are a common element still present throughout the Western Sydney region. They would not contribute information that is not already available and are of low significance. It was recommended that the proposed works may proceed with caution.

Site	Summary of Assessment
141-153 Aldington Road, Kemps Creek	An archaeological assessment of Dexus' proposed development determined that there was low potential for archaeological deposits and remains associated with Nicholas Bayly's ownership of the land in 1810 to be present in the form of post holes as evidence of fence lines and low impact pastoral activities. It was also determined that there was low archaeological potential for archaeological resources to be present as part of the residential land use of the study area (1960s-present) as fence lines, postholes, and present or demolished structures are modern constructs with no historical significance. No further archaeological assessment was recommended.

Source: Biosis

6.13.2 Mitigation Measures

The updated mitigation measures in relation to historical heritage are outlined in **Table 56** below.

Table 56 Updated Mitigation Measures – Historical Heritage

Impact / Issue	Mitigation Measures
Discovery of unanticipated historical relics	• Relics are historical archaeological resources of local or State significance and are protected in NSW under the Heritage Act. Relics cannot be disturbed except with a permit or exception/exemption notification or SSD approval issued by DPE where the project is an SSD or SSI project. If unanticipated relics are discovered during the course of the project, work in the vicinity must cease and an archaeologist contacted to make a preliminary assessment of the find. Heritage NSW will require notification if the find is assessed as a relic.
Discovery of Human Remains	• Human remains may be found in a variety of landscapes in NSW, including middens and sandy or soft sedimentary soils. If any suspected human remains are discovered during any activity you must: - Immediately cease all work at that location and not further move or disturb the remains. - Notify the NSW Police and Heritage NSW Environmental Line on 131 555 as soon as practicable and provide details of the remains and their location. - Not recommence work at that location unless authorised in writing by Heritage NSW.

6.14 Hazards and Risks

The Resilience and Hazards SEPP Assessment (previously titled 'SEPP 33 Assessment') prepared by Riskcon Engineering has been updated in accordance with the amended development and is included at **Appendix EE**. It has also been updated to address the Resilience and Hazards SEPP due to SEPP 33, since Public Exhibition, has been repealed and is now located within the Resilience and Hazards SEPP.

The Resilience and Hazards SEPP Assessment was conducted based on a limited quantity of dangerous goods stored and handled at each warehouse (Warehouse 1-8), noting that the development has considered the potential for warehouse tenants to store and handle limited dangerous goods as part of their operations.

The analysis identified that the quantity of dangerous goods held at each part of the warehouse did not exceed the storage threshold levels listed in "Applying SEPP33". It was also identified that based on the relatively low quantity of dangerous goods stored and handled at the warehouse, and the type of operations proposed at the warehouse (i.e. warehouse is not a dedicated DG storage facility), it was unlikely that the maximum permissible transport quantity and number of vehicle operation listed in "Applying SEPP33" would be exceeded.

In addition to the dangerous goods storage and transport assessments, a potentially offensive industry assessment was conducted, which identified that the operations at the site would not classify the warehouse as offensive.

As such, the updated Resilience and Hazards SEPP Assessment remains consistent with that exhibited in November 2021 and the amended development would not constitute potentially hazardous development.

6.14.1 Mitigation Measures

The updated mitigation measures in relation to hazards and risk are outlined in **Table 57** below.

Table 57 Updated Mitigation Measures – Hazards and Risk

Impact / Issue	Mitigation Measures
Increased Dangerous Goods Storage	• If a tenant requires to store and handle additional dangerous goods to those listed for the specific warehouse in this study, it is recommended that a review of the application of SEPP33 will be conducted and where required a Preliminary Hazard Analysis (PHA) study be performed if it is identified that the RH SEPP applies to the specific warehouse.
Dangerous Goods Storage	• Tenants storing dangerous goods are to comply with the requirements of the NSW Work Health and Safety Regulation 2017 and that based on the specific site category, the documentation requirements of this regulation be completed prior to occupancy of the site.

6.15 Bushfire

The Bushfire Assessment prepared by Peterson Bushfire has been updated in response to the amended development and is included at **Appendix FF**. It provides an assessment of whether the amended development will comply with *Planning for Bush Fire Protection 2019* (PBP),

6.15.1 Existing Environment

The amended development site remains surrounded by cleared lands consisting of paddocks and managed areas with the addition of surrounding sites now under-construction for future industrial development. The bushfire threat is the potential for the paddocks to present a grassland hazard. The grassland hazard is currently in the process of being, and will eventually be, removed as development progresses across the MRP, however must be addressed in the interim.

