Environmental Impact Statement

Proposed Warehouse and Logistics Hub

155-217 Aldington Road, Kemps Creek
(Lot 33 DP258949 and Lots 25-28 DP255560)

Prepared by Willowtree Planning on behalf of Frasers Property Industrial

October 2021

A national town planning consultancy
www.willowtreeplanning.com.au

Document Control Table			
Document Reference:	WTJ21-001		
Contact	Stephanie Wu – Senior Town Planner		
Version and Date	Prepared by	Checked by	Approved by
Version No. 1 – 30/04/2021	Stephanie Wu Senior Town Planner	Travis Lythall Associate	Travis Lythall Associate
Version No. 2 – 01/06/2021	Stephanie Wu Senior Town Planner	Andrew Cowan Director	Andrew Cowan Director
Version No. 3 – 11/06/2021	Stephanie Wu Senior Town Planner	Andrew Cowan Director	Andrew Cowan Director
Version No. 4 – 16/06/2021	Andrew Cowan Director	Andrew Cowan Director	Andrew Cowan Director
Version No. 5 – 23/06/2021	Stephanie Wu Senior Town Planner	Andrew Cowan Director	Andrew Cowan Director
Version No. 6 – 13/09/2021	Stephanie Wu Senior Town Planner	Andrew Cowan Director	Andrew Cowan Director
Version No. 7 – 19/10/2021	Stephanie Wu Senior Town Planner	Andrew Cowan Director	Andrew Cowan Director

SECTION 4.12 CERTIFICATE

Declaration Form	**Submission of Environmental Impact Statement (EIS)** prepared under the *Environmental Planning and Assessment Act 1979* – Part 4, Division 4.3, Section 4.12
EIS Prepared By	
Name	Stephanie Wu
Qualifications	Bachelor of City Planning (Honours), University of New South Wales
Address	Suite 4, Level 7 100 Walker Street North Sydney NSW 2060
In Respect Of	Proposed Warehouse and Logistics Hub
Development Application	
Applicant Name	Frasers Property Industrial
Address	Level 2, 1C Homebush Bay Drive, Rhodes NSW 2138
Land to be Developed	155-217 Aldington Road, Kemps Creek including the following allotments: ▪ Lot 33 DP 258949 ▪ Lots 25-28 DP 255560
EIS	An Environmental Impact Statement (EIS) is enclosed.
Certificate	I certify that I have prepared the contents of this EIS to the best of my knowledge: ▪ it is in accordance with Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*, ▪ contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and ▪ that the information contained in the statement is neither false nor misleading.
Signature	
Name	Stephanie Wu
Qualification	BCP (Hons.), UNSW
Date	21 October 2021

Signature

Name	Andrew Cowan
Qualification	BURP, UNE MPD, UTS
Date	21 October 2021

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APPENDICES

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1	Secretary's Environmental Assessment Requirements	NSW Department of Planning, Industry and Environment
2	Quantity Surveyors Report	Northcroft
3	Survey Plan	AT&L
4	Architectural Plans	Frasers Property Industrial
5	Subdivision Plan	Frasers Property Industrial
6	Landscape Plans	Habit8
7	Landscape and Visual Impact Assessment and Response Letter	Habit8
8	Water Cycle Management Strategy	AT&L
9	Traffic & Accessibility Management Plan	Ason Group
10	Biodiversity Development Assessment Report	Ecologique
11	Detailed Site Investigation	JBS&G
12	Remedial Action Plan	JBS&G
13	Air Quality Impact Assessment and Greenhouse Gas Assessment	Northstar Air Quality
14	SEPP 33 Assessment	Riskcon
15	Acoustic Report, Construction Noise and Vibration Management Plan and Response Letter	Acoustic Works
16	Historical Heritage Assessment Report	Biosis
17	Aboriginal Cultural Heritage Assessment Report	Biosis
18	Archaeological Assessment Report	Biosis
19	Ecologically Sustainable Development Report/Energy Eficiency	Frasers Property Industrial
20	Civil Design Report, Plans and Response Letter	AT&L
21	Waste Management Plan	LG Consult
22	Bushfire Impact Assessment	Peterson Bushfire
23	Services Infrastructure Assessment	Landpartners
24	BCA Report	Modern Building Certifiers
25	Aeronautical Impact Assessment	Landrum & Brown
26	Community and Stakeholder Participation Strategy with consultation letters	SLR Consulting
27	Social Impact Assessment	SLR Consulting
28	Geotechnical Report	Pells Sullivan Peynink
29	Draft Mamre Road Precinct Development Control Plan Compliance Table	Willowtree Planning
30	Email correspondence sent to Landowner at 141-153 Aldington Road	Frasers Property Industrial
31	Consultation with Council regarding Aldington and Abbotts Road Upgrade	Frasers Property Industrial

32	Email Correspodence with DPIE Planning Agreement team dated 6 August 2021	Frasers Property Industrial
33	Letter from Altis regarding civil works coordination dated 19 July 2021	Altis Property Partners

GLOSSARY OF KEY TERMS

TERM	MEANING
ACHAR	Aboriginal Cultural Heritage Assessment Report
AUD	Australian Dollars
BAM	Biodiversity Assessment Method
BDAR	Biodiversity Development Assessment Report
BC Act	Biodiversity Conservation Act 2016
BC Regulation	Biodiversity Conservation Regulation 2017
CEEC	Critically Endangered Ecological Community
CEMP	Construction Environmental Management Plan
CIV	Capital Investment Value
CNVMP	Construction Noise and Vibration Management Plan
CPTED	Crime Prevention through Environmental Design
CTMP	Construction Traffic Management Plan
DGs	Dangerous Goods
NSW DPIE	NSW Department of Planning, Industry and Environment
EES	Environment, Energy & Science Group (former OEH)
ESD	Ecologically Sustainable Development
EIS	Environmental Impact Statement
EP&A Act	Environmental Planning and Assessment Act 1979 (as amended)
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPA	Environment Protection Authority
EPBC Act	Commonwealth Environment Protection and Biodiversity Conservation Act 1999
Frasers	Frasers Property Industrial (the Proponent)
GFA	Gross Floor Area
GME	Groundwater Monitoring Event
GSC	Greater Sydney Commission
MNES	Matter of National Environmental Significance
OEH	NSW Office of Environment and Heritage
PMF	Probable Maximum Flood
NPW Act	National Parks and Wildlife Act 1974
NSW RMS	NSW Roads and Maritime Services
RAPs	Registered Aboriginal Parties

SEARs	Secretary's Environmental Assessment Requirements issued 12 May 2021
SEPP	State Environmental Planning Policy
SEPP WSEA	State Environmental Planning Policy (Western Sydney Employment Area) 2009
SRD SEPP	State Environmental Planning Policy (State and Regional Development) 2011
Sqm or m^2	Square metres
SREP	Sydney Regional Environmental Plan
SSD	State Significant Development
The Site / Study Area / Subject Site	155-217 Aldington Road, Kemps Creek
TfNSW	Transport for NSW
WSA / Aerotropolis	Western Sydney Aerotropolis
WSEA	Western Sydney Employment Area
WSUD	Water Sensitive Urban Design
Willowtree Planning	Willowtree Planning Pty Ltd

EXECUTIVE SUMMARY

This Environmental Impact Statement (EIS) has been prepared by Willowtree Planning on behalf of Frasers Property Industrial (Frasers), and is submitted to the NSW Department of Planning, Industry and Environment (DPIE), in support of State Significant Development (SSD) **17552047**, for the proposed construction and operational use of a Warehouse and Logistics Hub, at 155-217 Aldington Road, Kemps Creek (Lot 33 DP258949 and Lots 25-28 DP 255560).

Development Consent under this Proposed Development is sought for the construction and operational use of a Warehouse and Logistics Hub pertaining to the following scope of works:

- Demolition of existing dwelling houses and associated outbuildings;
- Bulk earthworks involving dam dewatering, cut and fill works and pad construction;
- Retaining Wall Construction
- Vegetation clearing;
- Nine-lot Torrens title subdivision;
- Proposed construction of internal public access roads of 24m and 25.2m wide and connections to existing and future local roads;
- Stormwater and drainage works;
- 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 Site is subject to the provisions pertaining to *State Environmental Planning Policy (Western Sydney Employment Area) 2009* (SEPP WSEA) – Precinct 12 (Mamre Road), which aims to create employment, by providing development in the form of major warehousing, distribution, freight transport, industrial and manufacturing facilities.

This Proposed Development is deemed to be State Significant Development (SSD) under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). For *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP) to apply, the Capital Investment Value (CIV) of development needs to be greater than AUD $50 Million and its use identified for the purposes of warehouses or distribution centres pursuant to Schedule 1, Clause 12 of SRD SEPP.

It is noted that Clause 12 in Schedule 1 of the SRD SEPP was amended on 1 June 2021 to reduce the SSD threshold to a CIV of $30 Million for development to which the relevant environmental assessment requirements are notified under the EP&A Act on or before 31 May 2023. Notwithstanding, given that the Secretary's Environmental Assessment Requirements (SEARs) was received from DPIE on 12 May 2021, the Proposed Development is subject to the $50 Million threshold.

The CIV, as defined under Part 1, Clause 3 the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation), is defined as follows:

> ***capital investment value*** *of a development or project includes all costs necessary to establish and operate the project, including the design and construction of buildings, structures,* ***associated infrastructure*** *and fixed or mobile plant and equipment, other than the following costs:*
>
> *(a) amounts payable, or the cost of land dedicated or any other benefit provided, under a condition imposed under Division 7.1 or 7.2 of the Act or a planning agreement under that Division,*
> *(b) costs relating to any part of the development or project that is the subject of a separate development consent or project approval,*
> *(c) land costs (including any costs of marketing and selling land),*
> *(d) GST (within the meaning of A New Tax System (Goods and Services Tax) Act 1999 of the Commonwealth).*

The Proposed Development has a CIV of approximately $86 Million (excluding GST). Therefore, it satisfies the requirements under the SRD SEPP, Schedule 1, Clause 12. The Proposed Development, therefore qualifies as SSD in accordance with the provisions and must be assessed accordingly.

Under the EP&A Act, it is required that a request for SEARs must be made prior to the lodgement of any SSD Application. Accordingly, the SEARs were requested for the Proposed Development (Reference: **SSD-17552047**) and later issued by the NSW DPIE on 12 May 2021 (refer to **Appendix 1**).

In addition to the general requirements, the SEARs for the Proposed Development, highlight a number of Key Issues. These have all been fully addressed as part of this EIS and are set out as follows, in the 20 categories below:

1. Suitability of the Site
2. Statutory and Strategic Context
3. Community and Stakeholder Engagement
4. Infrastructure Requirements
5. Urban Design and Visual
6. Traffic and Transport
7. Soil and Water
8. Noise and Vibration
9. Hazards and Risk
10. Biodiversity
11. Cultural Heritage and Aboriginal Cultural Heritage
12. Social Impact
13. Contamination
14. Bushfire
15. Waste Management
16. Air Quality
17. Greenhouse Gas and Energy Efficiency
18. Ecologically Sustainable Development
19. Airport Safeguarding
20. Planning Agreement / Development Contributions

The findings of this EIS have concluded that the Proposed Development can proceed without any unacceptable impacts on the built and natural environment. All assessed impacts have been examined and deemed acceptable, in relation to all the relevant legislative requirements applicable to the Subject Site. Furthermore, the proposed Warehouse and Logistics Hub, is consistent with the objectives of SEPP WSEA; SRD SEPP; *The Greater Sydney Region Plan - A Metropolis of Three Cities*; the *Western City District Plan* and the *Draft Mamre Road Precinct Development Control Plan 2021* (Draft Mamre Road Precinct DCP).

Based on the findings of this EIS, the Proposed Development can successfully support a Warehouse and Logistics Hub under this SSD Application, with acceptable environmental impacts. The proposed Warehouse and Logistics Hub would operate on a 24/7 basis over nine (9) allotments, comprising one (1) warehouse or distribution centre with two portions on Proposed Lot 9, carparking, estate access roads and associated landscaping. Development on the remaining proposed allotments will be subject to separate subsequent development consents. The proposed Warehouse and Logistics Hub would be undertaken over several construction phases, which would exhibit a well-resolved built form outcome, resulting in approximately 65,327m^2 of Gross Floor Area (GFA).

The Proposed Development will be a low impact addition to the wider Western Sydney Employment Area (WSEA) – Mamre Road Precinct and will align with the development controls established for the Mamre Road Precinct. The Proposed Development will provide positive social and economic benefits to the area and support large scale industrial and warehousing development within an area earmarked for such purposes. With its industrial character and setting, it will complement the industrial existing and future industrial character envisaged for the Site and surrounding industrial land uses. The topography of the Site, as well as the separation offered by major road infrastructure routes, such as Mamre Road and the wider

M4 & M7 Motorways promote the Site's suitability, by being sufficiently located away from sensitive receiver locations.

The Warehouse and Logistics Hub's state-of-the-art design, equipment and technologies will provide industry-leading energy efficient performance solutions; and the inherent building fabric performance will ensure an Ecologically Sustainable Development can be achieved, in line with best-practice and global industry standards of the Warehouse and Logistics Hub.

The Subject Site is zoned IN1 General Industrial pursuant to SEPP WSEA. Development for the purpose of warehouse or distribution centre is permissible with consent within the IN1 General Industrial zone under SEPP WSEA. The Proposed Development is consistent with surrounding land uses that SEPP WSEA applies to; and would contribute to the efficient use of employment lands for industrial and warehousing purposes.

Based on the findings of this EIS, the Proposed Development supports the development of a Warehouse and Logistics Hub, providing further employment-generating opportunities in the immediate local communities, as well as the wider locale of the Sydney Metropolitan Region, particularly the Western Sydney Region.

The Proposed Development is deemed suitable for its regional and local context and would not result in any significant environmental impacts, for which it satisfactorily addresses the SEARs (issued on 12 May 2021). As such, it is recommended that the Proposed Development be approved by the NSW DPIE.

PART A PRELIMINARY

1.1 INTRODUCTION

This EIS has been prepared by Willowtree Planning on behalf of the Proponent, Frasers, and is submitted to the NSW DPIE in support of the Proposed Development on the land portion described as 155-217 Aldington Road, Kemps Creek (Lot 33 DP258949 and Lots 25-28 DP 255560), for the purposes of a Warehouse and Logistics Hub.

This SSD Application seeks Development Consent for the construction and operational use of a Warehouse and Logistics Hub that would play a vital role in providing an advanced facility to support the growth and development of large scale industrial and warehouse land uses across the Sydney Metropolitan Region and would contribute to the enhanced promotion and creation of employment-generating opportunities.

Development Consent under this Proposed Development is sought for the construction and operational use of a Warehouse and Logistics Hub pertaining to the following scope of works:

- Demolition of existing dwelling houses and associated outbuildings;
- Bulk earthworks involving dam dewatering, cut and fill works and pad construction;
- Retaining Wall Construction;
- Vegetation clearing;
- Nine-lot Torrens title subdivision;
- Proposed construction of internal public access roads of 24m and 25.2m wide and connections to existing and future local roads;
- Stormwater and drainage works;
- 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.

It is noted that the built form of the warehouse development in Proposed Lots 1 to 8 would be subject to separate development consents, based on customer demand and operational requirements.

The Proposed Development seeks to facilitate an investment of over $86 Million (excluding GST) in a new operation, that would seek to support large floorplate industrial and warehouse development and generate job opportunities within the Western Sydney Employment Area (WSEA), being in an area already earmarked for creation of employment. Accordingly, the Proposed Development seeks to establish an innovative operation that would benefit the end user on a National, State, Regional and Local scale, as well as benefitting the immediate community and wider locale through the provision of employment opportunities close to home during both the construction and operational phases of development.

This EIS describes the Subject Site and Proposed Development, including future land-use outcomes for the Site, for the purposes of warehousing and logistics, with an employment-generation focus. It also responds to the SEARs and assesses the Proposed Development in terms of all relevant matters set out in legislation, Environmental Planning Instruments (EPIs) and associated planning policies.

The structure of this EIS is as follows:

- **Part A Preliminary**
- **Part B Site Analysis**
- **Part C Proposed Development**
- **Part D Legislative and Policy Framework**
- **Part E Consultation**
- **Part F Environmental Risk Assessment**

- **Part G Management and Mitigation Measures**
- **Part H Proposed Development Justification**
- **Part I Conclusion**

1.2 PROJECT TEAM

The Project Team involved in the preparation of this SSD Application includes:

- Frasers (Proponent, Architect, Energy Efficiency and ESD)
- Habit8 (Landscaping and Visual Impact)
- Northcroft (Quantity Surveyor)
- Willowtree Planning (Town Planning)
- Acoustic Works (Acoustics)
- Peterson Bushfire (Bushfire)
- Ecologique (Ecological)
- AT&L (Survey, Civil Engineering & Flooding)
- Biosis (Aboriginal Cultural, Archaeological and Historic (European) Heritage)
- Riskcon (Hazard and Risk)
- LG Consult (Waste)
- Landpartners (Services Infrastructure)
- Northstar Air Quality (Air Quality and Greenhouse Gas)
- JBS&G (Geotechnical, Salinity and Contamination)
- Pells Sullivan Meynink (Geotechnical)
- Landrum & Brown (Airport Safeguarding)
- Modern Building Certifiers (BCA)
- Ason Group (Traffic Engineering)
- SLR Consulting (Community Engagement and Social Impact)

All consultant expert reports are appended in **Appendices 2** to **28** of this EIS.

1.3 THE PROPONENT

The Proponent is Frasers. Refer to **Table 1** outlined below for contact details.

Table 1 Proponent Contact Details	
Contact Name	Paul Solomon
Company Details	Frasers Property Industrial
Email Address	Paul.Solomon@frasersproperty.com.au

1.4 CAPITAL INVESTMENT VALUE

The CIV of the Proposed Development in accordance with the CIV definition under the EP&A Regulation is $86,655,103 (excluding GST) as shown in **Appendix 2**, containing QS Costings with respect to the Proposed Development.

1.5 EXISTING ZONING PROVISIONS

The Site is currently zoned IN1 General Industrial pursuant to the provisions of SEPP WSEA.

1.6 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

Prior to obtaining the SEARs, a Pre-Scoping Meeting was held with the NSW DPIE on 10 March 2021 to discuss the Proposed Development and confirm the SEARs could be issued accordingly. An application requesting SEARs was then submitted on 14 April 2021 (DPIE Reference: **SSD-17552047**). The SEARs were subsequently issued by the NSW DPIE on 12 May 2021 and are fully addressed in this EIS, including supporting specialist reports and plans.

For reference, the full SEARs, as issued, are annexed in **Appendix 1** of this Submission. The response as to how the SEARs has been addressed, is covered fully by this EIS. A summary of all issues contained in the SEARs and all responses is set out in **Table 2** below. This EIS is also consistent with all requirements for Environmental Impact Statements, as set out in Clauses 6 and 7 of Schedule 2 of the EP&A Regulation.

Table 2 How SEARs have been satisfied	
General Requirements	**Comment**
The Environmental Impact Statement (EIS) for the development must meet the form and content requirements in clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (the Regulation).	This EIS has been prepared in accordance with Clauses 6 & 7 of Schedule 2 of the EP&A Regulation. The structure of this EIS addresses all legislative requirements set out in the EP&A Regulation.
Key Issues	
1. Suitability of the site – including: ▪ detailed justification for the proposal and the suitability of the site under the State Environmental Planning Policy (Western Sydney Employment Area) 2009 ▪ a detailed description of the history of the site, including the relationship between the proposed development, other proposed developments and all development consents and approved plans previously or currently applicable to the site ▪ an analysis of site constraints.	Refer to **Sections 4.2.7** and **2.6**.
2. Statutory and strategic context – including: ▪ detailed justification that the proposed land use is permissible with consent ▪ details of any proposed consolidation or subdivision of land ▪ demonstration that the proposal is consistent with all relevant planning strategies, environmental planning instruments, adopted precinct plans, draft district plan(s) and adopted management plans and justification for any inconsistencies. This includes, but is not limited to: ○ State Environmental Planning Policy (State and Regional Development) 2011 ○ State Environmental Planning Policy (Infrastructure) 2007 ○ State Environmental Planning Policy (Western Sydney Employment Area) 2009 ○ State Environmental Planning Policy (Western Sydney Aerotropolis) 2020 ○ State Environmental Planning Policy No 33 – Hazardous and Offensive Development ○ State Environmental Planning Policy No 55 – Remediation of Land ○ State Environmental Planning Policy No 64 – Advertising and Signage ○ Penrith Local Environmental Plan 2010 ○ Greater Sydney Region Plan – A Metropolis of Three Cities ○ Western City District Plan ○ Future Transport 2056 and supporting plans ○ Mamre Road Precinct Structure Plan (DPIE, 2020) and the Local Road	Refer to **Sections 3.2**, **4.2**, **4.3** and **4.4**.

○ Network Structure Plan ○ Western Sydney Aerotropolis Plan (DPIE, 2020) ○ Draft Mamre Road Precinct Development Control Plan.	
3. Community and stakeholder engagement – including: ▪ a community and stakeholder participation strategy identifying key community members and other stakeholders ▪ details and justification for the proposed consultation approach(s) ▪ clear evidence of how each stakeholder identified in the community and stakeholder participation strategy has been consulted ▪ issues raised by the community and surrounding landowners and occupiers ▪ clear details of how issues raised during consultation have been addressed and whether they have resulted in changes to the development ▪ details of the proposed approach to future community and stakeholder engagement based on the results of consultation.	Refer to **Part E** and **Appendix 27**.
4. Infrastructure requirements – including: ▪ a detailed written and/or graphical description of infrastructure required on the site, including any electrical substation/s and on-site switch yard/s ▪ identification of any infrastructure upgrades required off-site to facilitate the development, and describe any arrangements to ensure that the upgrades will be implemented in a timely manner and maintained ▪ an infrastructure delivery and staging plan, including a description of how infrastructure on and off-site will be co-ordinated and funded to ensure it is in place prior to the commencement of construction ▪ an assessment of the development's impacts on existing utilities and services and service providers' assets surrounding the site.	Refer to **Section 6.19** and **Appendix 23**.
5. Urban design and visual – including: ▪ a detailed design and options analysis of the development including diagrams, illustrations and drawings with reference to the built form, height, setbacks, bulk and scale in the context of the immediate locality, the wider area, the desired future character of the area and consideration of Clause 31 of State Environmental Planning Policy (Western Sydney Employment Area) 2009 ▪ demonstration of how the development will achieve design excellence in accordance with any relevant EPI provisions and the objectives for good design in Better Placed (Government Architect NSW, 2017) ▪ a visual impact assessment (including photomontages, perspectives and cross sections) of the development layout and design (buildings and storage areas), including staging, site coverage, setbacks, open space, landscaping, height, colour, scale, building materials and	Refer to **Sections 4.2.7**, **6.3** and **Appendices 4, 6** and **7.**

finishes, façade design, signage and lighting. The assessment must consider potential impacts on: o views, vistas, open space and significant vantage points in the broader public domain o nearby private receivers o edge conditions and interface treatments between the site and adjoining land o Aldington Road ▪ consideration of the layout and design of the development having regard to the surrounding vehicular, pedestrian and cycling networks ▪ detailed plans showing suitable landscaping which incorporates endemic species as well as how it maximise opportunities for green infrastructure, consistent with Greener Places (Government Architect NSW, 2020).	
6. Traffic and transport – including: ▪ details of all traffic types and volumes likely to be generated during construction and operation, including a description of key access / haul routes. Traffic flows are to be shown diagrammatically to a level of detail sufficient for easy interpretation ▪ an assessment of the predicted impacts of this traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts at key intersections using SIDRA or similar traffic model. This is to include the identification and consideration of approved and proposed developments/planning proposals/road upgrades in the vicinity. The assessment needs to consider the impact on Aldington Road for the duration of the development because traffic growth in this area is expected to increase more quickly than standard growth rates ▪ details of how the proposed development connects to adjoining sites to facilitate their future development for their intended purposes ▪ plans demonstrating how all vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the street network ▪ details and plans of the proposed internal road network, loading dock servicing and provisions, on-site parking provisions, and sufficient pedestrian and cyclist facilities, in accordance with the relevant Australian Standards and the Draft Mamre Road Precinct Development Control Plan ▪ swept path diagrams depicting the largest anticipated vehicle entering, exiting and manoeuvring throughout the site ▪ details of road upgrades, infrastructure works or new roads or access points required for the development ▪ details of travel demand management measures to minimise the impact on general traffic and bus operations, including details of a location-specific sustainable travel plan (Green Travel Plan and specific Workplace Travel Plan) and the provision of facilities to	Refer to **Section 6.8** and **Appendix 9**.

increase the non-car mode share for travel to and from the site ▪ details of the adequacy of existing public transport or any future public transport infrastructure within the vicinity of the site, pedestrian and bicycle networks and associated infrastructure to meet the likely future demand for the proposed development ▪ identification of any dangerous goods likely to be transported on arterial and local roads to/ from the site and, if necessary, the preparation of an incident management strategy ▪ measures to integrate the development with the existing/future public transport network.	
7. Soil and water – including: ▪ a topographic assessment and justification demonstrating the proposed earthworks are responsive and contextually appropriate ▪ an assessment of the development's potential impacts on soil and water resources, topography, hydrology, groundwater, groundwater dependent ecosystem(s), drainage lines, watercourses and riparian lands on or nearby to the site, including mapping and descriptions of existing background conditions and cumulative impacts and measures proposed to reduce and mitigate impacts ▪ a detailed site water balance including identification of water requirements for the life of the development, measures that would be implemented to ensure an adequate and secure water supply is available for the development and a detailed description of the measures to minimise water consumption at the site; ▪ demonstration satisfactory arrangements for drinking water, wastewater and, if required, recycled water services have been made ▪ characterisation of water quality at the point of discharge to surface and/or groundwater against the relevant water quality criteria (including the Draft Mamre Road Precinct Development Control Plan) and proposed mitigation measures, monitoring activities and methodologies ▪ a site-specific integrated water management strategy with details of stormwater/wastewater management system including how it will be designed, operated and maintained, including the capacity of on-site detention system(s), on-site sewage management and measures to treat, reuse (including indicative quantities) or dispose of water ▪ demonstration of how stormwater discharge will comply with the trunk drainage infrastructure identified in the Mamre Road Precinct Draft Development Control Plan, including concept stormwater plans for both the proposed development and the ultimate developed estate ▪ detailed flooding assessment ▪ description of the proposed erosion and sediment controls during construction ▪ consideration of salinity and acid sulfate soil impacts.	Refer to **Section 6.7** and **Appendices 8** and **20**.
8. Noise and vibration – including:	Refer to **Section 6.10** and **Appendix 15**.

▪ a quantitative noise and vibration impact assessment for construction and operation of the development, including traffic noise, undertaken by a suitably qualified person in accordance with the relevant Environment Protection Authority guidelines and Australian Standards which includes: o the identification of impacts associated with construction, site emission and traffic generation at noise affected sensitive receivers, including the provision of operational noise contours and a detailed sleep disturbance assessment o details of noise monitoring survey, background noise levels, noise source inventory and 'worst case' noise emission scenarios o consideration of annoying characteristics of noise and prevailing meteorological conditions in the study area o a cumulative impact assessment inclusive of impacts from other developments, including the existing development o details and analysis of the effectiveness of proposed management and mitigation measures to adequately manage identified impacts, including a clear identification of residual noise and vibration following application of mitigation these measures and details of any proposed compliance monitoring programs.	
9. Hazards and risk – including: ▪ a preliminary risk screening completed in accordance with State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33 (DoP, 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development. Should preliminary screening indicate that the project is "potentially hazardous" a Preliminary Hazard Analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011) ▪ details of fire and life safety systems which would be installed to service the development.	Refer to **Sections 4.2.9** and **6.16** and **Appendix 14**.
10. Biodiversity – including an assessment of the proposal's biodiversity impacts in accordance with the Biodiversity Conservation Act 2016, including the preparation of a Biodiversity Development Assessment Report (BDAR) where required under the Act, except where a waiver for preparation of a BDAR has been granted.	Refer to **Section 6.12** and **Appendix 10**.
11. Cultural heritage and Aboriginal cultural heritage – including: ▪ an assessment of cultural heritage items and values of the site and surrounding area ▪ the identification, description and documentation of the Aboriginal cultural heritage values that exist across the site in an Aboriginal Cultural Heritage Assessment Report (ACHAR), prepared in consultation with Aboriginal parties (including the local Aboriginal Council). The ACHAR must	Refer to **Sections 6.14** and **6.15** and **Appendices 16-18**.

describe any impacts on Aboriginal cultural heritage values and the associated mitigation measures.	
12. Social impact – including: ▪ a social impact assessment in accordance with the Department's Draft Social Impact Assessment Guideline – State significant projects (October 2020) ▪ an analysis of any potential economic impacts of the development, including a discussion of any potential economic benefits to the local and broader community.	Refer to **Section 6.13** and **Appendix 27**.
13. Contamination – including an assessment of the site suitability for the proposed use(s) in accordance with State Environmental Planning Policy No 55 – Remediation of Land.	Refer to **Sections 4.2.10** and **6.5** and **Appendices 11** and **12**.
14. Bushfire – including a bushfire assessment against the requirements of Planning for Bush Fire Protection (NSW Rural Fire Service, 2019).	Refer to **Section 6.17** and **Appendix 22**.
15. Waste management – including details of the quantities and classification of waste streams generated during construction and operation and proposed storage, handling and disposal requirements.	Refer to **Section 6.9** and **Appendix 21**.
16. Air quality – including an assessment of air quality impacts at sensitive receivers during construction and operation in accordance with NSW Environment Protection Authority guidelines and details of mitigation, management and monitoring measures.	Refer to **Section 6.11** and **Appendix 13**.
17. Greenhouse gas and energy efficiency – including an assessment of the energy uses onsite and all reasonable and feasible measures that would be implemented onsite to minimise the development's greenhouse gas and carbon emissions (reflecting the Government's goal of net zero emissions by 2050).	Refer to **Sections 6.11** and **6.21** and **Appendices 13** and **19**.
18. Ecologically Sustainable Development – including a description of how the development will incorporate the principles of Ecologically Sustainable Development in the design, construction and operation of the development.	Refer to **Section 6.21** and **Appendix 19**.
19. Airport Safeguarding – including a risk assessment of the proposed development on Western Sydney Airport operations and addressing related matters in the Western Sydney Aerotropolis Plan and the State Environmental Planning Policy (Western Sydney Aerotropolis) 2020.	Refer to **Section 6.18** and **Appendix 25**.
20. Planning agreement/development contributions – including consideration of any applicable State and local development contributions and/or details of any Voluntary Planning Agreement and demonstration that satisfactory arrangements have been made or will be made to provide or contribute to the provision of the necessary local and regional infrastructure required by State Environmental Planning Policy (Western Sydney Employment Area) 2009 or any other policy or plan to support the development.	Refer to **Sections 4.4.2** and **4.4.5**.
Consultation	
During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular you must consult with: ▪ Penrith City Council	Refer to **Part E** and **Appendix 26**.

▪ Department of Planning, Industry and Environment, specifically the:
  o Central (Western) team, Place Design and Public Spaces Group
  o Green and Resilient Places, Place Design and Public Spaces Group
  o Environment, Energy and Science Group
  o Water Group (including the Natural Resources Access Regulator)
• Endeavour Energy
• Environment Protection Authority
• Fire and Rescue NSW
• NSW Rural Fire Service
• Sydney Water
• Transport for NSW
• Water NSW
• Western Sydney Airport Corporation
• Western Sydney Planning Partnership
▪ surrounding local landowners and stakeholders
 	
The EIS must describe the consultation process and the issues raised and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.	

Further consultation after 2 years	
If you do not lodge a Development Application and EIS for the development within two (2) years of the issue date of these SEARs, you must consult further with the Secretary in relation to the preparation of the EIS.	Noted.

PART B SITE ANALYSIS

2.1 SITE LOCATION & EXISTING SITE CHARACTERISTICS

The identified portion of land, that is the subject of this EIS is legally defined as 155-217 Aldington Road, Kemps Creek. The Subject Site comprises two (2) allotments as described in **Table 3** below.

Table 3 Site Identification	
Street Address	**Legal Description**
155-167 Aldington Road, Kemps Creek	Lot 33 DP258949
169-181 Aldington Road, Kemps Creek	Lot 28 DP255560
183-197 Aldington Road, Kemps Creek	Lot 27 DP255560
199 Aldington Road, Kemps Creek	Lot 26 DP255560
201-217 Aldington Road, Kemps Creek	Lot 25 DP255560

The entire Site comprises a total area of approximately 43 hectares (ha) and is located within the Mamre Road Precinct pursuant to SEPP WSEA. The Site affords a primary frontage of approximately 647m to Aldington Road to the east. Currently no formal access has been established, however formal vehicular access to the site would logically be provided from Aldington Road.

In its existing state, the Site comprises a plant nursery, rural housing, agricultural land, farm sheds and undeveloped land with dams and waterbodies connected to the tributaries of South Creek. The Site is bound by agricultural land and rural residential dwellings. The Site is located within the WSEA and is situated approximately 5km from Badgerys Creek, 20km from Parramatta and 39km from the Sydney CBD. The Site affords road linkages to Mamre Road, Elizabeth Drive, Lenore Drive, Erskine Park Road and the M4 Western Motorway.

The Site is also within close proximity to transport infrastructure routes (predominantly the bus network), as well as sharing direct links with the wider regional road network, including Mamre Road and both the M4 & M7 Motorways. All of which provide enhanced connectivity to the Subject Site and immediate vicinity, as well as the wider locality. Additionally, the Subject Site is located within close proximity to active transport links, such as bicycle routes, providing an additional mode of accessible transport available to the Subject Site.

The Site is subject to the provisions outlined within SEPP WSEA, which is the primary Environmental Planning Instrument (EPI) and categorises the Site within the IN1 General Industrial zone, as displayed in **Figure 11**. The Site and surrounding context are illustrated in **Figures 1** and **2** below.

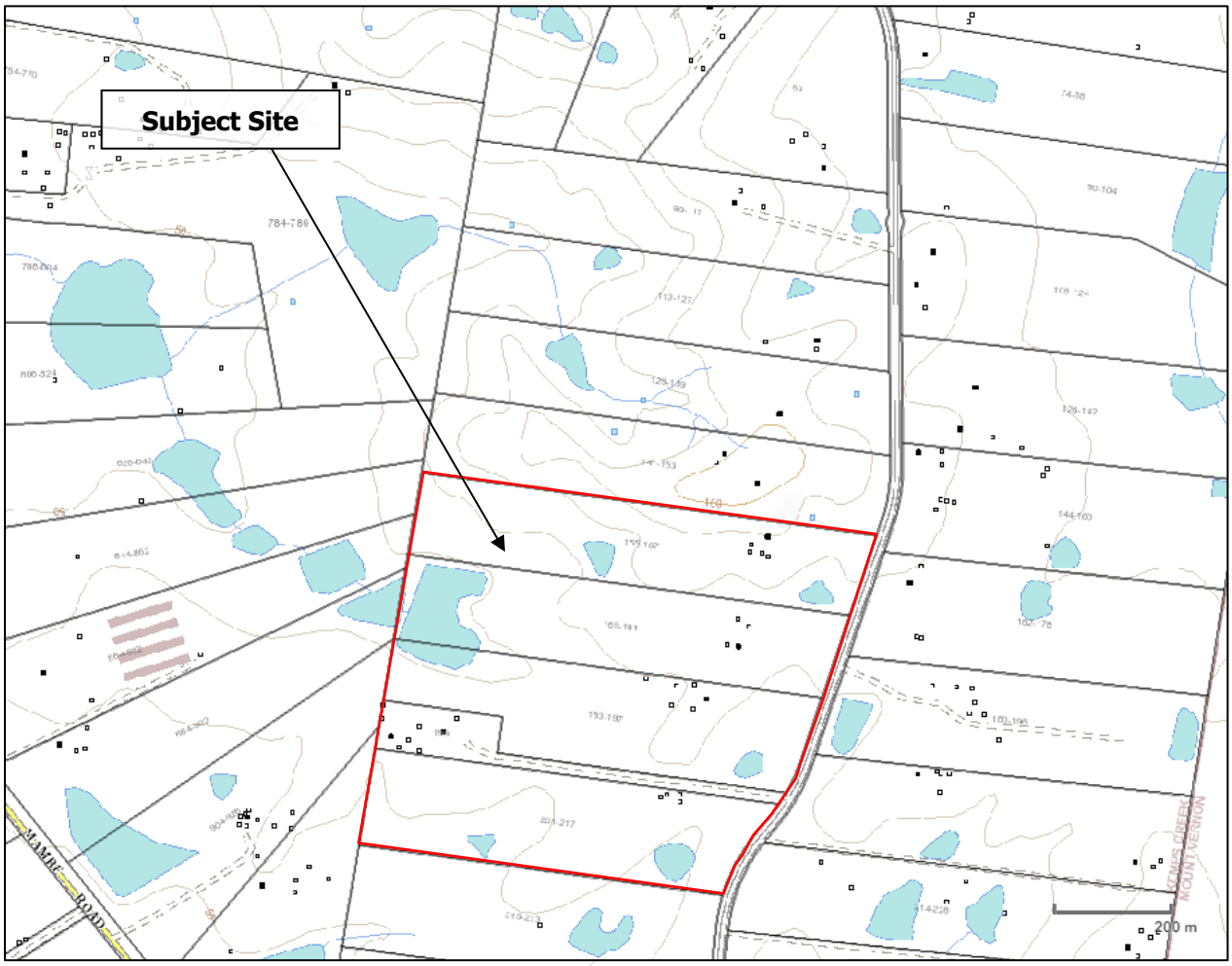


Figure 1 Cadastre Map (Source: SIX Maps 2021)

Figure 2 Aerial Photo (Source: NSW Government 2021)

2.2 SITE CONTEXT

The Subject Site is located in the suburb of Kemps Creek, which forms part of the wider Penrith LGA.

Key contextual attributes of the Subject Site are noted as follows:

- The Subject Site is wholly located within the Penrith Local Government Area (LGA).
- The Site is strategically located in the Mamre Road Precinct, WSEA and Western Sydney Aerotropolis (WSA).
- The Site is surrounded by industrial zoned land throughout the Mamre Road Precinct, in which the majority of the land comprises primary production activities at present.
- SEPP WSEA is the primary EPI applicable to the Subject Site. Under the provisions of SEPP WSEA, the Subject Site is located within the Mamre Road Precinct (Precinct 12) (refer to **Figure 3** below).
- The Proposed Development represents a logical connection and extension of the employment lands in this location with respect to the wider Mamre Road Precinct and WSEA. It would provide employment-generating land uses that are complimented by access to the surrounding regional road network.
- A significant regional road network is in close proximity to the Site, including Mamre Road and both the M4 & M7 Motorways, affording the Site excellent accessible transport links.
-

The immediate Site context exhibits an industrial character, being undeveloped; however, is zoned for industrial-related purposes pursuant to the provisions of SEPP WSEA and forms part of the wider Mamre Road Precinct.

Other land uses in the vicinity of the Site include:

- North – E2 Environmental Conservation zoned land within the Mamre Road Precinct, comprising a riparian corridor and existing rural residential dwellings;
- South – IN1 General Industrial zoned landholdings within the Mamre Road Precinct, currently comprising primary production activities;
- East – IN1 General Industrial, E2 Environmental Conservation and RE2 Private Recreation zoned land located within the Mamre Road Precinct;
- West – IN1 General Industrial and E2 Environmental Conservation zoned land within the Mamre Road Precinct, currently primary production activities.

SEPP WSEA remains the primary EPI applicable to the Subject Site. It is noted that the surrounding regional road network is located in close proximity to the Subject Site, which includes Mamre Road and both the M4 and M7 Motorways, providing enhanced connectivity to the wider Sydney Metropolitan Area.

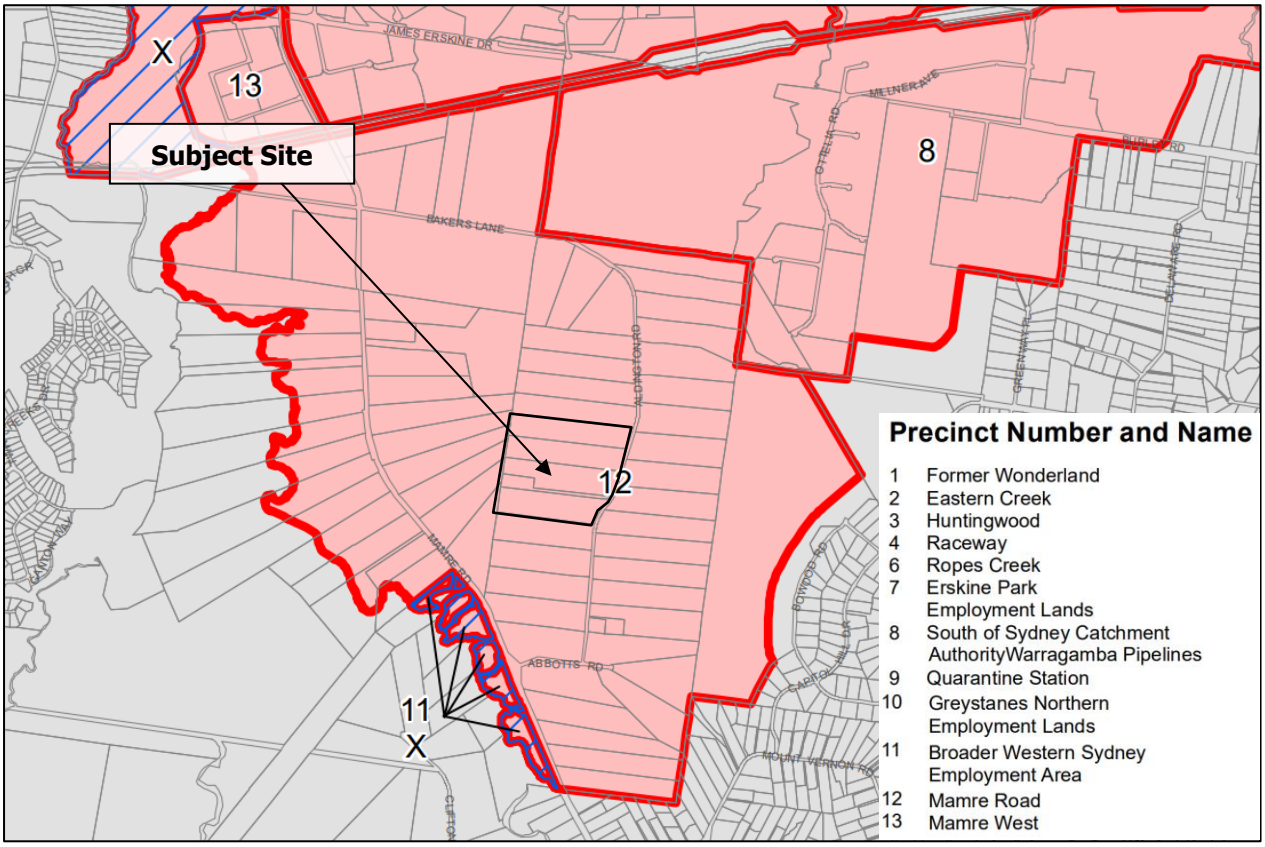


Figure 3 SEPP WSEA Land Application Map (Source: NSW Legislation 2021)

2.3 LAND OWNERSHIP

The Subject Site is under contract with Frasers Property Industrial and currently comprises rural undeveloped land portion.

2.4 SURROUNDING DEVELOPMENT

As indicated on the Major Projects website, a number of applications in the vicinity of the Site within the Mamre Road Precinct are currently under assessment by DPIE or Penrith City Council. The current applications occurring in the vicinity of the Site are summarised in **Table 4**. The location of the relevant applications is illustrated in **Figure 3** below.

Table 4 State Significant Development Applications, Development Applications and Modification Applications in the vicinity of the Subject Site			
Application number	**Address**	**Description**	**Status**
SSD-9522	657-769 Mamre Road, Kemps Creek – Kemps Creek Warehouse, Logistics and Industrial Facilities Hub	SSDA for a warehouse, logistics and industrial facilities hub	Approval granted by Minister for Planning and Public Spaces on 21 December 2020
SSD-9522-Mod-1	657-769 Mamre Road, Kemps Creek – Kemps Creek Warehouse, Logistics and Industrial Facilities Hub	Section 4.55 (2) Modification to SSD 9522 to amend the Stage 1 and 2 Subdivision Plan and the Masterplan	Approval granted by DPIE on 3 September 2021
SSD-25725029	657-769 Mamre Road, Kemps Creek Proposed Lot 10	ARDEX Warehouse and Manufacturing Facility – construction and use of a warehouse/industrial facility and subdivision	SEARs issued by DPIE on 3 September 2021
SSD-10101987	706-769 Mamre Road, Kemps Creek – Kemps Creek Data Centre	SSDA for a data centre	SEARs issued by DPIE on 1 March 2021. EIS currently under preparation by the Proponent
SSD-10272349	754-770 and 784-786 Mamre Road, Kemps Creek – Yiribana Logistics Estate	SSDA for a Concept Masterplan comprising five industrial buildings and Stage 1 works including construction and use of one industrial building for warehouse and distribution or manufacturing purposes, site preparation works, realignment of a riparian corridor, stormwater and associated works, internal road network, signage and landscaping	SEARs issued by DPIE in November 2020. EIS currently under preparation by the Proponent
SSD-5211	788-804 Mamre Road, Kemps Creek	SSDA for a waste and resource management facility	Director General's Environmental Assessment Requirements issued by the former Department of Planning and Infrastructure in April 2012
SSD-10448	788-882 Mamre Road, Kemps Creek – Aspect Industrial Estate	SSDA for a Concept Masterplan comprising 11 industrial buildings and Stage 1 works for site preparation, construction and use of two warehouse and distribution buildings, stormwater and associated works, internal road network, signage and subdivision	Request for Additional Information issued by DPIE on 29 March 2021.
SSD-22595032	1-51 Aldington Road, Kemps Creek – 1-51 Aldington Road Estate	SSDA for Development of a manufacturing and warehousing hub including construction and operation of	SEARs issued by DPIE on 14 July 2021. EIS currently under

		a chemical manufacturing facility and a warehouse for a total of 50,210m^2 of floor space. Bulk earthworks, site infrastructure and subdivision of the site	preparation by the Proponent
SSD-17647189	884-928 Mamre Road, Kemps Creek – Access Logistics Park	SSDA for one warehouse building, demolition and bulk earthworks, 13-lot Torrens Title subdivision, constriction and operation of internal roads, infrastructure and utilities	SEARs issued by DPIE on 14 May 2021. EIS currently under preparation by the Proponent
SSD-23480429	253-267 Aldington Road, Kemps Creek – 253-267 Aldington Road Estate	SSDA for construction and operation of four 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	SEARs issued by DPIE on 30 July 2021. EIS currently under preparation by the Proponent
SSD-10479	106-228 Aldington Road, Kemps Creek – 200 Aldington Road Industrial Estate	SSDA for Concept plan comprising 13 development lots for 356,660m^2 of warehouse floor space, 17,770m^2 office and 200m^2 café floor space, internal road layouts, parking and hardstand areas, landscaping, utilities and services and a Stage 1 development including site preparation, bulk earthworks, road works, infrastructure and utilities and a warehouse building with a total gross floor area of 52,500m^2	Request for additional information issued by DPIE on 28 April 2021
SSD-9138102	290-308 Aldington Road and 59-62 & 63 Abbotts Road, Kemps Creek – Westlink Industrial Estate	SSDA for construction of seven warehouse and distribution buildings including offices, loading docks, parking and hardstand areas, landscaping, utilities and services. Associated works including demolition and bulk earthworks, vegetation removal and construction of internal roads	Request for Response to Submissions (RtS) was issued by DPIE on 21 July 2021. RtS currently under preparation by the Proponent

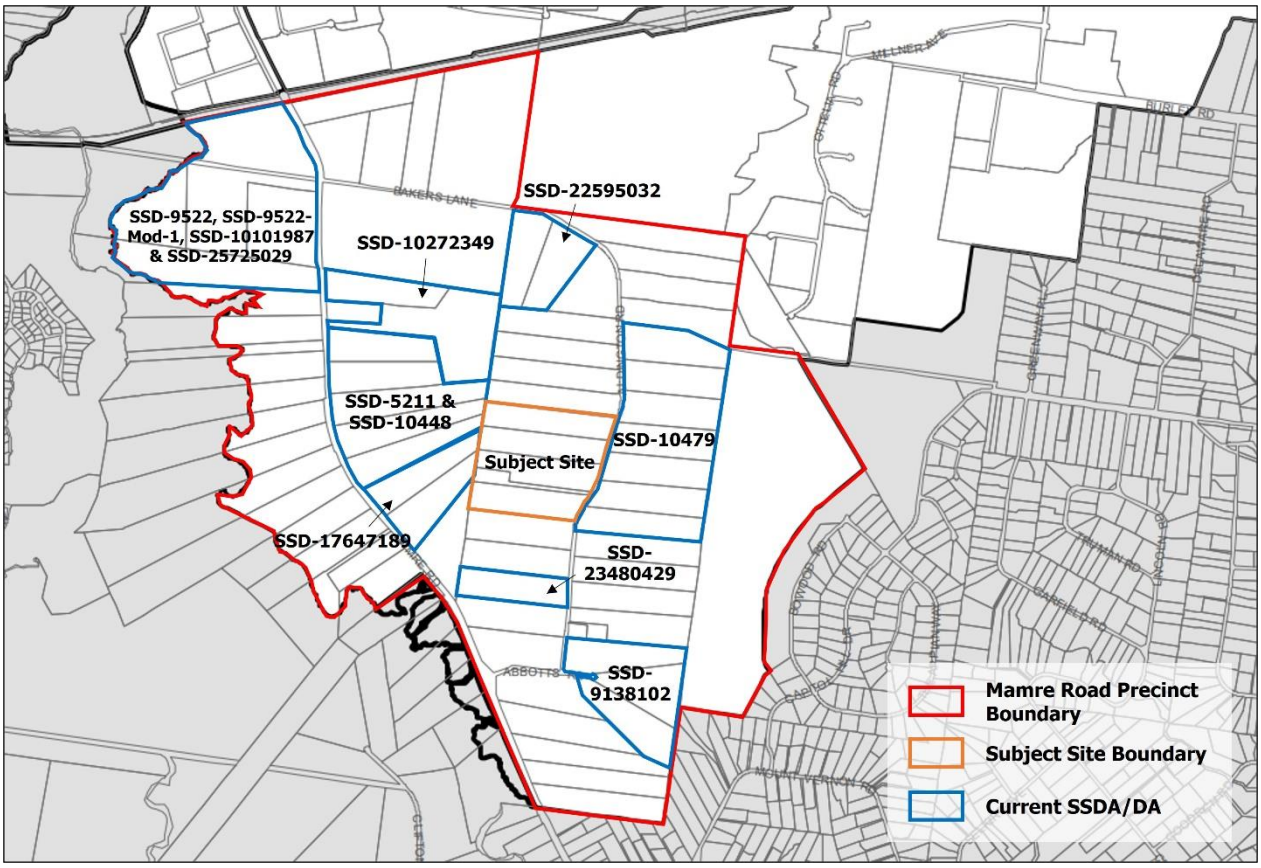


Figure 4 Surrounding Development (Source: NSW Legislation 2021)

2.5 STRATEGIC CONTEXT

The Productivity Priorities of the Western Parkland City under the *Western City District Plan* (issued by the Greater Sydney Commission (GSC), 2018) sets out for the Site its strategic planning priorities, namely:

- *Planning Priority W7 – Establishing the land use and transport structure to deliver a liveable, productive and sustainable Western Parkland City;*
- *Planning Priority W8 – Leveraging industry opportunities from the Western Sydney Airport and Badgerys Creek Aerotropolis;*
- *Planning Priority W9 – Growing and strengthening the metropolitan cluster;*
- *Planning Priority W10 – Maximising freight and logistics opportunities and planning and managing industrial and urban services land; and,*
- *Planning Priority W11 – Growing investment, business opportunities and jobs in strategic centres.*

The Proposed Development is considered entirely consistent with and responsive to the above priorities. It makes a valuable contribution to the Western Parkland City, which is earmarked for development and higher-and-better uses with regard to the sequential and orderly economic development the Subject Site.

As the Proposed Development is entirely consistent with the objectives of SEPP WSEA; SRD SEPP; *A Metropolis of Three Cities*; the *Western City District Plan*; and the Draft Mamre Road Precinct DCP, the Proposed Development is considered to be orderly development and consistent with both the strategic vision for the region and the desired economic and employment outcomes envisaged for the WSEA, particularly the Mamre Road Precinct.

2.6 SITE SUITABILITY

The Proposed Development provides for a Warehouse and Logistics Hub in a location that is highly sympathetic to the desired future character of the Mamre Road Precinct, being land designated for major warehousing, logistics and industrial development. The Site is adequately separated from sensitive land uses, such as residential development and educational establishments. The Site is identified to comprise bushfire prone land and biodiversity values, for which planned management and mitigation measures would be implemented accordingly, based on the recommendations provided in the specialist reports prepared, which are summarised in **Part F** of this EIS.

In summary, the Subject Site is suitable to accommodate the intended new, state-of-the-art Warehouse and Logistics Hub due to the following factors:

- It is identified within the Land Application Area under SEPP WSEA, which allows for the Proposed Development;
- It is zoned IN1 General Industrial under SEPP WSEA, in which warehouse or distribution centre is permissible with consent;
- Access to the NSW regional road network which facilitates connectivity to the surrounding key employment hubs and the wider region;
- Compatibility with surrounding and future development, as well as strategic and local context is evident;
- The Site represents orderly and sequential development given its proximity to existing and planned industrial development in the Mamre Road Precinct, Mamre West Precinct and Erskine Park Employment Lands, and other developed employment lands in the WSEA;
- All built form at the Site has been designed to mitigate any impacts on surrounding properties, through siting, the conscious positioning of the warehouse building in Proposed Lot 9, fencing, deep-soil landscaping and a conducive architectural and urban design outcome.

The following key elements of the Site and Proposed Development are also significant to note:

1. **Consistency with the Draft Mamre Road Precinct DCP:**

   The Proposed Development is generally consistent with the vision and provisions of the Draft Mamre Road Precinct DCP. Particularly, the proposed Site and access road layout has been designed in accordance with the Mamre Road Precinct Road Network Map and the Integrated Freight Network to create a permeable road network and enable the future delivery of the integrated freight network. The Proposed Development aligns with the vision of the Precinct and is consistent with Mamre Road Precinct Structure Plan (**Figure 20**) in that the Proposed Development will facilitate large scale warehousing and industrial development, forming an extension of the WSEA and ultimately creating a world-class industrial area.

2. **Visual Impact:**

   The Landscape and Visual Impact Assessment Report (**Appendix 7**) prepared by Habit8 concludes that the Proposed Development will cause a change in the view for a very small minority of properties. Residential dwellings, road users' pedestrians and cyclists have been identified as being impacted at medium level. Notwithstanding, the provision of high quality landscaping, particularly the street tree planting and landscape setback within the 60m Transgrid easement, will soften and provide adequate screening for the development from surrounding residential properties and road users.

3. **Noise:**

   The Acoustic Report (**Appendix 15**) prepared by Acoustic Works confirms that the 24-hour operation of the Site is predicted to comply with the NSW Environmental Protection Authority (EPA) Noise Policy for Industry and the relevant criteria subject to the recommendations implemented.

4. **Traffic:**

   A Transport and Accessibility Management Plan (**Appendix 9**) has been prepared by Ason Group which has prepared SIDRA modelling which outlines that the intersections surrounding the Site would continue to operate with a satisfactory level of service and that the Proposed Development does not require the provision of any further network upgrades to service to proposed Warehouse and Logistics Hub.

The Site's consistency with applicable Regional and Local Strategies, is demonstrated in the comprehensive Environmental Assessment, provided in full in **Part F** of this EIS. The Environmental Assessment contains an analysis of all potential Site impacts, which has been informed by the relevant consultant reports. Accordingly, the Environmental Assessment concludes that the Site is highly suited for its intended land use. It also sets out recommendations and mitigation measures (where necessary), to account for identified potential impacts, which may be caused by the Proposed Development.

The suitability of the Subject Site with regard to the Proposed Development, can be attributed to its ready ability to provide employment; its excellent access arrangements to the regional road network; its suitable contextual setting; and its minimal impact on the environment it would impose.

PART C PROPOSED DEVELOPMENT

3.1 OBJECTIVES OF THE PROPOSAL

The subject Proposed Development seeks Development Consent for the construction and operational use of a proposed Warehouse and Logistics Hub. The following aims and objectives have been identified as forming the basis of the Proposed Development in line with Industry Best Practice, as well as being consistent with the aims set out with SEPP WSEA, including:

- Construct a new warehouse and logistics hub comprising nine industrial allotments and a warehouse or distribution centre at proposed Lot 9 with a building area of 65,327m^2.
- Provide for 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.
- Ensure development is compatible with surrounding development and the regional and local context.

The Site and proposed design are considered to meet the objectives of the Project, as it allows for development on a land portion that is currently undeveloped in its state, as well as being zoned for such industrial-related purposes.

3.2 DESCRIPTION OF THE PROPOSAL

Development Consent is sought to develop the Subject Site for the purposes of a Warehouse and Logistics Hub. Operational use of the Warehouse and Logistics Hub would be undertaken on a 24-hour, 7-day basis, consistent with existing developments within the wider WSEA. Furthermore, the design for the Site, illustrates the emphasis of the urban design to produce a greater and more pleasant working environment in line with the vision outlined in the Greater Sydney Commission's (GSC's) *A Metropolis of Three Cities – Greater Sydney Region Plan* and the *Western City District Plan*, as well as adhering to the employment objectives of the WSEA.

Specifically, the Proposed Development entails the following:

- 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.

In particular, the Proposed Development involves the construction of one warehouse and distribution centre on Proposed Lot 9, with an east and west component for different product storage, and will be operated by one user.

The Proposed Development includes a CIV of approximately $86 Million (refer to **Appendix 2**), for which a complete set of Architectural Plans prepared by Frasers Property Industrial are located in **Appendix 4** of this EIS. The development particulars of the Proposed Development are outlined in **Table 5** below.

Table 5 Proposed State Significant Development Particulars	
Project Element	**Development Particular**
Overall Site	
Subject Site Area	Approximately 43 ha
General	The Proposed Development is considered SSD pursuant to Schedule 1, Clause 12 of the SRD SEPP attaining a CIV of approximately $86 Million (excluding GST).
Site preparation works	Given the steep undulating topography of the Site, bulk earthworks and construction of retaining walls will be required to provide flat pads to facilitate the proposed industrial development. While retaining walls are required on the northern, southern and western Site boundaries, retaining walls have been minimised where possible, fronting public roadways. The proposed earthworks involve a balanced cut to fill ratio resulting in a net import of 25,149m^3. Further details are provided in **Sections 3.2.6** and **6.7**.
Remediation works	In accordance with the Remedial Action Plan (**Appendix 12**) prepared by JBS&G, the remedial strategy for the Site comprises: ▪ Manual picking of surficial Asbestos Containing Material (ACM) at Area of Environmental Concern (AEC) 1a, 1b and 1e with the ACM fragments disposed to a landfill/licensed waste facility; ▪ Offsite disposal of concrete slabs with affixed ACM (AEC 6c); and ▪ Excavation and offsite disposal of hydrocarbon impacted material at TP398 (≈ 15 m^3) to an appropriately licensed waste facility. Validation of the remedial works will be conducted by JBS&G to demonstrate that the remediation objectives have been achieved. Further details are provided in **Sections 3.2.7** and **6.5**.
Road construction	▪ A 24.0m estate access road providing connection to the industrial allotments within the Site and the adjoining industrial landholdings to the north and south. Turning heads will be provided within the Site until the connection of the proposed road network through the adjoining sites to the north and south are facilitated. ▪ A 26.4m access road providing connection to the roundabout on Aldington Road to the east and to 884-928 Mamre Road (Altis site) to the west.
Subdivision	A nine-lot Torrens title subdivision is proposed, creating nine industrial allotments, proposed access roads, bio-retention basins and the Aldington Road dedication zone. Refer to **Table 6** below.
Acoustic barriers	In accordance with the recommendations in the Acoustic Report (**Appendix 15**), interim acoustic barriers are to be constructed to mitigate the noise impacts associated with the Proposed Development while the residential dwellings adjacent to the Site are occupied. Further details are provided in **Sections 3.2.9** and **6.10**.
Detention basins	The proposed estate-wide drainage system will incorporate three detention basins. Surface water runoff from the proposed lots and within the internal access roads is proposed to be collected via pits and pipes and discharge into one of the three on-site detention (OSD) basins. Further details are provided in **Sections 3.2.8** and **6.7**.

Infrastructure and Services	All services to the Site will be provided from Mamre Road and the internal Estate Access Roads to the Site, including potable water; electricity; gas; wastewater; and communications.
Operational & Construction Jobs	Employment Generation (Subject SSD Application): ▪ Operational jobs generated by the Proposed Development, are estimated at 228 full time jobs ▪ Construction jobs generated by the Proposed Development, are expected to be in the order of up to 143 full time jobs
Proposed Lot 9 Development	
Primary Land Use	Warehouse or distribution centre (24/7 use)
Warehouse building in Proposed Lot 9	**Total GFA: 65,327m^2** ▪ Warehouse 9A: 33,095m^2 ▪ Office and entry 9A: 408m^2 ▪ Office and entry 9B: 408m^2 ▪ Warehouse 9B: 30,600m^2 ▪ Office and entry 9C: 408m^2 ▪ Office and entry 9D: 408m^2
Building Height	14.6m

The Proposed Development involves a nine-lot Torrens title subdivision of the Subject Site. Details of the proposed subdivision are summarised in **Table 6** below.

Table 6 Proposed Torrens Title Subdivision Particulars

Proposed Lot Number	Description	Lot Area
1	Proposed industrial lots	27,355m^2
2		27,766m^2
3		27,127m^2
4		31,841m^2
5		30,426m^2
6		33,271m^2
7		30,658m^2
8		43,236m^2
9	Proposed warehouse or distribution centre	142,281m^2
Proposed access roads		31,372m^2
Aldington Road dedication zone		4,869m^2
Total Site Area (Approximate)		**430,202m^2**

It is noted that the building works of the industrial development in Proposed Lots 1 to 8 would be subject to separate Development Consents pertaining to the built form and internal fitout, based on customer demand and operational requirement. Local roads are to be dedicated to Council as required.

The proposed Site Plan (refer to **Figure 6** of this EIS below) incorporates high standards of landscaping and architectural design, to create a well-designed and articulated warehouse and distribution facility at Proposed Lot 9. This vision is commensurate with the planning aspirations and objectives contained in *A Metropolis of Three Cities*, the *Western City District Plan* and the Draft Mamre Road Precinct DCP.

The proposed Masterplan layout is illustrated in **Figure 5**. The Proposed Site Plan and Elevations are shown in **Figures 6-9** overleaf. The complete Architectural Plans are located in **Appendix 4** of this EIS.

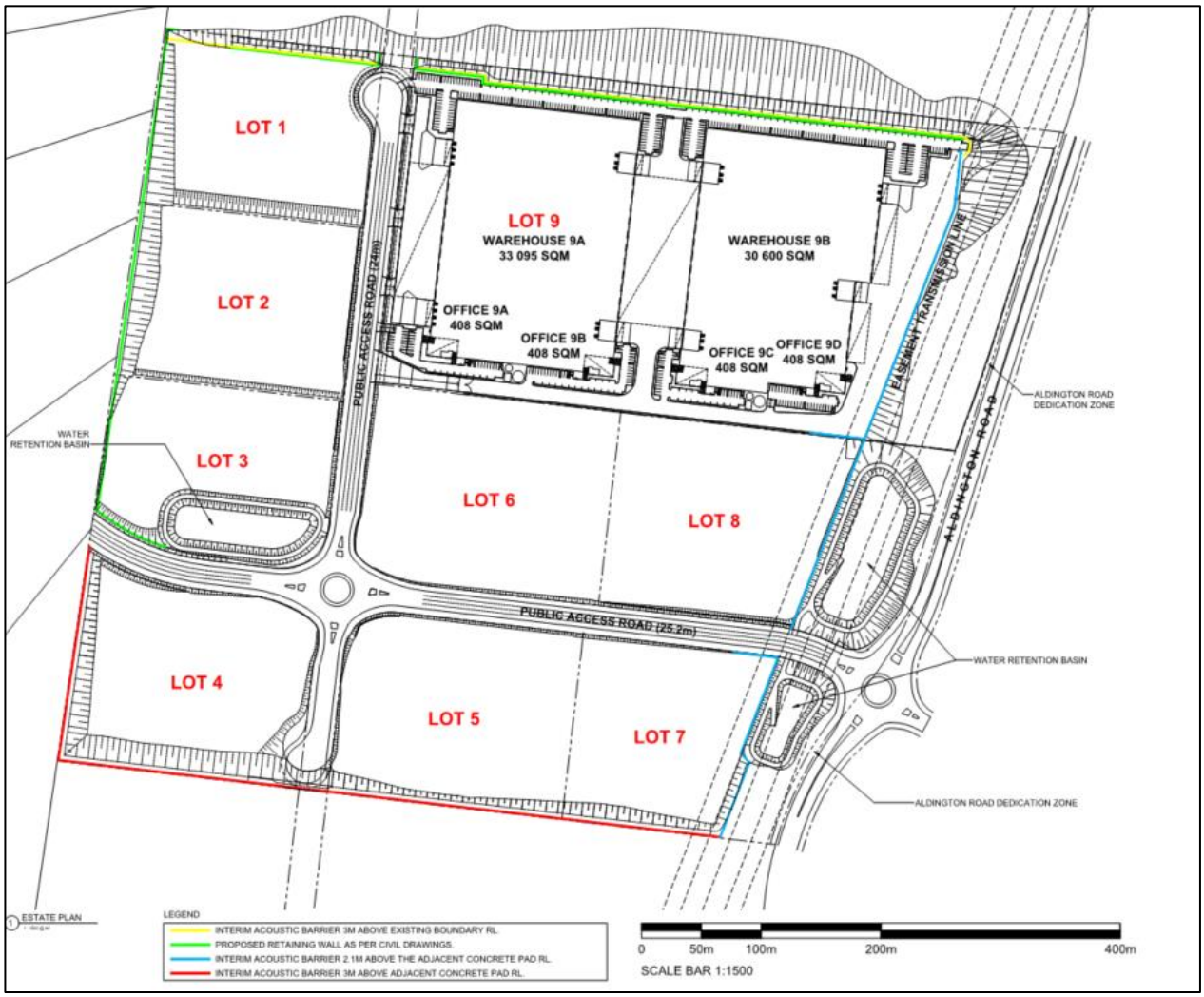


Figure 5 Proposed Master Plan (Source: Frasers 2021)

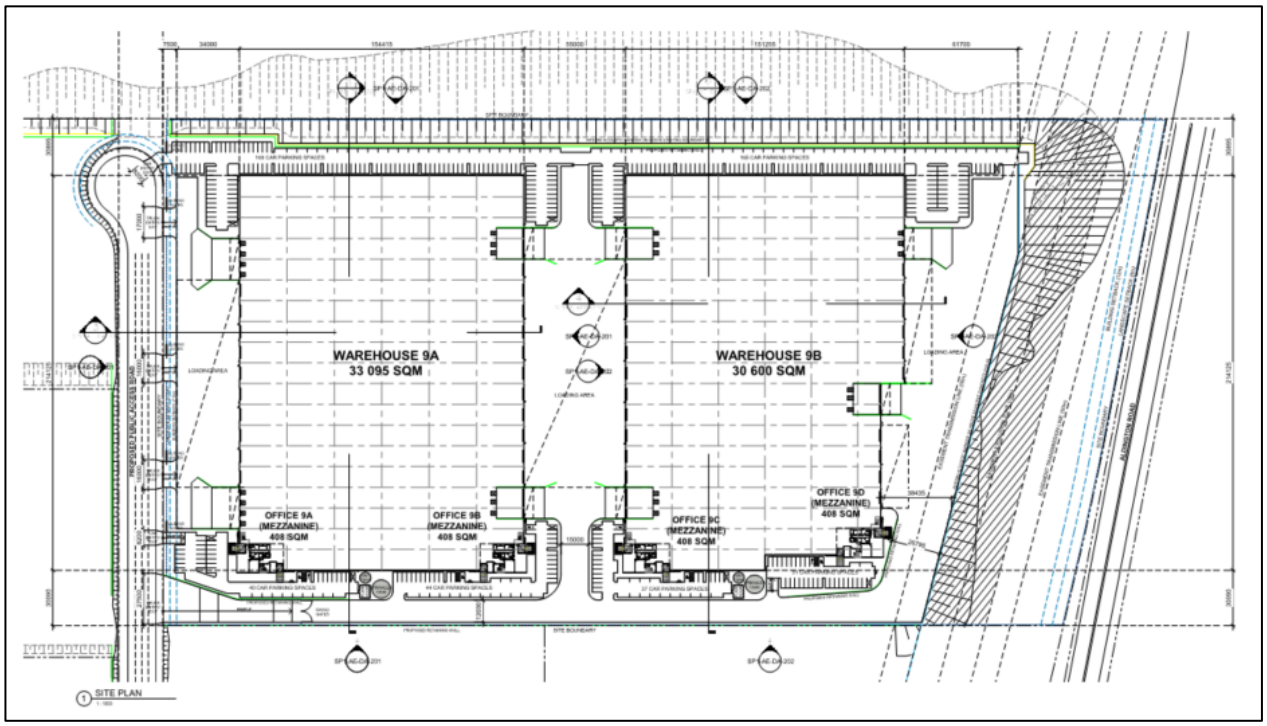


Figure 6 Proposed Lot 9 Site Plan (Source: Frasers 2021)

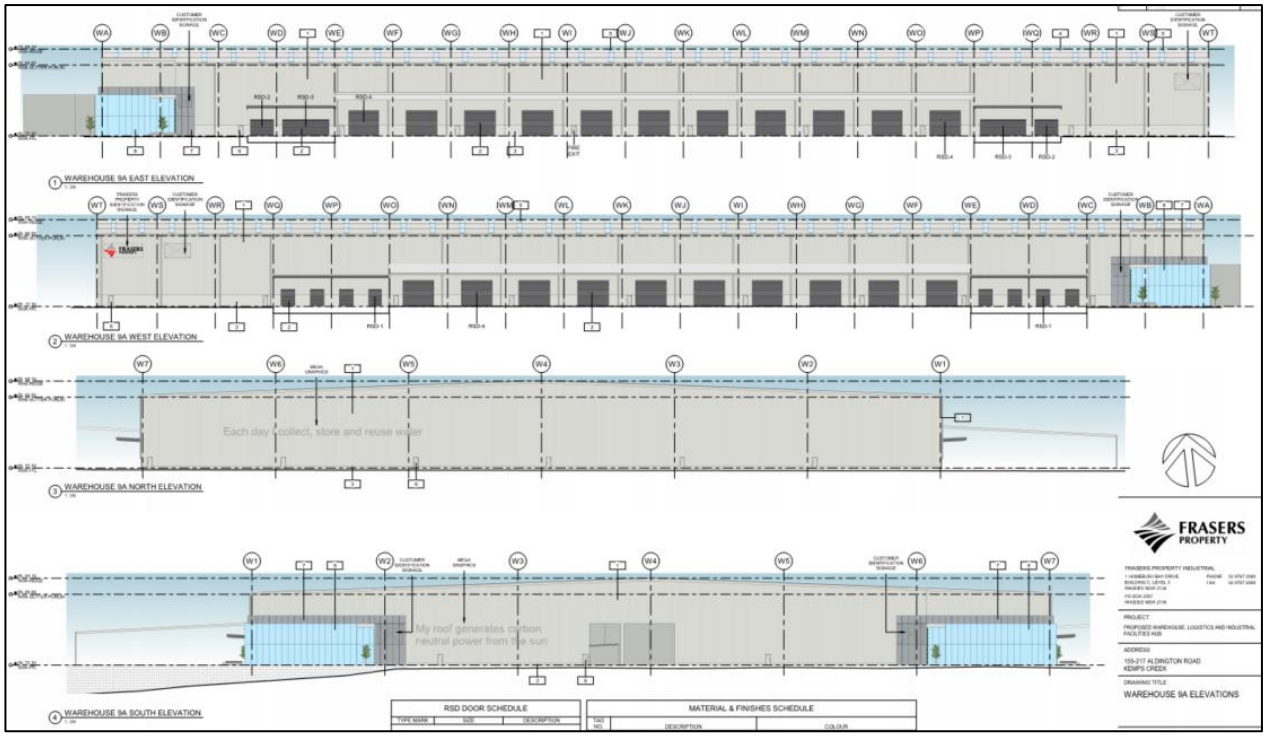


Figure 7 Warehouse 9A Elevations (Source: Frasers 2021)

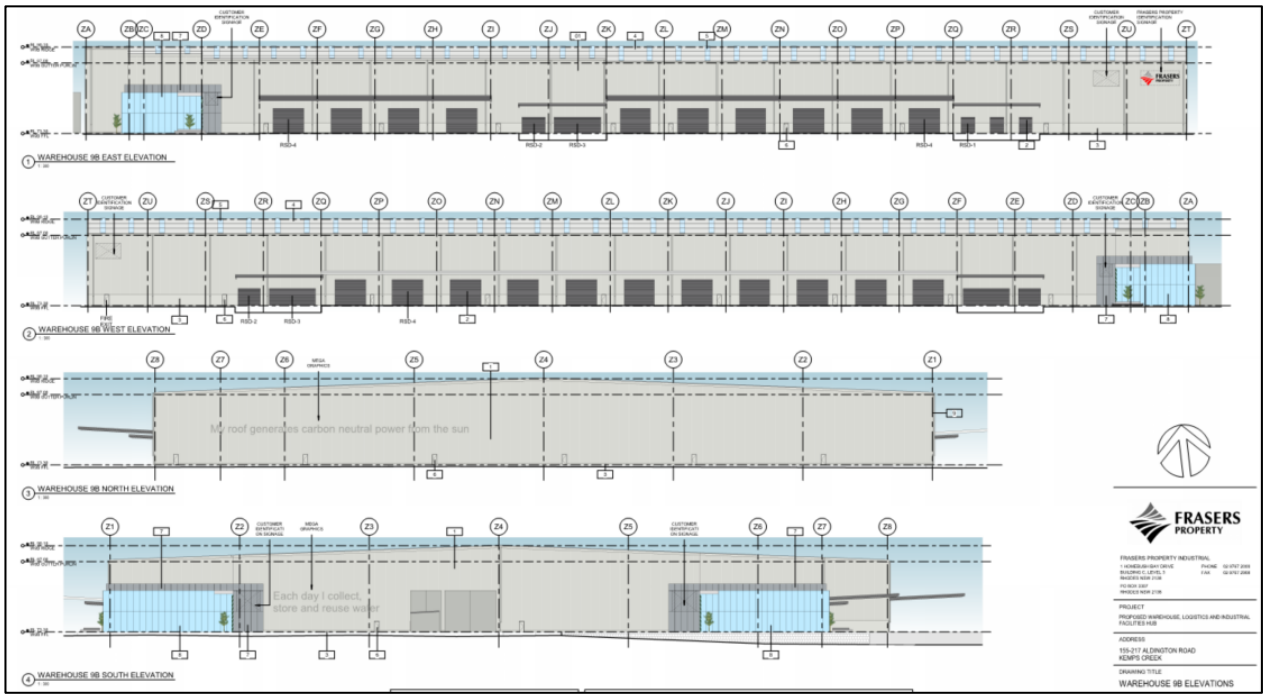


Figure 8 Warehouse 9B Elevations (Source: Frasers 2021)

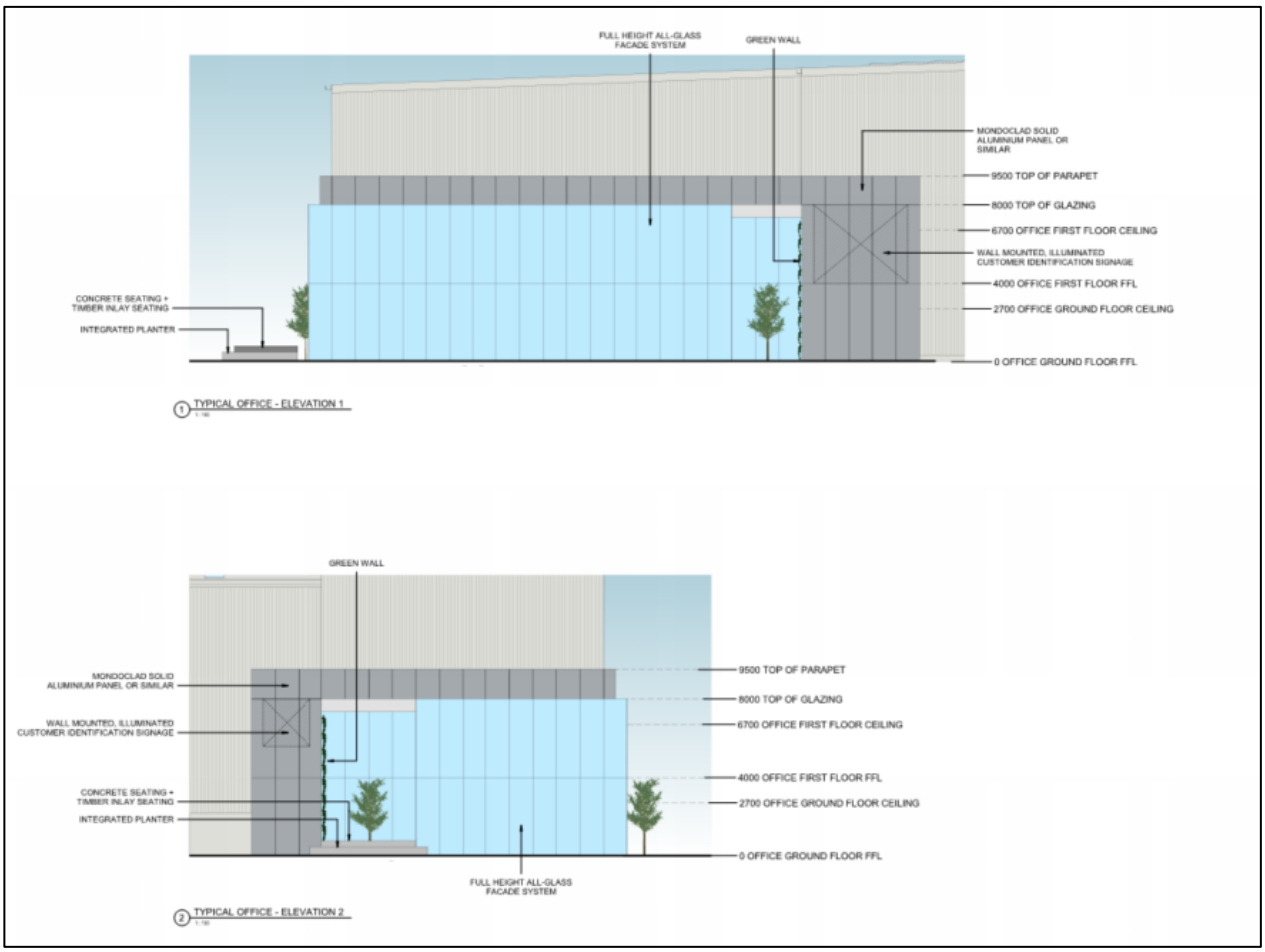


Figure 9 Typical Office Elevations (Source: Frasers 2021)

3.2.1 Warehouse or Distribution Centre in Proposed Lot 9

The layout of Proposed Lot 9 has been developed for a warehouse or distribution centre with two portions, providing a total building area of 65,327m^2. The building and Site layout have been designed to meet the operational requirement of the end user in order to ensure the functionality and efficiency of the proposed warehouse or distribution centre, for the operation of two product lines by the same operator. Specifically, the proposed warehouse or distribution centre will include one warehouse building, ancillary offices, carparking and associated landscaping. The proposed warehouse building will exhibit a building height of 14.6m, which is consistent with the built form and scale of the surrounding industrial and warehouse development in the wider WSEA. Further details of the proposed design are provided in the Architectural Plans at **Appendix 4**.

In relation to the operational particulars, the following is noted:

- The proposed warehouse will be occupied by a single operator (undisclosed user) under single management.
- The respective buildings (warehouse 9A and 9B) cater for different products to be distributed to different locations for different customers.
- Warehouse 9A caters for products to be distributed to last mile warehouses. The goods stored and distributed will primarily consist of Fast-Moving Consumer Goods (FMCGs) that require faster turn over, delivery cycles and a unique stock turnover pattern (First in First out) through real time stock management.
- Warehouse 9B caters for products to be distributed to customer warehouses, are larger in size have completely different Stock Keeping Units (SKU's) and operate on a different delivery cycle and delivery timetable, one that reflects a more uniform delivery pattern. This Warehouse offers customisation through integration of product line delivery schedules and a different level of security and scalability.

3.2.2 Access and Servicing

Access to the Site will be provided via a roundabout intersection with Aldington Road, with access to the wider road network provided via Mamre Road to the west of the Site, which itself will be upgraded in accordance with the TfNSW Mamre Road Upgrade project.

In particular, the Proposed Development involves the construction of a 24.0m local industrial road providing connection to the industrial landholdings to the north and south as well as access to the roundabout within the Site which provides connection to the proposed 25.2m access road. The proposed 25.2m wide collector road is designed to facilitate internal estate access as well as connection to the roundabout on Aldington Road to the east and the road network in 884-928 Mamre Road (Altis site) to the west and within the wider Mamre Road Precinct. It is noted that the proposed access road does not extend beyond the Site boundary. As demonstrated in the coordination letter at **Appendix 33**, the design and construction of the access road are being coordinated with Altis. The proposed estate access roads have been designed in accordance with the Draft Mamre Road Precinct DCP and Road Network Map.

The design vehicle adopted for the proposed estate roads is a 26m long B-Double with a design speed of 60km/hr, with the check vehicle being the 36m long B-Triple. Cul-de-sacs will also be designed and constructed in accordance with Council guidelines requiring a 16.5m radius on the turning heads and to accommodate a 36m long B-Triple.

Further details of the proposed access and road layout are provided in **Sections 6.7** and **6.8** and the Civil Design Report and Plans at **Appendix 20** and the Transport and Accessibility Management Plan at **Appendix 9**.