The amended development site remains classified as Vegetation Category 2, consistent with the exhibited development site.

6.15.2 Assessment of Impacts

The Bushfire Assessment remains substantially unchanged and outlines that the amended development will comply with the PBP, subject to the recommendations in the report being followed, as outlined in the following section.

6.15.3 Mitigation Measures

The updated mitigation measures in relation to bushfire are outlined in **Table 58** below.

Table 58 Updated Mitigation Measures – Bushfire

Impact / Issue	Mitigation Measures
Public Road Design	• Public road design and construction is to comply with Table 5.3b of PBP. An exception is that the roads may be in excess of 200 m long as a temporary arrangement until development of adjoining lands allow through road access.
Landscape Maintenance	The site is to be maintained to achieve the performance requirement of an Inner Protection Area (IPA) as described in Appendix 4 of PBP. The following landscape specifications will achieve an IPA standard for the protection against grassfires at this site: • Trees: - Trees at maturity should not touch or overhang the building. - Tree canopies should not be connected when at maturity. Gaps between crowns or groups of crowns are to be maintained at distances of 2 to 5m. • Shrubs: - Ensure gaps in the vegetation, such as between garden beds, to prevent the spread of fire towards the building. - Clumps of shrubs should be separated from glazing and doors by a distance of at least twice the height of the vegetation. • Groundcovers: - Grass should be kept mown (i.e. at no more than 100mm in height). - Leaves and vegetation debris should be regularly removed. - Organic mulch is not to be used within 1m of a building.
Fire Hydrant Availability	• The proposed public roads require fire hydrants to be installed to comply with AS 2419.1 – 2021 Fire Hydrant Installations - System Design, Installation and Commissioning (AS 2419). • The warehouse will require fire hydrants to be installed to comply with AS 2419.1 – 2005 Fire Hydrant Installations - System Design, Installation and Commissioning (AS 2419) so that all sides of the building are within 70 m of a hydrant by lay of the hose (or 90 m with a tanker parked in-line maximum 20 m from the hydrant).
Hazardous Materials	• Any gas services shall be installed and maintained in accordance *with AS/NZS 1596-2014 The storage and handling of LP gas*. • Hazardous or combustible materials are not to be stored outside of the warehouse buildings.

6.16 Airport Safeguarding

The Aeronautical Impact Assessment (AIA) prepared by Landrum & Brown Worldwide has been updated in relation to the amended development and is included at **Appendix GG**.

It includes a risk assessment of the amended development on Western Sydney International Airport (WSA) operations, addressing the relevant legislative provisions and the National Airports Safeguarding Framework (NASF).

6.16.1 Methodology

The AIA assumed a virtual building covering the entire site at a height of 166 m AHD. It was assumed that any plant will be no more than 2m higher than the height of the virtual building resulting in a height, for permanent objects, of 168 m AHD. In addition, temporary craneage will be required to operate at 20m higher than the permanent objects. Therefore, a height of 188 m AHD was used for the assessment in the AIA against the various airspace requirements.

6.16.2 Assessment of Impacts

Legislative Provisions

The updated AIA includes an assessment against the relevant provision of:

- *State Environmental Planning Policy (Western Parkland City) 2021*;
- *State Environmental Planning Policy (Industry and Employment) 2021*; and
- *Penrith Local Environmental Plan 2010*.

An assessment against the relevant provision of the legislative provisions is provided within the updated Statutory Compliance Table (**Appendix B**) and concludes that of the assessment the amended development will be adequately and appropriately safeguarded with the amended development not impacting its future operation in any capacity.

National Airports Safeguarding Framework

The updated AIA includes an assessment that includes an assessment against the NASF. The NASF includes several guidelines that seek to improve community amenity by minimising aircraft noise-sensitive developments near airports and improve safety outcomes by ensuring aviation safety requirements are recognised in land use planning decisions through guidelines being adopted by jurisdictions on various safety-related issues.

A summary of Landrum and Brown's assessment of the amended development against the NASF is summarised in **Table 59** below.