3.2.3 Landscaping

A carefully selected landscape setting will be chosen comprising a mix of native and endemic plant species, shrubs, trees and grasses which will help to improve the aesthetic for workers and visitors, as well as exhibit

an appropriate landscaping treatment for motorists traversing Aldington Road and the Estate access roads. Landscaping will aid the Proposed Development by virtue of landscape screening ultimately improving the visual amenity of the Site. Increased landscaping provisions will provide canopy cover for the Site, which will act as a natural cooling mechanism across the Site, achieving the objectives of Council's 'Cooling the City' Strategy, further ameliorating any concerns with respect to the Proposed Development's potential impacts concerning the Urban Heat Island Effect. Further details of the proposed landscape design are provided in the Landscape Plans at **Appendix 6**.

3.2.4 Car Parking

Car parking has been provided across the Site to facilitate both the construction and operational phases of the Proposed Development. Car parking has been provided in accordance with the Draft Mamre Road Precinct DCP with a total of 477 car parking spaces.

3.2.5 Construction Staging of Development

The approval strategy sought, seeks to obtain Development Consent to complete the construction works over several construction stages upon issue of the relevant Construction Certificates; however, any such staging does not constitute staged development as defined under Section 4.22 of the EP&A Act.

The proposed construction stages will be completed as demand for warehouse or distribution centres is required. The Architectural Plans located in **Appendix 4** accurately demonstrated the envisaged construction stages.

The indicative sequence of works would be as follows:

a) Demolition of structures (under Complying Development);
b) Site clearing;
c) Bulk earthworks and provision of infrastructure;
d) Construction of estate roads;
e) Construction of facilities 9A and 9B (concurrent with (d)); and
f) Site landscaping.

3.2.6 Site Preparation and Bulk Earthworks

The Proposed Development involves bulk earthworks and site infrastructure works to provide large, flat building pads for industrial development and manage existing upstream catchment flows. The proposed bulk earthworks have been designed to avoid retaining walls fronting Aldington Road and minimising retaining walls fronting internal access road reserves. It is noted that the Site has been designed for a balanced cut to fill ratio resulting in a net import of 25,149m^3. The proposed bulk earthworks design is illustrated in the Bulk Earthworks Plan in the Civil Engineering Drawing 20-776-C1030 at **Appendix 20**. All import materials will comply with the requirements of the requirements of the Import Fill Protocol and Geotechnical Specifications for the Development. Topsoil stripping, blending and placement will be completed in accordance with the Geotechnical Engineering Specifications for the project.

Retaining walls are required along the northern, eastern and southern site boundaries where the proposed building pad will be altered from existing levels. The cut and fill wall locations are illustrated in the Retaining Wall General Arrangement Plans within the Civil Engineering Drawing 20-776-C1080 and C1081. The proposed retaining walls will be built to the manufacturers design guideline requirements and verified by a structural engineer prior to construction.

All retaining walls will be constructed on a staged basis and as required to accommodate the proposed earthworks and stormwater basin works. Where retaining walls are not constructed, a batter of 1 in 4 will be maintained for stability purposes. Any batters steeper than 1in 5 shall be vegetated.

Further details of the proposed site preparation works are provided in **Section 6.7** and the Civil Design Report and Plans at **Appendix 20**.

3.2.7 Remediation Works

The goal for the remediation is to remove the potential for unacceptable health risks to occur for future users of the Site; and to undertake remedial works in a manner that best complies with the principles of ecologically sustainable development (ESD).

Based on the assessments that have been completed on the Site, the following contamination issue has been identified on the Site:

- Elevated hydrocarbons above the adopted land use criteria within a distinct silty gravel fill layer at TP398 (≈15 m^3); and
- ACM identified in surficial soils (< 0.1 m bgs) and affixed to stockpiled concrete slabs below the adopted health criteria but representing an aesthetic issue at AEC 1a, 1b (BH412_0.0- 0.4), 1e and 6c (affixed to stockpiled concrete slabs).

Although not requiring remediation, the following issues will require management during remediation and redevelopment works:

- Asbestos identified within site structures at AEC 1a, 1c and 1d;
- ACM identified below the adopted health criteria in sub surface soils (> 0.1 m bgs) at AEC 1f/3c (TP460_2.0-2.6 and TP463_0.8-1.8); and
- Aboveground storage tanks across the Site that are anticipated to be removed in conjunction with Site structure removal.

Following the assessment of a number of remedial options, the preferred remedial strategy for the Site is:

- Manual picking of surficial ACM (AEC 1a, 1b and 1e), with the ACM fragments disposed to a landfill/licensed waste facility;
- Offsite disposal of concrete slabs with affixed ACM (AEC 6c); and
- Excavation and offsite disposal of hydrocarbon impacted material at TP398 (≈ 15 m^3) to an appropriately licensed waste facility.

Further details are provided in **Section 6.5** of this EIS and the Remedial Action Plan at **Appendix 12**.

3.2.8 Detention Basins

The proposed estate-wide drainage system will incorporate three detention basins. The stormwater on the lots and within the road reserve for the overall development of the Site is proposed to be collected via pits and pipes and connect into one of three OSD basins:

- Basin A – located near the south-eastern corner of the Site, adjacent to Aldington Road and within the Transgrid easement.
- Basin B – located adjacent to the eastern boundary of the Site, between proposed Lot 8 and Aldington Road, and within the Transgrid easement.
- Basin C – located near the western boundary of the Site and north-west of the proposed intersection of Road 1 (proposed 25.2m collector road) and Road 2 (proposed 24.0m local industrial road).

The location of proposed detention basins is depicted in **Figures 10-12** as well as Drawings 20-776-C1006, C1071 and C1073 within the Civil Engineering Plans at **Appendix 20**.

It is noted that the proposed basins also form part of the bio-retention system which provides a filtering effect when stormwater runoff flows through a vegetation layer and sand and/or gravel filter media to remove pollutants from the runoff. The surface water runoff from the proposed lots and within the internal roads will be collected via pits and pipes and discharged into one of the three basins.

Further details of the proposed detention basins are provided in **Section 6.7** and the Water Cycle Management Strategy and Civil Engineering Plans at **Appendices 8** and **20**.

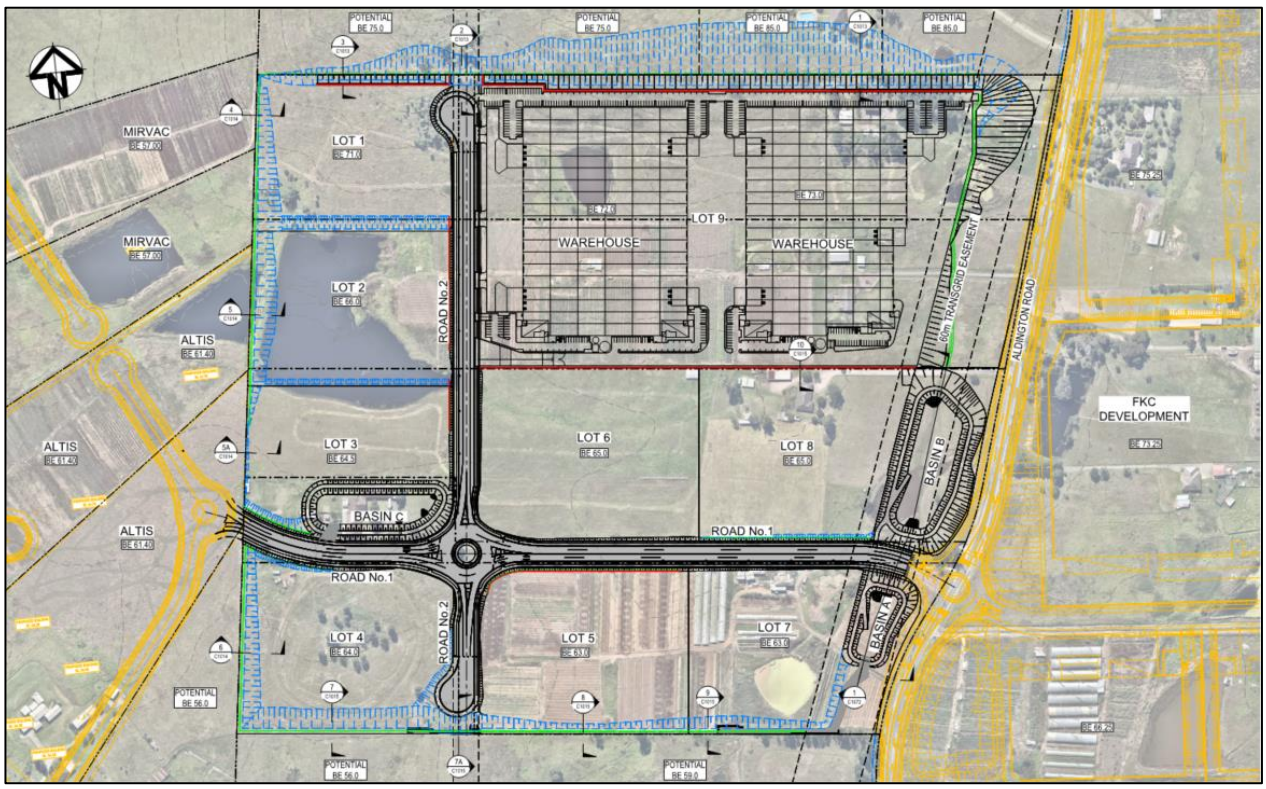


Figure 10 Location of detention basins on site (Source: At&l 2021)

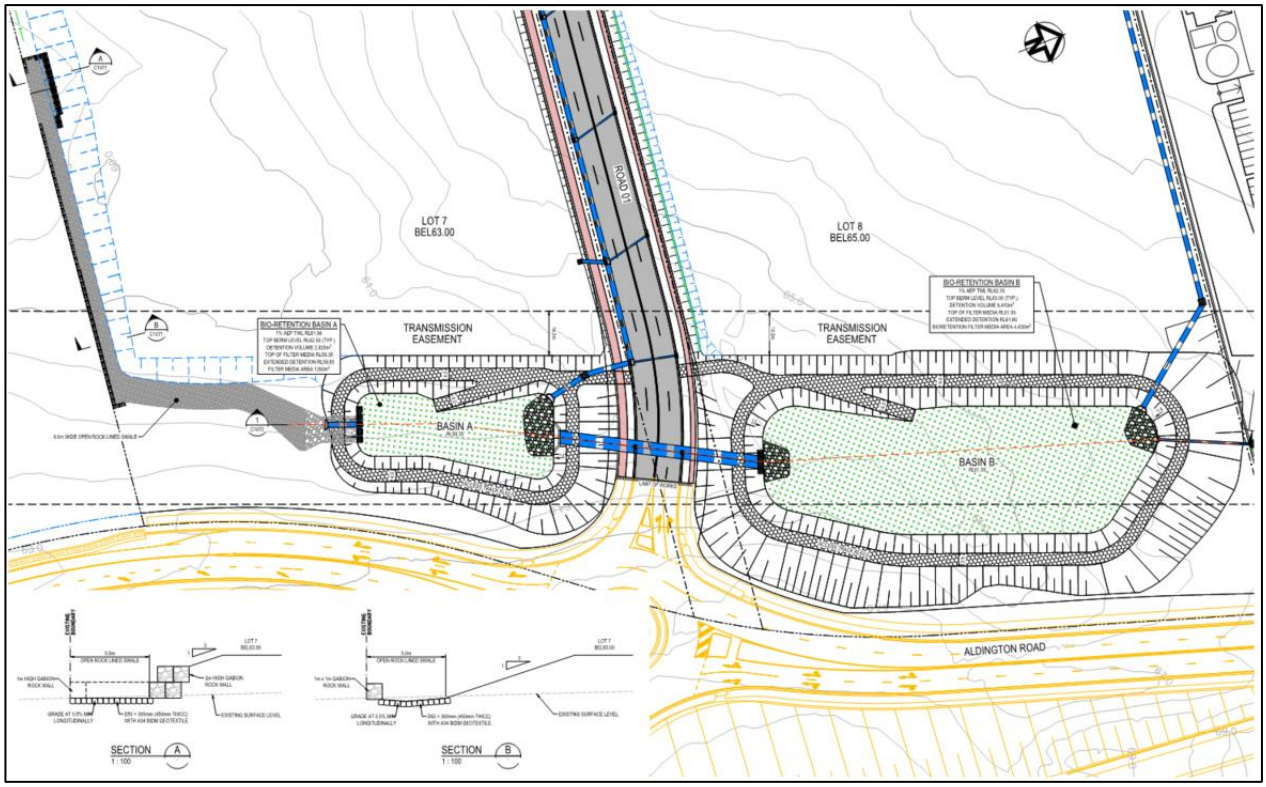


Figure 11 Bio-retention basin A and B detail plan (Source: At&l 2021)

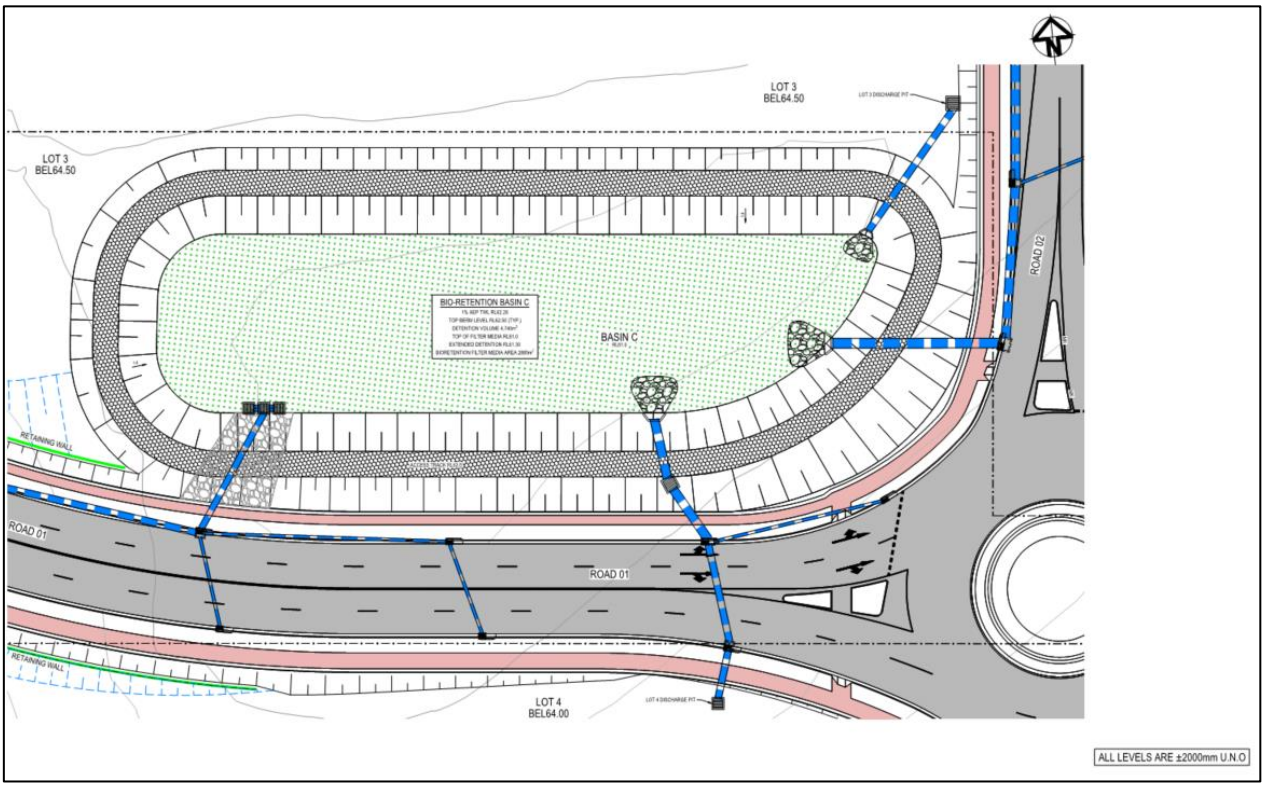


Figure 12 Bio-retention basin C detail plan (Source: At&l 2021)

3.2.9 Acoustic Barriers

As demonstrated in the Acoustic Report, interim acoustic barriers will be required to be constructed while the residential dwellings adjacent to the Site are occupied given that the surrounding dwellings are likely to be acquired for industrial developments. It is noted that the corresponding acoustic barrier may be removed when a given residential dwelling has been purchased for industrial development and is no longer occupied by residents. In overview, the following interim acoustic barriers will be required to be constructed:

- One interim acoustic barrier 3m above existing boundary RL along the northern boundary;
- Proposed retaining wall in accordance with civil drawings on the western boundary of Lots 1, 2 and 3; and
- One interim acoustic barrier 2.1m above adjacent concrete pad RL on the western and southern boundaries of Lot 4 and southern boundary of Lots 5 and 7; and
- One interim acoustic barrier in the eastern portion of the Site 3m above adjacent concrete pad RL.

The acoustic barriers should be constructed using either masonry, 9mm fibre cement sheet, Hebel, or other materials with a minimum surface density of 9kg/m^2 and shall be free of gaps and holes. A reduction in barrier height may be possible once layouts for Lots 1 to 8 are finalised, with the potential for buildings to be oriented to provide additional acoustic screening. Further details are provided in **Section 6.10** and the Acoustic Report at **Appendix 15**.

In particular, the proposed 3m interim acoustic barrier on the northern boundary is illustrated in **Figure 13** below.

Figure 13 Landscape Section A-A - Proposed interim acoustic barrier on northern boundary (Source: Habit8 2021)

3.2.10 Intersection upgrades

As demonstrated in the Transport and Accessibility Management Plan, the Abbotts Road / Mamre Road intersection is the key intersection with regards to access to and from Mamre Road. Interim upgrades are proposed as part of the Proposed Development to support the initial development of the Site by 2026.

Access to the Site will be provided via a roundabout intersection with Aldington Road, with access to the wider road network provided via Mamre Road to the west of the Site, which itself is already planned to be upgraded to accommodate the anticipated growth in the Mamre Road Precinct. The interim configuration of the future Mamre Road / Abbotts Road intersection is identified to be required to facilitate the early stages of the Proposed Development by 2026. The SIDRA analysis indicates that the proposed interim arrangements will be sufficient to accommodate the initial stages of development, anticipated by 2026 as a minimum, while the wider upgrades are being finalised and undertaken. The SIDRA analysis also identifies that an appropriate roundabout intersection at the Site's access point can be provided for the 2026 assessment year. Further details are provided in **Section 6.8** and the Transport and Accessibility Management Plan at **Appendix 9**.

3.2.11 Dangerous Goods

In order to provide operational flexibility for warehouse occupants, it is proposed to submit a SEPP 33 Assessment of the each of the individual portion of the warehouse with an allowance for limited storage of Dangerous Goods. A SEPP 33 Assessment has been prepared by Riskcon Engineering and is further discussed at **Section 6.16** of this EIS.

3.2.12 Employment Generation

The Proposed Development would positively impact on the social and economic conditions of the Penrith LGA and the wider WSEA, which are envisaged for employment-generation and economic growth and

prosperity. Construction jobs are expected to be in the order of approximately 143, whilst operational jobs would be expected to exceed approximately 228 future staff (which includes maintenance contractors).

3.2.13 Supporting Project Documentation

Documents provided in support of the Proposed Development are outlined in **Table 7** below.

Table 7 Document Schedule and Consultant Team

Appendix	Document	Prepared by
1	Secretary's Environmental Assessment Requirements	NSW Department of Planning, Industry and Environment
2	Quantity Surveyors Report	Northcroft
3	Survey Plan	AT&L
4	Architectural Plans	Frasers Property Industrial
5	Subdivision Plan	Frasers Property Industrial
6	Landscape Plans	Habit8
7	Landscape and Visual Impact Assessment and Response Letter	Habit8
8	Water Cycle Management Strategy	AT&L
9	Traffic & Accessibility Management Plan	Ason Group
10	Biodiversity Development Assessment Report	Ecologique
11	Detailed Site Investigation	JBS&G
12	Remedial Action Plan	JBS&G
13	Air Quality Impact Assessment and Greenhouse Gas Assessment	Northstar Air Quality
14	SEPP 33 Assessment	Riskcon
15	Acoustic Report, Construction Noise and Vibration Management Plan and Response Letter	Acoustic Works
16	Historical Heritage Assessment Report	Biosis
17	Aboriginal Cultural Heritage Assessment Report	Biosis
18	Archaeological Assessment Report	Biosis
19	Ecologically Sustainable Development Report	Frasers Property Industrial
20	Civil Design Report, Plans and Response Letter	AT&L
21	Waste Management Plan	LG Consult
22	Bushfire Impact Assessment	Peterson Bushfire
23	Services Infrastructure Assessment	Landpartners
24	BCA Report	Modern Building Certifiers
25	Aeronautical Impact Assessment	Landrum & Brown
26	Community and Stakeholder Participation Strategy with consultation letters	SLR Consulting
27	Social Impact Assessment	SLR Consulting
28	Geotechnical Report	Pells Sullivan Peynink
29	Draft Mamre Road Precinct Development Control Plan Compliance Table	Willowtree Planning
30	Email correspondence sent to Landowner at 141-153 Aldington Road	Frasers Property Industrial
31	Consultation with Council regarding Aldington and Abbotts Road Upgrade	Frasers Property Industrial
32	Email Correspodence with DPIE Planning Agreement team dated 6 August 2021	Frasers Property Industrial
33	Letter from Altis regarding civil works coordination dated 19 July 2021	Altis

3.3 PROJECT NEED

The Proposed Development would provide new employment opportunities through the provision of a Warehouse and Logistics Hub to facilitate employment-generating development and economic growth of the Mamre Road Precinct within the WSEA. The Proposed Development will also contribute to greater productivity and a significant increase in jobs for the Western Sydney Aerotropolis (WSA) in the industrial and logistics sector.

The Proposed Development, for the purposes of a Warehouse and Logistics Hub is considered consistent with the strategic direction of both the *Western City District Plan* published by the Greater Sydney Commission and the *Western Sydney Aerotropolis Plan* published by the Western Sydney Planning Partnership and the NSW Government. Additionally, the Proposed Development will further facilitate employment-generating development in the Mamre Road Precinct, contributing to the Western City District's economic growth, particularly supporting the economic development of WSEA and the 24/7 operation of WSA.

Furthermore, the Proposed Development could support the growth of the existing sectors in the Western City District, such as logistics and freight, whilst promoting industry diversification; and would attract investment opportunities, ultimately fostering the growth of the Mamre Road Precinct within the WSEA as the economic catalyst of the Western Parkland City.

3.4 CONSIDERATION OF ALTERNATIVES

The purpose of the Proposed Development is to contribute towards the intended industrial character and nature of the IN1 General Industrial zone, and provide a Warehouse and Logistics Hub which encourages employment opportunities and promotes the economic development of the WSEA and WSA. The proposed development seeks to ensure it:

- Is compatible with surrounding development and the local context;
- Would provide increased operational efficiencies for storage and distribution of goods;
- Would result in minimal impact on the environment; and
- Would allow for the implementation of suitable mitigation measures, where required.

Overall, the scale of the Proposed Development is considered suitable, and the built form proposed would transform an undeveloped and underutilised land portion into a modernised, state-of-the-art Warehouse and Logistics Hub, which will be highly compatible with surrounding industrial-related uses in the vicinity of Site and consistent with the vision for the Mamre Road Precinct as an extension of the WSEA and a world-class industrial area. The proposed built form and Site layout are deemed consistent with the IN1 General Industrial zone objectives under SEPP WSEA and have been developed to facilitate employment-generating development involving large floorplate warehousing and logistics development, commensurate with the Western Sydney Aerotropolis Plan. Furthermore, the proposed warehouse or distribution centre comprises a well-resolved built form which is sympathetic to the natural landscape, topography and amenity of the surrounding area.

The options considered and subsequently dismissed, in arriving to the current Proposed Development with regard to the proposed development included:

(a) 'Do Nothing' Scenario

This option was dismissed as the objectives of the Proposed Development would not be met, including the objective of facilitating an employment-generating development. If the proposed development was not to proceed, the Site would continue to remain vacant, or be developed for another industrial-related development.

(b) Development on an Alternative Site

Consideration was given to carrying out development on alternate sites; however, these were dismissed as the Site resulted in the most beneficial outcomes for the proposed development as:

- It is subject to the provisions of the IN1 General Industrial zone pursuant to the provisions of SEPP WSEA, which seeks to provide employment-generating land uses and protect the ecological values of the land;
- The Site is suitably located with respect to sensitive land uses, including residential development;
- All potential environmental and amenity impacts concerning the Proposed Development are able to be suitably mitigated within the Site through the implementation of the mitigation and management measures as detailed in this EIS;
- The proximity to the regional road network provides accessibility and linkages to the surrounding area in Western Sydney and the wider region;
- The Proposed Development will facilitate employment-generating and create job opportunities during both the construction and operational phases;
- The Proposed Development has not been identified as containing any items of Heritage significance, including State or Local Heritage items that require further consideration. The Site has also been identified to have low archaeological potential; and,
- The proposed development could be developed with appropriate visual amenity achieved given its surrounding context.

(c) Different Site Configuration

The configuration of the Proposed Development was chosen based on the Site's topography, road network, existing mature and proposed vegetation / landscaping, as well as the need to respond to the character of the surrounding IN1 General Industrial and E2 Environment Conservation zones. It is noted that a different site configuration would not have been able to respond to the abovementioned site opportunities and constraints. This option was therefore not considered appropriate.

Notwithstanding, the Proposed Development is justified on the basis that it is compatible with the locality in which it is proposed, resulting in positive social and economic benefits, whilst appropriately managing and mitigating any potential environmental impacts requiring consideration.

From a locational perspective, the Subject Site was chosen as it would be able to accommodate a suitable platform and scale of development proposed. Accordingly, the Proposed Development for the purposes of a Warehouse and Logistics Hub is consistent with the industrial character earmarked for the Site and the Mamre Road Precinct situated within the WSEA.

Additionally, the Site affords connectivity to nearby regional and major road networks, such as Mamre Road, Aldington Road and both the M4 and M7 Motorways, which are considered highly beneficial for the overall operations of the Proposed Development.

It is noted that if the Proposed Development did not proceed, the Site would not be able to provide employment opportunities for the Mamre Road Precinct in the industrial and warehousing sector. Further, it would not provide local employment opportunities, including generating construction and operational (including maintenance) jobs as envisaged in the Western Sydney Aerotropolis Plan.

In light of the above, the Proposed Development for the purpose of a Warehouse and Logistics Hub at the Site would allow for the provision of additional employment opportunities and enhance the competitiveness of the Mamre Road Precinct as a world-class warehouse and industrial hub.

PART D LEGISLATIVE AND POLICY FRAMEWORK

Controls and Policies

The following current and draft Commonwealth, State, Regional and Local planning controls and policies, have been considered in the preparation of this SSD Application:

Commonwealth Planning Context

- *Commonwealth Environment Protection and Biodiversity Conservation Act 1999*

State Planning Context

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2000*
- *Protection of the Environment Operations Act 1997*
- *Biodiversity Conservation Act 2016*
- *State Environmental Planning Policy (State and Regional Development) 2011*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *State Environmental Planning Policy No 19 – Bushland in Urban Areas*
- *State Environmental Planning Policy No 33 – Hazardous and Offensive Development*
- *State Environmental Planning Policy No 55 – Remediation of Land*
- *State Environmental Planning Policy (Western Sydney Employment Area) 2009*
- *State Environmental Planning Policy (Western Sydney Aerotropolis) 2020*

Strategic / Regional Planning Context

- *A Metropolis of Three Cities – Greater Sydney Region Plan*
- *Western City District Plan*
- *Western Sydney Employment Area*

Local Planning Context

- *Penrith Local Environmental Plan 2010*
- *Penrith Development Control Plan 2014*
- *Draft Mamre Road Precinct Development Control Plan 2021*

This Project has therefore been carefully assessed against the requirements and objectives of all of the above planning statutory and policy documents. A detailed analysis is set out in the following sections:

4.1 COMMONWEALTH PLANNING CONTEXT

4.1.1 Environment Protection and Biodiversity Conservation Act 1999

Under the EPBC Act 1999, any action (which includes a development, project or activity) that is considered likely to have a significant impact on Matters of National Environmental Significance (MNES) (including nationally threatened ecological communities and species and listed migratory species), must be referred to the Commonwealth Minister for the Environment. The purpose of the referral is to allow a decision to be made about whether an action requires approval on a Commonwealth level. If an action is considered likely to have significant impact on Matters of National Significance, it is declared a "Controlled Action" for which formal Commonwealth approval is required.

Based on the Biodiversity Development Assessment Report (BDAR) prepared by Ecologique (**Appendix 10**), two Matters of National Environmental Significance (MNES) have been identified on the subject land, which comprise two threatened ecological communities (TECs). Only one area of TEC meets the threshold guidelines for consideration as a TEC under the EPBC Act. Further details of the BDAR are provided in **Section 6.12** and **Appendix 10**.

4.2 STATE PLANNING CONTEXT

4.2.1 Environmental Planning and Assessment Act 1979

The EP&A Act is the overarching governing statute for all development in NSW and pursuant to Part 4, Section 4.36(2), the Proposed Development constitutes State Significant Development, for which the SSD Application would be submitted to and determined by the NSW DPIE.

The Proposed Development is deemed to be entirely consistent with the EP&A Act, particularly Part 1 Preliminary, Section 1.3 Objects of the Act. The following response is provided with regard to each Object:

Object (a): to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,

to promote the social and economic welfare of the community

The Proposed Development strongly promotes the social and economic welfare of the community, because its function is to support the continued growth of the warehousing and logistics sector as well as encourage and promote employment generation outcomes as a result of the Proposed Development. The creation of jobs would have a direct and positive economic impact on both the local and broader communities located within the Western Sydney Region. The economic development of the Proposed Development, would attract a diverse workforce over a range of long-term permanent and part-time jobs, sourced from the region and beyond. Having diverse permanent full-time and part-time employment opportunities, in Western Sydney, it is indeed highly significant in promoting the economic welfare of the community.

The social welfare of the community is also promoted and achieved through the permanent provision of workforce opportunities to individuals and their families in a new area, not yet supplied with employment, due to the undeveloped nature of the Site. The Proposed Development also fulfils the underlying objectives of SEPP WSEA, which emphasises the importance of job creation throughout the WSEA. This is achieved here (in line with the objectives of both the Act and SEPP WSEA), via the promotion of economic development, through a large financial investment to development the Subject Site for the purposes of a Warehouse and Logistics Hub.

The Proposed Development also satisfies both the objectives of *A Metropolis of Three Cities*, the *Western City District Plan* and the wider objectives of the WSEA, by creating jobs in close proximity to established residential areas within the Penrith LGA. This strongly aligns with the GSC's 30-Minute City Concept, which enhances liveability and elevates the role of the Western Parkland City to a competitive and connecting working hub with direct linkages to Parramatta, Sydney and Penrith with the Eastern and Central Cities, promoting the overall social and economic welfare of the broader Sydney community.

a better environment by the proper management, development and conservation of the State's natural and other resources

By including provisions that include a conducive built form design and informed aesthetically pleasing architectural landscape design, this will further assist in the creation of a more sustainable project. Also, in creating a more meaningful sense of place and community, the Site will further contribute to the social and economic welfare of the community, through delivering both a healthier and more-sustainable working and recreational environment for workers.

Conservation practices at the Site, such as rainwater harvesting, is expected to deliver greater efficiencies in both water and energy management, as well as waste minimisation via increased recycling capabilities. In line with broader State Resource Conservation Objectives, such as recycling materials and waste during the construction and operational phases of development, this development will ultimately reduce its carbon emissions substantially.

Object (b): to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,

The Site exhibits a fully considered architectural landscape design, by creating an outdoor recreation space for all users and visitors. This is achieved through the use of varied plant and trees species selection; applying a sustainable landscape design; and increasing community and environmental benefits simply through good landscape design practices. The landscape design incorporates endemic species and trees, providing natural screening along the interfaces of the internal Estate access roads and Aldington Road.

Object (c): to promote the orderly and economic use and development of land,

The WSEA is fully recognised and promoted by State Policy for rapid transformation into employment-generating land uses. The Proposed Development constitutes a sequential (and highly orderly) economic development. It is highly compatible with respect to immediately-surrounding land uses, as well as in the wider locality. Given its siting and location, the Site is highly logical, given its proximity to existing industrial facilities and services to which it can connect at.

Accordingly, the Proposed Development is considered to be fully consistent with the aims and objectives of the SEPP WSEA, which are comprehensively assessed in **Section 4.2.7** of this EIS. As well as fulfilling a significant role in satisfying market needs and improving the operational efficiencies of industrial and warehouse land uses within NSW. The Proposed Development demonstrates, a logical and orderly extension of existing land use both nearby and adjoining. It is already earmarked in SEPP WSEA for this very purpose pursuant to its IN1 General Industrial zoning. The Site's economic development is both logical and orderly for the following reasons:

- It delivers employment-generating opportunities in both the construction and operational phases in an area already earmarked by both State and Regional Policy for employment.
- It provides both a new economically and ecologically sustainable development, delivering new industry-best-practice in industrial construction.
- It provides a genuine and obvious transition from existing industrial development, further reinforcing the notion of orderly development, within an area already designated for such purposes.
- It implements best-practice sustainability measures, to promote ecologically sustainable development.
- It includes increased provisions for landscaping, helping to revitalise and naturally landscape a substantial canopy cover across the Site, further minimising the potential impacts of the Urban Heat Island Effect, by further reducing the Site's microclimate.
- It improves water-quality for stormwater by fully treating it prior to discharge, filtering it through a carefully-designed, On-site Stormwater Detention (OSD) system that is in accordance with the requirements of both the Penrith City Council DCP, Draft Mamre Road Precinct DCP and Council's engineering guidelines.

The overall scale of the Proposed Development and the low-interface impacts with surrounding properties, demonstrates that the Site is able to be developed for employment purposes immediately following

Development Consent being obtained. Accordingly, this represents orderly development of the Site as currently proposed under this SSD Application. This is because the Site is not only highly compatible with the nearby industrial developments towards the east but is also precisely in line with the aims of both the WSEA, all of which emphasise the need for employment in Western Sydney.

The Proposed Development is also deemed orderly because the land use proposed under this SSD Application, would not pose a risk to any existing industrial or logistics businesses within the broader WSEA, including the Mamre Road Precinct.

In terms of appropriate use of land, the Proposed Development is deemed appropriate for the following reasons:

- The Proposed Development provides employment on land already designated for employment.
- The Proposed Development minimises land use conflict by locating similar land uses, as is demonstrated by the similar land uses on industrial development to the west of the Site.

The proximity of this Site to and the ability to consolidate with other industrial land uses by having the Proposed Development co-locate with nearby industrial development is a great advantage. This also allows the Site and the Proposed Development to achieve the economic and ecological outcomes, as set out by both the EP&A Act and other State Policies.

It is for these reasons and others that this SSD Application represents development that promotes the orderly and economic use and development of land, in line with the objects of the EP&A Act.

Object (d): to promote the delivery and maintenance of affordable housing,

This objective is not applicable to the Proposed Development, given that no housing will ever exist at the Site.

Object (e): to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats.

A BDAR has been prepared to address the biodiversity matters of the Site. The Proposed Development will implement the mitigation and management measures identified in the BDAR to avoid and minimise any unintentional direct and indirect impacts on the Site's retained biodiversity values.

Object (f): to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),

An Aboriginal Cultural Heritage Assessment (ACHA) has been prepared by Biosis which identified one area of potential archaeological deposit (PAD) requiring further assessment. Notwithstanding, a number of recommendations have been included in the ACHA to ensure the associated impacts are appropriately mitigated and managed.

Object (g): to promote good design and amenity of the built environment,

The Proposed Development can be seen to promote both good design and at the same time improving the amenity of the built environment through activation of the Site by enhanced landscaping across the Site. Through both the use of new-age materials and an innovative contemporary design, the Proposed Development allows the built form to connect with the natural landscape, to tie the built-form elements into a relatable thematic nexus to the natural environment, using industry-best-practice.

Object (h): to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,

The warehouse building has been designed to comply with the Building Code of Australia (BCA) and the requirements of Fire and Rescue NSW, with respect to Fire Safety. This incorporates into the design, all of the statutory and functional requirements of the BCA regarding access, egress and fire, deemed necessary to safeguard the safety of building occupants, and the longevity of functional structures in the Development.

Object (i): to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,

The Proposed Development will have a positive impact on other existing (and proposed) developments within the wider locality, particularly, the wider WSEA, which is further reinforced throughout the specialist reports contained in this EIS that have satisfactorily reinforced the main content of this EIS (See **Part F** of this EIS). Where potential impacts have been identified throughout the assessment, such as flooding, noise and traffic, appropriate mitigation measures have been set out accordingly to counteract any possible adverse impacts on existing or proposed developments within the immediate vicinity, as well as the wider locality.

It is noted, that throughout the assessment process, all relevant Government agencies have been consulted and provided opportunity to both assess the Proposed Development and provide comments. This SSD process has been informed by significant input from agencies such as EES Group, TfNSW, FRNSW and NSW RFS, as well as the community. Community consultation has been undertaken as part of this Proposed Development, which has assisted to inform the final submitted design and reinforces compliance with this objective.

Object (j): to provide increased opportunity for community participation in environmental planning and assessment.

A comprehensive level of community and stakeholder engagement has been undertaken for the Proposed Development. This has included numerous Government Agency meetings and notification letters to both Government agencies and all potentially-impacted residents.

A comprehensive Community and Stakeholder Participation Strategy (CSPS) (located in **Appendix 27** of this EIS), prepared by SLR Consulting, offers a summary and analysis of all community and stakeholder consultation sessions, distilling into themes, those items identified in the consultation process, as significant.

4.2.2 Environmental Planning and Assessment Regulation 2000

In accordance with EP&A Regulation, the Proposed Development is not classified as Designated Development.

Section 4(1) – Designated Development

Section 4(1) of the EP&A Regulation states that any development described in Part 1 of Schedule 3 would be declared to be Designated Development for the purposes of the Act. The Proposed Development being for a proposed Warehouse and Logistics Hub, does not trigger the Designated Development thresholds under Part 1 of Schedule 3 of the EP&A Regulation.

Clause 270 – Contribution Plans for Western Sydney Employment Area

Clause 270(1) specifies that a development application in relation to any IN1 General Industrial zoned land under SEPP WSEA must not be determined by the consent authority unless a contributions plan under Section 7.18 of the EP&A Act has been approved for the land to which the application relates.

Despite subclause (1), a consent authority may dispense with the need for a contributions plan if a Planning Agreement has been entered into by the developer with a planning authority (within the meaning of Section 7.1 of the EP&A Act).

It is noted that both the Draft Mamre Road Precinct DCP and the Draft Mamre Road Precinct Contributions Plan are currently under consideration and yet to be finalised by Council. Given their current status and timing of the Land Owners Group (LOG) – E SSD applications, the delivery of Aldington and Abbotts Roads is required to support future development. Therefore, the Proponent, as part of LOG-E, proposes to enter into a Voluntary Planning Agreement (VPA) to deliver an interim solution for the upgrade of Aldington and Abbotts Roads.

Frasers, ESR, Fife Capital and Stockland have been in consultation with Penrith City Council to develop a concept design of the Aldington and Abbots Road upgrades as part of a VPA offer. As demonstrated in **Appendix 31**, a VPA offer was made to Council on 9 July 2021 and there has been ongoing discussions between the stakeholders regarding the delivery of the upgrade works. In particular, the proposed upgrade works will include the proposed 2026 intersection as shown in Figure 16 and discussed in Section 6.5 of the Transport and Accessibility Management Plan (**Appendix 9**).

In addition, a VPA process has been initiated with DPIE and the Proponent is currently awaiting feedback from DPIE. In particular, a VPA offer was made to DPIE in June 2021, followed up by additional information as requested by DPIE on 22 July 2021 in relation to the satisfactory arrangements for the provision of regional infrastructure. It is noted that the DPIE Infrastructure Partnerships and Agreements team has referred to the offer to their internal legal team for preparation of a draft VPA. The email correspondence between the Proponent and DPIE Infrastructure Partnerships and Agreements team is provided at **Appendix 32** for reference.

Clause 275B – Development Assessment in Mamre Road Precinct

Clause 275B(1) requires an assessment of the consistency of the proposed development with the Mamre Road Precinct Structure Plan for development on land within the Mamre Road Precinct.

An assessment against the Mamre Road Precinct Structure Plan has been prepared and is provided in **Section 4.3.5** of this EIS.

4.2.3 Biodiversity Conservation Act 2016

The *Biodiversity Conservation Act 2016* (BC Act) is the key legislation in NSW relating to the protection and management of biodiversity and threatened species. The purpose of the BC Act is to "maintain a healthy, productive and resilient environment, for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development". The BC Act is supported by a number of regulations, including the *Biodiversity Conservation Regulation 2017* (BC Regulation).

Part 7 of the BC Act sets out requirements for biodiversity assessments and approvals under the Planning Act (meaning the EP&A Act).

Pursuant to Section 7.2(1) of the BC Act, *development or an activity is likely to significantly affect threatened species if:*

(a) it is likely to significantly affect threatened species or ecological communities, or their habitats, according to the test in section 7.3, or
(b) the development exceeds the biodiversity offsets scheme threshold if the biodiversity offsets scheme applies to the impacts of the development on biodiversity values, or
(c) it is carried out in a declared area of outstanding biodiversity value.

Pursuant to Section 7.9 of the BC Act, an SSD *is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.*

Under Clause 7.1 of the BC Regulation, where the future development involves clearing of native vegetation of 1 ha or more; or the clearing of native vegetation of land with outstanding biodiversity values, the

development will exceed the biodiversity offset scheme and will require the preparation of a Biodiversity Development Assessment Report (BDAR).

Upon review of the Biodiversity Values Map, a small portion of the Site is identified to contain biodiversity values (refer to **Figure 14**).

A BDAR has been prepared by Ecologique and identifies that the Proposed Development will directly impact on approximately 1.27 ha of native vegetation with indirect impacts that are generally of low risk. A total of 18 ecosystem credits are required to be offset for the Proposed Development. It should also be noted that approximately 38.7 ha of the subject land does not require an offset. This area includes market gardens, cleared residential land, planted native and exotic vegetation and pasture/exotic weed areas. A series of mitigation and management measures will be implemented in accordance with the BDAR to avoid and minimise any unintentional direct and indirect impacts on the Site's retained biodiversity values. Further details are provided in **Section 6.12** of this EIS and **Appendix 10**.

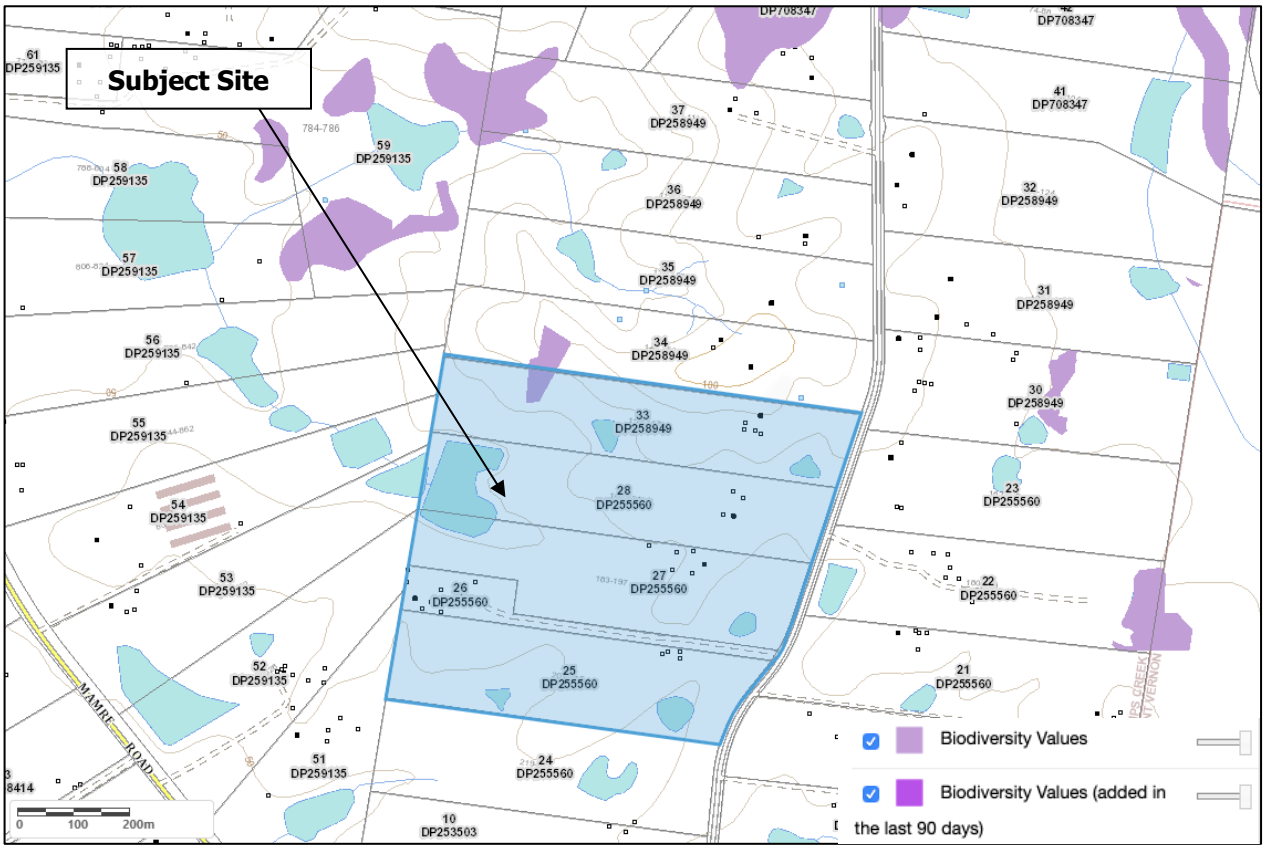


Figure 14 Biodiversity Values Map (Source: NSW Government 2021)

4.2.4 Protection of the Environment Operations Act 1997

Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act) contains a core list of activities that require a licence before they may be undertaken or carried out. The definition of an 'activity' for the purposes of the POEO Act is:

> *"an industrial, agricultural or commercial activity or an activity of any other nature whatever (including the keeping of a substance or an animal)."*

The proposed development for the purpose of a Warehouse and Logistics Hub does not trigger any thresholds in respect of the POEO Act.

4.2.5 State Environmental Planning Policy (State and Regional Development) 2011

Proposed developments involving activities that are listed in Schedule 1 of the SRD SEPP are identified as being State Significant Development (SSD). Schedule 1, Clause 12 of the SRD SEPP includes provisions for developments comprising warehouse or distribution centres to be undertaken as SSD. Clause 12 states:

"12 Warehouses or distribution centres

(1) Development that has a capital investment value of more than $50 million for the purpose of warehouses or distribution centres (including container storage facilities) at one location and related to the same operation.

(2) This clause does not apply to development for the purposes of warehouses or distribution centres to which clause 18 or 19 applies."

The Proposed Development relating to warehouses or distribution centres has a CIV of greater than $50 Million, thus satisfying the SSD provisions. This EIS has been prepared based on the SEARs issued on 12 May 2021. It is noted that Clause 12 in Schedule 1 of the SRD SEPP was amended on 1 June 2021 to reduce the SSD threshold to a CIV of $30 Million for development to which the relevant environmental assessment requirements are notified under the EP&A Act on or before 31 May 2023. Notwithstanding, given that the Secretary's Environmental Assessment Requirements (SEARs) was received from DPIE on 12 May 2021, the Proposed Development is subject to the $50 Million threshold.

4.2.6 State Environmental Planning Policy (Infrastructure) 2007

The *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP) repeals the former State Environmental Planning Policy No 11 – Traffic Generating Development and, pursuant to Clause 104, provides for certain proposals, known as Traffic Generating Development, to be referred to Transport for NSW (TfNSW) for concurrence.

Schedule 3 lists the types of development that are defined as Traffic Generating Development. The referral thresholds for 'Warehouse and distribution centres' are:

- *8,000 m^2 in site area or (if the site area is less than the gross floor area) gross floor area with site access to a road,*
- *8,000 m^2 in site area or (if the site area is less than the gross floor area) gross floor area with site access to a classified road.*

The Site comprises a site area of greater than 8,000m^2. Therefore, the proposed development would require referral to TfNSW.

4.2.7 State Environmental Planning Policy (Western Sydney Employment Area) 2009

The Site forms part of the WSEA – 'Precinct 12 (Mamre Road)' and is subject to the provisions of SEPP WSEA. According to SEPP WSEA, the Aims of the Policy are:

- *To facilitate a wide range of employment-generating development including industrial, manufacturing, warehousing, storage and research uses and ancillary office space;*
- *To encourage employment opportunities along motorway corridors, including the M7 and M4;*
- *To minimise any adverse effect of industry on other land uses;*
- *To facilitate road network links to the M7 and M4 Motorways;*
- *To encourage a high standard of development that does not prejudice the sustainability of other enterprises or the environment; and,*
- *To provide for small-scale local services such as commercial, retail and community facilities (including child care facilities) that service or support the needs of employment-generating uses in the zone.*

The Proposed Development is highly consistent with the aims of SEPP WSEA, in that it would strongly promote economic development and employment opportunities, exactly as per the aims of the SEPP.

Employment and Investment results anticipated for the Site, would be consistent with both short and long-term outcomes for the Penrith LGA and the broader Western Sydney Region.

The aims of SEPP WSEA are addressed as follows:

> *"To promote economic development and the creation of employment in the Western Sydney Employment Area by providing for development including major warehousing, distribution, freight transport, industrial, high technology and research facilities."*

> *"To promote economic development and the creation of employment in the Western Sydney Employment Area by providing for development including major warehousing, distribution, freight transport, industrial, high technology and research facilities."*

Response: The Proposed Development will support future employment generation with regard to the Warehouse and Logistics Hub proposed under this SSD Application.

> *"To provide for the co-ordinated planning and development of land in Western Sydney Employment Area."*

Response: The Proposed Development represents a logical and rational development with respect to the vision for both the WSEA and Aerotropolis with regard to industry and employment lands. In this respect, the same scale and form of development is proposed for the Subject Site in a coordinated and orderly manner. This logical extension proposed contributes to the provision of employment, in line with the aims of SEPP WSEA. It is an appropriate form of development as the Mamre Road Precinct transitions from rural to industrial and supports the intended objectives of the subject Proposed Development.

The broader Aerotropolis Precinct and Western Sydney Airport would not be affected by the Proposed Development, given its location; and all planning for this broader area could proceed as planned and not impact on the operation proposed under this SSD Application.

> *"To rezone land for employment and environmental conservation purposes."*

Response: Following the release of the Mamre Road Precinct Finalisation Report, the Mamre Road Precinct was rezoned pursuant to the provisions of SEPP WSEA, for which the Proposed Development represents a permissible industrial-related land use for employment purposes. While the Proposed Development involves direct impact on 1.27 ha of native vegetation, a total of 18 ecosystem credits will be offset under the BC Act. A series of mitigation and management measures will also be implemented to avoid and minimise any unintentional direct impacts and indirect impacts on the Subject Site's retained biodiversity values.

> *"To improve certainty and regulatory efficiency by providing a consistent planning regime for future development and infrastructure provision in the Western Sydney Employment Area."*

Response: The Proposed Development would represent a logical extension to existing and operational employment lands within the WSEA, as well as an orderly and logical extension, via means of extension of existing and future industrial development to the surrounding area of the Site within the Mamre Road Precinct.

The scale of development proposed is deemed entirely consistent with the employment lands, that are in relatively close proximity to the Site, in terms of overall built-form, and intensity of operations.

> *"To ensure that development occurs in a logical, environmentally sensitive and cost-effective manner and only after a development control plan (including specific development controls) has been prepared for the land concerned."*

Response: The Draft Mamre Road Precinct DCP was publicly notified between 10 November and 17 December 2020 and is currently being finalised by DPIE. The Proposed Development has been designed to be consistent with the Draft Mamre Road Precinct DCP.

> *"To conserve and rehabilitate areas that have a high biodiversity or heritage or cultural value, in particular area of remnant vegetation."*

Response: A total of 18 ecosystem credits will be offset under the BC Act. A series of mitigation and management measures will also be implemented to avoid and minimise any unintentional direct impacts and indirect impacts on the Subject Site's retained biodiversity values. Aboriginal Cultural Heritage will also be mitigated accordingly. Adequate management and mitigation measures will be implemented for the Proposed Development during both construction and operational phases.

Permissibility under the SEPP

The Site is predominantly zoned IN1 General Industrial under the provisions of SEPP WSEA (refer to **Figure 15**).

Within the IN1 zone the following are permissible without consent:

> *Nil.*

Within the IN1 zone the following are permissible with consent:

> *Building identification signs; Business identification signs; Depots; Environmental facilities; Environmental protection works; Food and drink premises; Freight transport facilities; Garden centres; Hardware and building supplies; Industrial retail outlets; Industrial training facilities;* ***Industries (other than offensive or hazardous industries)****; Neighbourhood shops; Places of public worship; Recreation areas; Recreation facilities (indoor);* ***Roads****; Service stations; Storage premises; Transport depots; Truck depots; Vehicle body repair workshops; Vehicle repair stations;* ***Warehouse or distribution centres****.*

Within the IN1 zone the following are prohibited:

> *Any development not specified in item 2 or 3.*

The Proposed Development comprising warehouse or distribution centres, bulk earthworks, infrastructure, Torrens title subdivision are intended to facilitate the use of the Site for warehousing and distribution purposes. Therefore, the uses may be characterised as follows:

In accordance with the *Standard Instrument – Principal Local Environmental Plan* (Standard Instrument),

a **warehouse or distribution centre** means:

> *a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made, and includes local distribution premises.*

an **industrial activity** means:

> *the manufacturing, production, assembling, altering, formulating, repairing, renovating, ornamenting, finishing, cleaning, washing, dismantling, transforming, processing, recycling, adapting or servicing of, or the research and development of, any goods, substances, food, products or articles for commercial purposes, and includes any storage or transportation associated with any such activity.*

The Proposed Development for warehouse or distribution centres, bulk earthworks, infrastructure and Torrens title subdivision are proposed to facilitate future warehouse or distribution centres and industrial uses, which are permissible with consent within the IN1 zone. Given that the Proposed Development is

required to facilitate the warehousing and industrial use of the site, the proposed development is also permissible with consent within the IN1 zone.

The proposed construction of access roads, subdivision of land and bulk earthworks are permissible with consent within the IN1 zone. It is noted that the proposed subdivision and bulk earthworks are subject to the provisions of Clauses 24 and 33H of SEPP WSEA respectively, which are further discussed in **Table 8**.

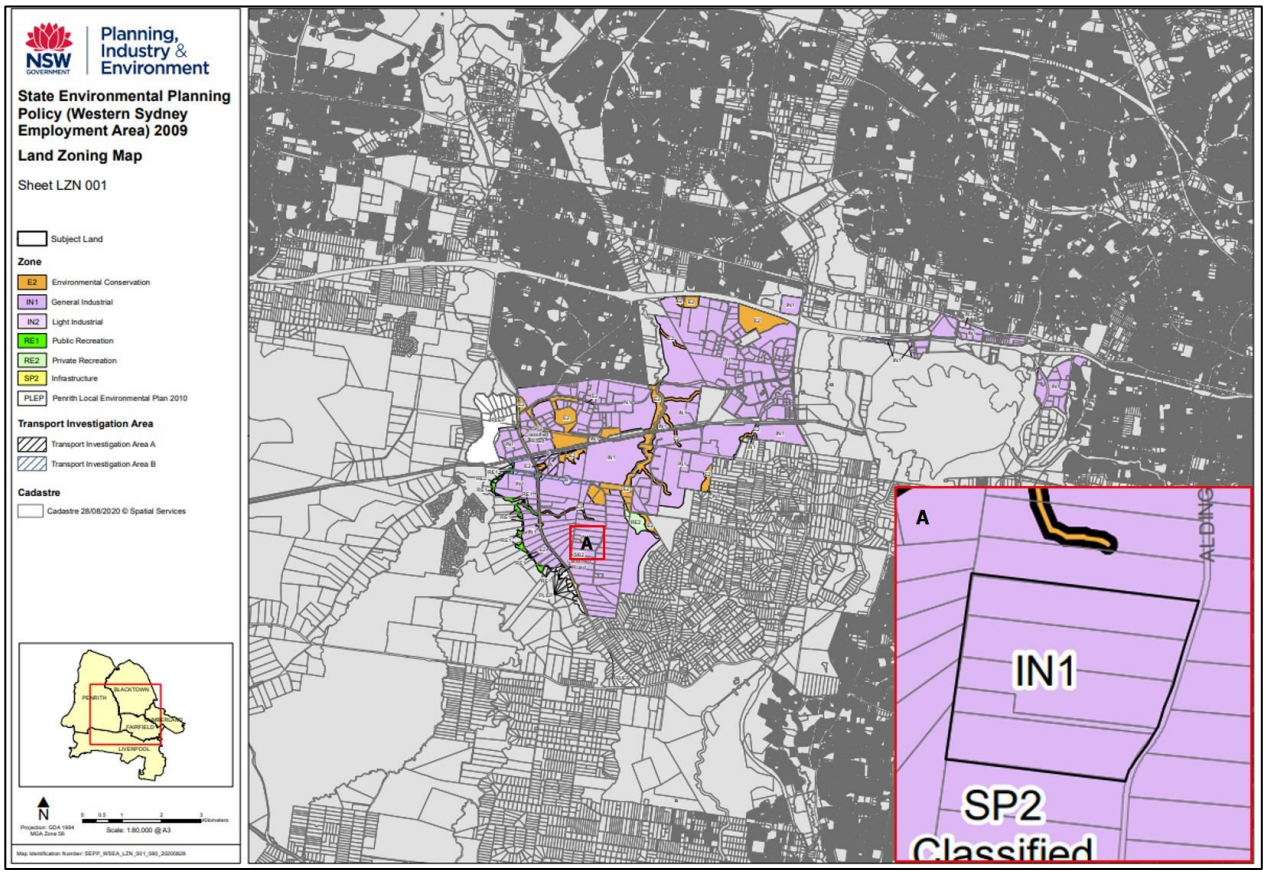


Figure 15 Land Zoning Map (Source: NSW Legislation 2021)

Table 8 outlines the consistency and compliance of the Proposed Development with the relevant development standards and controls under SEPP WSEA.

Table 8 Development Standards	
Clause	**Comment**
Clause 14 Subdivision – consent requirements	Pursuant to Clause 14, subdivision may be undertaken only with consent. The Proposed Development seeks consent for a nine-lot Torrens title subdivision, Mamre Road widening and the creation of the access roads.
Clause 15A – Demolition requires development consent	Clause 15A prescribes that the demolition of a building or work may be carried out only with development consent. The Proposed Development seeks consent to demolish the existing buildings and structures on Site to facilitate the construction of the proposed Warehouse and Logistics Hub.
Clause 18 – Requirement for development control plans	Pursuant to Clause 18, a development control plan (DCP) is to be prepared for development on land within the WSEA except in such cases as the Secretary may determine by notice in writing to the consent authority or as provided by Clause 19.

	It is noted that the Draft Mamre Road Precinct DCP was on exhibition between 10 November and 17 December 2020 and is currently being finalised by DPIE. The Proposed Development is generally consistent with the provisions of the Draft Mamre Road Precinct DCP. A detailed assessment against the provisions of the Draft Mamre Road Precinct DCP has been prepared and is provided in **Section 4.4.4** and **Appendix 29**.
Clause 19 – Existing precinct plans under SEPP 59	Subclause (1) outlines that the consent authority may grant consent to development on land in the WSEA without a DCP being prepared if there is an existing precinct applied to the land immediately before the repeal of *State Environmental Planning Policy No 59—Central Western Sydney Regional Open Space and Residential*. It is noted that the Site is not subject to an existing precinct plan prescribed by clause 19. Notwithstanding, as demonstrated previously, the Site is subject to the Draft Mamre Road Precinct DCP which is currently being finalised by DPIE.
Clause 20 – Ecologically sustainable development	Proposed development on the Subject Site, for the purposes of a Warehouse and Logistics Hub would incorporate a number of Ecologically Sustainable Development (ESD) initiatives to reduce the consumption of potable water and greenhouse gas emissions of future built form. Initiatives relate to: ▪ Energy & Greenhouse Gas Emissions; ▪ Potable water reduction; ▪ Minimising waste to landfill; ▪ The Indoor Environment; ▪ Occupant amenity and comfort; ▪ Land Use & Ecology; ▪ Emissions; and ▪ Building Management.
Clause 21 – Height of buildings	No maximum building height has been adopted under SEPP WSEA. However, the consent authority must be satisfied that: *(a) building heights will not adversely impact on the amenity of adjacent residential areas, and,* *(b) site topography has been taken into consideration.* The maximum building height with respect to the proposed warehouse or distribution centre in Proposed Lot 9 would be 14.6m. A Landscape and Visual Impact Assessment Report has been prepared for the Proposed Development and is further discussed in **Section 6.3**.
Clause 22 – Rainwater harvesting	Under clause 22 of SEPP WSEA, *"the consent authority must not grant consent to development on land to which this Policy applies unless it is satisfied that adequate arrangements will be made to connect the roof areas of buildings to such rainwater harvesting scheme (if any) as may be approved by the Director-General."* Rainwater harvesting will be provided for any future built form proposed, with re-use for non-potable applications incorporated into the overall design for built form characteristics. Internal uses will include such potable applications as toilet flushing, while external applications would be used for irrigation. Further details of rainwater harvesting are provided in the Water Cycle Management Strategy at **Appendix 8**.

Clause 23 – Development adjoining residential land	Clause 23 applies to land within 250m of residential zoned land. The Site is not located within 250m of residential zoned land. The Site adjoins an existing residential dwelling to the north. The proposed development is not anticipated to adversely affect the amenity of the adjoining residential dwelling. The Proposed Development will be designed to achieve a compatible outcome with the surrounding land uses, including the adjoining residential development and the adjacent industrial zoned land. Appropriate mitigation and management measures will be implemented to minimise any potential amenity impacts on the adjoining residential development.
Clause 24 – Development involving subdivision	The consent authority must consider the following for development involving subdivision: *(a) the implications of the fragmentation of large lots of land,* *(b) whether the subdivision will affect the supply of land for employment purposes,* *(c) whether the subdivision will preclude other lots of land to which this Policy applies from having reasonable access to roads and services.* The proposed nine-lot subdivision will not result in fragmentation of industrial land. Rather, the proposed subdivision will facilitate the employment-generating development of the Site for warehousing and industrial purposes. The proposed subdivision will increase the supply of industrial land, which will encourage employment opportunities in the Mamre Road Precinct, ultimately facilitating economic growth in the wider WSEA and the WSA. The Proposed Development will not preclude any other lots within the WSEA from having reasonable access to roads and services. Access roads and internal driveways will be constructed to facilitate vehicular access to and within the Site.
Clause 25 – Public utility infrastructure	The Proposed Development involves the provision of utilities services at the Site. Adequate arrangements for the provision of public utility infrastructure will be provided as part of the Proposed Development. Further details of the provision of site infrastructure are provided in the Site Infrastructure Assessment at **Appendix 23**.
Clause 26 – Development on or in vicinity of proposed transport infrastructure routes	The Site is not directly adjoined by any proposed transport infrastructure as illustrated on the Transport and Arterial Road Infrastructure Plan Map and therefore is not considered to require referral to the Secretary-General of the DPIE under clause 26 of SEPP WSEA.
Clause 27 – Exceptions to development standards	Not applicable. The Proposed Development does not seek exceptions to development standards under SEPP WSEA.
Clause 28 – Relevant acquisition authority	The Site is not identified to be or adjoin land reserved for acquisition. Hence further consideration under Clause 28 is not warranted.
Clause 29 – Industrial Release Area – satisfactory arrangements for the provision of regional transport infrastructure and services	Given that the Site is not currently used for industrial purposes, referral to the Secretary seeking concurrence regarding satisfactory arrangements for the provision of regional transport infrastructure and services will be required. A Voluntary Planning Agreement (VPA) is proposed to be entered into with the Minister for Planning. The Voluntary Planning Agreement (VPA) process has been initiated with DPIE and the Proponent is currently awaiting feedback from DPIE. In particular, a VPA offer was made to DPIE in June 2021, followed up by additional information as requested by DPIE on 22 July 2021 in relation to the satisfactory

	arrangements for the provision of regional infrastructure. It is noted that the DPIE Infrastructure Partnerships and Agreements team has referred to the offer to their legal team for preparation of a draft VPA. The email correspondence between the Proponent and DPIE Infrastructure Partnerships and Agreements team is provided at **Appendix 32** for reference.
Clause 31 – Design principles	The proposed development will consider the following design principles, as they apply to Clause 31 of SEPP WSEA, including: *(a) the development is of a high quality design, and* *(b) a variety of materials and external finishes for the external facades are incorporated, and* *(c) high quality landscaping is provided, and* *(d) the scale and character of the development is compatible with other employment-generating development in the precinct concerned.* The proposed warehouse or distribution centre in Proposed Lot 9 is consistent with the above design principles. The design merits of the Proposed Development are further discussed in **Section 6.3**.
Clause 32 – Preservation of Trees or Vegetation	Vegetation clearing is required to facilitate the proposed development. It is noted that the proposed built form has included provisions for landscaping across the Site in accordance with the relevant development controls articulated within the Draft Mamre Road Precinct DCP.
Clause 33B – Development of land within or adjacent to transport investigation area	The Site is not located in areas marked as "Transport Investigation Areas A and B" on the Land Zoning Map. Hence, further consideration is not warranted under Clause 33B.
Clause 33C – Development within the Mamre Road Precinct	Pursuant to Clause 33C, consent must not be granted to development within Precinct 12 (Mamre Road) that has a CIV of more than $200,000 without the concurrence of TfNSW. TfNSW is required to take into account the likely effect of the development on: *(a) the compatibility of the proposed development with the delivery of an integrated freight network, including use of fire access roads and connection to the fire access roads of adjoining land, and* *(b) the operation of an integrated freight network, including whether the development is likely to impede access to or from the integrated freight network, and* *(c) the practicability and cost of carrying out transport projects on the land in the future.* As the CIV of the Proposed Development is more than $200,000, referral to TfNSW will be required to seek concurrence. It is noted that the Proposed Development has been designed to ensure the compatibility with the integrated freight work through the incorporation of access roads as identified in the Mamre Road Precinct Network under the Draft Mamre Road Precinct DCP. This is further discussed in **Section 6.8**.
Clause 33D – Development in areas subject to aircraft noise	It is noted that the site is located approximately 7.5km from the Western Sydney International (Nancy-Bird Walton) Airport (the Airport) and is identified to be located on land in Australian Noise Exposure Concept (ANEC) contour of less than 20 as indicated by the Noise

	modelling tool published by the Department of Infrastructure, Transport, Regional Development and Communications. Notwithstanding, an Acoustic Report has been prepared to address the potential noise impacts of the Proposed Development. This is further discussed in **Section 6.10**.
Clause 33E – Airspace operations	Pursuant to Clause 33E, the consent authority may grant development consent for the development if the relevant Commonwealth body advises that – *(a) the development will penetrate the prescribed airspace but it has no objection to its construction, or* *(b) the development will not penetrate the prescribed airspace.* As addressed in the Aeronautical Impact Assessment (**Appendix 25**), It is noted that the Proposed Development will not penetrate the prescribed airspace. Further details are provided in **Section 6.18** and **Appendix 25**.
Clause 33F – Development of land adjacent to Airport	Clause 33F applies to development on land which is less than 13km from a boundary of the Airport. Consent must not be granted to the development at the site unless the consent authority is satisfied that the Proposed Development will not attract birds or animals of a kind and in numbers that are likely to increase the hazards of operating an aircraft. It is noted that the Site is located approximately 7.5km from the Airport. The Proposed Development will be designed to not attract birds or animals that are likely to increase the hazards of operating an aircraft.
Clause 33H – Earthworks	The proposed bulk earthworks will facilitate the suitability of the Site for warehousing and industrial uses. The proposed bulk earthworks are designed to ensure the Proposed Development will not have a detrimental impact on the environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land. Each matter under Clause 33H(3) is addressed as follows: *(a) the likely disruption of, or detrimental effect on, existing drainage patterns and soil stability in the locality,* A detailed flood assessment has been completed in relation to flooding considerations – refer **Section 6.7.8** of this EIS and Section 8 of the Water Cycle Management Strategy at **Appendix 9**. Refer to Sections 4, 5, 6 and 7 of the Water Cycle Management Strategy and the Civil Engineering Plans as well as **Section 6.7** of this EIS, which set out stormwater management for the Site. The proposed strategy incorporates management of site runoff and upstream drainage paths managing quantity and quality and ensuring acceptable impacts in accordance with various council and NSW government policy. Consideration to stability of soil has been made during and post construction.

	(b) the effect of the proposed development on the likely future use or redevelopment of the land, The proposed Warehouse and Logistics Hub is consistent with the IN1 General Industrial zoning. Future redevelopment of similar industrial developments would be able to be undertaken. *(c) the quality of the fill or the soil to be excavated, or both,* Geotechnical and environmental assessments have been undertaken for the Site and are addressed in **Sections 6.5** and **6.6** of this EIS. The Detailed Site Investigation (DSI) and Geotechnical Investigation address the suitability for use as engineered fill, foundations and other development requirements. The DSI and Geotechnical Investigation show that with due consideration to the design requirements that development would be able to be made over the development footprint. *(d) the effect of the proposed development on the existing and likely amenity of adjoining properties,* Adjoining properties to the north, south, east and west are noted to comprise land zoned for industrial use within the Mamre Road Precinct, hence similar amenity to these frontages is achieved. *(e) the source of fill material and the destination of excavated material,* All import materials will comply with the requirements of the requirements of the Import Fill Protocol and Geotechnical Specifications for the Development. Topsoil stripping, blending and placement will be completed in accordance with the Geotechnical Engineering Specifications for the project. Import of fill is required and is expected to be sourced from a variety of locations which will need to be confirmed as part of the Construction Management Plan for the development during Construction Certificate stage of the development. *(f) the likelihood of disturbing relics,* An ACHA (**Appendix 17**), a Heritage Impact Statement (HIS) (**Appendix 16**) and an Archaeological Assessment Report (**Appendix 18**) have been prepared by Biosis. Refer to **Sections 6.14** and **6.15** of this EIS. Based on the findings of the ACHA, HIS and the Archaeological Assessment Report, there is unlikely to be any archaeological material contained on the Site and is deemed to have low heritage significance. *(g) the proximity to and potential for adverse impacts on a waterway, drinking water catchment or environmentally sensitive area,* A detailed flood assessment has been completed in relation to flooding considerations – refer **Section 6.7.8** of this EIS and

	Section 8 of the Water Cycle Management Strategy at **Appendix 9**. Assessments relating to discharge to water has been made in the BDAR (**Appendix 10**). Refer Section 6, 7 and 8 of the Civil Engineering Report for details of water quantity, water quality and water balance assessments which confirm acceptable impacts relating to stormwater management. *(h) appropriate measures proposed to avoid, minimise or mitigate the impacts of the development,* Appropriate measures during and following development have been made in relation to earthworks, erosion and sediment controls during construction/earthworks in accordance with the *Managing Urban Stormwater: Soils and Construction – Volume 1: Blue Book* (the Blue Book). *(i) the proximity to and potential for adverse impacts on a heritage item, an archaeological site, or a heritage conservation area,* An ACHA (**Appendix 17**), a HIS (**Appendix 16**) and an Archaeological Assessment Report have been prepared by Biosis. Refer to **Sections 6.14** and **6.15** of this EIS. Based on the findings of the ACHA and HIS, there is unlikely to be any archaeological material contained on the Site and is deemed to have low heritage significance. *(j) the visual impact of earthworks as viewed from the waterways.* A Land and Visual Impact Assessment (**Appendix 7**) has been prepared to assess the visual impacts of the Proposal and is further discussed in **Section 6.3.3** in this EIS.
Clause 33I – Development on flood prone land	A Water Cycle Management Strategy has been prepared by AT&L to address the pre and post development flows of the Site. An Erosion and Sediment Control Plan will also be implemented to mitigate potential for siltation during construction. During the operation phase, stormwater detention and water quality measures will be implemented to address the potential impact associated with the increased impervious land surfaces. Further details are provided in **Section 6.7** and **Appendix 8**.
Clause 33J – Heritage conservation	The Site is not identified to contain or located in proximity to a heritage item. Any potential Aboriginal Cultural Heritage affectations attributed to the Site are addressed in **Section 6.14**.
Clause 33K – Consent for clearing native vegetation	It is noted that the Site comprises biodiversity values in the north western portion of the Site. A BDAR has been prepared for the Proposed Development. While the Proposed Development involves direct impact on 1.27 ha of native vegetation, a total of 18 ecosystem credits will be offset under the BC Act. A series of mitigation and management measures will also be implemented to avoid and minimise any unintentional direct impacts and indirect impacts on the Subject Site's retained biodiversity values. Further details are provided in **Section 6.12** and **Appendix 10**.
Clause 33L – Stormwater, water quality and water sensitive design	The Proposed Development will be designed to minimise the adverse impacts of stormwater on the Site and the surrounding riparian land.

	The proposed stormwater and water sensitive design are addressed in **Section 6.7** and **Appendices 8** and **20**.

4.2.8 State Environmental Planning Policy (Western Sydney Aerotropolis) 2020

State Environmental Planning Policy (Western Sydney Aerotropolis) 2020 (SEPP WSA) aims to facilitate development in the Western Sydney Aerotropolis in accordance with the Western Sydney Aerotropolis Plan and ensure development is compatible with the long-term growth and development of the Western Sydney Airport and other critical transport infrastructure.

Pursuant to Clause 5 of SEPP WSA, Part 3 and Clause 29 apply to land that surrounds land shown on the Land Application Map and the Western Sydney Aerotropolis. It is noted that the Site is located approximately 7.5km north-east of the Aerodrome Reference Point for Western Sydney Airport. Hence the Site is considered to surround land shown on the Land Application Map (refer to **Figure 16**) and therefore the provisions in Part 3 and Clause 29 of the SEPP WSA are applicable to the Site.

The relevant development controls under Part 3 and Clause 29 are addressed in **Table 9** below.

Table 9 SEPP WSA Development Standards	
Clause	**Comments**
Part 3 Development controls – Airport safeguards	
Clause 19 Aircraft noise	Subclause (2) provides that development consent must not be granted to noise sensitive development if the development is to be located on land that is in an ANEF or ANEC contour of 20 or greater. As addressed in the Aeronautical Impact Assessment (AIA) (**Appendix 25**), the Site is located outside the ANEC Zones where the highest predicted noise value is in the 25 to 30 zone. The Proposed Development as a Warehouse and Logistics Hub would be an acceptable activity under AS 2021-2015.
Clause 20 Building wind shear and turbulence	Subclause (2) provides that development consent must not be granted to the following development unless the consent authority has consulted the relevant Commonwealth body— *(a) development on land shown on the Lighting Intensity and Wind Shear Map,* *(b) development that penetrates the 1:35 surface.* For reference, development penetrates the 1:35 surface if the distance from the runway centreline to the closest point of the building is less than or equal to 35 times the height above runway level of the building. As addressed in the AIA and illustrated in **Figure 17**, the Site is located outside of the Windshear Assessment Trigger Area and will not have any impact on turbulence at the Western Sydney Airport.
Clause 21 Wildlife hazards	Pursuant to subclause (2), development consent must not be granted to relevant development (within the meaning of Clause 21) on land in the 13km wildlife buffer zone unless the consent authority has consulted the relevant Commonwealth body, has considered a written assessment of the risk of the wildlife to the operation of the Airport and is satisfied that the development will mitigate the risk of wildlife to the operation of the Airport.

Table 9 SEPP WSA Development Standards	
Clause	**Comments**
	As illustrated in **Figure 18**, the Site is located within the 13km wildlife buffer zone. Given that the Proposed Development does not involve the relevant development as defined under Clause 21, referral to the relevant Commonwealth body will not be required for the future DA and thus a written assessment of wildlife will also not be required.
Clause 22 Wind turbines	Pursuant to Clause 22, development consent must not be granted to development for the purposes of a large wind monitoring tower or electricity generating works comprising a large wind turbine on land in the 3-30km zone unless the consent authority has consulted the relevant Commonwealth body, has considered a written assessment of the risk of the wildlife to the operation of the Airport and is satisfied that the development will mitigate the risk of wildlife to the operation of the Airport. As illustrated in **Figure 19**, the Site is located within the 30km zone. Notwithstanding, the Proposed Development does not relate to a large wind monitoring tower or electricity generating works. Hence further consideration is not required in this regard.
Clause 23 Lighting	Development consent must not be granted to development for the purposes of external lighting on land shown on the Lighting Intensity and Wind Shear Map unless the consent authority has consulted the relevant Commonwealth body. The Site is not located outside of the Light Control Zones (refer to **Figure 16**) and hence further consideration is not required in this regard.
Clause 24 Airspace operations	The Obstacle Limitation Surface (OLS) applicable to the Site is identified in **Figure 20**. As demonstrated in the AIA, with building and lighting poles heights projected to be beneath 105m AHD, there will not be any infringements of the OLS for the Western Sydney Airport. There is also adequate clearance for typical construction cranes to be used on the Site. As such, the Proposed Development will not penetrate the prescribed airspace for the Western Sydney Airport.
Clause 25 Public safety	Development for a number of purposes is prohibited on land identified as public safety area unless the consent authority is satisfied with the mitigation of the risk of the development to persons on the land. The Site is not identified to be located within the public safety area and hence further consideration is not warranted.
Part 4 Development controls – general	
Clause 29 Transport corridors	Pursuant to Clause 29, development consent must not be granted to the following development unless the consent authority has obtained the concurrence of TfNSW:

Table 9 SEPP WSA Development Standards	
Clause	**Comments**
	(a) development on transport corridor land with a capital investment value of more than $200,000, *(b) development that involves the penetration of ground to a depth of at least 2 metres below ground level (existing) on land within 25 metres (measured horizontally) of transport corridor land.* The Site is not identified as transport corridor land.