Table 59 Assessment of the Proposal against the NASF Guidelines

Guideline	Comments and compliance
Guideline A Measures for managing impacts of aircraft noise	The amended development site built warehouse is considered as 'Other Industrial' which can be accommodated within ANEF zones as per the Australian Standard (AS2021-2015),
Guideline B Managing the risk of building generated windshear and turbulence at airports	The amended development site will be located beyond the airport boundary and will not have the risk of generating windshear and turbulence at the airport. The buildings and the cranes will not have an impact upon the airport.
Guideline C Managing the risk of wildlife strikes in the vicinity of airports	The Applicant will continue to assess the appropriate types of flora that will enhance the visual features of the estate without being an attractant for birds or bats and not encouraging fauna such as rats and mice, being recognised as food, that would attract birds to the site.
Guideline D Managing the risk of wind turbine farms as physical obstacles for air navigation	No wind turbines are planned for the site. Therefore, the site will be in compliance with the requirements.

Guideline E Managing the risk of distractions to pilots from lighting in the vicinity of airports	The nearest point of the amended development site is approximately 8.5 km from the centre of Runway 05L/23R and does not lie within any of the NASF light zones and therefore no special lighting requirements apply. The building and the cranes will not have the risk of distractions to pilots from lighting in the vicinity of WSA airport.
Guideline F Managing the risk of intrusions into the protected airspace of airports	Planned activity within the estate is not likely to produce such an exhaust plume and therefore not have an impact on WSA. With maximum building heights projected to be beneath 188 m AHD there will not be any infringements of the PANS-OPS for Western Sydney Airport. There is also adequate clearance for typical construction cranes to be used on the site.
Guideline G Protecting aviation facilities – Communication, Navigation and Surveillance (CNS)	The amended development site will not have any impact upon the performance of ATC Communications systems installed at WSA. The Aldington South Estate Development Site is located outside the Building Restricted Areas (BRA) and will not have any impact upon the performance of navigation aids installed at WSA.
Guideline H Protecting strategically important Helicopter Landing Sites (HLS)	The amended development site is located well beyond the airport boundary and will not impact any helicopter landing sites.
Guideline I Public Safety Areas (PSAs)	The amended development site is located outside of the designated PSAs associated with the runways at WSA.

6.17 Infrastructure Requirements

The Services and Infrastructure Report prepared by Land Partners has been updated in response to the amended development and is included at **Appendix HH**. The infrastructure requirements of the amended development remain generally unchanged from the exhibited development.

In summary, the infrastructure requirements for the amended development are outlined in **Table 60** below.

Table 60 Updated Infrastructure Report Requirements Summary

Service	Summary
Potable Water	• Estimated Potable Water Demand - Average Day Demand 121kl/day; and - Max Day Demand 254kl/day. • Supply will derive from the Cecil Park reservoir system which has recently been amplified by the commissioning of the Liverpool reservoir transfer system.
Recycled Water	• Development of the Upper South Creek Advanced Water Recycling facility (delivered by 2026) will create highly treated recycled water. Sydney Waters' intention is to develop a recycled water reticulation system to serve the Mamre Rd precinct. • To facilitate future supply from this proposed recycled water system a recycled water reticulation pipe (a "purple" pipe) will be installed across the frontage of the site.
Waste Water	• Estimated Waste Water Demand 97kl/day (Average Dry Weather Flow). • Sydney Water servicing to provide Sewer Pump Station by 2025 to service the southern catchment of the Mamre Road precinct. • The site falls within the southern catchment. • Lead in sewer reticulation services are being provided in the development to the west of the site (development by Altis under SSD-17647189).
Electricity	• Endeavour Energy have commissioned a new zone substation (the South Erskine Park Zone Substation) within the Oakdale West precinct which will supply this site. • Endeavour Energy will re-energise the existing overhead 11kv feeder in Aldington Road to 22kv in 2024. This will provide supply to the development.
Telecommunications	• New fibre-optic systems will need to be provided to serve the development. Other developments within the Mamre Road precinct which will precede this development will provide lead-in capacity for this site.

Source: Land Partners

The expected impact on adjacent infrastructure remains unchanged from the exhibited development.

6.18 Planning Agreement and Development Contributions

LOG-E are in negotiation with the DPE and Penrith City Council to contribute to transport upgrades consistent with the road network described in the MRP DCP. This includes the upgrade and signalisation of the Mamre Road intersection at Mamre Road. It also includes the widening of Aldington Road and Abbotts Road which requires the dedication of LOG-E owned land along the road frontages. This involves construction of new signalised intersections on Aldington Road, including one which will form the main access to the Edge Estate.