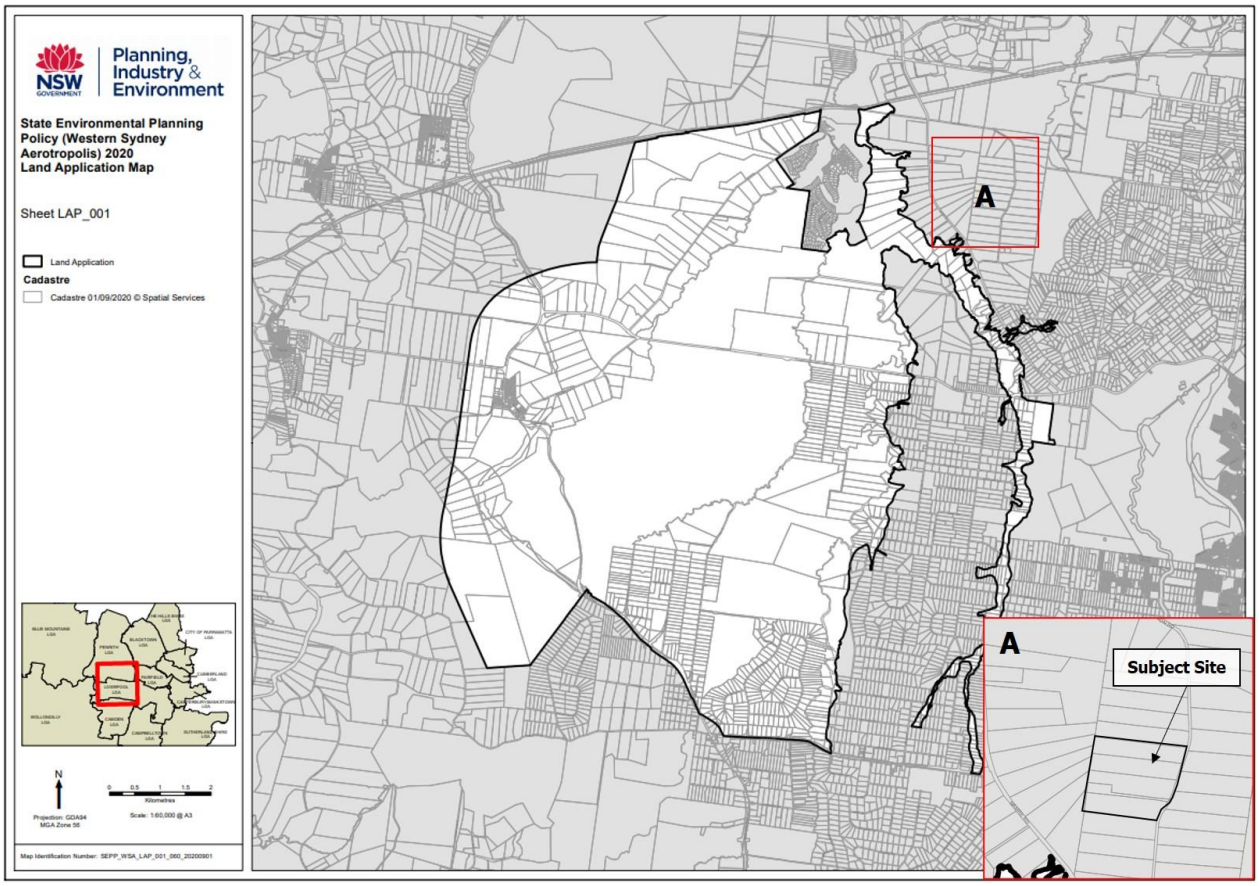


Figure 16 SEPP WSA Land Application Map (Source: NSW Legislation 2021)

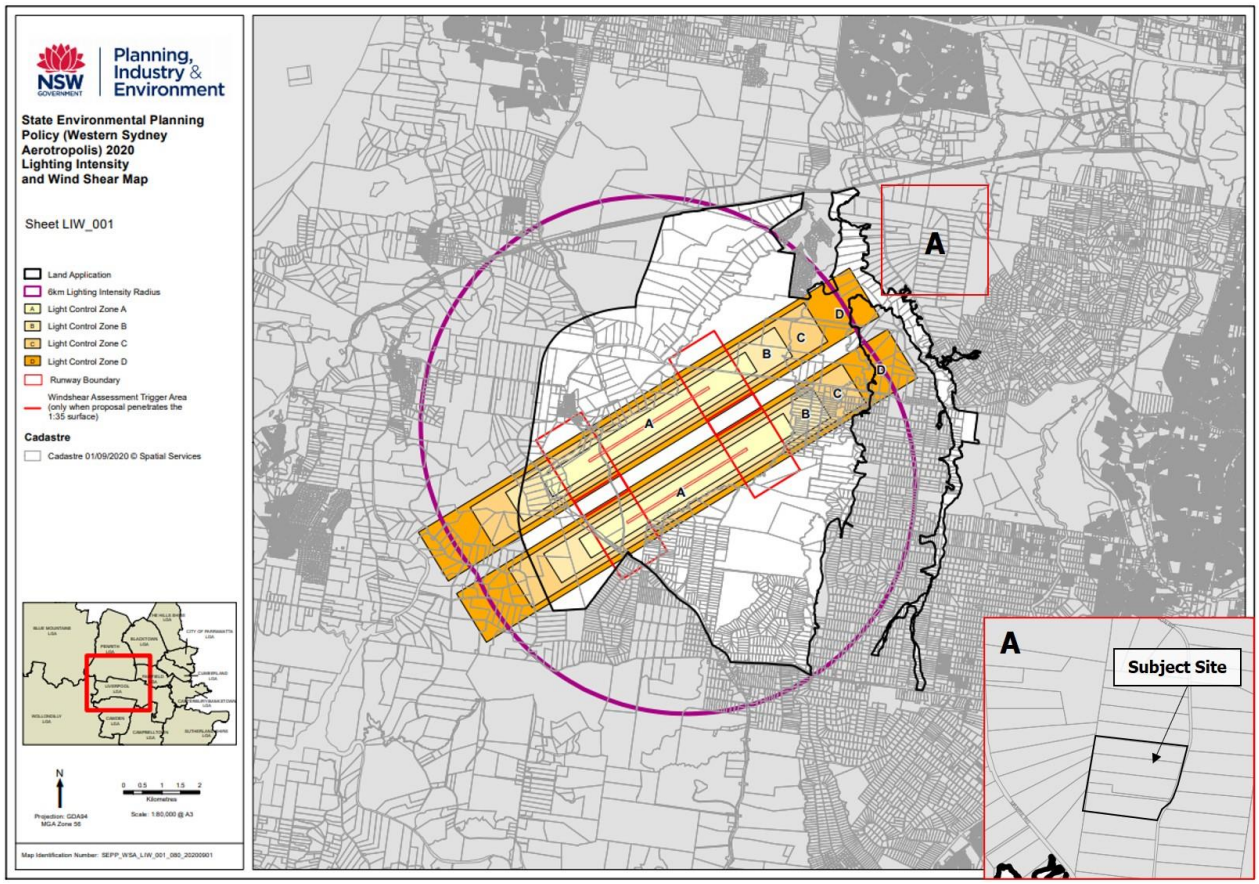


Figure 17 Lighting Intensity and Wind Shear Map (Source: NSW Legislation 2021)

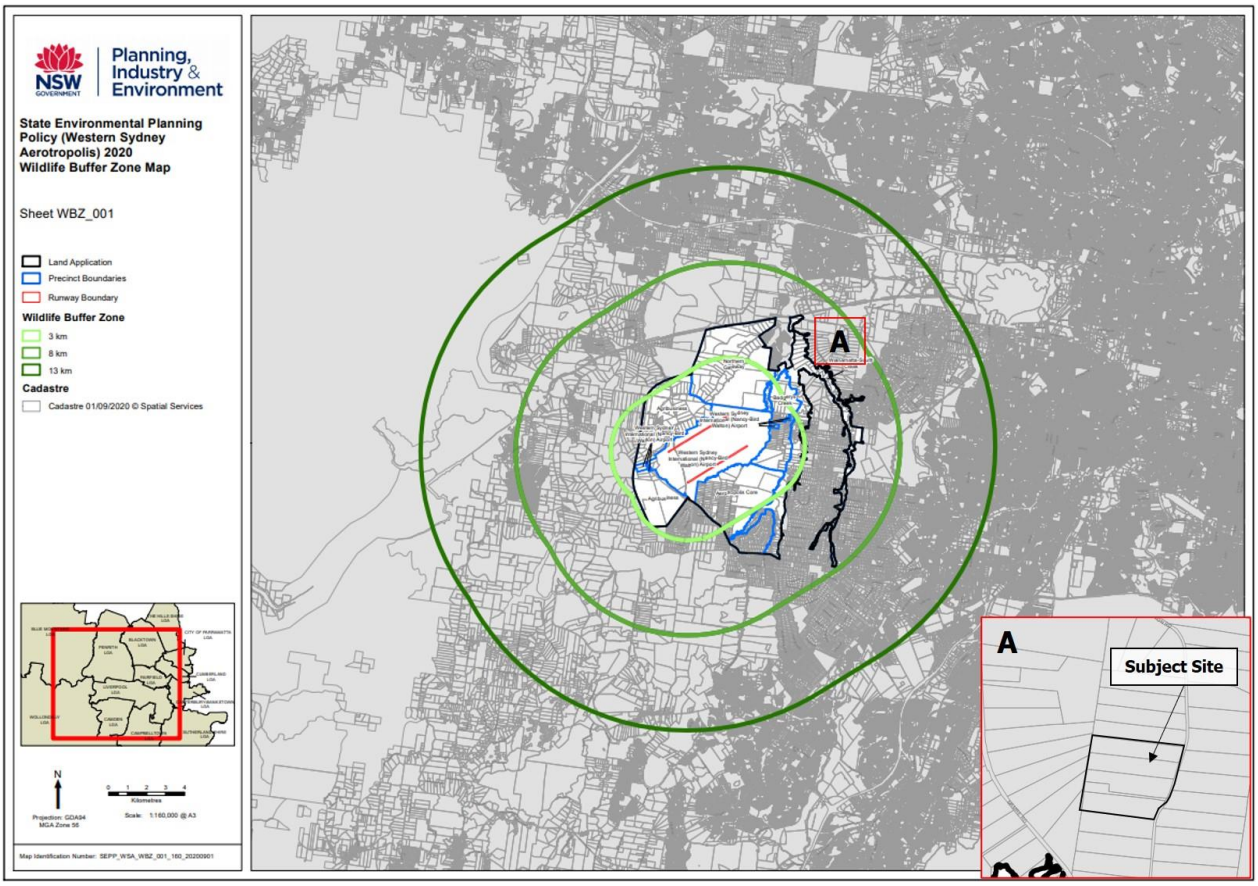


Figure 18 Wildlife Buffer Zone Map (Source: NSW Legislation 2021)

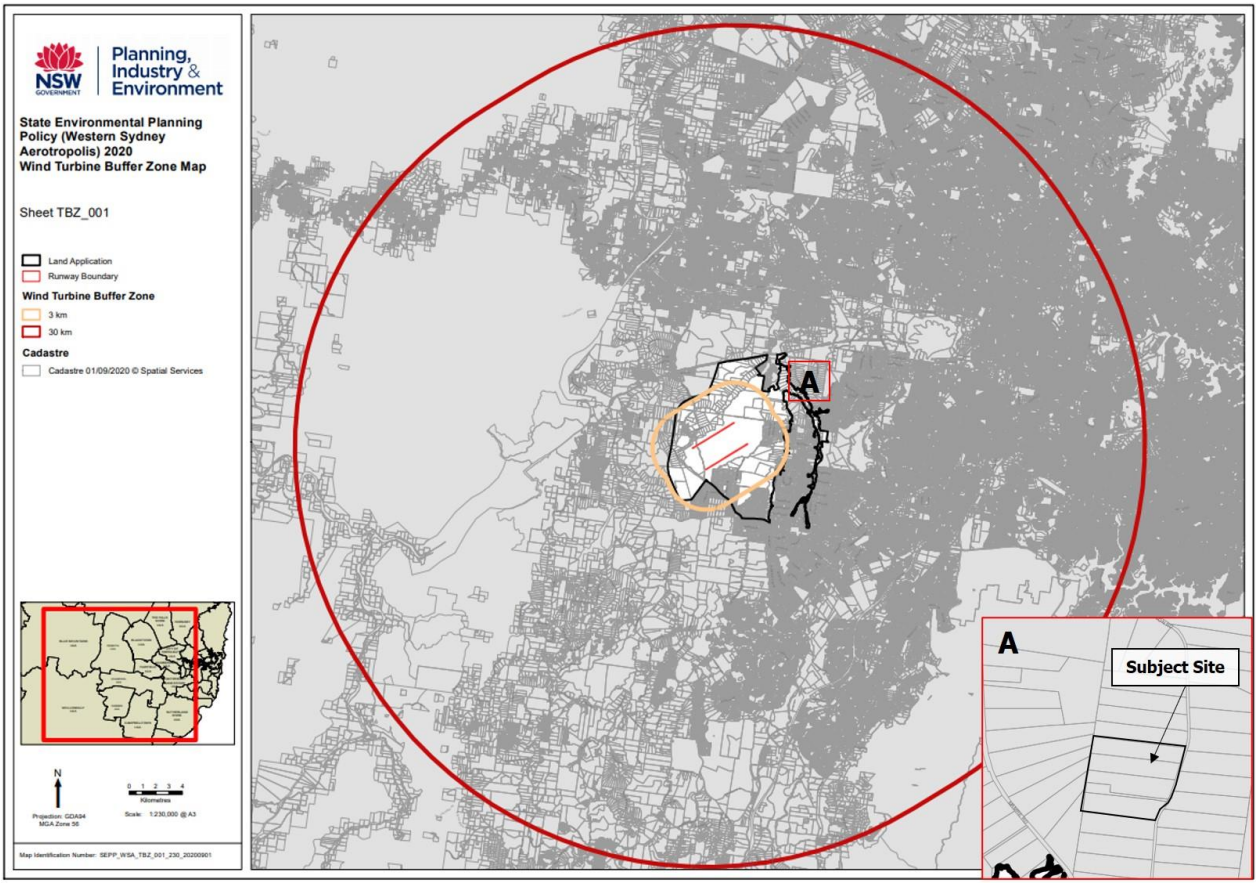


Figure 19 Wind Turbine Buffer Zone Map (Source: NSW Legislation 2021)

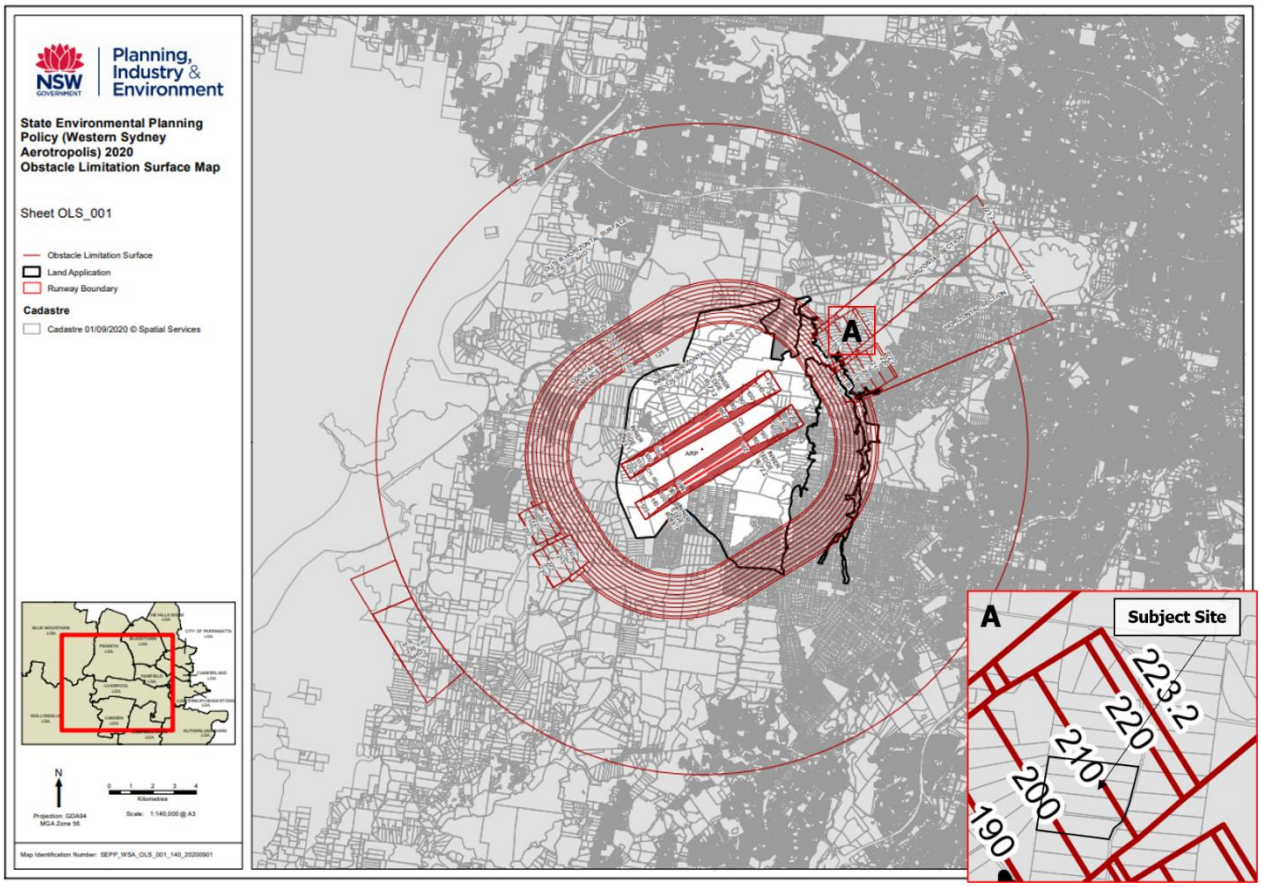


Figure 20 Obstacle Limitation Surface Map (Source: NSW Legislation 2021)

4.2.9 State Environmental Planning Policy No 33 – Hazardous and Offensive Development

The SEPP 33 Assessment prepared by Riskcon Engineering contains a preliminary risk screening in accordance with *State Environmental Planning Policy No 33 – Hazardous and Offensive Development* (SEPP 33) – and if required, a Preliminary Hazard Analysis (PHA), for which it details the location and quantity of potentially hazardous materials proposed to be used on-site (refer to **Appendix 14**). The findings of the SEPP 33 Assessment are further discussed in **Section 6.16** of this EIS.

4.2.10 State Environmental Planning Policy No 55 – Remediation of Land

Under the provisions of *State Environmental Planning Policy No 55 – Remediation of Land* (SEPP 55), where a development application is made concerning land that is contaminated, the consent authority must not grant consent unless:

> *(a) it has considered whether the land is contaminated, and*
>
> *(b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or would be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and*
>
> *(c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land would be remediated before the land is used for that purpose*.

A Site Contamination Assessment has been prepared by JBS&G to evaluate the contamination status of the Site in response to the proposed development on Site. This is further addressed in **Section 6.5** of this EIS.

4.3 STRATEGIC PLANNING CONTEXT

4.3.1 A Metropolis of Three Cities – Greater Sydney Region Plan

A Metropolis of Three Cities – Greater Sydney Region Plan divides the Sydney Region into three (3) Cities, with a vision of growth until 2056 (refer to **Figure 21**). The Plan aims to anticipate the housing and employment needs of a growing and vastly-changing population. The overall vision pursues an objective of transforming "Greater Sydney" into a "Metropolis of Three Cities", namely:

- The Western Parkland City;
- The Central River City; and
- The Eastern Harbour City

The GSC's division of Greater Sydney into three (3) Cities, aims to locate a greater proportion of the population closer to employment regions with more intensive jobs; 'city-scale' infrastructure & services; entertainment; and cultural facilities. By managing and retaining industrial land close to city centres and transport, the Plan aims to ensure that critical and essential services, are readily available to support local businesses and community members and residents. Particularly, the Proposed Development situated in the Western Parkland City would not only achieve new economic growth, but would also encourage employment-generating opportunities, closer to residential communities, allowing for better access to job opportunities and a shorter commute time to and from work.

The Proposed Development also contributes to the four (4) standardised themes in the Plan, across all three (3) cities, including:

- **Infrastructure and Collaboration** – the Proposed Development of the Site for the purposes of a Warehouse and Logistics Hub, would facilitate the provision of warehousing and distribution land uses, in line with the infrastructure planned for the Western Parkland City, including (but not limited to) major road upgrades and the Sydney Metro – Western Sydney Airport network.

- **Liveability** – the Proposed Development will provide employment-generating opportunities and integrate with the existing and future public and active transport network in the Western Parkland City, improving the connectivity between major employment hubs and the surrounding neighbourhoods.

- **Productivity** – the location of the Subject Site, ensures that it can connect with the Western and Eastern City and remain competitive. It is expressly noted in the Plan, that it is essential to ensure that the three (3) Cities envisaged by the GSC, are more connected and economically competitive. This competition would be facilitated unequivocally by the Proposed Development, through the creation of jobs and provision of space for warehouse and distribution. To this end, the objective of a "30-Minute City", can be realised under the Proposed Development. The Site will create up to 228 new permanent jobs under this SSD Application.

  The development of the Site for employment purposes, therefore, further enhances productivity, as envisaged under the Plan.

- **Sustainability** – the Proposed Development would not exhibit or emit any detrimental impacts to its wider ecological surroundings.

In summary, the Proposed Development would substantially contribute to the themes set out in the *A Metropolis of Three Cities - Greater Sydney Region Plan,* by providing employment-generating opportunities to the wider locality and community, by being already located within SEPP WSEA and the wider Penrith LGA.

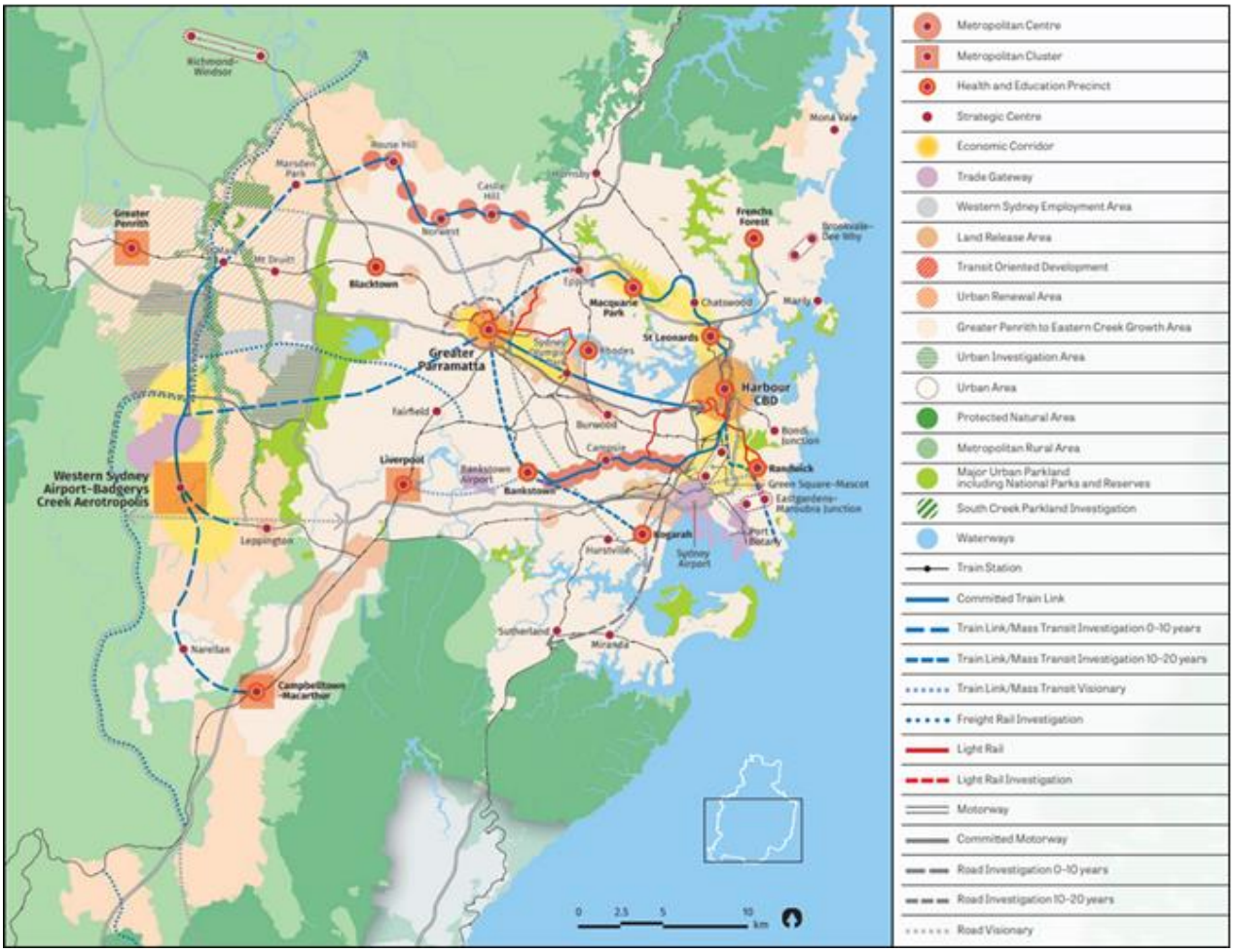


Figure 21 A Metropolis of Three Cities: A Vision to 2056 (Source: Greater Sydney Commission: Greater Sydney Region Plan 2018)

4.3.2 Western City District Plan

The *Western City District Plan* covers the Penrith LGA. The Plan encourages a twenty-year plan to help encourage and establish goals set out in *A Metropolis of Three Cities – Greater Sydney Region Plan* mentioned above in **Section 4.3.1**. The Plan is considered the 'bridge' between Regional and Local planning.

The Subject Site is situated within the *Western City District Plan*, which falls within the Western Parkland City.

The Western City District Plan reinforces the four (4) planning priorities of the GSC. The Plan establishes a number of priorities and actions to guide growth, development and change. It also emphasises connectivity to infrastructure, collaboration, liveability, productivity and sustainability. The GSC's mission statement further reinforces the Plan's concentrated aims by outlining its main strategies, namely:

- *Creating a once-in-a-generation economic boom with the Western Sydney Airport and Badgerys Creek Aerotropolis bringing together infrastructure, businesses and knowledge intensive jobs;*
- *Building on the Western Sydney City Deal to transform the Western City District over the next 20 to 40 years by building on natural and community assets and developing a more contained Western City District with a greater choice of jobs, transport and services aligned with growth;*
- *Delivering the first stage of the North South Rail Link;*
- *Collaborating and building strong relationships between Liverpool, Greater Penrith and Campbelltown-Macarthur reinforced by the emerging Badgerys Creek Aerotropolis forming a unique metropolitan cluster;*

- *Providing major transport links for people and freight by unprecedented transport investments;*
- *Developing a range of housing, providing access to public transport and infrastructure including schools, hospitals and community facilities;*
- *Linking walking and cycling paths, bushland and a green urban landscape framed by the Greater Blue Mountains World Heritage Area, the Scenic Hills and Western Sydney Parklands;*
- *Enhancing and protecting South Creek, Georges River and Hawkesbury-Nepean river systems;*
- *Mitigating the heat island effect and providing cooler places, by extending urban tree canopy and retaining water in the landscape;*
- *Protecting the District's natural landscapes, heritage and tourism assets, unique rural areas and villages; and,*
- *Protecting the environmental, social and economic values of the Metropolitan Rural Area.*

The Proposed Development, would contribute to the objectives set out in the Western City District Plan (of which the Site forms a part), by promoting a greater range of land uses of benefit to the community, including the Proposed Development (warehouse, logistics and industrial facilities hub) and other associated land uses; facilitating the provision of greater and improved infrastructure; and promoting additional employment-generating opportunities, to the wider locality and community closer to home, whilst supporting economically and environmentally-sustainable development.

Additionally, the warehousing and logistics activities associated with the Proposed Development would provide employment opportunities and support the 24/7 operation and growth of the Western City District and Western Sydney Aerotropolis. The Proposed Development will also provide employment opportunities in line with the surrounding road and transport infrastructure including (but not limited to) the Mamre Road upgrade and Sydney Metro – Western Sydney Airport (formerly North South Rail Link). The proposed Warehouse and Logistics Hub will also create a major employment hub within the WSEA, building strong relationships with the other employment hubs in the Western City District.

Further, the Proposed Development has been designed to integrate with the existing and proposed active transport network in the WSEA, including the cycling and pedestrian network, which will promote the use of active transport modes and ultimately enhance the environmental sustainability of development in the Western City District. The proposed high quality landscaping and tree planting have been designed to be compatible with the natural landscape and topography of the Mamre Road District, which will preserve the ecological values of the Western City District through the implementation of appropriate mitigation measures.

Accordingly, the proposed Warehouse and Logistics Hub is consistent with the aims of the *Western City District Plan* and is considered to positively contribute to the growth of the District.

4.3.3 Western Sydney Aerotropolis Plan

The Western Sydney Aerotropolis Plan was finalised and released in September 2020 by the Western Sydney Planning Partnership in collaboration with NSW Government and local councils to establish a vision and the overarching planning principles for the WSA; as well as to identify the intended land use planning outcomes for each of the 10 precincts, the phasing of precincts, and the envisaged transport and infrastructure framework associated with the vision for the new Aerotropolis.

Particularly, the Western Sydney Aerotropolis Plan identifies 11 objectives under the four themes underpinned by *A Metropolis of Three Cities – Greater Sydney Region Plan* (Productivity, Sustainability, Infrastructure and collaboration and Liveability). The 11 objectives are identified as follows:

- Productivity:
    1. An accessible and well-connected Aerotropolis
    2. High-value jobs growth is enabled, and existing employment enhanced
    3. Safeguard airport operations

- Sustainability:
    4. A landscape-led approach to urban design and planning

5. A sustainable, low carbon Aerotropolis that embeds the circular economy
6. A resilient and adaptable Aerotropolis

- Infrastructure and collaboration:
    7. Infrastructure that connects and services the Western Parkland City as it grows
    8. A collaborative approach to planning and delivery

- Liveability:
    9. Diverse, affordable, healthy, resilient and well-located housing
    10. Social and cultural infrastructure that strengthens communities
    11. Great places that celebrate local character and bring people together

The Site is located within the Mamre Road Precinct (**Figures 22** and **23**) which is identified as one of the initial precincts under the Western Sydney Aerotropolis Plan.

In addition, Mamre Road Precinct (of which the Site is located within) in the north of the Aerotropolis was rezoned in June 2020 under SEPP WSEA to deliver a warehousing and industrial hub and preserve land for environmental conservation and open space in Western Sydney. Under SEPP WSEA, the Mamre Road Precinct has been planned to achieve the proposed employment generation outcomes envisaged.

Importantly, the Proposed Warehouse and Logistics Hub is consistent with the themes and objectives identified in the Western Sydney Aerotropolis Plan. The Proposed Development will create employment opportunities during both construction and operational phases, which support high-value jobs growth in the warehousing and logistics sector. The Proposed Development will facilitate large-format industrial and warehouse land uses within the Mamre Road Precinct in the WSA, which will support the 24/7 operation of the Western Sydney Airport through enabling export freight and logistics.

A number of sustainable design strategies have been developed to achieve Ecologically Sustainable Development (ESD) for the proposed Warehouse and Logistics Hub. The Proposed Development's commitment to achieving a 5-star Green Star 'Design & As-Built' certification will also contribute to the resilience and environmental sustainability of the Aerotropolis.

The Proposed Development has been designed to enable the integrated freight network which provides direct connections to the potential Western Sydney Intermodal Terminal and the Western Sydney Freight Line Corridor. The proposed Warehouse and Logistics Hub is thus considered to contribute to the delivery of the freight and road infrastructure in the Mamre Road Precinct which preserve freight and logistics opportunities and facilitates connectivity between the WSEA and the Aerotropolis.

Through integrating with the planned public and active transport network in the Mamre Road Precinct and the wider WSA, the Proposed Development will deliver job opportunities close to homes, aligning with the 30-minute city concept and improving the amenity and quality of life for the workers and residents in the WSA. The Proposed Development has also been designed to ensure adequate separation is provided from the surrounding rural-residential development to provide an appropriate interface with the residential communities and preserve the amenity of the neighbourhoods.

As such, the Proposed Development is consistent with the objectives of the Western Sydney Aerotropolis Plan and will facilitate orderly development in the Mamre Road Precinct as an initial precinct in the WSA.

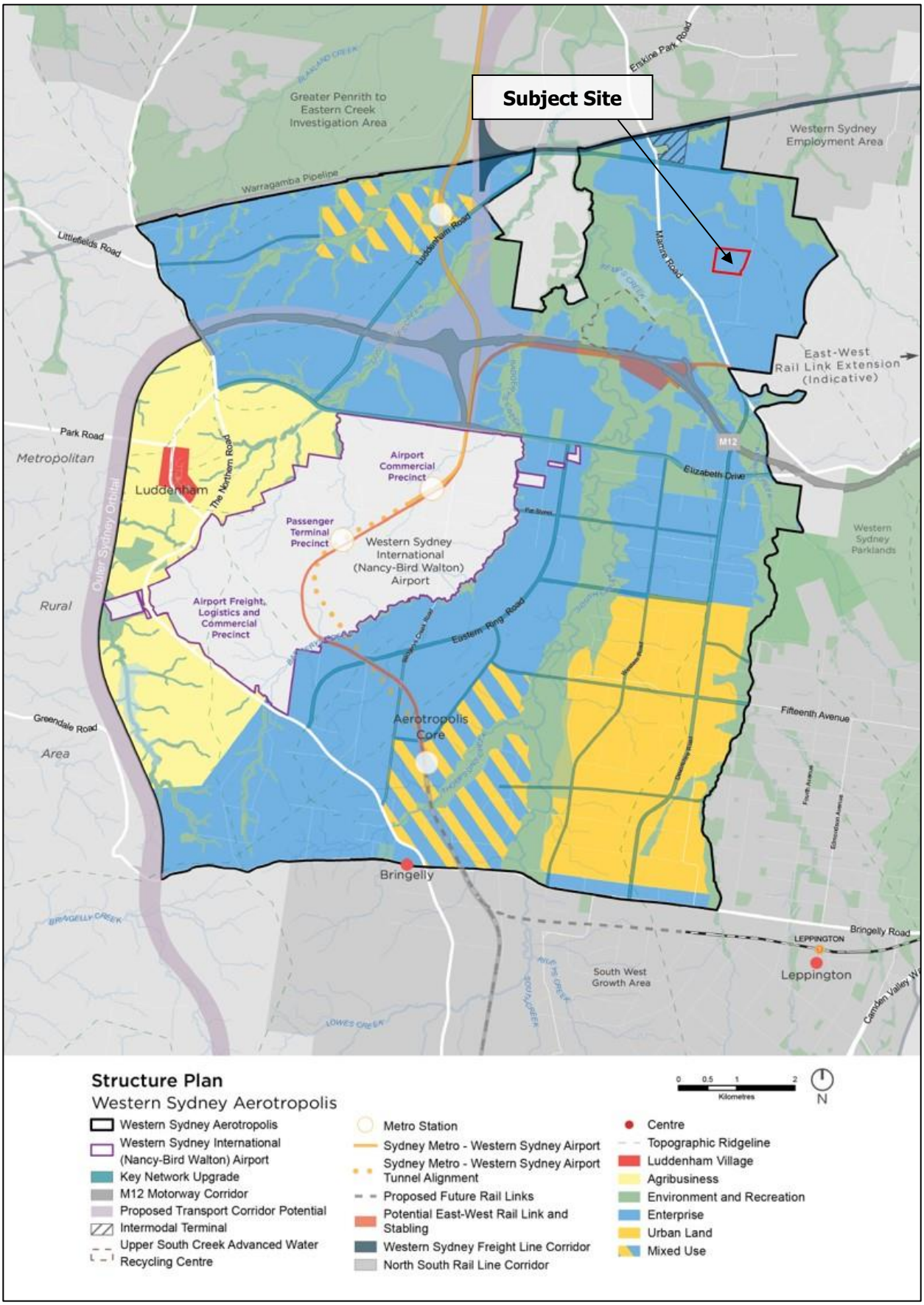


Figure 22 Western Sydney Aerotropolis Structure Plan (Source: Western Sydney Planning Partnership 2020)

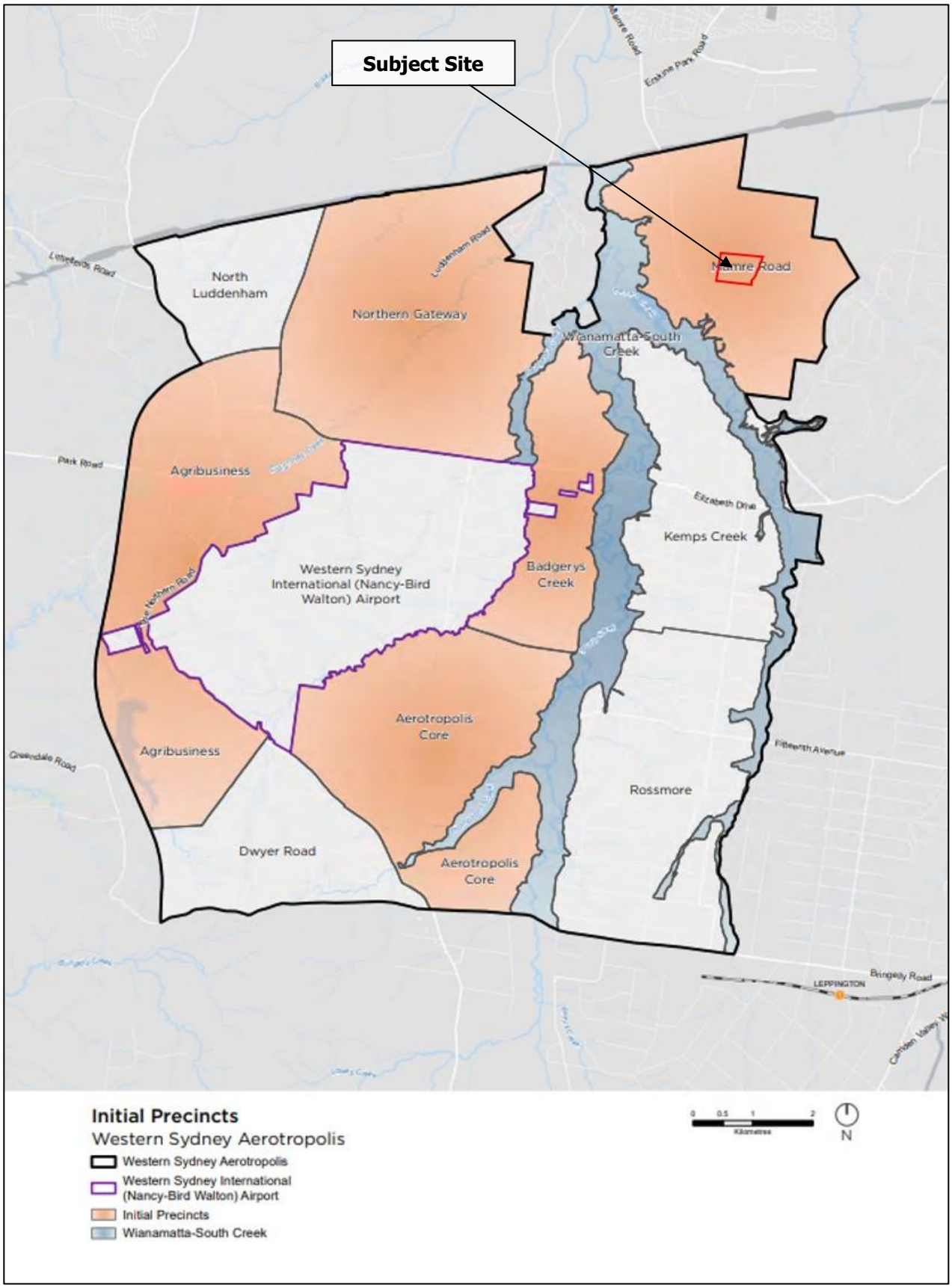


Figure 23 Western Sydney Aerotropolis Initial Precincts Plan (Source: Western Sydney Planning Partnership 2020)

4.3.4 Western Sydney Employment Area

The Subject Site is located within the south eastern portion of the WSEA, within 'Precinct 12 (Mamre Road)'. The aims / objectives of the WSEA are summarised below, including:

- Promoting an economically sustainable development and reinforcing the status of an employment-generating development, that positively contributes to the WSEA;
- Encourages assurance for the coordinated planning and development of land within the WSEA;
- Ensures minimal environmental and amenity impacts;
- Ensures development is compatible with surrounding development and the local context.

As outlined in **Section 4.2.7** of this EIS, the Proposed Development is considered to meet the objectives outlined above, as it enables development on land zoned for such permissible industrial-related uses.

4.3.5 Mamre Road Precinct Structure Plan

The Subject Site is located within the Mamre Road Precinct and comprises land identified for environmental conservation as illustrated on the Mamre Road Precinct Structure Plan (**Figure 24**). This identifies an additional 850 ha of industrial land for employment and open space development, as well as a potential Western Sydney freight intermodal terminal (IMT). It is noted that the Subject Site has been rezoned as IN1 General Industrial under SEPP WSEA (refer to **Figure 15**), the Site is clearly suited for its proposed land uses, for which this SSD Application seeks Development Consent for.

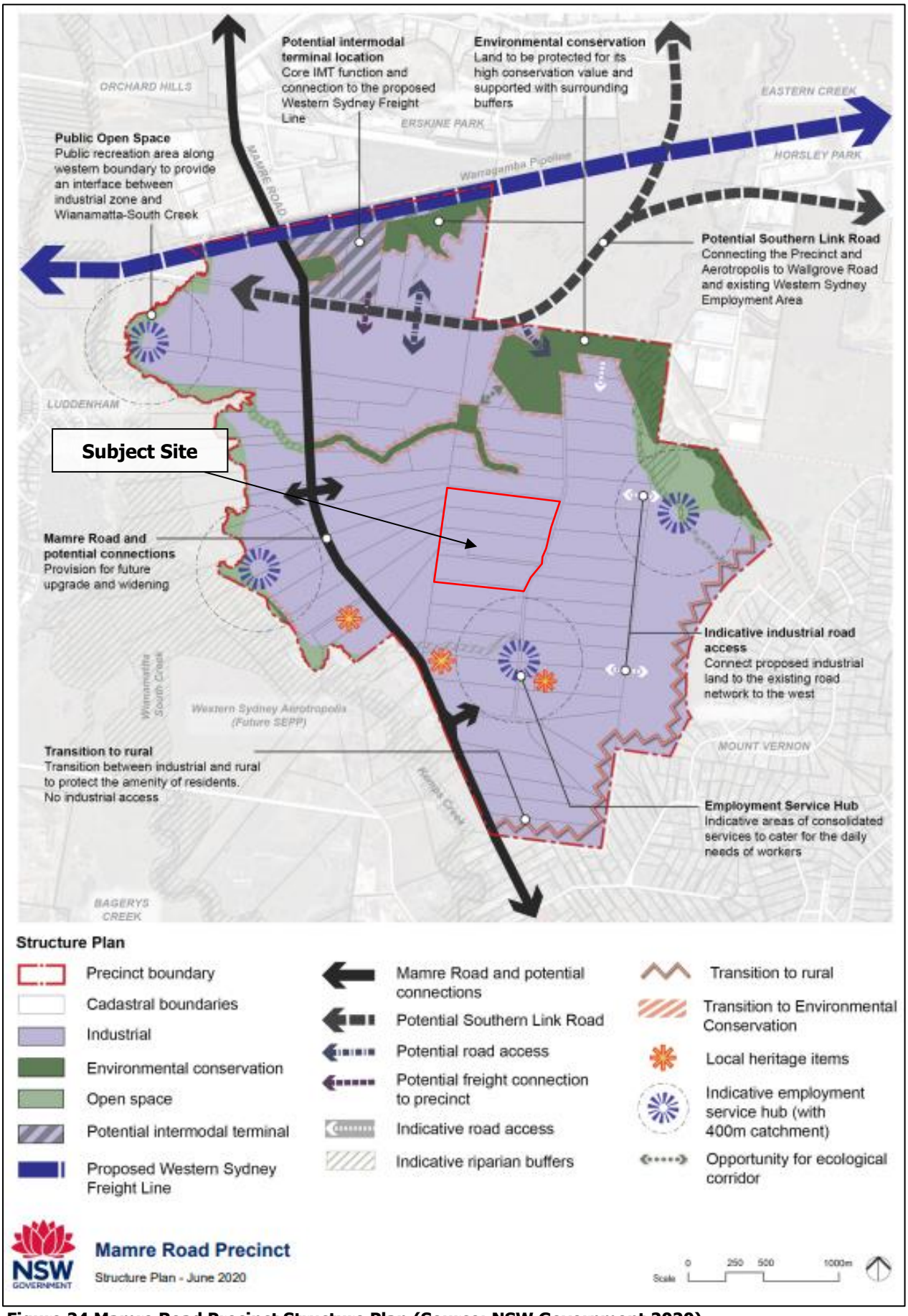


Figure 24 Mamre Road Precinct Structure Plan (Source: NSW Government 2020)

4.4 LOCAL PLANNING CONTEXT

4.4.1 Penrith Local Environmental Plan 2010

As the Subject Site is part of the WSEA Land Application Area, the provisions of the SEPP WSEA prevails over the *Penrith Local Environmental Plan 2010* (PLEP2010). Hence, the provisions of the PLEP2010 therefore do not apply to the Proposed Development.

4.4.2 Draft Environmental Planning Instruments

No draft EPIs apply to the Subject Site.

4.4.3 Penrith Development Control Plan 2014

The PDCP2014 is a non-statutory policy used to guide development in the Penrith LGA, including land that is covered by SEPP WSEA. It does not apply to the Subject Site however for the purpose of the Proposed Development.

As is noted in Part 2, Clause 11 of the SRD SEPP which governs this SSD Application:

> *"Development control plans (whether made before or after the commencement of this Policy) do not apply to:*
>
> *(a) State Significant Development."*

Notwithstanding, the Draft Mamre Road Precinct DCP has been prepared by the NSW DPIE, which would apply for the Proposed Development, which encapsulates key planning controls, such as setbacks, building heights and landscape requirements. Review of the applicability of the Draft Mamre Road Precinct DCP has been considered in **Appendix 29**.

4.4.4 Draft Mamre Road Precinct Development Control Plan

The Draft Mamre Road Precinct DCP was on exhibition between 10 November and 17 December 2020 and is currently being finalised by DPIE. The proposed development has been designed to be generally consistent with the controls specified in the Draft Mamre Road Precinct DCP. A detailed assessment against the Draft Mamre Road Precinct DCP is located within **Appendix 29** of this EIS.

4.4.5 Draft Mamre Road Precinct Section 7.11 Contributions Plan

Penrith City Council is currently preparing the Mamre Road Precinct Contributions Plan which will impose Section 7.11 contribution to development in the Mamre Road Precinct once finalised. The Penrith City Section 7.12 Development Contributions Plan is currently applicable to non-residential development in the Penrith LGA, which will therefore apply to the Proposed Development in the interim.

In addition, Frasers, ESD, Fife Capital and Stockland have been in consultation with Council to develop a concept design of the Aldington and Abbots Road upgrades as part of a VPA offer. As demonstrated in **Appendix 31**, a VPA offer was made to Council on 9 July 2021 and there has been ongoing discussions between the stakeholders regarding the delivery of upgrade works.

PART E CONSULTATION

5.1 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

During the preparation of the SEARs, the NSW DPIE also consulted with key stakeholders, and in the process obtained a list of their Key Issues for the Proponent to assess throughout this EIS. These Key Issues for assessment are contained in **Tables 10-26**.

Table 10 Penrith City Council Key Issues for Assessment	
Key Issues	**Response**
General Requirements	
Planning & strategic planning considerations: ▪ It is noted that the proposed development is advancing ahead of the finalisation of the recently exhibited Draft Development Control Plan for the Precinct. This is concerning as the strategic planning controls and objectives for the Precinct are not yet confirmed and early advancement of development proposals ahead of this process, has the potential to undermine orderly development within the Precinct. It is appreciated that this is ultimately a matter for the NSW Government to address in the consideration of any SSD application lodged, however Council will maintain that there is a need to consider the appropriateness of site specific DCP advancing independently, and how such a DCP is contextually responsive to existing land attributes and the strategic planning vision for the broader precinct.	Refer to **Sections 4.2.1 and 4.4.4** and **Appendix 29**. The Proposed Development does not seek consent for a concept or staged development. Hence a site specific DCP is not required.
▪ The proposal indicates site regrading / benching however at this stage inadequate information is available to understand how the intended earthworks have informed the proposed subdivision arrangement. Minimisation of excessive cut and fill should be derived by the proposed arrangement of road and development lots, as further informed by the structure plans that will need to form part of the DCP when adopted. The concept plan for Lot 9 has indications of retaining walls along both side boundaries however no details of finished ground levels and retaining wall heights are available which will be critical in the assessment of the proposal. The spatial arrangement of the development must be informed by a topographic assessment which ensures that any earthworks, road patterns, built form and landscaping is site responsive and contextually appropriate. This will require a cut and fill / benching plan that is informed by a visual impact analysis through the site, from neighbouring boundaries and along approaches to the development as viewed from the public domain. Of particular emphasis will be edge conditions and interface treatments between the subject site and adjoining land, with cross sections required.	Refer to **Section 6.7** and **Appendices 8** and **20**.
▪ The proposal is in relatively close proximity to a listed heritage item and mapped land known to contain aboriginal heritage potential (south of the subject site as per the Draft DCP). The proposal will need to address implications and considerations of the proposal relating to the heritage significance of that item and the potential for disturbance to items of indigenous significance.	Refer to **Sections 6.14** and **6.15** and **Appendices 16-18**.
▪ The south eastern corner of the site is affected by mapped "indicative trunk drainage infrastructure" (Item B07) pursuant to the Draft DCP for the precinct. The DCP details that:-	Refer to **Section 6.7** and **Appendices 8** and **20**.

"Development consent must not be granted on land which is to be serviced by this infrastructure until such time as it has been delivered to the satisfaction of the trunk drainage manager (Council or other)" This clause implies that a precinct wide drainage strategy and implementation of that strategy is required prior to "granting of consent" for any subdivision or industrial development. This means that the proposal cannot be progressed independently of the broader precinct planning framework and must demonstrate both an integrated drainage strategy and works that are already delivered, or delivered as part of the proposal before consent can be granted.	
▪ Of positive note, is the indication of 7.5m wide landscaping between the proposed internal access road and subdivision lot boundary for the proposed built form on Lot 9. Council has advocated with the Department that the Draft DCP provision is inadequate and incapable of achieving the objectives of the standard, given the expanse of hard stand areas proposed to support large scale industrial warehouse developments. The concept plan for Lot 9 does have some parking encroachments forward of the 7.5m setback line (adjacent to entry / exit driveways). It is considered appropriate that a consistent setback be adopted and that the minor encroachments be removed or at a minimum, the 2 x spaces entirely forward of the setback line be deleted.	Refer to **Appendices 4** and **29**.
▪ While Lot 9 has a suitable and respectful setback zone to the proposed internal road for landscaping, diagrammatical indications of significantly lesser front setbacks to the south of Lot 9 and opposite Lot 9 are not supportable and undermine the intention of the standard for consistent embellished streetscape presentations. Maintenance of a consistent setback zone is critical between lots for the entire road length.	Refer to **Appendices 4** and **29**.
▪ The plans indicate a significant setback to Aldington Road with indications of an exclusion zone. A review of the Deposited Plan confirms that an easement for transmission lines of 60.96m wide exists. While no works are proposed in the easement, the provision of a vegetated setback with a layering of tree canopy plantings will be required along Aldington Road. If the planting cannot be located within the easement (to a density and arrangement that provides for a vegetated streetscape presentation), then a further landscape setback between the edge of the easement and the proposed truck manoeuvring areas will be required. The benefiting authority for the easement must provide written verification as to what planting is permitted in the easement extent and that advice should inform the landscape design plans and arrangement of the built form and hard stand areas on the proposed allotments.	Refer to **Appendices 6** and **29**.
▪ Address of environmental considerations such as noise, air quality, contamination and waste management as well as parking compliance, detailed landscape design and architectural detail (including demonstration of design quality) will need to be further explored and addressed as the proposed develops.	Refer to **Appendices 4, 6, 9, 11, 12, 13, 15** and **21**.
Development contributions: ▪ Councils Section 7.12 Citywide Contribution Plan is currently applicable to this site. Please note that an amendment to this plan was exhibited in November 2020 to remove the applicability of this plan from the Mamre Road Precinct. This amendment is yet to be determined and may impact the determination of this application.	Noted. Refer to **Section 6.20**.

▪ It is requested that the applicant and DPIE in combination discuss local contributions with Councils' City Planning – Contributions. The intended contribution pathway would need to be discussed and agreed to prior to determination of the application.	Noted. Ongoing discussions have been held with Council regarding contributions.
Engineering design: <u>Stormwater Management</u> ▪ Stormwater drainage for the site must be in accordance with the following: o Mamre Road Precinct Draft DCP ▪ A stormwater concept plan, accompanied by a supporting report and calculations, shall be submitted with the application. ▪ As the site catchment is split, and pending the timing for adjoining development, drainage of the site may require an easement to drain water over downstream properties for any interim stormwater disposal. Evidence of owner's consent shall be provided with the application for the provision of the easement. The easement to drain water must be registered prior to the issue of an operational consent. Drainage easement widths shall be in accordance with Council's Stormwater Drainage Specification for Building Developments policy. ▪ The application is to demonstrate how stormwater discharge from the proposed development complies with the trunk drainage infrastructure as per Figure 6 of the Mamre Road Precinct Draft DCP. The application shall include concept stormwater plans for both the proposed development and the ultimate developed estate scenarios. ▪ The stormwater concept plan shall demonstrate how the development complies with the Mamre Road precinct Draft DCP water quality and water quantity controls for any interim and ultimate developments. ▪ A water sensitive urban design strategy prepared by a suitably qualified person is to be provided for the site. The strategy shall address water conservation, water quality, water quantity, and operation and maintenance. ▪ The application shall include MUSIC modelling (*.sqz file) demonstrating compliance with Council's adopted Water Sensitive Urban Design Policy and Technical Guidelines. ▪ Penrith City Council will not accept the dedication of any estate water quantity or water quality basins. Any estate drainage basins are to be maintained in perpetuity by the estate. It is Council's preference that all water quantity and water quality treatment be provided on the individual lots. Any on-site detention system or water quality system must be within common property and accessible from the street.	Refer to **Section 6.7** and **Appendices 8** and **20**.

Local Overland Flow Flooding ▪ The site flood affected by local overland flow flooding from the local catchment and has been coded as being subject to flood related development controls. ▪ The application must demonstrate that the development proposal is consistent with the Mamre Road Precinct Draft DCP Section 2.7 Flood Prone Land. ▪ The application must be accompanied by an Overland Flow Flood Report prepared by a suitably qualified person to assess the developments impacts upon overland flows. Overland flows shall be managed through the site in a safe manner. ▪ Further information regarding Council's Flood Studies is available from Council's website at the following address: https://www.penrithcity.nsw.gov.au/services/otherservices/floodplain-management	
Car Parking and Access ▪ Motor vehicle access for the south-eastern car park for Warehouse 9A and the southern car park for Warehouse 9B relies upon the shared use of a heavy vehicle access driveway off the internal estate road which is not supported. Car parking areas between the warehouses appears to be shared with heavy vehicle manoeuvring areas and is also not supported. Car parking areas along with pedestrian and vehicular access to all car parking areas shall be separated from heavy vehicle access and heavy vehicle manoeuvring areas for safety reasons.	Refer to **Appendices 4** and **9**.
Earthworks ▪ No retaining walls or filling is permitted for this development which will impede, divert or concentrate stormwater runoff passing through the site. ▪ The location and height of any retaining walls are to be included. The potential impact of any retaining walls upon future development of adjoining lands is to be considered. ▪ The application is to be supported by a geotechnical report prepared by a suitably qualified person and shall address, but not be limited to ground water movement, salinity, contamination and potential damage to adjoining public and private infrastructure during construction.	Refer to **Sections 6.6** and **6.7** and **Appendices 8, 20** and **28**.
Subdivision Works ▪ The application is to be accompanied by a subdivision concept plan.	Refer to **Appendix 4**.
Traffic management and road design:	Refer to **Appendices 4** and **29**.

▪ The proposed subdivision arrangement and indicated internal road network is inconsistent with the structure plan within the draft DCP and cannot be supported unless the NSW Government confirms acceptance and amends the road network structure plan in the Draft DCP. The proposal will need to respond to a setback alignment for the Addington Road reconstruction which has not been resolved and designed. Reliance on the existing easement extent in isolation is inadequate.	
▪ The Draft DCP has not yet been supported by details including traffic modelling, cut/fill strategy, road designs for alignments / cross sections / intersections, cost estimates, road and infrastructure delivery strategy and a contributions plan and staged development strategy.	Noted.
▪ If the proposal is intended to be pursued prior to the finalisation and adoption of Mamre Road Precinct DCP, then this application must itself address precinct wide traffic management and road design considerations including precinct wide traffic modelling. In addition a detailed cut/fill strategy, road designs for alignments / cross sections / intersections, cost estimates and a staged development strategy is required in support. This includes designs for all of the precinct collector / distributor / arterial roads and intersection (Mamre Rd/ Abbotts Rd / Aldington Rd / and link / collector roads). In summary the proposal must depict how the proposed road network will connect to adjoining lands in a form and arrangement that does not undermine or impact their respective development potential in accordance with the capability established via the exhibited Draft DCP for the Precinct. In the absence of a precinct wide roads study, a precautionary principle 'worst case scenario' proposal of connections and road hierarchy should be adopted until there is greater certainty.	Refer to **Sections 6.7** and **6.8** and **Appendices 8, 9** and **20.** The Proposed Development does not seek to undertake staged development.
The strategic transportation planning and modelling that should inform the development proposal (if pursued ahead of the DCP adoption) includes: - ○ Macro-modelling using Equilibrium Model/Multimodal Equilibrium(EMME) for the transportation corridors including Mamre Road, Bakers Lane , Southern Link Road, and Freight Corridor; meso-modelling using Aimsun or equivalent for the Mamre Precinct road network/micro-SIDRA for each intersection staged development triggers and ultimate Mamre Precinct; micro-modelling using SIDRA traffic modelling of the staged and ultimate future traffic movements to determine the required lane numbers, intersection types, lengths for turning lanes and associated lengths of merging and diverging tapers in accord with Austroads and TfNSW (RMS) guidelines. This shall include Transportation and Traffic modelling to the year 2036 or other year to be agreed by TfNSW and Council. ○ It is also critical that a commitment be given to delivering the Arterial Roads including Mamre Road and Southern Link Road, Freight Corridor and infrastructure. Also setting / coordinating / controlling delivery of the internal road networks including Aldington Road and Abbots Road in line with staged developments. ○ Bakers Lane, Abbotts Road and Aldington Road are currently local rural roads with poor horizontal and vertical alignment that are not suitable for constant heavy vehicle use.	Refer to **Sections 6.7** and **6.8** and **Appendices 8**, **9**, **20** and **29**.

○ The Mamre Road Precinct DCP will dictate road patterns, alignments, road widths, intersections, intersection treatments, cycle routes, cross sections, property dedications etc. Any development shall be consistent with the future Mamre Road Precinct DCP. ○ Any road shall be designed to accommodate B-Triple vehicles. ○ Cul-de-sacs are generally not supported. If they are to be considered, then they shall be designed to accommodate the turn movements of B-Triple vehicles. ○ Heavy vehicle driveway access is to be separate from motor vehicle driveway access from a public road. ○ The ultimate design of the Mamre Road / Precinct Roads / Bakers Lane / Aldington Road / Abbotts Road / other Development Road intersection being either sign priority or left in / left out or roundabouts or Traffic Control Signalised (TCS) treatments. If any prior staged development proposes to use this intersection prior to possible ultimate roundabouts or signalisation, then the interim stage treatment design shall be provided and show the time / development stage trigger and staged reconstruction connection to the ultimate design treatment.	
○ Mamre Road/Abbotts Road intersection, Abbotts Road/ Aldington Road/ Bakers Lanes/ Southern Link Road /Mamre Road link and Bakers Lane/Southern Link Road/ Mamre Road intersection works shall be informed by detailed plans, long sections and cross sections that define the required alignment, intersection works, major drainage and structures, widening, landscaping, earthworks, acquisition and levels. All proposed Road reconstruction and cross sections shall comply with the DCP including: • Provision of kerbside road shoulders for parking, breakdown vehicles, service vehicles, clear zones, buses and bicycles in addition to the required throughlanes each way in accord with Austroads guidelines. • Provision of a central median at least 5 metres wide. • Provision of verge widths to accommodate pathways and shared pedestrian pathways along each side. • Any required additional Left Turn Lanes are to be 3.5 metres wide and include an additional 2.0 metre wide through bicycle lane beside the parking / travel lane in accordance with Austroads guidelines. • All lanes are subject to additional widening to accommodate the turn paths of B-triple heavy vehicles at curves and intersections as determined by turn path design.	Refer to **Sections 6.7** and **6.8** and **Appendices 8**, **9**, **20** and **29**.

• Pedestrian kerb ramps and pedestrian gaps in the centre medians shall be provided at all approach road to intersections in accordance with Austroads, TfNSW and Council guidelines and requirements.	
▪ The proposed warehouse logistics hub development on the proposed lot may require amendment to respond to and comply with an agreed road network that stems from the above required analysis. Further, the heavy vehicle driveway access and aisle movements must be separate from light vehicle driveways and aisle movements to address safety considerations. There should also be at least a 1.8m wide accessible path from the road reserve / footpath to the buildings and from the car parking to the buildings.	Refer to **Appendices 4** and **9**.
▪ A Traffic Assessment should be provided which addresses the impact of traffic generated by the ultimate development on the Mamre Road Precinct road network and the development's fit with the Mamre Road Precinct Masterplan, DCP and staged delivery of road network infrastructure as well as the type and volume of heavy vehicles accessing the development, assessment of staff and visitor parking and heavy vehicle access and turning swept paths, bicycle end of journey facilities and electric vehicle charging stations in accordance with AS 2890.1, AS 2890.2, TfNSW (formerly RMS) guidelines and Council Development Control Plan C10 / Mamre Road Precinct DCP and Council requirement.	Refer to **Appendix 9**.
▪ The development should be informed by a Transportation Mobility and Access Plan (TMAP – of the road, path, bicycle and bus network and infrastructure). This is recommended to inform engineering designs and documentation of the precinct road network including Aldington Road, Bakers Lane, Mamre Road, Abbotts Road and internal roads and intersections.	Refer to **Appendix 9**.
▪ The engineering plans and documents should include staged works as required, development trigger points, horizontal and vertical alignments, longitudinal sections, cross sections, widening for cut / fill batters, major drainage and stormwater structures and widening, public utilities, land acquisition plans and estimates of costs.	Refer to **Appendix 20**.
▪ The engineering plans and documents can inform the assessment of the traffic impact of this development on the road network, the required works to accommodate this traffic impact, the fit of this development with the staged development of the precinct and the required precinct roads and infrastructure delivery plan contributions and/or works in kind to be developed and managed by either/or DPIE, Council and / or land owners.	Refer to **Appendices 9** and **20**.
Waste management: ▪ The following controls relate to developments outlined within Part D – Land Use Controls of the Penrith Development Control Plan 2014 o Waste collection vehicles proposed to service commercial and industrial developments are to be designed in accordance with the vehicle specifications outlined in section 3.5 of the 'Industrial, commercial and mixed-use waste management guideline' document. o The vehicle must be able to safely and efficiently access the site and the nominated collection point to perform on-site waste collection. There must be sufficient manoeuvring area on-site to allow the collection vehicle to enter and exit the site in a forward direction and service the development efficiently with little or no need to reverse.	Refer to **Appendices 9** and **22**.

○ Swept path models to be provided illustrating how a standard waste collection vehicle (section 3.5) will enter, service and exit the site. A 0.5m unobstructed clearance is required from all obstructions for the vehicle's ingress and egress maneouvres. The model to provide on-street parking on both sides of the road adjacent to the development to demonstrate unobstructed access during a 'business as usual' configuration. ○ All development applications should be submitted with accompanying 'Plan of Operations', outlining proposed; Bin Infrastructure Sizes, Collection Frequency, Waste Collection Vehicle Dimensions, Hours of Collection and Access to Waste Collection Room. ○ Waste collection infrastructure to be provided in accordance with section 3.1 of the 'Industrial, commercial and mixed-use waste management guideline' document. ○ Proposed generates rates for respective developments are required to be provided to permit waste collection in accordance with section 3.3 of the 'Industrial, commercial and mixed-use waste management guideline' document. ○ For commercial and industrial waste streams that are not outlined in section 3.3, supporting documentation is required to validate the proposed volumes for the respective waste streams. ○ All developments are required to provide a waste collection room integrated wholly within the developments-built form to permit a safe and efficient waste collection service. The room will to incorporate infrastructure into its design in accordance with section 3.4 of the 'Industrial, commercial and mixed-use waste management guideline' document. ○ For further specific waste operational and infrastructure information refer to the 'Industrial, commercial and mixed-use waste management guideline' document attached: https://www.penrithcity.nsw.gov.au/Building-andDevelopment/Development-Applications/Forms/	

Table 11 NSW Department of Planning, Industry & Environment – Central (Western) Team Key Issues for Assessment	
Key Issues	**Response**
General Requirements	
▪ The EIS, concept plan and supporting plan must demonstrate that the development will be consistent with the provisions within the WSEA SEPP and the draft Mamre Road DCP. Sufficient detail in architectural plans, landscape plans and supporting reports should be provided as part of the EIS to demonstrate compliance. This includes: ○ Building controls such as setbacks, built form, landscaping and height controls.	Refer to **Appendices 4** and **29**.

○ The management of flood prone lands as it applies the DCP	Refer to **Appendices 8** and **20**.
○ The management of riparian lands as it applies to the DCP	Refer to **Section 6.12** and **Appendix 10**.
○ How matters of stormwater management and flood risk address the integrated water cycle management as set out in the Mamre Road DCP.	Refer to **Section 6.7** and **Appendix 8**.
○ Demonstration that the proposal does not impede the functioning of the trunk drainage infrastructure across the site to the satisfaction of the trunk drainage manager.	Refer to **Section 6.7** and **Appendices 8** and **20**.
○ Areas of known and potential Aboriginal heritage and their management	Refer to **Section 6.14** and **Appendix 17**.
○ Demonstration of how the proposal will support the internal road pattern for the Mamre Road precinct and achieve performance objectives relating to transport as specified in the Mamre Road DCP. It is noted that the site adjoins Aldington Road which is a distributor road under the draft DCP, Aldington Road is access denied and the development should allow for road widening to cater for future intersections, road widening for a 30.6m road corridor and adequate landscape setback in line with the draft DCP controls.	Refer to **Section 6.8** and **Appendices 9** and **29**.
○ How bulk earthworks and the road pattern were prepared to connect to adjoining sites to enable their feasible development for industrial purposes (as proposed in the WSEA SEPP amendment and Structure Plan). In this regard, Stage 1 should include roads being deliver to adjoining lots.	Refer to **Section 6.7** and **Appendix 20**.
○ Demonstrate how the proposal considers the physical and natural features of the site and the immediate surrounding area and provides a streetscape design and landscaped transition to the public realm that is consistent with the Mamre Road DCP.	Refer to **Section 6.3** and **Appendices 6** and **7**.
○ The EIS must include a plan for vegetation management which includes the identification any trees to be removed and trees to be retained or transplanted; and, demonstrates how the landscape design will contribute to the Greater Sydney Regional Plan canopy cover.	Refer to **Appendix 6**.
○ The EIS must demonstrate how views and visual impacts relating to the site will be maintained as specified in the Mamre Road DCP.	Refer to **Section 6.3** and **Appendices 7** and **29**.
▪ The Western Sydney Aerotropolis SEPP is also a matter for consideration. This includes particular development controls regarding referrals and airport safeguarding requirements that extend to this land. The obstacle limitation surface development controls apply, which may impact on building design, including height.	Refer to **Sections 4.2.8** and **6.11** and **Appendix 26**.
▪ Agencies to be consulted: ○ TfNSW (Freight and Road) ○ NRAR ○ Sydney Water ○ Airport Operator (where relevant) ○ DPIE (Central Western) team ○ DPIE (Green and Resilient Places, Biodiversity Planning)	Refer to **Part E** and **Appendix 26**.

▪ State and Local infrastructure contributions will apply. Relevant State agencies and Penrith City Council should be consulted with regarding this matter.	Noted. Ongoing discussions have been undertaken with DPIE and Council regarding the VPA offer.
▪ The applicant should consult with DPIE Infrastructure and Place regarding the preparation of a VPA with the Minister for Planning and Public Spaces to satisfy the requirements of Clause 29 of the WSEA SEPP for the provision of regional transport infrastructure.	Noted. The VPA process has been initiated with DPIE and the Proponent is currently awaiting feedback from DPIE.
Comments provided in letter received on 18 June 2021	
▪ The master plan for SSD 17552047 should demonstrate compliance with the Mamre Road Precinct DCP and the WSEA SEPP. Should the EIS be lodged prior to the finalisation of the DCP, the master plan should demonstrate compliance with the exhibited draft DCP. The EIS, concept plan and supporting plans must be supported with sufficient detail in architectural plans, landscape plans and supporting reports to demonstrate compliance.	Refer to **Appendices 4** and **29**.
▪ High quality built form, setbacks and earthworks, including landscaped retaining walls and setbacks, should be provided to the public domain, consistent with the Mamre Road DCP. Retaining walls should be minimised on the public domain interface (including public roads).	Refer to **Appendices 4**, **20** and **29**.
▪ Demonstrate how matters of stormwater management and flood risk address the integrated water cycle management as set out in the draft Mamre Road DCP and meet the requirement of Clause 33L of the WSEA SEPP. It is noted that trunk drainage B07 flows across Lots 25, 26 and 27 of DP 255560 and trunk drainage D05 flows north west from Lot 28 DP 255560.	Refer to **Appendices 8** and **20**.
▪ Demonstrate that the proposal does not impede the functioning of the trunk drainage infrastructure across the site to the satisfaction of the trunk drainage manager.	Refer to **Appendices 8** and **20**.
▪ Demonstrate that the access roads as depicted in the proposed master plan, link into and support the road network and hierarchy for the Mamre Road Precinct as described in the Mamre Road DCP. Roads identified to connect with adjoining properties should be delivered as part of the first stage of the development. Road levels must consider the existing levels and road level connections on adjoining properties.	Refer to **Appendices 4**, **9** and **20**.
▪ The site adjoins Aldington Road which is a distributor road under the draft DCP. Aldington Road is access denied and the development should allow for road widening to cater for future intersections, road widening for a 30.6m road corridor and adequate landscape setback in line with the draft DCP controls.	Refer to **Appendices 4**, **6** and **9**.
▪ Bulk earthworks must demonstrate compliance with Clause 33H of the WSEA SEPP. This includes demonstration of how bulk earthworks will be prepared to connect to adjoining sites to enable their feasible development.	Refer to **Section 4.2.7**, **Appendices 20** and **28**.
▪ Demonstrate how the proposal considers the physical and natural features of the site and the immediate surrounding area and provides a streetscape design and landscaped transition to the public realm that is consistent with the Mamre Road DCP.	Refer to **Part B** and **Appendices 4** and **6**.
▪ Demonstrate how the views and visual impacts relating to the site will be maintained as specified in the Mamre Road DCP.	Refer to **Section 6.3** and **Appendix 7**.

Table 12 Western Sydney Airport Key Issues for Assessment	
Key Issues	**Response**
General Requirements	
General Comments	
▪ The future Development Application needs to have regard for relevant provisions of *State Environmental Planning Policy (Western Sydney Aerotropolis) 2020,* with particular focus on the provisions of Part 3 of the Aerotropolis SEPP.	Refer to **Section 4.2.8** and **Appendix 25**.
▪ Detail should be provided to ensure that the development will not interfere with the protected airspace of Western Sydney Airport.	Refer to **Section 4.2.8** and **Appendix 25**.
Wildlife Attraction	
▪ Given that the site is within 3-8km wildlife buffer, consideration needs to be given to the landscape species selected, to ensure that wildlife attraction risk is adequately addressed.	Refer to **Section 4.2.8** and **Appendices 6** and **25**.
▪ Any proposed fill should be detailed, noting the fills uses need to be non-putrescible.	Refer to **Sections 6.6** and **6.7** and **Appendices 8, 20** and **28**.
▪ Waste Management measures should be detailed, including measures to mitigate wildlife attraction (e.g. storage of waste indoors).	Refer to **Appendices 21** and **25**.
Traffic	
▪ Potential traffic impacts from the proposed development should be considered on a cumulative scale, taking into account projects being undertaken concurrently including other projects in the Mamre Road Precinct, the M12 Motorway, Sydney Metro Western Sydney Airport and Western Sydney Airport.	Refer to **Section 6.8** and **Appendix 9**.

Table 13 Western Sydney Planning Partnership Key Issues for Assessment	
Key Issues	**Response**
General Requirements	
Strategic Planning Context	
The subject site at No's 155-217 Aldington Road, Kemps Creek is located within the Mamre Road precinct of the Western Sydney Aerotropolis. The site is identified for future employment land under the Western Sydney Aerotropolis Plan (WSAP). The land is zoned IN1 General Industrial under the State Environmental Planning Policy (Western Sydney Employment Area) 2009 (WSEA SEPP). The proposed development is a permitted use with consent under the IN1 zone.	Noted.
Application assessed against the Western Sydney Aerotropolis State Environmental Planning Policy (Aerotropolis SEPP)	
Whilst the land is zoned under the WSEA SEPP, certain provisions of the State Environmental Planning Policy - Western Sydney Aerotropolis 2020 (Aerotropolis SEPP) apply to the site. The Aerotropolis SEPP applies to the site for the purpose of aligning the strategic objectives and Western Sydney Aerotropolis Plan and to also protect the future operations of the airport with airport safeguarding provisions.	Noted.

Part 3 Development controls—Airport safeguards The applicant must ensure that the proposal is consistent with aviation safeguarding requirements contained within the Western Sydney Aerotropolis Planning Package. This includes the Western Sydney Aerotropolis Plan and the State Environment Planning Policy (Western Sydney Aerotropolis) 2020 (Aerotropolis SEPP). More specifically, the applicant shall address Section 5 (Safeguarding the 24-hour airport) of the Western Sydney Aerotropolis Plan and Part 3 (Development Controls-Airport safeguard) of the Aerotropolis SEPP. It is noted that the subject site is situated north-east of the future Western Sydney International Airport and falls within the Australian Noise Exposure Forecast (ANEF) 20-25 contour. The proposed use for a warehouse and distribution centre is an acceptable development within these contours. The site is also within the 8 km wildlife buffer zone on the Wildlife Buffer Zone Map of the SEPP and careful consideration must be given to any proposed vegetation or landscaping to minimise wildlife attraction as per Clause 21 of Part 3 of the Aerotropolis SEPP.	Refer to **Sections 4.2.8** and **4.3.3** and **Appendix 25**.

Wildlife Management Please note, in accordance with Clause 21(2) of the Aerotropolis SEPP, development consent must not be granted to relevant development on land in the 13 km wildlife buffer zone unless the consent authority— a) has consulted the relevant Commonwealth body, and b) has considered a written assessment of the wildlife that is likely to be present on the land and the risk of the wildlife to the operation of the Airport provided by the applicant, which includes: i. species, size, quantity, flock behaviour and the particular times of day or year when the wildlife is likely to be present, and ii. whether any of the wildlife is a threatened species, and iii. a description of how the assessment was carried out, and c) is satisfied that the development will mitigate the risk of wildlife to the operation of the Airport, including, for example, measures relating to— i. waste management, landscaping, grass, fencing, stormwater or water areas, or ii. the dispersal of wildlife from the land by the removal of food or the use of spikes, wire or nets Further, in accordance with Clause 21(4) of the Aerotropolis SEPP, relevant development means development for the following purposes— a) agricultural produce industries, b) aquaculture, c) camping grounds, d) eco-tourist facilities, e) garden centres, f) intensive livestock agriculture, g) intensive plant agriculture, h) livestock processing industries, i) plant nurseries, j) recreation facilities (major), k) recreation facilities (outdoor), l) sewage treatment plants, m) waste or resource management facilities that consist of outdoor processing, storage or handling of organic or putrescible waste, n) water storage facilities. It is unlikely the proposal relates to any of the relevant development listed above, therefore consideration must be given to Clause 21 of the Aerotropolis SEPP. However, the proponent will need to demonstrate compliance with this Clause of the SEPP.	Refer to **Section 4.2.8** and **Appendix 25**.
Application assessed against the Western Sydney Aerotropolis Plan (WSAP)	

The WSAP establishes a vision, objectives and principles for the development of the Aerotropolis. The Mamre Road precinct is generally identified for industrial uses and may initially support the infrastructure that enables the construction of the Airport and Aerotropolis. Page 70 of the WSAP outlines the key considerations, strategic outcomes and implementation strategies for the Mamre Road Precinct and an assessment of the proposal against this is requested. An analysis of the proposal should also be given against the Aerotropolis planning principles contained in the Appendix (pages 92-94).	Refer to **Section 4.3.3** and **Appendix 25**.

Table 14 Transport for NSW Key Issues for Assessment	
Key Issues	**Response**
General Requirements	
Transport and Accessibility	
Provide a transport and accessibility impact assessment, which includes, but is not limited to the following: 1. Details of all traffic types and volumes likely to be generated by the proposed development during construction and operation, including a description of haul route origins and destinations, including: a. Daily inbound and outbound vehicle traffic profile by time of day and day of week (if travel patterns differ across the week); b. Site and traffic management plan on how to manage number of vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the surrounding road network; c. Detailed plan of proposed layout of internal road network to demonstrate that the site will be able to accommodate the most productive vehicle types and parking on site in accordance with the relevant Australian Standard and Council's Development Control Plan; d. Plans detailing how the proposed development connects to adjoining sites to facilitate their future development for their intended purposes; e. demonstrate compliance with the Western Sydney Employment Area State Environmental Planning Policy, Part 6; clause 33C; Development within the Mamre Road Precinct; specifically: i. integration with the Mamre Road Precinct dedicated freight corridor (DFC), including provision for access from the DFC to the entire estate. The applicant should continue to liaise with TfNSW to ensure the DFC is incorporate; f. Swept path diagrams to demonstrate vehicles entering, exiting and manoeuvring throughout the site; g. An assessment of the forecast impacts on traffic volume generated on road safety and capacity of road network including consideration of cumulative traffic impacts at key intersections using SIDRA or similar traffic model as prescribed by TfNSW (former Roads and Maritime). The traffic modelling should consider the scenarios of year 2026, 2031, 2036. These should include, but not be limited to: i. Mamre Road at Bakers Lane (Aldington Road); and	Refer to **Section 6.8** and **Appendix 9**.

ii. Mamre Road at Abbotts Road. h. An assessment of potential impact on load road pavement lifespan including: i. Aldington Road/ Bakers Lane/ Abbotts Road; and ii. Mamre Road. i. To ensure that the above requirements are fully addressed, an assessment of the predicted impacts of this traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts at key intersections using SIDRA or similar traffic model. This is to include the identification and consideration of approved and proposed developments/planning proposals/road upgrades in the vicinity. The assessment needs to consider the impact on Aldington Road for the duration of the works because traffic growth in this area is expected to increase more quickly than standard growth rates; j. details of road upgrades, infrastructure works, or new roads or access points required for the development; k. details of travel demand management measures to minimise the impact on general traffic and bus operations, including details of a location-specific sustainable travel plan (Green Travel Plan and specific Workplace Travel Plan) and the provision of facilities to increase the non-car mode share for travel to and from the site; l. details of the adequacy of existing public transport or any future public transport infrastructure within the vicinity of the site, pedestrian and bicycle networks and associated infrastructure to meet the likely future demand for the proposed development; and m. measures to integrate the development with the existing/future public transport network. n. The preparation of a preliminary Construction Pedestrian and Traffic Management Plan (CPTMP) to demonstrate the proposed management of the impact in relation to construction traffic addressing the following: i. assessment of cumulative impacts associated with other construction activities (if any); ii. an assessment of road safety at key intersection and locations subject to heavy vehicle construction traffic movements and high pedestrian activity; iii. details of construction program detailing the anticipated construction duration and highlighting significant and milestone stages and events during the construction process; iv. details of anticipated peak hour and daily construction vehicle movements to and from the site; v. details of on-site car parking and access arrangements of construction vehicles, construction workers to and from the site, emergency vehicles and service vehicle; vi. vi. details of temporary cycling and pedestrian access during construction. 2. Traffic Counts: TfNSW requests that any counts undertaken are not within close proximity to the school holidays/long weekend. Counts undertaken within close proximity to these events may not indicate normal traffic conditions. Ideally vehicle counts should be undertaken during a typical day, to include Thursday (or Wednesday) and Friday for the study (not near school/public	

holidays). This will provide the departments with an accurate understanding of the existing traffic conditions and the actual impact of this development application to the surrounding network. Should the date of the counts be within a week either side of the above events, it will be recommended that new counts are undertaken at more appropriate dates and are to include a breakdown of light and heavy vehicles.	
Flooding	
The EIS shall: ▪ Provide a flood impact assessment to understand the potential impacts of the development on flood evacuation is to be carried out. To assess the impacts of the proposed development, information for pre and post-development scenarios including modelling of the local overland flows are to be provided to allow assessment of the impact of the development.	Refer to **Section 6.7** and **Appendices 8** and **20**.
Statutory and Strategic Framework	
The applicant is to demonstrate that the proposal is generally consistent with all relevant environmental planning instruments including: ▪ State Environmental Planning Policy (Western Sydney Employment Area) 2009 Amendment ▪ State Environmental Planning Policy (Infrastructure) 2007 ▪ Draft State Environmental Planning Policy (Western Sydney Aerotropolis) In addition (but not limited to) the following plans and reports: ▪ Future Transport 2056 and supporting plans ▪ Guide to Traffic Generating Developments (Roads and Maritime Services, 2002). ▪ Freight and Ports Plan 2018-2023 ▪ Guidelines for Planning and Assessment of Road Freight Access in Industrial Areas. ▪ Cycling Aspects of Austroads Guides. ▪ NSW Planning Guidelines for Walking and Cycling (Department of Infrastructure, Planning and Natural Resources (DIPNR), 2004). ▪ Guide to Traffic Management Part 12: Integrated Transport Assessments for Developments (Austroads, 2020). ▪ Australian Standard 2890.3 Parking facilities, Part 3: Bicycle parking (AS 890.3). ▪ Draft Mamre Road Precinct Structure plan - Local Road Network Structure Plan ▪ Mamre Road Upgrade Strategic Design Report (2016) ▪ Mamre Road Upgrade Strategic Design Plans ▪ Southern Link Road Strategic Design Plans	Refer to **Sections 4.2.6**, **4.2.7**, **4.2.8** and **Appendix 9**.
Consultation	
During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular you must consult with:	Noted. A consultation letter was issued to TfNSW on 29 April 2021. Response to the comments provided by

▪ Transport for NSW	TfNSW as part of the SEARs is provided in this Section.

Table 15 NSW DPIE Water and Natural Resources Access Regulator Key Issues for Assessment	
Key Issues	**Response**
General Requirements	
The SEARS should include: ▪ The identification of an adequate and secure water supply for the life of the project. This includes confirmation that water can be sourced from an appropriately authorised and reliable supply. This is also to include an assessment of the current market depth where water entitlement is required to be purchased. ▪ A detailed and consolidated site water balance. ▪ Assessment of impacts on surface and ground water sources (both quality and quantity), related infrastructure, adjacent licensed water users, basic landholder rights, watercourses, riparian land, and groundwater dependent ecosystems, and measures proposed to reduce and mitigate these impacts. ▪ Proposed surface and groundwater monitoring activities and methodologies. ▪ Consideration of relevant legislation, policies and guidelines, including the NSW Aquifer Interference Policy (2012), the Guidelines for Controlled Activities on Waterfront Land (2018) and the relevant Water Sharing Plans (available at https://www.industry.nsw.gov.au/water).	Refer to **Section 6.19** and **Appendix 23**.

Table 16 NSW DPI – Fisheries Key Issues for Assessment	
Key Issues	**Response**
A: General Requirements	
▪ site address and contact details ▪ property description (e.g. Lot and DP numbers) ▪ a clear description of the proposal including details of construction methods and materials ▪ map(s) of the development area and adjacent areas - this should include nearby waterways, adjacent infrastructure (such as jetties) and land use ▪ clear photographs of the site (at low and high tide in estuaries), including photographs of any riparian and aquatic vegetation present (including pest species such as Caulerpa taxifolia) ▪ location of any oyster leases or other aquaculture facilities and recreational and commercial fishing areas within the subject waterway ▪ a description of the potential direct and indirect impacts on aquaculture, commercial and recreational fishing from the development ▪ a clear description of the physical and hydrological features of the development area (which may extend upstream and downstream of the development site in the case of flowing rivers or tidal waterways) ▪ approximate depth contours within 20 metres of the proposal	Refer to **Sections 1.1, 1.3, 2.1, 2.2, 3.2, 6.12** and **Part G** and **Appendices 3, 8, 10** and **20.**

▪ a clear description of aquatic environments including: - fish in the locality, including threatened and protected species, populations, ecological communities, - pest species or presence of 'critical habitat' under the FM Act or EPBC Act - an aquatic and riparian vegetation survey map of the area which shows the location and/or coverage - of saltmarsh, mangrove, seagrass, macroalgae, macrophytes, riparian vegetation and snags - description of aquatic habitat TYPE on site (see Table 1 in the P&GLs) - description of the waterway CLASS (see Table 2 in the P&GLs) ▪ details of the nature, timing, magnitude and duration of the proposed disturbance to the aquatic environment ▪ assessments of predicted impacts upon any threatened species (fish and marine vegetation) (i.e. completion of a 7 part test and/or species impact statement(s)) and other aquatic flora and fauna ▪ details of any mitigation measures to limit environmental impacts ▪ details of the general regional context, any protected areas, other developments in the area, and/or cumulative impacts ▪ a copy of the land owner's consent where relevant ▪ notification of any other matters relevant to the proposal and of interest to NSW DPI	
Dredging and reclamation activities	
▪ purpose of works ▪ type(s) and distrbution of marine vegetation in the vicinity of the proposed works ▪ method of dredging to be used ▪ timing and duration of works ▪ dimension of area of works including levels and volume of material to be extracted or placed as fill ▪ nature of sediment to be dredged, including Acid Sulphate Soil, contaminated soils etc ▪ method of marking area subject to works ▪ environmental safeguards to be used during and after works ▪ measures for minimising harm to fish habitat under the proposal ▪ spoil type and source location for reclamation activities ▪ method of disposal of dredge material ▪ location and duration of spoil stockpiling, if planned	Refer to **Sections 6.5**, **6.6, 6.7** and **6.12** and **Appendices 10, 11**, **12** and **28**.
Activities that damage marine vegetation	
▪ type of marine vegetation to be harmed ▪ map and density distribution of marine vegetation ▪ reasons for harming marine vegetation ▪ methods of harming marine vegetation ▪ construction details ▪ duration of works/activities ▪ measures for minimising harm to marine vegetation under the proposal and details of compensatory habitat development to replace lost vegetation.	The Proposed Development does not involve harm to marine vegetation. Refer to **Appendix 10**.