The upgrades are proposed to be undertaken as part of Planning Agreements with NSW Government and Penrith City Council, respectively. The Planning Agreements are in advanced stages of negotiations and are expected to be executed by the end of 2023, with construction to commence early 2024.

6.19 Ecologically Sustainable Development

The Ecologically Sustainable Development Report prepared by Frasers Property has been updated in accordance with the amended development and is included at **Appendix II**.

As a result of the amended development, the water usage of the development is expected to increase from 39 kL/day to 428.65 kL/day due to the increase in floorspace by approximately 90,000m^2 between the exhibited and amended development. The existing measures to reduce potable water demand remain valid and effective measures.

The overall sustainable design strategies and measures to reduce environmental impact remain unchanged with the objective for the development to achieve a 5-star rating against the Green Building Council of Australia's Green Star rating scheme also unchanged representing a clear sustainability focus of the amended development.

6.20 Building Code of Australia & Fire Engineering

The BCA Design Compliance Report prepared by MBC Group has been updated in accordance with the amended development and included at **Appendix JJ**. It confirms that the amended development remains capable of readily achieving compliance with the relevant provisions of the BCA. Where compliance matters are proposed to comply with the Performance Requirements (rather than DtS Provisions), the development of a Performance Solution Report will be required prior to the issue of the Construction Certificate

An Access Report has been prepared by Ergon Consulting and included at **Appendix KK**. It assesses the proposal against the applicable accessibility provisions to the proposal. The amended proposal is found to be capable of complying with all relevant accessibility provisions.

In addition, a Fire Engineering Statement has been prepared by Affinity Engineering and included at **Appendix LL**. It provides confidence to the consent authority that prior to the issue of development consent, the development will be formally reviewed by an Accredited Certifier in Fire Safety. It outlines the proposed design incorporating features that are intended to meet the performance provisions of the BCA 2022 through the formal Fire Engineering process. It is concluded that the fire safety engineering assessment to be conducted as part of the Construction Certificate stage will achieve compliance with the performance requirements of the BCA.

7.0 Justification of the Development

This section summarises the various components of the development that have been examined in this Amendment Report. In general, investment in major projects can only be justified if the benefits of doing so exceed the costs. Such an assessment must consider all costs and benefits, and not simply those that can be easily quantified. As a result, the EP&A Act specifies that such a justification must be made having regard to the environmental, economic and social considerations as well as the principles of ecologically sustainable development.

This means that the decision on whether a proposed development can proceed or not needs to be made in the full knowledge of its effects, both positive and negative, whether those impacts can be quantified or not.

The development involves the development of industrial estate containing eight (8) warehouse and distribution centres including ancillary office space as described in **Section 3.0**. The assessment must, therefore, focus on the identification and appraisal of the effects of the proposed change over the site's existing condition. The various components of the amended development which have been examined in this Amendment Report are summarised in the following sections.

7.1 Design of the Project

The development will deliver a refined industrial estate that will minimise its potential impacts and deliver a high quality built form response which is supported by detailed and dense landscaping. Specifically, the design of the development:

- Responds to the sloping topography on the existing site by delivering, on balance, the most contextually appropriate outcome in regard to bulk earthworks as well as the utilisation of the transitioning ground levels for undercroft car parking.
- Minimises the use of retaining walls as much as feasibly possible and positions retaining walls outside of the public domain.
- Delivers large-format warehouse and distribution centres that respond to current market demands and shortfall of warehouse floorspace.
- Comprises strong street frontage appeal with ancillary office space, car parking and landscape all addressing the main street frontage of each warehouse.
- Delivers an efficient and well considered estate layout that enables strong segregation between light and heavy vehicles enabling the creation of safer vehicle environments.
- Mitigates bulk, scale and visual impact though detailed landscaping and tree canopy planting that
- Delivers high quality and dense landscaping through the planting of 2,566 trees.

In summary, the design of the amended development is entirely justified as it will deliver the highest and best use of the site, while responding to the context of the site and its surrounding to deliver a scheme that is consistent with the desired future character of the area.

7.2 Consistency with the Strategic Context

The development will deliver large-format warehouse and distribution centres to meet current market demands for warehouse floorspace enabling the creation of a more efficient logistics supply chain enabling consumers and businesses to receive goods faster. The development involves an industrial estate that is consistent with the MRP Structure Plan.