▪ method and location of transplanting activities or disposal or marine vegetation.	
Activities that block fish passage	
▪ type of activity eg works in a stream that change flow or morphological characteristics ▪ length of time fish passage is to be restricted ▪ timing of proposed restriction ▪ remediation works	Refer to **Sections 6.5** and **6.12** and **Appendices 10, 11** and **12**.
B: Aquatic habitat assessment C: Aquatic fauna assessment D: Assessment of likely impacts E: Ameliorative measures	Refer to **Section 6.12** and **Appendix 10**.

Table 17 Sydney Water Key Issues for Assessment	
Key Issues	**Response**
Water and Wastewater Servicing	
▪ The proponent, Frasers Property, has engaged a Water Servicing Coordinator (WSC) and submitted a feasibility application under case number 190802. Sydney Water will continue to liaise directly with the proponent via this case and any future cases. ▪ We note there are currently capacity constraints in the Cecil Park Water Supply Zone (WSZ), and that this development may be dependent on delivery of trunk potable water infrastructure by a separate developer as well as Sydney Water. ▪ Currently, no wastewater servicing is available to the site. Sydney Water plans to deliver Stage 1 wastewater to service this catchment within Mamre Road precinct by about mid-2023.Future stages will be delivered in line with growth within the precinct. ▪ Where high-water users are identified, commercial agreements or further studies may be required.	Noted. Refer to **Section 6.19** and **Appendix 23**.
Recycled Water	
▪ Sydney Water supports recycled water in this precinct. Sydney Water wrote to DPIE in December 2020 to notify our intent to supply recycled water to this precinct from the new Upper South Creek Advanced Water Recycled Centre. Sydney Water recycled water (DSP) charges are to be confirmed. ▪ We will continue to work with the developer to progress a suitable recycled water solution for the proposed development. ▪ Construction of recycled water reticulation mains on-site should be in accordance with Sydney Water requirements.	Noted. Refer to **Section 6.19** and **Appendix 23**.
Water-related Infrastructure Requirements	
1. The proponent of development should determine service demands following servicing investigations and demonstrate that satisfactory arrangements for drinking water, wastewater, and recycled water (if required) services have been made. 2. The proponent must obtain endorsement and/or approval from Sydney Water to ensure that the proposed development does not adversely impact on any existing water, wastewater or stormwater main, or other Sydney Water asset, including any easement or property. When determining landscaping options, the proponent should take into account that certain tree species can cause cracking or blockage of Sydney Water pipes and therefore should be avoided.	Refer to **Section 6.19** and **Appendix 23**.

3. Strict requirements for Sydney Water's stormwater assets (for certain types of development) may apply to this site. The proponent should ensure that satisfactory steps/measures been taken to protect existing stormwater assets, such as avoiding building over and/or adjacent to stormwater assets and building bridges over stormwater assets. The proponent should consider taking measures to minimise or eliminate potential flooding, degradation of water quality, and avoid adverse impacts on any heritage items, and create pipeline easements where required. 4. As this development creates trade wastewater, Sydney Water has trade wastewater requirements which need to be met. By law, the property owner must submit an application requesting permission to discharge trade wastewater to Sydney Water's sewerage system. The proponent must obtain Sydney Water approval for this permit before any business activities can commence. Given this development comprises industrial operations, wastewater may discharge into a sewerage area that is subject to wastewater reuse. Please contact Sydney Water's Business Customer Services to send your permit application or to find out more information. They can be contacted at the following email address: businesscustomers@sydneywater.com.au.	
Integrated Water Cycle Management	
5. The proponent should outline any sustainability initiatives that will minimise/reduce the demand for drinking water, including any alternative water supply and end uses of drinking and non-drinking water that may be proposed, and demonstrate water sensitive urban design (principles are used), and any water conservation measures that are likely to be proposed. This will allow Sydney Water to determine the impact of the proposed development on our existing services and required system capacity to service the development.	Refer to **Section 6.21** and **Appendix 19**.

Table 18 WaterNSW Key Issues for Assessment	
Key Issues	**Response**
The development will need to consider the downstream impacts on the Pipelines corridor, specifically surface water flow properties for pre- and post-development scenarios. It is a WaterNSW requirement that post-development flows that enter or are conveyed across the Pipelines corridor must be equal to or less than the pre-development flows for each storm event up to and including 1% AEP event.	Refer to **Section 6.7** and **Appendices 8** and **20**.
WaterNSW requests the following points be included in the SEARs and addressed in the subsequent Environmental Impact Statement (EIS) for the proposal, as this will assist WaterNSW to determine any potential impact on the downstream Warragamba Pipelines Corridor. ▪ Consideration of the Mamre Road Precinct planning controls and objectives, including a detailed assessment against the provisions of the Draft Mamre Road Precinct DCP and how they will be achieved.	Refer to **Appendix 29**.
▪ An assessment of the impacts of the proposed development on hydrology. The EIS should include a water balance that models pre- and post-development flows that enter and leave the site, including volume, frequency and quality of discharges.	Refer to **Section 6.7** and **Appendix 29**.
▪ The EIS should include a stormwater management strategy that ensures safe and appropriate management and disposal stormwater without negative impacts on downstream or neighbouring allotments.	Refer to **Section 6.7** and **Appendix 29**.

Table 19 Environment Protection Authority (EPA) Key Issues for Assessment	
Key Issues	**Response**
Key Environmental Issues	
1. EPA Licensing and Regulation The proponent should undertake a review of all activities associated with the development and document any EPA licensing requirements. The proponent should consult the EPA's Guide to Licensing to assess whether any activities undertaken at the premises will require licencing. The supporting information states that no activities may require licencing. It is important that any licencing considerations should be assessed once more detailed understanding of the proposal is available. For example, while the supporting information states that some hazardous substances will be stored on the site, activities that involve the capacity to store more than 20 tonnes (pressurised gases), 200 tonnes (liquefied gases) or 2,000 tonnes (chemicals in any other form) would require licensing as "Chemical Storage" under the Protection of the Environment Operations Act 1997 (POEO Act). Section 47 of the POEO Act defines scheduled development work as 'work at any premises at which scheduled activities are not carried on that is designed to enable scheduled activities to be carried on at the premises'. Under Section 47 of the POEO Act it is an offence for scheduled development work to be undertaken without an EPL.	Refer to **Section 6.16** and **Appendix 14**.
2. Water Quality The environmental outcome for the project should ensure: ▪ there is no pollution of waters (including surface & groundwater) except in accordance with an EPL ▪ provides development that maintains or restores the community's environmental uses and values of water through the achievement of the relevant NSW Water Quality and Flow Objectives ▪ promotes integrated water cycle management that optimises opportunities for sustainable water supply, wastewater and stormwater management and reuse initiatives where it is safe and practicable to do so ▪ bunding is designed in accordance with the EPA's Bunding and Spill Management Guidelines. The EIS should document how the above outcomes will be achieved. The EIS should also include but not necessarily be limited to the following matters: ▪ Details on proposed stormwater management at the site including integrated water cycle management/water sensitive urban design, first flush systems etc. ▪ Provide a description of the receiving waters including measures to ensure the achievement of the relevant NSW Water Quality and Flow Objectives in particular, how the proposal will support waterway health outcomes being sought for Winanamatta- South Creek (See WS Draft Aerotropolis Precinct Plan)	Refer to **Sections 6.5** and **6.7** and **Appendices 8, 11, 12** and **20**.

▪ Provide information on any water discharges including location, volumes, water quality, monitoring programs and frequency of discharge. ▪ Describe the nature and degree of any likely impacts that the proposed project may have on the receiving environment. This should include a characterisation of potential water pollutants at the site and any associated mitigation and management measures. ▪ Demonstrate that all practical options to avoid discharge have been implemented and environmental impact minimised where discharge is necessary. ▪ Information on any stormwater reuse, retention and detention strategies including measures to minimise impervious areas to minimise impacts on the hydrological (flow) regime of receiving waterways. ▪ Describe how stormwater will be managed during the construction phase. The proponent should provide a commitment in the EIS that a Soil and Water Management Plan will be developed and implemented prior to construction in accordance with the Managing urban stormwater: soils and construction, vol. 1 (Landcom 2004) and vol. 2 (A. Installation of services; B. Waste landfills; C. Unsealed roads; D. Main Roads; E. Mines and quarries) (DECC 2008). ▪ Identify any potential risks of salinity at the site and document appropriate management strategies to inform the design and construction of the proposal. This should include options including minimising any disturbance to the soil profile.	
<u>Sewage Management</u> There appears to be no information provided regarding connection of the proposed development to the existing Sydney Water sewerage system. The EPA recommends that the proponent document in the EIS discussions with Sydney Water regarding this connection and whether it can cater for any new loads. Information should also be sought on whether any additional load will impact the system's environmental performance especially in relation to sewage overflows from any existing sewage pumping stations and discharges from any associated sewage treatment plant. The EPA's policy is that for new systems there should be no pollution of waters as a result of overflows during dry weather and that overflows during wet weather should be avoided.	Refer to **Section 6.19** and **Appendix 23**.
3. Air Quality The environmental outcome for the project should ensure: ▪ emissions do not cause adverse impact upon human health or the environment ▪ no offensive odour beyond the boundary of the premises ▪ compliance with the requirements of the POEO Act and its associated regulations ▪ maintains or improves air quality to ensure National Environment Protection Measures for ambient air quality are not compromised ▪ any dust emissions are prevented or minimised. The EIS should document how the above outcomes will be achieved.	Refer to **Section 6.11** and **Appendix 13**.

The EPA recommends that an Air Impact Assessment must be prepared in accordance with the Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in New South Wales. A thorough assessment needs to be undertaken of the proposed activities at the site to assess the impact of any air emissions and the adequacy of proposed air pollution controls. This should include but not necessarily be limited to information on the following matters: ▪ characterization of any emissions (including any fugitive emissions) for example NOx, VOCs, ▪ particles and odours ▪ best practice management measures to control emissions ▪ any cumulative impacts. In particular back up power generation of electricity with diesel equipment can also be a source of PM10, PM2.5 and NOx. In this regard if the proposal involves back up power generation of electricity with diesel equipment that has the capacity to burn more than 3 megajoules of fuel per second, the EIS should document a best practice review of reasonable and feasible diesel emission reduction technology. Off road transport sources (particularly diesel engines) can be a source of PM10, PM2.5 and NOx. Opportunities that involve the adoption of best practices to achieve the lowest possible emission standard for these pollutants should be assessed. The EPA recommends that any off road equipment or plant should achieve the specifications or be consistent with the specifications listed on page 16 of the NSW Government Resource Efficiency Policy, (OEH 2019). The EIS should detail measures to prevent or minimise air pollution during construction and operation. The EIS should include a commitment that the proponent will develop and implement an Air Quality Management Plan prior to construction. This plan should include but not necessarily be limited to the following requirements: ▪ Identify all major sources of air emissions and associated mitigation measures to ensure air ▪ pollution is prevented or minimised ▪ Describe protocols for regular maintenance of plant and equipment ▪ Outline procedures for monitoring and reporting air emissions ▪ Describe measures to regularly review the effectiveness of air pollution control measures.	
4. Noise and Vibration The environmental outcome of the project should be to minimise adverse impacts due to noise and vibration from the development. The EIS must clearly outline the noise mitigation, monitoring and management measures the proponent intends to apply to the project to minimise noise and vibration impacts during construction and development of the site. The assessment should be undertaken in accordance with the NSW Noise Policy for Industry (NPfI). In particular the assessment should include, but not necessarily limited to the identification and assessment of all potential noise sources associated with the development, the location of all sensitive receptors, proposed hours of operation and proposed noise mitigation measures.	Refer to **Section 6.10** and **Appendix 15**.

The assessment should also take into account adverse weather conditions including temperature inversions. Sound power levels measured or estimated for all plant and equipment should be clearly stated and justified. It should also include an assessment of cumulative noise impacts, having regard to existing surrounding industrial activities and development. The proposal involves a nine (9) lot subdivision on employment land and the potential development of multiple noise sources in each lot. The NPfI has a number of guidelines, including the concept of Noise Management Precincts (s. 2.8) and the process to derive amenity noise levels in areas near an existing or proposed cluster of industry (s 2.4.1) that could be drawn on to develop a mechanism to ensure that the land is developed in a manner that minimises noise to adjoining or nearby sensitive receiver locations in a structured and equitable manner. The EIS should also identify the transport route(s) to be used, the hours of operation and assess any potential road traffic noise impacts in accordance with the "NSW Road Noise Policy". Any construction noise should also be assessed and any proposed noise mitigations measures identified and documented in the EIS in accordance with the Interim Construction Noise Guideline (2009) or if superseded by the Draft Construction Noise Guideline currently being exhibited.	
5. Traffic and Transport The EPA would support a proposal that delivers an environmental outcome that minimise air and noise emissions due to heavy vehicle movements from the project. In this regard the EIS should include predictions of expected traffic volumes likely to be generated during the construction and operation of the project, including proposed transport routes and details of any upgrades to road or shipping infrastructure. The supporting information should include a feasibility assessment of Best Management Practices for all on-road diesel trucks associated with the project. Best Management Practices could include, but not necessarily be limited to: a) The development and implementation of a truck noise auditing program to confirm trucks achieve noise standards for engine brake noise; and b) All on-road diesel trucks associated with the project should: - Conform with relevant and current emission standards as prescribed in Australian Design Rules for heavy-duty engines and vehicles (EURO IV); or - Where the vehicle is older than the 2006 model year (that is, EURO I, EURO II or EURO III standards), the vehicle should be fitted with a diesel exhaust treatment device. - Consider emission reduction options in the diesel NEPM.	Refer to **Sections 6.8, 6.10** and **6.11** and **Appendices 9**, **13** and **15**.
6. Waste Management The goal of the development should be to ensure:	Refer to **Sections 6.6**, **6.7** and **6.9** and **Appendices 8**, **20, 22** and **28**.

▪ it is in accordance with the principles of the waste hierarchy and circular economy ▪ the handling, processing and storage of all materials used at the premises does not have negative environmental or amenity impacts ▪ the beneficial reuse of all wastes generated at the premises are maximised where it is safe and practical to do so ▪ no waste disposal occurs on site except in accordance with an EPL. The EIS should document waste management strategies that will ensure any waste generated during construction and operation is classified and managed in accordance with the latest version of EPA's Waste Classification Guidelines. The EIS should also provide details of how waste will be handled and managed both onsite and offsite to minimise pollution. This should include information on the procedures and protocols to be implemented to ensure that any waste leaving the site is transported and disposed of lawfully and does not pose a risk to human health or the environment. The supporting information states that bulk earthworks are proposed involving cut and fill. Details of bulk earth work should be documented in the EIS including the quantity, source and quality of any fill material brought to the site. If any fill is imported to the site it should be only Virgin Excavated Natural Materials (VENM) or Excavated Natura Material (ENM) or other soils under a specific resource recovery order and exemption. In addition, any fill received for this purpose must be validated by a suitably qualified independent person to demonstrate that it is VENM or meets the requirements of the relevant resource recovery order/exemption and is fit for its intended purpose. The EPA recommends the proponent consult the following guidelines: ▪ The Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities (EPA December 2012).	
7. Contaminated Land State Environmental Planning Policy (SEPP) 55 will apply and a contaminated land assessment will need to be undertaken and included in the EIS. SEPP 55 states that as part of the development process the following key considerations should be addressed: ▪ Whether the land is contaminated ▪ If the land is contaminated whether it is suitable in its contaminated state (or will be suitable, after remediation) for all the purposes to which the land will be used ▪ If the land requires remediation; will be made suitable for any purpose for which the land will be used.	Refer to **Section 6.5** and **Appendices 11** and **12**.

In cases where land is potentially contaminated, the investigation and any remediation and validation work is to be carried out in accordance with the guidelines made or approved by the EPA under Section 105 of the Contaminated Land Management Act 1997 and be in accordance with the requirements and procedures in the following: ▪ Contaminated Land Management Act 1997 ▪ Contaminated Land Management Regulation 2013 ▪ State Environmental Planning Policy 55 – Remediation of Land.	
8. Emergency Response The EIS should document systems and procedures to deal with all types of emergencies. This includes incidents (for example, spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment. This should also include appropriate measures to protect the environment during these emergencies such as on site containment measures for fire water and communication strategies that involves reporting of any incidents to appropriate regulatory authorities.	A Construction Environmental Management Plan will be prepared for the Proposed Development.

Table 20 Environment, Energy and Science Group (EES) Key Issues for Assessment	
Key Issues	**Response**
Waterway health	
As set out in the Section 7 Water and Soils in Attachment A, EES recommends that: *The EIS must describe background conditions for any water resource likely to be affected by the development, including:* ▪ *Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions http://www.environment.nsw.gov.au/research-and-publications/publications-search/risk-based-framework-for-considering-waterway-health-outcomes-in-strategic-land-use-planning.* In accordance with the Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions, EES has developed the NSW Government water quality and flow related objectives (Tables 1 and 2 below) for the Wianamatta-South Creek catchment to achieve the vision for Western Sydney Parkland City. The water quality and flow related objectives were provided to key stakeholders at a workshop on 19 October 2020 and were included in the recently exhibited Draft Aerotropolis Precinct Plan. EES has also worked closely with DPIE Place Design and Public Spaces in developing the exhibited draft Mamre Road Precinct DCP and it is expected that the interim objectives in Section 2.6 in the draft Mamre Road Precinct DCP will be superseded by tables 1 and 2 below as follows: ▪ Page 26, Section 2.6 Integrated Water Cycle Management: Following the description of the flow components the new Table 1 (below) will be added and referred to. Also, 'and baseflow requirements' in the last/following sentence will be deleted.	Refer to **Section 6.7** and **Appendices 8** and **20**.

Table 1 Ambient stream flows and requirements of waterways and water dependent ecosystems in the Mamre Rd Precinct

Flow Related Objectives		
	1-2 Order Streams	3rd Order Streams or greater
Median Daily Flow Volume (L/ha)	71.8 ± 22.0	1095.0 ± 157.3
Mean Daily Flow Volume (L/ha)	2351.1 ± 604.6	5542.2 ± 320.9
High Spell (L/ha) ≥ 90th Percentile Daily Flow Volume	2048.4 ± 739.2	10091.7 ± 769.7
High Spell - Frequency (number/y) High Spell - Average Duration (days/y)	6.9 ± 0.4 6.1 ± 0.4	19.2 ± 1.0 2.2 ± 0.2
Freshes (L/ha) ≥ 75th and ≤ 90th Percentile Daily Flow Volume	327.1 to 2048.4	2642.9 to 10091.7
Freshes - Frequency (number/y) Freshes - Average Duration (days/y)	4.0 ± 0.9 38.2 ± 5.8	24.6 ± 0.7 2.5 ± 0.1
Cease to Flow (proportion of time/y)	0.34 ± 0.04	0.03 ± 0.007
Cease to Flow – Duration (days/y)	36.8 ± 6	6 ± 1.1

- Page 30, Section 2.6.2 Stormwater Quality: Table 6 will be replaced with the new Table 2 below.

Table 2 Ambient water quality of waterways and waterbodies in the Mamre Rd Precinct

Water Quality Objectives	
*Total Nitrogen (TN, mg/L)	1.72
Dissolved Inorganic Nitrogen (DIN, mg/L)	0.74
Ammonia (NH_3-N, mg/L)	0.08
Oxidised Nitrogen (NOx, mg/L)	0.66
*Total Phosphorus (TP, mg/L)	0.14
Dissolved Inorganic Phosphorus (DIP, mg/L)	0.04
Turbidity (NTU)	50
Total Suspended Solids (TSS, mg/L)	37
Conductivity (µS/cm)	1103
pH	6.20 - 7.60
Dissolved Oxygen (DO, %SAT)	43 - 75
Dissolved Oxygen (DO, mg/L)	8

* when showing compliance towards TN and TP through industry models, the DIN and DIP performance criteria should be instead to recognise that stormwater discharges of nutrients are mostly in dissolved form

Biodiversity	
1. Biodiversity impacts related to the proposed development are to be assessed in accordance with Section 7.9 of the Biodiversity Conservation Act 2017 the Biodiversity Assessment Method and documented in a Biodiversity Development Assessment Report (BDAR). The BDAR must include information in the form detailed in the Biodiversity Conservation Act 2016 (s6.12), Biodiversity Conservation Regulation 2017 (s6.8) and Biodiversity Assessment Method, including an assessment of the impacts of the proposal (including an assessment of impacts prescribed by the regulations). 2. The BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the Biodiversity Assessment Method. 3. The BDAR must include details of the measures proposed to address the offset obligation as follows: ▪ The total number and classes of biodiversity credits required to be retired for the development/project; ▪ The number and classes of like-for-like biodiversity credits proposed to be retired; ▪ The number and classes of biodiversity credits proposed to be retired in accordance with the variation rules; ▪ Any proposal to fund a biodiversity conservation action; ▪ Any proposal to conduct ecological rehabilitation (if a mining project); ▪ Any proposal to make a payment to the Biodiversity Conservation Fund. If seeking approval to use the variation rules, the BDAR must contain details of the reasonable steps that have been taken to obtain requisite like-for-like biodiversity credits. 4. The BDAR must be submitted with all spatial data associated with the survey and assessment as per Appendix 11 of the BAM. 5. The BDAR must be prepared by a person accredited in accordance with the Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017 under s6.10 of the Biodiversity Conservation Act 2016.	Refer to **Section 6.12** and **Appendix 10**.
Water and soils	
6. The EIS must map the following features relevant to water and soils including: a. Acid sulfate soils (Class 1, 2, 3 or 4 on the Acid Sulfate Soil Planning Map). b. Rivers, streams, wetlands, estuaries (as described in s4.2 of the Biodiversity Assessment Method). c. Wetlands as described in s4.2 of the Biodiversity Assessment Method. d. Groundwater. e. Groundwater dependent ecosystems f. Proposed intake and discharge locations	Refer to **Appendices 10**, **11**, **12** and **28**.
7. The EIS must describe background conditions for any water resource likely to be affected by the development, including: ▪ Existing surface and groundwater. ▪ Hydrology, including volume, frequency and quality of discharges at proposed intake and discharge locations. ▪ Water Quality Objectives (as endorsed by the NSW Government http://www.environment.nsw.gov.au/ieo/index.htm) including groundwater as appropriate that represent the community's uses and values for the receiving waters. ▪ Indicators and trigger values/criteria for the environmental values identified at (c) in accordance with the ANZECC (2000) Guidelines for Fresh and Marine Water Quality and/or local objectives, criteria or targets endorsed by the NSW Government.	Refer to **Sections 6.5-6.7** and **Appendices 8**, **11, 12, 20** and **28**.

▪ Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions http://www.environment.nsw.gov.au/research-and-publications/publications-search/risk-based-framework-for-considering-waterway-health-outcomes-in-strategic-land-use-planning	
8. The EIS must assess the impact of the development on hydrology, including: a. Water balance including quantity, quality and source. b. Effects to downstream rivers, wetlands, estuaries, marine waters and floodplain areas. c. Effects to downstream water-dependent fauna and flora including groundwater dependent ecosystems. d. Impacts to natural processes and functions within rivers, wetlands, estuaries and floodplains that affect river system and landscape health such as nutrient flow, aquatic connectivity and access to habitat for spawning and refuge (e.g. river benches). e. Changes to environmental water availability, both regulated/licensed and unregulated/rules-based sources of such water. f. Mitigating effects of proposed stormwater and wastewater management during and after construction on hydrological attributes such as volumes, flow rates, management methods and re-use options. g. Identification of proposed monitoring of hydrological attributes.	Refer to **Section 6.7** and **Appendices 8** and **20**.
Flooding and coastal hazards	
9. The EIS must map the following features relevant to flooding as described in the Floodplain Development Manual 2005 (NSW Government 2005) including: a. Flood prone land. b. Flood planning area, the area below the flood planning level. c. Hydraulic categorisation (floodways and flood storage areas) d. Flood Hazard. 10. The EIS must describe flood assessment and modelling undertaken in determining the design flood levels for events, including a minimum of the 5% Annual Exceedance Probability (AEP), 1% AEP, flood levels and the probable maximum flood, or an equivalent extreme event. 11. The EIS must model the effect of the proposed development (including fill) on the flood behaviour under the following scenarios: a. Current flood behaviour for a range of design events as identified above. This includes the 0.5% and 0.2% AEP year flood events as proxies for assessing sensitivity to an increase in rainfall intensity of flood producing rainfall events due to climate change. 12. Modelling in the EIS must consider and document: a. Existing council flood studies in the area and examine consistency to the flood behaviour documented in these studies. b. The impact on existing flood behaviour for a full range of flood events including up to the probable maximum flood, or an equivalent extreme flood.	Refer to **Section 6.7** and **Appendices 8** and **20**.

c. Impacts of the development on flood behaviour resulting in detrimental changes in potential flood affection of other developments or land. This may include redirection of flow, flow velocities, flood levels, hazard categories and hydraulic categories d. Relevant provisions of the NSW Floodplain Development Manual 2005. 13. The EIS must assess the impacts on the proposed development on flood behaviour, including: a. Whether there will be detrimental increases in the potential flood affectation of other properties, assets and infrastructure. b. Consistency with Council floodplain risk management plans. c. Consistency with any Rural Floodplain Management Plans. d. Compatibility with the flood hazard of the land. e. Compatibility with the hydraulic functions of flow conveyance in floodways and storage in flood storage areas of the land. f. Whether there will be adverse effect to beneficial inundation of the floodplain environment, on, adjacent to or downstream of the site. g. Whether there will be direct or indirect increase in erosion, siltation, destruction of riparian vegetation or a reduction in the stability of riverbanks or watercourses. h. Any impacts the development may have upon existing community emergency management arrangements for flooding. These matters are to be discussed with the NSW SES and Council. i. Whether the proposal incorporates specific measures to manage risk to life from flood. These matters are to be discussed with the NSW SES and Council. j. Emergency management, evacuation and access, and contingency measures for the development considering the full range or flood risk (based upon the probable maximum flood or an equivalent extreme flood event). These matters are to be discussed with and have the support of Council and the NSW SES. k. Any impacts the development may have on the social and economic costs to the community as consequence of flooding.	

Table 21 Heritage NSW – Aboriginal Cultural Heritage Key Issues for Assessment	
Key Issues	**Response**
Key Environmental Issues	
1. The EIS must identify and describe the Aboriginal cultural heritage values that exist across the whole area that will be affected by the development and document these in an Aboriginal Cultural Heritage Assessment Report (ACHAR). This may include the need for surface survey and test excavation. The identification of cultural heritage values must be conducted in accordance with the Code of Practice for Archaeological Investigation in NSW (DECCW 2010), and be guided by the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales (OEH 2011). 2. Consultation with Aboriginal people must be undertaken and documented in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010). The significance of cultural heritage values for Aboriginal people who have a cultural association with the land must be documented in the ACHAR.	Refer to **Section 6.14** and **Appendix 17**.

3. Impacts on Aboriginal cultural heritage values are to be assessed and documented in the ACHAR. The ACHAR must demonstrate attempts to avoid impact upon cultural heritage values and identify any conservation outcomes. Where impacts are unavoidable, the EIS must outline measures proposed to mitigate impacts. Any objects recorded as part of the assessment must be documented and notified to Heritage NSW. 4. The assessment of Aboriginal cultural heritage values must include a surface survey undertaken by a qualified archaeologist. The result of the surface survey is to inform the need for targeted test excavation to better assess the integrity, extent, distribution, nature and overall significance of the archaeological record. The results of surface surveys and test excavations are to be documented in the ACHAR. 5. The ACHAR must outline procedures to be followed if Aboriginal objects are found at any stage of the life of the project to formulate appropriate measures to manage unforeseen impacts. 6. The ACHAR must outline procedures to be followed in the event Aboriginal burials or skeletal material is uncovered during construction to formulate appropriate measures to manage the impacts to this material.	

Table 22 Aboriginal Land Council Key Issues for Assessment	
Key Issues	**Response**
Email dated 4 May 2021	
If you could please keep the NSW Aboriginal Land Council engaged throughout the SEAR process. I can confirm the following land parcels: Lot 33 DP 258949 and Lots 25-28 DP 255560 are not subject to an Aboriginal Land Claim or appear to have any Registered sites of Aboriginal culture and heritage significance. Has there been any predictive modelling undertaken to predict the unearthing of any Aboriginal; artefacts contained below surface level?	Refer to **Section 6.14** and **Appendix 17**.

Table 23 Heritage Council of NSW Key Issues for Assessment	
Key Issues	**Response**
The subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further, the site does not contain any known historical archaeological relics. Therefore, no referral to the Heritage Council of NSW is required. The Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW.	Noted. Refer to **Section 6.15** and **Appendices 16** and **18**.

Table 24 Fire + Rescue NSW Key Issues for Assessment	
Key Issues	**Response**
FRNSW have reviewed the submitted SEARs Scoping Report prepared by Willow Tree Planning Pty Ltd in support of the proposal and have no comment or requirements to be addressed in the preparation of the Environmental Impact Statement (EIS).	Noted.

We request that we be given the opportunity to review and provide comment on the EIS upon its release for exhibition.	

Table 25 NSW Rural Fire Service Key Issues for Assessment	
Key Issues	**Response**
The New South Wales Rural Fire Service (NSW RFS) has reviewed the request for the Secretary's Environmental Assessment Requirements and advise that the Environment Impact Statement must incorporate a bush fire report prepared by a suitably qualified person that address sections 8.3.1 and 8.3.10 of *Planning for Bush Fire Protection 2019*.	Refer to **Section 6.17** and **Appendix 22**.

Table 26 Endeavour Energy Key Issues for Assessment	
Key Issues	**Response**
Endeavour Energy would expect that the Planning Secretary would require the applicant to address in utilities as a key issue in the future Environmental Impact Statement, with the following being an example of the 'Utilities' section for other recent notification received by Endeavour Energy from the Department. **14. Utilities** • In consultation with relevant service providers: o assess of the impacts of the development on existing utility infrastructure and service provider assets surrounding the site. o identify any infrastructure upgrades required off-site to facilitate the development and any arrangements to ensure that the upgrades will be implemented on time and be maintained. o provide an infrastructure delivery and staging plan, including a description of how infrastructure requirements would be co-ordinated, funded and delivered to facilitate the development. The following is a combination of the various requests for SEARs for other State Significant Development referred to Endeavour Energy which attempts to capture are the possible 'Utilities' related matters. Prepare an Infrastructure Management Plan in consultation with relevant agencies / authorities to: ▪ Address the existing capacity of the site to service the proposed development and any extension or augmentation, property tenure or staging requirements for the provision of utilities, including arrangements to electrical network requirements, drinking water, waste water and recycled water and how the upgrades will be co-ordinated, funded and delivered on time and be maintained to facilitate the development; and	Refer to **Sections 6.5, 6.6, 6.7, 6.12, 6.17** and **6.19** and **Appendices 10, 11, 12, 22, 23** and **28**.

▪ Identify the existing infrastructure on the site or within the network which may be impacted by the construction and operation of the proposal and the measures to be implemented to address any impacts on this infrastructure. As shown in the below site plans from Endeavour Energy's G/Net master facility model (and extracts from Google Maps Street View) there are: ▪ No easements over the site benefitting Endeavour Energy (active easements are indicated by red hatching). ▪ Low voltage and 11,000 volt / 11 kilovolt (kV) high voltage overhead power lines including two pole mounted substations no. 8469 and 7500 (indicated by the symbol) to the road verge / roadway. ▪ 11 kV high voltage overhead power lines coming from poles on the road verge to pole mounted substation no. 8523 on the site from which there is a low voltage overhead service conductor going to the customer connection point for the existing dwellings / premises on Lot 26 DP 255560. ▪ Extended low voltage overhead service conductors coming from poles on the road verge using customer owned / private poles (indicated by the green circles) going to the customer connection point for the existing dwellings/premises. Please note the location, extent and type of any electricity infrastructure, boundaries etc. shown on the plan is indicative only . In addition it must be recognised that the electricity network is constantly extended, augmented and modified and there is a delay from the completion and commissioning of these works until their capture in the model. Generally (depending on the s cale and/or features selected), low voltage (normally not exceeding 1,000 volts) is indicated by blue lines and high voltage (n ormally exceeding 1,000 volts but for Endeavour Energy's network not exceeding 132,000 volts / 132 kV) by red lines (theseli nes can appear as solid or dashed and where there are multiple lines / cables only the higher voltage may be shown). This pl an only shows the Endeavour Energy network and does not show electricity infrastructure belonging to other authorities or c ustomers owned electrical equipment beyond the customer connection point / point of supply to the property. This plan is not a 'Dial Before You Dig' plan under the provisions of Part 5E 'Protection of underground electricity power lines' of the Electricit y Supply Act 1995 (NSW). In regard to the 11 kV high voltage overhead power lines traversing the site, although not held under easement (as they may only service the sites on which they are located) are protected assets and deemed to be lawful for all purposes under Section 53 'Protection of certain electricity works' of the Electricity Supply Act 1995 (NSW). Essentially this means the owner or occu pier of the land cannot take any action in relation to the presence in, on or over the land of electricity works ie. the electricity infrastructure cannot be removed to rectify the encroachment. These protected assets are managed as if an easement is in place – please refer the below point 'Easement Management / Network Access'.	

In accordance with Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights', as shown in the following extracts of Table 1 – 'Minimum easement widths', the low voltage overhead power lines require a 9 metre minimum easement width ie. 4.5 metres to both sides of the centre line of the poles / conductors.

Table 1 - Minimum easement widths

	Voltage	Asset Type	Construction	Minimum Easement (m)
Overhead Assets	400V–22kV	Bare Construction	All	9
		ABC		
		CCT		

ABC = Aerial Bundled Cables CTT = Covered Conductor Thick

This easement width in some circumstances may not be warranted ie. depending on the span, type of conductor, access etc. However as a minimum any buildings, structures, etc. whether temporary or permanent must comply with the minimum safe distances / clearances for voltages up to and including 132,000 volts (132kV) for any building or structure (including fencing, signage, flag poles etc.) whether temporary or permanent must comply with the minimum safe d istances / clearances for voltages up to and including 132,000 volts (132kV) as specified in:

- Australian/New Zealand Standard AS/NZS 7000 – 2016: 'Overhead line design' as updated from time to time.
- 'Service and Installation Rules of NSW' which can be accessed via the following link to the Energy NSW website:

https://energy.nsw.gov.au/government-and-regulation/legislative-and-regulatory-requirements/service-installation-rules .

As a guide please find attached a copy of Endeavour Energy Drawing 'Overhead Lines Minimum Clearances Near Structures'. These distances must be maintained at all times to all buildings and structures and regardless of the Council's allowable building setbacks etc. under its development controls.

Even if there is no issue with the safety clearances to the building or structure, ordinary persons must maintain a minimum safe approach distance of 3.0 metres to all voltages up to and including 132,000 volts / 132 kV. Work within the sa fe approach distances requires an authorised or instructed person with technical knowledge or sufficient experience to perform the work required, a safety observer for operating plant as well as possibly an outage request and/or erection of a protective hoarding.

If there is any doubt whatsoever regarding the safety clearances to the overhead power lines, the applicant will need to have the safety clearances assessed by a suitably qualified electrical engineer / Accredited Service Provider (please refer to

the below point 'Network Capacity / Connection'. This will require the provision of a detailed survey plan showing the location of the conductors to enable the assessment / modelling of the clearances for which there are software packages available. If the safety clearances are inadequate, either the parts of the building encroaching the required clearances or the overhead power lines will need to be redesigned to provide the required clearances. Subject to the foregoing and the following recommendations and comments Endeavour Energy has no objection to the State Significant Development. ▪ Network Capacity / Connection ▪ Network Asset Design ▪ Bushfire ▪ Flooding and Drainage ▪ Easement Management / Network Access ▪ Earthing ▪ Vegetation Management ▪ Location of Electricity Easements / Prudent Avoidance ▪ Dial Before You Dig ▪ Demolition ▪ Removal of Electricity Supply ▪ Site Remediation ▪ Public Safety ▪ Emergency Contact	

5.2 STAKEHOLDER CONSULTATION

5.2.1 Stakeholder identification

The following stakeholders were required to be consulted with under this SSD Application:

1. Penrith City Council
2. NSW DPIE Central (Western) Team, Place Design and Public Spaces Group
3. NSW DPIE Green and Resilient Places, Place Design and Public Spaces Group
4. Environment, Energy and Science Group
5. Water Group including the Natural Resources Access Regulator
6. Endeavour Energy
7. Environment Protection Authority
8. Fire and Rescue NSW
9. NSW Rural Fire Service
10. Sydney Water
11. Transport for NSW
12. WaterNSW
13. Western Sydney Airport Corporation
14. Western Sydney Planning Partnership
15. Surrounding and Local Landowners and Stakeholders

In addition, the Proponent has also undertaken consultation with and/or received advice from the following agencies:

16. NSW DPIE Crown Lands
17. Department of Primary Industries (DPI) – Agriculture
18. DPI – Fisheries
19. Heritage NSW – Heritage Council
20. Heritage NSW (Aboriginal Culture)
21. NSW Aboriginal Land Council
22. Western City and Aerotropolis Authority

Extensive consultation has already been completed to date. The Community and Stakeholder Participation Strategy (CSPS) prepared by SLR Consulting provides details with a comprehensive analysis of the overall strategy undertaken to date (refer to **Appendix 26**). The matters addressed are summarised below in accordance with the requirements of the SEARs. The information provided herein, demonstrates that genuine consultation has already taken place with stakeholders seeking feedback for the Proposed Development and its proposed future benefits and possible impacts.

As addressed in the CSPS, based on the scoping tool within the *Social Impact Assessment Guideline for State significant mining, petroleum production and extractive industry development* (DPIE 2017), a list of potentially impacted stakeholders was developed, including:

- Ancillary and adjacent land occupiers,
- The broader community (for example nearby residents beyond those immediately adjacent to the site and users of the surrounding road network), and
- Local Aboriginal Groups

Local Aboriginal groups were identified as stakeholders to the Project given their cultural knowledge and connection to the land on which the Project is proposed. In response to this and the cultural heritage and Aboriginal cultural heritage requirements of the issued SEARs, an Aboriginal Cultural Heritage Assessment (ACHA) (**Appendix 17**) has been prepared by Biosis in consultation with Aboriginal parties (including the local Aboriginal Council). Consultation with relevant local Aboriginal groups was undertaken by Biosis, with a summary of outcomes included within this report and more detailed outline available within the ACHA.

The identified community stakeholder properties (ancillary, adjacent and nearby) are shown in **Figure 25** below.