Specifically, the development is consistent with the objectives of the Greater Sydney Region Plan as it will support the projected growth in transport and distribution activity principally by virtue of its location, which is poised to leverage the proximity to WSA and service the logistical requirements of such a major trade gateway. In addition, the development will facilitate employment development at a suitable scale and will assist in repurposing a strategically significant site within the Western Sydney Employment Area that is in line with the strategic direction for the area.

The development will support freight opportunities and deliver significant industrial and urban services land by meeting the needs of modern tenants and businesses, supporting the long-term potential and objectives of the locality including WSA. The Western Parkland City includes a cluster of centres within the Western District and

provides land uses to support the delivery and operation of the Airport and Aerotropolis, supporting a range of jobs within the Western Parkland City.

7.3 Consistency with the Statutory Context

As described in **Section 4.0** and within **Appendix B**, the amended development is generally consistent with all relevant statutory requirements relating to the site. In summary:

- The development is consistent with the objects of the EP&A Act;
- The development is classified as certified-urban capable land under the CPCP;
- The development is consistent with principles of ESD under section 193 of the EP&A Regulation, as outlined below:
  - **Precautionary principle** – The development does not result in any unmanageable threat or irreversible damage to the environment and will seek to minimise any environmental impact employing strategies to reduce climate change impacts.
  - **Intergenerational equity** – The development has been designed to benefit both the existing and future generations by implementing safeguards and management measures to protect environmental values, facilitating job creation in close proximity to future residential areas and ensuring the WSEA is maintained and enhanced into the future for use by future generations.
  - **Conservation of biological diversity and ecological integrity** – The development is classified as certified-urban capable land under the CPCP. The Applicant will employ mitigation measures to ensure that any biodiversity value impacts are minimised.
  - **Improved valuation and pricing of environmental resources** – The development will seek to target a 5-star rating against the Green Building Council of Australia's Green Star rating scheme to guide environmental goals with the aim to achieve the sustainability improvements wherever feasible. Mitigation measures for avoiding, reusing, recycling and managing waste during construction and operation would be implemented to ensure resources are used responsibly in the first instance. Additional measures will be implemented to ensure no environmental resources in the locality are adversely impacted during the construction or operational phases.
- The development (as amended) is classified as SSD under Chapter 2 of the Planning Systems SEPP;
- The development is permissible with consent in the IN1 General Industrial zone and consistent with the zone objectives under the Industry and Employment SEPP;
- The development is consistent with the provisions under the Industry and Employment SEPP and the Western Parkland City SEPP; and
- The development has been designed in accordance with the MRP DCP and is generally consistent with the provisions.

7.4 Stakeholder Views

The Applicant consulted with all relevant stakeholders including the surrounding community prior to Public Exhibition. The development was placed on Public Exhibition in November 2021 which enabled submissions from the public, organisations and government agencies. A total of 12 submissions were received, with eleven (11) submissions from government agencies and one (1) submission from Dexus with no submissions from members of the public received.

Since Public Exhibition, the Applicant has taken on feedback received from the submissions and undertaken further consultation with the key relevant stakeholders for the amended development. The Applicant will continue to consult with the relevant stakeholders.

7.5 Likely Impacts of the Development

The following section assesses the Proposal against the relevant heads of consideration listed in Section 4.15 of the EP&A Act.

7.5.1 Natural Environment

The environmental impact assessment of the development has demonstrated that there are not anticipated to be more than minor impacts as a result of the development, and these are not considered to be of significance, either in nature or extent.

7.5.2 Built Environment

The development has been designed with consideration of the site's strategic context, characteristics of the site and the desired future character to deliver on balance the most appropriate and beneficial built environment outcome. Specifically, the development will include high quality materials and a responsive design response that includes generous and dense landscaping that provides a visual buffer, reduces urban heat and creates an inviting environment.

7.5.3 Social and Economic

The development will deliver social benefit to the community through the creation of jobs in an area of high demand, delivery of warehouse and distribution centres with strong worker facilities and amenity, protection of environmental land and inclusion of sustainability initiatives.

Specifically, the development will not result in any likely significant or detrimental economic impacts. On the contrary, the development is estimated to contribute to the creation of 360 direct construction jobs and 550 direct operational jobs per annum as well as total value-add to the economy of $231.2 Million for construction and $304.4 Million per annum during operation. Further, the development will align with the needs of modern tenant and business requirements, supporting the long term potential and objectives of the locality.

7.6 Suitability of the Site

Having regard to the characteristics of the site and its location within the MRP at Kemps Creek, the development is considered suitable in that:

- The site is zoned as IN1 General Industrial within the MRP which has been identified and recognised as appropriate for the development of warehouse and distribution centre;
- The development involves an industrial estate that is consistent with the MRP Structure Plan;
- The development enables the future utilisation of Transgrid easement;
- Development of the site for employment uses is complementary to the Western Sydney Aerotropolis and the soon to be operational WSA, through ensuring logistics and warehousing is available in close proximity;
- It appropriately responds to the sloping and undulating topography of the site to deliver the most contextually and economically appropriate design in consideration of the design criteria;
- The bulk earthworks for the site have been carefully considered to ensure a balanced cut and fill is achieved and to minimise the height and visual impacts of retaining walls; and
- The surrounding area will be developed for industrial purposes consistent with the development, ensuring a well-structured and accessible employment precinct is established to provide for ongoing jobs for workers within the broader Western Sydney Employment Area.

7.7 Public Interest

The development is identified as being in the public interest for the following reasons:

- It is consistent with relevant state and local strategic plans and complies with the relevant state and local planning controls;
- It is estimated to contribute to the creation of 360 direct construction jobs and 550 direct operational jobs per annum as well as total value-add to the economy of $231.2 Million for construction and $304.4 Million per annum during operation;
- It will deliver large-format warehouse and distribution centres to meet current market demands for warehouse floorspace enabling the creation of a more efficient logistics supply chain enabling consumers and businesses to receive goods faster;
- It will align with the needs of modern tenant and business requirements, supporting the long-term potential and objectives of the locality including WSA; and
- It minimises any environmental impacts.

8.0 Conclusion

This Amendment Report has been prepared in support of an amendment to the Edge Estate SSDA (SSD-17552047) under clause 37 of the EP&A Regulation. It describes the amended development which comprises the inclusion of additional land within the site and amendments to the proposed development.

The amended development comes as a result of Frasers Property acquiring the two (2) lots to the immediate south of the exhibited development site. The Applicant has also reached an agreement with Dexus to include the lot to the immediate north of the exhibited development site to enable transitional earthworks between the two sites. The amended development also includes the reconfiguration of the exhibited development layout to incorporate the additional land to the south of the exhibited development site, resulting in an increase in developable lots from nine (9) to fourteen (14). The amendments also include the increase of warehouse and distribution centres from two (2) to eight (8).

The amended development provides an opportunity to develop additional warehouse floorspace and create additional development-ready lots in an area that has been identified for future industrial development. The amended development also responds to the shortfall in warehouse floorspace currently present in the greater Sydney region enabling future supply, increasing the efficiency of greater Sydney's logistical supply chain.

The amended development also responds to the change in context between late-2021 (when the EIS was exhibited) and the present. Since Public Exhibition, the planning of regional infrastructure within the MRP has progressed enabling greater certainty in relation to development capacity. Key regional infrastructure beyond the MRP has also progressed including the new Western Sydney International Airport due to open in 2026 and M12 Motorway due to open prior to the opening of the airport.

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

- The amended development is permissible with consent, meets the objectives and complies with the provisions of the Industry and Employment SEPP;
- The amended development is consistent with the desired future character of the area and relevant strategic planning documentation, including the Greater Sydney Region Plan and Mamre Road Precinct Structure Plan;
- The amended development will deliver large-format warehouse and distribution centres to meet current market demands for warehouse floorspace enabling the creation of a more efficient logistics supply chain enabling consumers and businesses to receive goods faster;
- The amended development will align with the needs of modern tenant and business requirements, supporting the long-term potential and objectives of the locality including WSA;
- The amended development is estimated to contribute to the creation of 360 direct construction jobs and 550 direct operational jobs per annum as well as total value-add to the economy of $231.2 Million for construction and $304.4 Million per annum during operation;
- The development will deliver large-format warehouse and distribution centres to meet current market demands for warehouse floorspace enabling the creation of a more efficient logistics supply chain enabling consumers and businesses to receive goods faster;
- The amended development will not result in adverse environmental impacts, with the inclusion of appropriate mitigation measures that will minimise any potential impact of the development; and
- The amended development is suitable for the site and in the public interest.

Overall, the amended development represents an improvement in comparison to the exhibited development given it has minimal additional environmental impact, significantly improved economic benefits, more contextually appropriate and represents the highest and best use of the site.

Given the merits described above, and the significant benefits associated with the proposed development, it is requested that the application be approved.