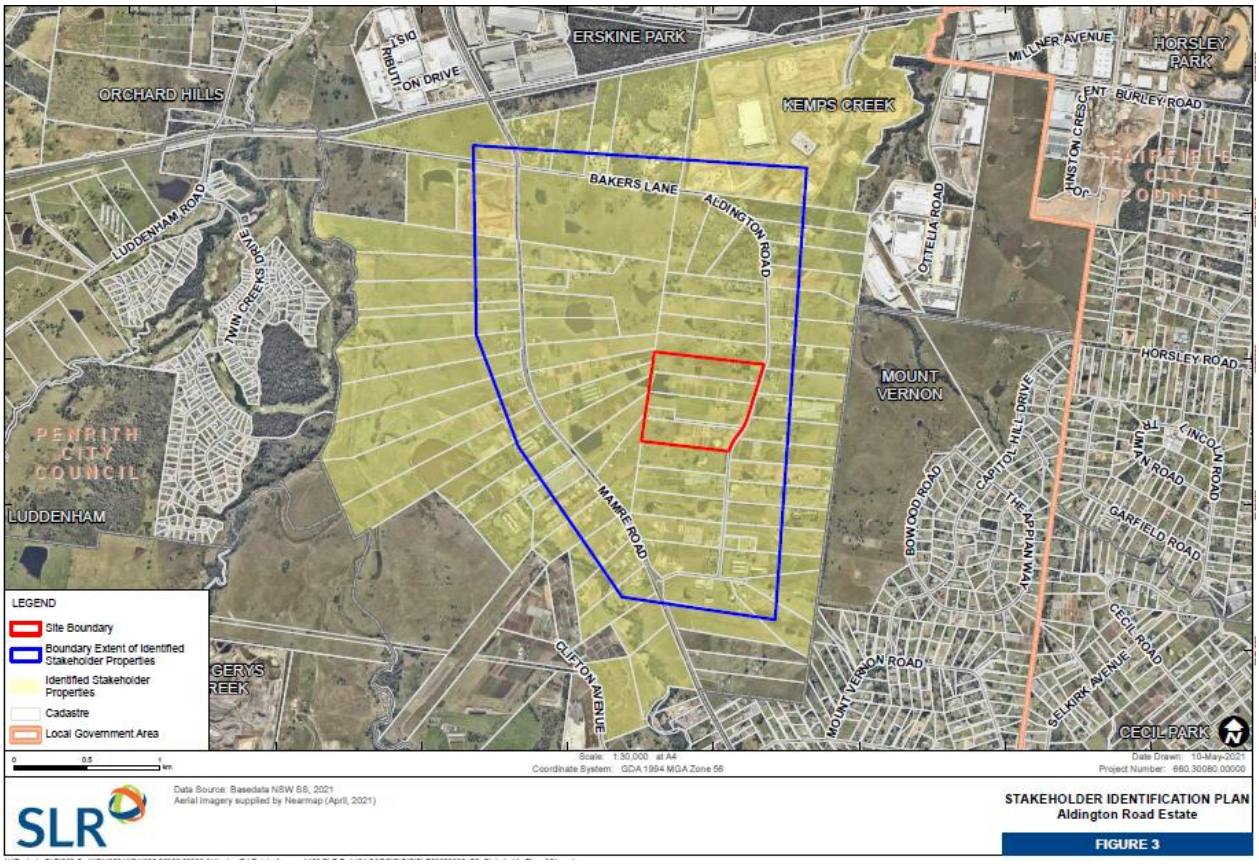


Figure 25 Stakeholder Identification Plan (Source: SLR Consulting 2021)

5.2.2 Engagement to date

Engagement and consultation associated with the proposed development has been conducted with both Community and Agency Stakeholders.

Community Stakeholders were notified of the development and invited to engage via formal letter, delivered via post to residential receivers and via email to known contacts at the Schools and Aged Care Facilities located on Bakers Lane. A copy of email and mail consultation letters are provided in **Appendix 26**. The Appendix includes emails and letters to:

- Robert Nastasi – Principal Emmaus College
- Leo Sibal – Manager Emmaus Aged Care Home
- Cathie Graydon - Principal Mamre Anglican School
- Cathy Hey – Principal Trinity Primary School
- Rosemary Chapman – Emmaus Retirement Village

A copy of the letter sent (via post mail) to all adjacent and nearby residential and other receivers is also included, as identified within the Community and Stakeholder Participation Strategy at **Appendix 26**.

In response to the invitation to engage, two emails were received, and three individual meetings were held to discuss the Project and address any issues or queries around the development. A summary of matters

addressed by the community stakeholders are summarised in the CSPS. The following key stakeholders in this respect were engaged with responses as outlined below in **Figure 26**:

Community Stakeholder and nature of interaction	Summary of Consultation or Communication
Principal – Bakers Lane School (email correspondence)	Email received from Principal of one of the Bakers Lane Schools advising they have no objection to the proposed development
Principal – Bakers Lane School (email correspondence)	Email received from Principal of one of the Bakers Lane Schools querying whether access to the development for construction trucks is proposed via Bakers Lane or via Abbots Road. The matter was discussed with Frasers who advised Bakers Lane was not proposed to be used. A response was provided to Principal via email stating the intention to use Abbots Road only for truck access and noting Frasers appreciate this issue is important to the Schools given existing traffic issues along Bakers Lane.
Resident – Aldington Road (phone interview)	Resident sought general information about the approval process, timing for lodgement and general durations for approval of SSD activities. Resident advised they have no objection to the proposed development, nor the general shift toward this form of development in the Kemps Creek area. Resident noted that the only impact currently experienced in the area due to development of this nature was a limited amount of construction noise, however, this was not at a level where it caused issue to their way of life and not at times where it was disruptive. Resident advised that changes to land rates due to rezoning of the area has made staying in place almost impossible due to lack of affordability, particularly for the elderly, retired or unemployed. Resident noted that there is a generally positive impact of the proposed development and trend in the area toward this form of development in the creation of much needed employment opportunities in the outer areas of Sydney, meaning residents of the area would be provided with employment opportunities closer to home.
Resident – Aldington Road (phone interview)	Resident sought general information about the proposed development and advised they are in support of this form of development for the area and did not have any concerns or objections to the Project.

Community Stakeholder and nature of interaction	Summary of Consultation or Communication
Resident – Mamre Road (phone interview)	Resident sought general information on the proposed development and specific information on the proposed servicing of the development (specifically water and sewer) and whether this was expected to impact on any surrounding properties (by way of easement requirements etc), including their own. The developer was contacted for further information on plans for services beyond the site and advised connections are still being determined and would be the sole responsibility of the relevant service authority. This advice was provided to the resident.

Figure 26 Summary of Community Consultation (nearby properties) (Source: SLR, 2021)

Further, Frasers undertook consultation with the adjoining property owner at 141-153 Aldington Road to the north in relation to site levels. The email sent to the landowner at 141-153 Aldington Road on 20 July 2021 is provided at **Appendix 30**. It is noted that no response has been received to date to the email and follow up email.

Ongoing consultation with the adjoining landowner at 884-928 Mamre Road (Altis Site) is also being undertaken to coordinate key civil design aspects of both sites to enable the most practical and environmentally sensible solution in line with the Draft Mamre Road Precinct DCP. A letter from Altis dated 19 July 2021 is provided at **Appendix 33** to outline the coordination of civil works between the Altis Site and the Subject Site. Specifically, the key civil design aspects include the following:

- Internal road alignments between the two sites, ensuring the vertical and horizontal geometry has been coordinated, with the civil designers working together to ensure both the designs match and the alignment of the local road network within the Draft Mamre Road DCP is maintained. Particular focus was on the round a bout existing on the Altis Site to ensure adequate connection to the Subject Site can be facilitated.
- Stormwater designs to enable connection of the Subject Site to the Altis Site through the proposed road network, allowing water to drain west following the natural topography of the land.

In relation to Agency Stakeholders, a list of the stakeholders consulted is provided within **this Section**, with response to the feedback received provided in **Section 5.1**. A consultation letter was sent via email to each agency, and a two (2) week turn-around time was allowed for all responses to be received. Responses received reiterated the need to address all the matters listed in the SEARs which is demonstrated throughout this EIS.

To date Biosis has completed Stage 1 Aboriginal community consultation, which entails the identification of Registered Aboriginal Parties (RAPs) through notifications and a public notice. Following this process, a total of 18 groups registered their interest in the project. Stage 2 involving the presentation of information about the proposed project and Stage 3 Gathering information about cultural significance are currently ongoing and will be followed by and Stage 4 – review of draft ACHA report. Further information on registered parties and the ongoing consultation process is included within the ACHA submitted as part of the EIS package.

5.2.3 Ongoing and future engagement

Ongoing consultation and engagement shall be undertaken through all future stages of the Project. It is assumed that formal notification of the Proposed Development will be undertaken by DPIE during the assessment period for the SSD Project, with Frasers committed to responding to all relevant issues and queries arising during this period through DPIE's formal response to submissions process.

PART F ENVIRONMENTAL RISK ASSESSMENT

6.1 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

The SEARs were issued by the NSW DPIE on 12 May 2021. The Key Issues included in the SEARs and addressed by this EIS are:

1. Suitability of the Site
2. Statutory and Strategic Context
3. Community and Stakeholder Engagement
4. Infrastructure Requirements
5. Urban Design and Visual
6. Traffic and Transport
7. Soil and Water
8. Noise and Vibration
9. Hazards and Risk
10. Biodiversity
11. Cultural Heritage and Aboriginal Cultural Heritage
12. Social Impact
13. Contamination
14. Bushfire
15. Waste Management
16. Air Quality
17. Greenhouse Gas and Energy Efficiency
18. Ecologically Sustainable Development
19. Airport Safeguarding
20. Planning Agreement / Development Contributions

The above 20 matters have all been satisfactorily addressed in the various sections of this EIS, as detailed below.

6.2 STRATEGIC & STATUTORY CONTEXT

Sections 2.5 and **4.2** above have previously considered the Proposed Development's strategic and statutory context.

Furthermore, the Proposed Development, for the purposes of a Warehouse and Logistics Hub, is considered consistent with the intended development of industrial land within the wider WSEA and Penrith LGA. The Proposed Development would enable the efficient and sustainable use of such designated industrial land via adherence to the provisions, and overarching aims, and objectives set out within SEPP WSEA that allows for the construction and operation of Warehouse and Logistics Hub. The Proposed Development would beneficially contribute to the regional and local economies, and population groups positioned in the wider locality.

The Proposed Development is considered compatible with surrounding industrial land uses adjoining the Site and throughout the wider WSEA, that are designated for such industrial-related and employment-generating land uses. The Subject Site is not located in proximity of any residential receivers or other sensitive land uses. Therefore, the Proposed Development would not exhibit any adverse environmental or amenity impacts as further explained in this **Part** of the EIS. It is noted, that the Subject Site contains bushfire prone land, for which are further analysed in the Bushfire Assessment Report in **Sections 6.17** of this EIS. Accordingly, any recommendations drawn from these reports would be adopted and adhered to.

The proposed site layout and building design would ensure the functional operation of the Warehouse and Logistics Hub in accordance with the needs of the end user, whilst not impacting on any other operations. Similarly, the Site and built form have been designed in respect of the planned / existing road infrastructure,

noting its direct linkages to the wider regional road network, including Mamre Road and both the M4 & M7 Motorways.

As mentioned above, the Proposed Development would not exhibit any significant environmental impacts and would not adversely impact on the amenity or operations of any adjoining sites within close proximity to the Subject Site. Therefore, the Proposed Development would be considered compatible with the Site's statutory and strategic context.

6.3 URBAN DESIGN AND VISUAL

This part of the EIS considers the SEARs, specifically addressing the Urban Design and Visual assessment items, as well as the design principles outlined in Clause 31 of SEPP WSEA. The design principles addressed are summarised below, including:

- *The development of a high-quality design;*
- *Incorporating a variety of materials and external finishes for the external facades;*
- *Providing a high-quality landscaping; and*
- *Having a scale and character of development that is compatible with other employment-generating development in the precinct.*

The layout and design of Site features and built form, have been considered in terms of the visual amenity of both the Site and the broader context, in order to create a positive visual outcome. Specifically, the visual impact of the Proposed Development is informed by the following:

6.3.1 Site Layout and Landscaping

The proposed Site layout has been designed to ensure that the efficient use of the land and the functionality of the proposed Warehouse and Logistics Hub, meets the operational requirements of the future end user. The overall Site layout is configured in a sense to allow fluid access around the Site, whilst offering a sense of safety and continuity relating to the circulation of vehicular and pedestrian movements on-site.

The precise siting of the various structures and hardstand areas of the Site including the warehouse building, offices, loading docks, car parks and landscaping, has been strategically coordinated to provide a highly functional layout and coherent visual outcome. In particular, adequate separation has been provided between the proposed warehouse building in Proposed Lot 9 and the Transgrid easement along the eastern boundary. Large canopy tree planting will be provided outside the easement while turf will be provided within the easement and exclusion zone.

High quality landscaping will be provided for the Site. A minimum of 3m landscape setback will be provided along the internal access road from boundary to fence line. Canopy street tree planting and large canopy trees in the setback area ranging from 6m to 15m+ in height will be provided to enhance the visual interest of the Site. Feature tree planting will also be provided at site entry as well as carpark and office entry points. Carpark hard surfaces, cycleways and path systems will also be shaded by canopy tree planting. Further details of the proposed landscaping design are provided in the Landscape Plans at **Appendix 6**. The overall Site Landscape Plan is provided in **Figure 27** below.

Lighting would be designed to be in compliance with the latest version of AS1158 and AS4282 (INT) – Control of Obtrusive Effects of Outdoor Lighting. Lighting has also been provided in accordance with the requirements of Australian Standard 1158.3.1-1999 and the recommendations contained therein. Glare and spill lights would be limited by the selection of fittings and are in accordance with the Australian Standard 4282-1987. Additionally, light fittings are LED wall mounted, pole mounted and mounted on the face of the awning and directed in such a manner, that they do not cause nuisance to surrounding properties or the public road network.

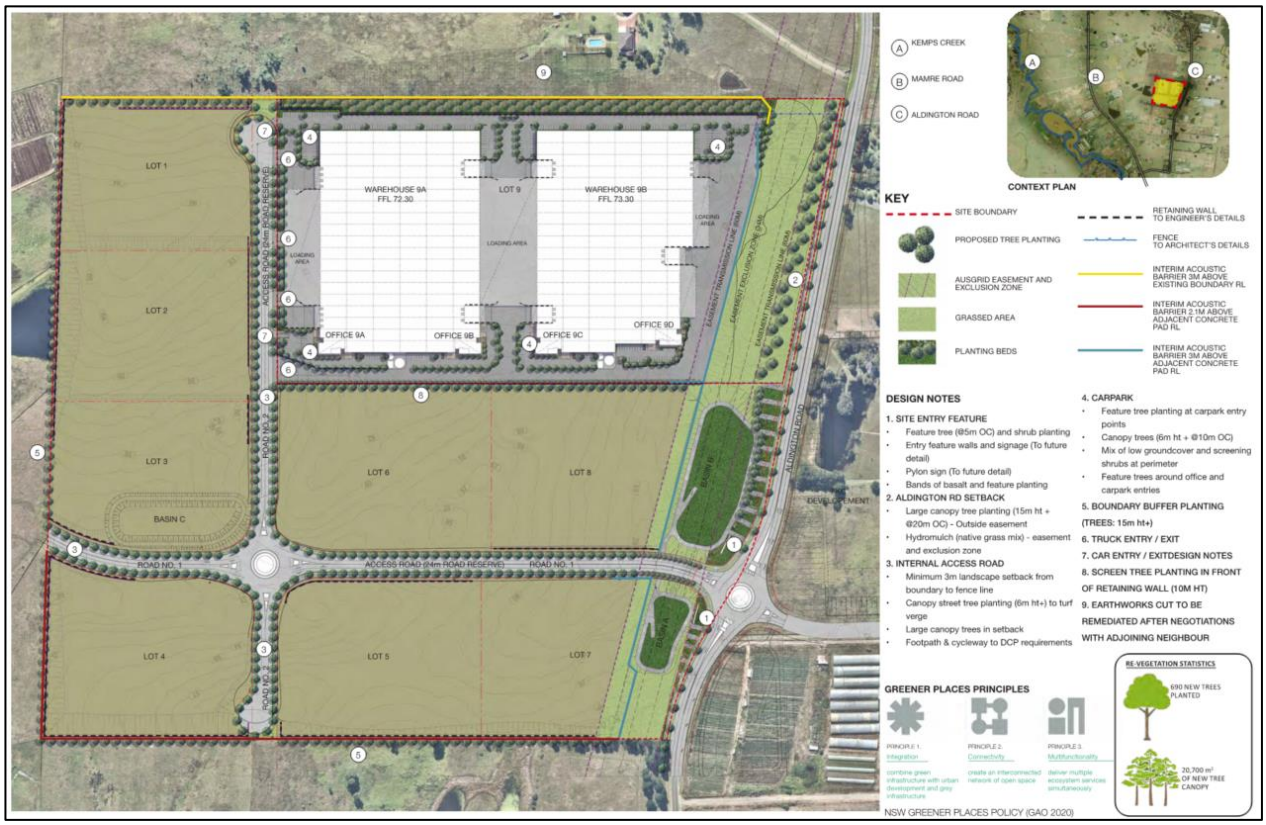


Figure 27 Site Landscape Plan (Source: Habit8, 2021)

6.3.2 Design of Built-Form

The approach to the built-form of the proposed warehouse and distribution facility at Proposed Lot 9, is to create an architectural treatment towards a high-quality, cohesive warehouse building with an attractive appearance, in a manner that is consistent with the Mamre Road Precinct Structure Plan. The proposed built-form, incorporates a high-quality design and fabric, to ensure a positive, visual outcome and sustainable development.

The built form of the proposed warehouse and distribution facility is compatible with the warehouse development of similar scale throughout the WSEA (and the wider Sydney Metropolitan Region) and is therefore considered highly appropriate for the Site. The proposed warehouse building exhibits a consistent design that would be reflected throughout the wider Mamre Road Precinct upon the development of additional land in direct proximity to the Subject Site.

The proposed building bulk and scale would not cause any undesirable visual impact, view obstruction, privacy intrusion or loss of solar access owing to the provision of adequate setbacks, building separation and deep-soil landscaping.

Overall, the Site layout has been designed to address the street frontages through the positioning and orientation of offices at the forefront of the Site, where feasible. This would provide additional façade articulation, as well as opportunities for passive surveillance of the street and car park, in accordance with the principles of Crime Prevention Through Environmental Design (CPTED).

Façade articulation will be incorporated in the design through a complementary variety of materials, colours design features and openings, that would create visual interest and prevent the presentation of large expanses of blank wall with positive connotations for views toward the Subject Site.

Figure 28 below shows a representation of the Proposed Development at completion.

Figure 28 Visual Perspective of Warehouses (Source: Frasers, 2021)

6.3.3 Visual impact

The height and scale of the Proposed Development are uniform and representative of existing and proposed industrial developments throughout the wider WSEA. The heights proposed are considered consistent with buildings located in close proximity to the Site, which allows for flexibility for the end user and high volumes of warehousing and logistics activities to be undertaken on the Site. Additionally, the height and scale of the Proposed Development is further articulated within a comprehensive Visual Impact Assessment prepared by Habit8. The Landscape and Visual Impact Assessment Report is located within **Appendix 7** of this EIS.

Sensitivity of the landscape

A local value may be held by some visual receptors with high sensitivity to the site along Aldington Road, and passing pedestrians and motorists of medium sensitivity. These views are likely to be based on perceptual aspects such as wildness, tranquility, land use and green open space. The site is privately owned and therefore does not add any recreational benefit to the community. The character of the adjacent sites is generally IN1 – General Industrial.

A large number of native tall canopy trees will be planted in the north, south, western setbacks. A 60m Transgrid easement will be along the eastern setback part of the site along Aldington Road. Almost all planting within the development is proposed to be native with a large proportion of endemic species.

The conclusion drawn from the analysis above suggests the sensitivity of the landscape to be **low**.

Key view – receptor locations

The location of viewpoints close to nearby sensitive residential receptors and significant vantage points within the surrounding public domain are illustrated in **Figure 29** below. The most visual sensitive receptors are those properties along Aldington Road. Photomontages from eye level, car level and 8m high level are provided within the Landscape and Visual Impact Assessment Report to represent as closely as possible views from these receptor locations.

	GROUND RL	14m HT
VIEW A	RL 53.00	RL 67.00
VIEW B	RL 60.00	
VIEW C	RL 67.00	
VIEW D	RL 71.00	
VIEW E	RL 75.00	RL 89.00
VIEW F	RL 71.00	
VIEW G	RL 58.00	RL 72.00
VIEW H	RL 48.00	
VIEW I	RL 50.00	
VIEW J	RL 46.00	
VIEW K	RL 45.00	

Figure 29 Visual receptor locations (Source: Habit8 2021)

Landscape and visual impact assessment

The nearest residential properties to the site are around 2km (located at Mount Vernon) and may catch glimpses over the development and horizon beyond, however it is considered too far to experience such impact. The design of the setbacks recognizes the need to provide significant mitigation to surrounding lots in the form of dense canopy tree planting together with a shrub and groundcover understory. This should help to soften the appearance of the development from the most highly sensitive receptors. It can be argued that the landscape will be enhanced by the introduction of new landscape setback areas that currently do not exist.

Based on the Proposed Development, mitigation and the existing industrial character of adjacent landscape, the magnitude of change is judged to be **medium**. The value of the Site has been assessed based on the character and context in which it is located. The significance of the impact upon the landscape is judged to be **medium**. This is in part due to the surrounding topography, agricultural uses and in part due to the industrial zoning designation under the SEPP WSEA.

It is concluded in the visual impact assessment that the proposed development will cause a change in the view for a very small minority of properties. Residential dwellings, road users' pedestrians, and cyclists have been identified as being impacted at a **low-medium** level.

Views from single houses located south west of the development will be mitigated with a dense landscape setback in which tall native canopy trees, screening shrubs and groundcovers are planted. Following maturity, these planted buffers will provide a dense screen to help to soften and screen the development. The development proposes substantial landscape planting to offset the visual impact in the form of setbacks with dense tree and shrub planting. Specifically, trees that are 15m in height will be planted along the Site boundaries as buffer planting and trees that are 10m in height will be provided as screen tree planting in front of the proposed retaining walls. The proposed planting will provide screening for the Proposed Development gradually (from 0 to 15 years) and will be most effective after 15 years for those receptors who experience direct views.

Passing motorists, cyclists and pedestrians will also experience a **medium** change in view. However, Aldington Road is not on the major cycleway route and is not streets where walking is encouraged due to

industrial truck movements and the lack of close by services and facilities. It should also be noted that these users living along and/or traveling along Aldington Road will have a Transgrid easement - a 60m wide turf verge creating distance from the development, landscape setback and street planting that serve as screen for the development.

In relation to the proposed retaining walls on the northern site boundary, the LVIA provides visualisations from viewpoints E, F and G (**Figures 30-32**), which demonstrate that the significance of the impact is considered low to medium once the proposed tree planting reaches semi maturity. It is noted that the associated visual impacts are offset by the visual sensitivity of the area due to the current IN1 General Industrial zoning of the locality, in which the Mamre Road Precinct is earmarked for industrial and logistics development.

The proposed interim acoustic walls are visible from Viewpoint H and I (**Figures 33 and 34**). Notwithstanding, the proposed warehouse buildings at Lot 9 will have a **minor** impact on the adjoining residential property at 904-928 Mamre Road due to topography and distance. The significance of the impact is considered **moderate** as the distance to the proposed warehouse buildings and the Site boundary planting mitigate the impact of the Proposed Development. In addition, it is noted that the identified property forms part of **SSD-17647189** at the Altis Site for industrial development. As such, visual sensitivity will be further reduced following the redevelopment of the property for industrial purposes.

Wider reaching views to the Site from residential areas located in the greater landscape (around Mount Vernon) and from Mamre Road have also been considered, however the Site is too far that makes viewing the Site negligible.

The various scenarios from key viewpoints (year zero, year 5, year 10 to year 15) are shown in **Figures 29-34** below which demonstrates how the landscape strategy will suitably mitigate visual impacts:

Baseline photo -14m

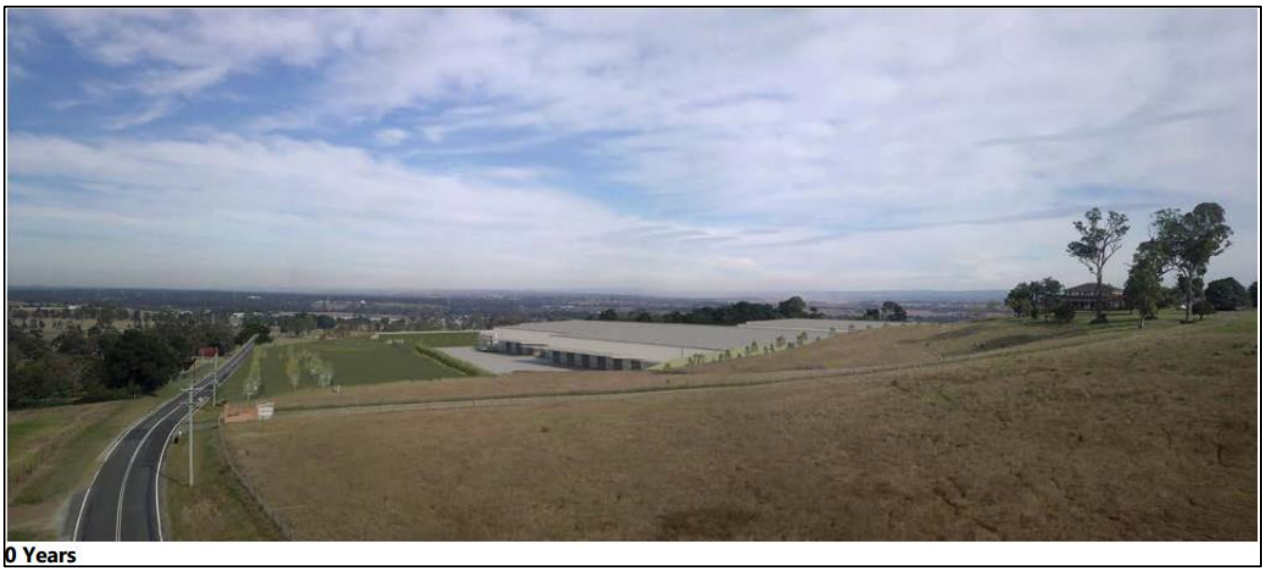
0 Years

5 Years

10 Years

Figure 30 Viewpoint A (Source: Habit8, 2021)

Baseline Photo



0 Years

5 Years

10 Years

15 Years

Figure 31 Viewpoint E (Source: Habit8, 2021)

Baseline Photo

0 Years

5 Years

10 Years

15 Years

Figure 32 Viewpoint F (Source: Habit8, 2021)

Baseline Photo- Eye Level

0 Years

5 Years

10 Years

15 Years

Figure 33 Viewpoint G (Source: Habit8, 2021)

Baseline Photo

0 Years

5 Years

10 Years

15Years

Figure 34 Viewpoint H (Source: Habit8, 2021)

Baseline Photo- eye level

0 Years

5 Years

10 Years

15 Years

Figure 35 Viewpoint I (Source: Habit8, 2021)

Further details of the landscape and visual impact assessment are provided at **Appendix 7**.

6.4 SAFETY, SECURITY AND CRIME PREVENTION

The principles of Crime Prevention Through Environmental Design (CPTED) have been considered in the design of the proposed development.

The CPTED guidelines were prepared by the NSW Police in conjunction with NSW DPIE. CPTED provides a clear approach to crime prevention and focuses on the 'planning, design and structure of cities and neighbourhoods'. The main aim of the policy is to:

- Limit opportunities for crime;
- Manage space to create a safe environment through common ownership and encouraging the general public to become active guardians; and,
- Increase the perceived risk involved in committing crime.

The guidelines provide four (4) key principles to limit crime, including:

- Natural Surveillance;
- Access Control;
- Territorial Reinforcement; and,
- Space Management.

Principle 1 – Surveillance:

The attractiveness of crime targets can be reduced by providing opportunities for effective surveillance, both natural and technical.

- The Proposed Development would orientate active areas such as the ancillary offices and building entrances towards surrounding roads, pedestrian paths, car parking areas and deep-soil landscaping;
- The Proposed Development would utilise low lying landscaping in appropriate locations to ensure there would be no obstruction of surveillance opportunities; and,
- External lighting would enable the maintenance of sight-lines and surveillance after dark.

Principle 2 – Access Control:

Access Control can be defined as physical and symbolic barriers that are used to 'attract, channel or restrict the movement of people'.

- The Site would be secured by perimeter fencing and access gates to deter unauthorised access to the Site; and,
- Directional signage to heavy vehicle, car parking, pedestrian paths and building entries would define the various areas of the Site, providing legibility and minimising vehicular and pedestrian conflict with the Site.

Principle 3 – Territorial Reinforcement:

Territorial Reinforcement can be described as creating a sense of ownership to a public space or vicinity, encouraging the usage of that space. By increasing usage capability, this also deters crimes and further increases the chances of a crime being witnessed and reported in a timely manner.

- The provision of security-controlled entrances to the Site and proposed Warehouse and Logistics Hub would emphasise the separation between the private and public domain; and,
- Well maintained landscape design would indicate the proposed development is well-used and cared for to reduce criminal activity.

Principle 4 – Space Management:

Space Management is intuitive of Principle 3 – Territorial Reinforcement – and, refers to ensuring a space is utilised and cared for appropriately.

- On the ground level, pathways and planters would be well maintained by a landscape contractor. Continued repairs and maintenance would discourage vandalism; and,

- High quality materials, varied façade treatments and landscaping along boundaries would assist in discouraging vandalism and graffiti.

The Proposed Development would successfully integrate the four (4) principles outlined to limit crime outlined in the CPTED guidelines, which are adopted into the Draft Mamre Road Precinct DCP.

6.5 CONTAMINATION

A Detailed Site Investigation has been prepared by JBS&G to characterise the contamination at the Site and to assess the suitability of the Site for the proposed commercial/industrial use, or make recommendations for management actions if required. The sample locations are provided in **Figure 36**.

The majority of the site is made up of undeveloped pastoral land, with horticultural activities making up the balance of the site. A review of the site history indicates the site and surrounding area land uses have been consistent since the 1970's. A total of 438 soil locations have been advanced within the site which identified areas of filling and stockpiled material was present in some isolated areas of the site which generally consisted of mixed soil types with various inclusions including demolition waste (Areas of Potential Environmental Concern (AEC) 3c and 6b), asphalt (AEC 3a and 6b) and brick and tile (AEC 3a and 3b). Market areas across the site (AEC 2a, 2b and 2c) were predominately underlain by reworked natural soil with trace inclusions of black plastic while the balance of the site consisted of clayey/silty soils. ACM was identified on the ground surface, within site structures and surface soil samples (< 0.1 m bgs) at AEC 1a, 1b, 1c and 1e. Asbestos (non-friable ACM and friable) was identified within subsurface soils (> 0.1 m bgs) below the adopted site criteria within AEC 1f and at TP397_0.0-0.1.

All individual or 95% upper confidence level (UCL) COPC concentrations were below the adopted site criteria, with the exception of isolated elevated TRH and polycyclic aromatic hydrocarbons (PAHs) at TP398_0.0-0.2. Review of the test pit log from TP398 indicated that the given odours, staining and proximity to vehicle garages the source of the TRH and PAH impact is likely mechanical maintenance or inclusions of asphalt. The impact has been vertically delineated and is considered to be highly localised (≈ 15 m3).

Groundwater levels were measured between 2.681 and 6.986m below top of casing (btoc) and the groundwater was observed to vary from clear to turbid, colourless to grey (to clear), acidic to circum-neutral and saline. Analysis of groundwater samples for a broad range of Contaminants of Potential Concern (COPCs) indicated concentrations in the current investigation were below the adopted site criteria.

Analysis was undertaken on all surface water samples for a broad range of COPCs. All concentrations were below the adopted site criteria.

Based on the assessment undertaken, a Remedial Action Plan (RAP) is required to address ACM on the ground surface within ARC 1a, 1b, 1e and 6c, the hydrocarbon impact at TP398, manage the removal of the AGSTs in Lot 27, address unexpected finds during development and set out requirements to validate the site is suitable for the intended use.

An interim Asbestos Management Plan (AMP) is required to manage asbestos risks on and in soil in accordance with WHS Regulation requirements, until such time as asbestos risks are removed or require long term management following remediation.

Given the presence of ACM in building material it is recommended that a Hazardous Building Material Surveys (HBMS) be undertaken prior to any demolition of existing site structures.

Based on the findings of this investigations it is concluded that the site can be made suitable for the proposed commercial/industrial land use subject to remediation and/or management of identified contamination under a RAP.

Accordingly, a RAP has been prepared by JBS&G to outline the principles of remedial/validation works required for the site, that when completed, will make and demonstrate the site as suitable for the proposed commercial/industrial land use.

A number of potential remedial options have been considered within the RAP. The preferred remedial strategy for the Site is:

- Manual picking of surficial ACM (AEC 1a, 1b and 1e), with the ACM fragments disposed to a landfill/licensed waste facility;
- Offsite disposal of concrete slabs with affixed ACM (AEC 6c); and
- Excavation and offsite disposal of hydrocarbon impacted material at TP398 (≈ 15 m^3) to an appropriately licensed waste facility.

Following remediation, validation data is required to be collected to verify the effectiveness of the remedial works and document the final site conditions as being suitable for the proposed future use. Subject to the successful implementation of the measures described in this RAP and the recommendations below, it is concluded that the site can be made suitable for the intended uses and that the risks posed by contamination can be managed in such a way as to be adequately protective of human health and the environment.

It is recommended that the processes outlined in the RAP be implemented and that the following documentation be developed and implemented to ensure the risks and impacts during remediation works are controlled in an appropriate manner:

- An AMP/Asbestos Removal Control Plan (ARCP) with an asbestos register to document the location, condition and relevant applicable controls required to be implemented during works involving asbestos;
- A dewatering plan should be developed if dewatering of the dams is to occur during development works; and
- A (Work Health and Safety Plan (WHSP) to document the procedures to be followed to manage the risks posed to the health of the remediation workforce.

Further details of the contamination matters are addressed in the Detailed Site Investigation and Remedial Action Plan at **Appendices 11** and **12**.

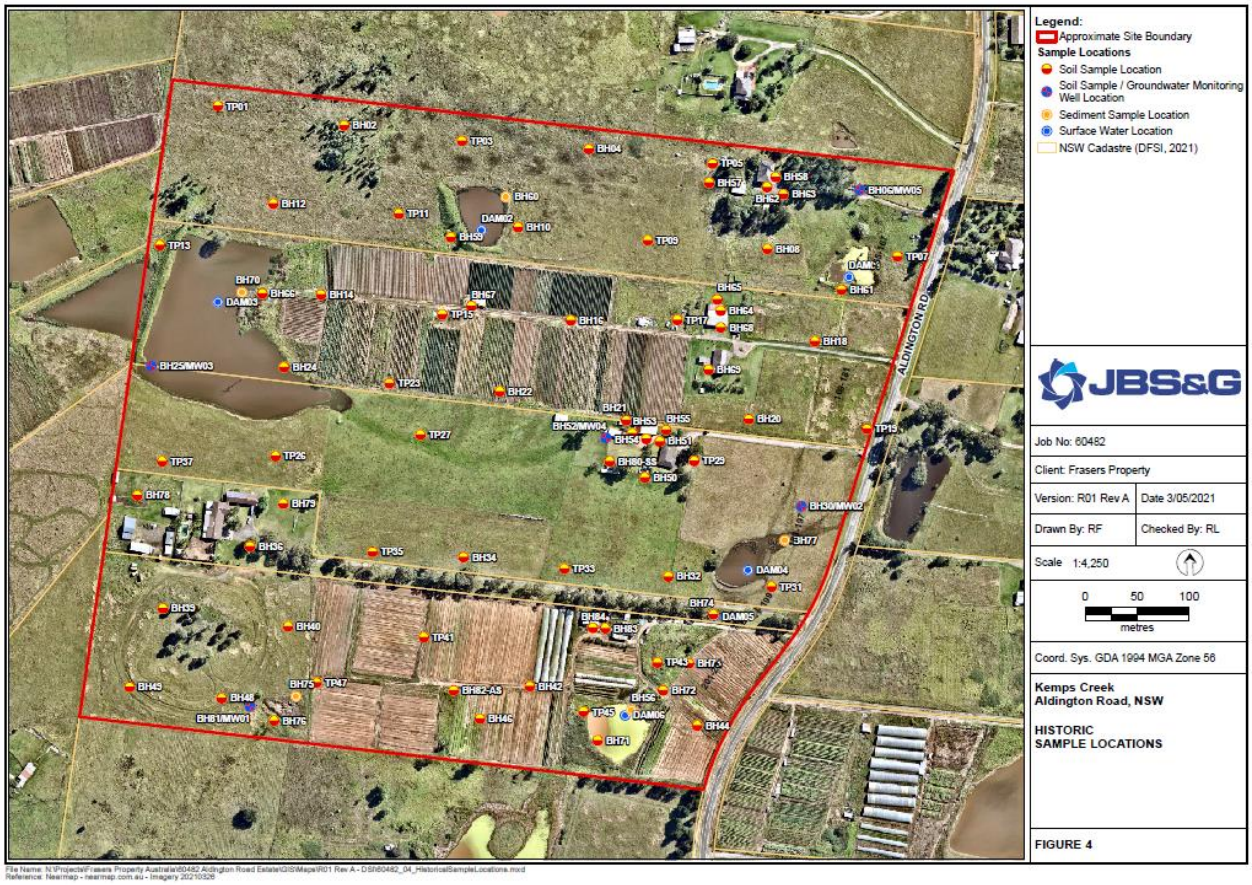


Figure 36 Sample Locations (Source: JBS&G, 2021)

6.6 GEOTECHNICAL INVESTIGATION

A Geotechnical Investigation was undertaken by Pells Sullivan Meynink (PSM) for the Site. A total of 49 test pits and auger holes were excavated for the geotechnical investigation.

6.6.1 Subsurface Conditions

The subsurface conditions encountered within the test pits and auger holes are summarised in **Figure 37** below.

Inferred Unit	Inferred Top of Unit Depth Below Ground Surface (m)	Description
TOPSOIL	0.0	Silty CLAY, low plasticity, pale brown and grey, firm to stiff consistency, dry, rootlets and organics observed. Silty CLAY with gravel; low plasticity, dark brown and grey, firm consistency, sub-angular gravel size up to 5 mm, dry to moist, rootlets and barks observed.
FILL	0.0 to 0.17	FILL; roadbase and gravel; grey and black, sub-angular gravel size up to 30 mm, dry, with rootlets and organics. CLAY with some filled sandstone; low plasticity, pale grey and red, stiff consistency, dry to moist. Silty CLAY; medium plasticity, black, stiff consistency, moist to wet.
RESIDUAL	0.1 to 1.2	CLAY; medium to high plasticity, dark brown and red, very stiff consistency, dry to moist, trace of rootlets. Silty CLAY; medium plasticity, pale grey, brown and yellow, very stiff consistency, moist.
BEDROCK	0.6 to 2.8	SILTSTONE; pale grey and red, extremely weathered, iron stained, extremely low to very low strength. SILTSTONE; pale grey and orange, moderately weathered, iron stained, low to medium strength. SANDSTONE; fine grained, slightly weathered, high strength.

Figure 37 Summary of Inferred Subsurface Conditions Encountered in Test Pits and Auger Holes (Source: PSM 2019)

6.6.2 Groundwater

No groundwater was observed in any test pits/auger holes during the excavation. No long-term groundwater monitoring was undertaken.

6.6.3 Salinity

The salinity classification for the soil samples that were tested is presented in **Figure 38** below.

Sample ID & Depth	$EC_{1:5}$ (dS/m)	Soil Type	M	EC_e (dS/m)	Salinity Class
TP02 1.0 m	0.018	Heavy clay	6	0.108	Non-saline
TP05 0.3 m	0.030	Medium clay	7	0.210	Non-saline
TP15 0.6 m	0.167	Heavy clay	6	1.002	Non-saline
TP24 0.5 m	0.088	Medium clay	7	0.616	Non-saline
TP36 0.5 m	0.078	Medium clay	7	0.546	Non-saline
TP41 0.5 m	0.863	Medium clay	7	6.041	Moderately saline
TP44 1.5 m	0.297	Heavy clay	6	1.782	Non-saline
TP49 1.0 m	0.593	Medium clay	7	4.151	Moderately saline

Figure 38 Salinity Classification (Source: PSM 2019)

It is assessed that the majority of soils on Site are classified as "non-saline" with two soil samples classified as "moderately saline". Table 4.8.2 of Australian Standard AS3600-2009 "Concrete Structures" provides an exposure classification for concrete structures in saline soils based on soil electrical conductivity (ECe). It is assessed by PSM that the exposure classification for the Site is "A2".

An Interim Geotechnical Design Advice (IGDA) and bulk earthworks specification have also been prepared for the Proposed Development. Further details of the geotechnical investigation are provided at **Appendix 28**.

6.7 SOIL AND WATER

A Water Cycle Management Strategy has been prepared by AT&L for the Proposed Development.

6.7.1 Soil and Water Management

A Soil and Water Management Plan (SWMP) has been prepared in accordance with the NSW Department of Housing Publication titled: Managing Urban Stormwater – Soils and Construction (2004) for the Site. The erosion control measures proposed for the Site will comply with the requirements of the Penrith City Council Engineering Guidelines and DPIE. The SWMP has also been designed to ensure that the best management practice is applied to the development site in controlling and minimising the negative impacts of soil erosion.

6.7.2 Proposed Site Stormwater Drainage

The proposed drainage network within the estate has been designed to safely convey major and minor flows prior to discharging to neighbouring properties to the south and west. The following criteria have been adopted for the proposed drainage system:

- Major system (pit and pipe network, overland flow paths and channels): 1% AEP

- Minor system (pit and pipe network): minimum 5% AEP, and increased where required to address major system design requirements.

The Site is divided into two broad catchments: one discharging towards the south-eastern corner of the Site and across the southern boundary and one discharging towards the western boundary. These two broad catchments are generally delineated by the proposed Road 2 that will run in a north-south direction through the Site. The section of proposed Road 2 south of the roundabout will discharge towards the southern boundary via a level spreader and outlet scour protection to minimise potential impacts associated with scour beyond the Site.

The proposed estate-wide drainage system will incorporate three detention basins. Key parameters relating to these proposed basins are described in **Table 27**.

Table 27 Key detention basin parameters

Basin ID	Location	Collects stormwater from:	Discharges to:
A	Lot 7, within the Transgrid easement and adjacent to Aldington Road	Lot 3, on the northwestern corner of proposed Roads 1 and 2	Transgrid easement on Lot 7, and ultimately to a level spreader and outlet scour protection adjacent to the southern boundary via a new overland flow channel.
B	Lot 8, within the Transgrid easement and adjacent to Aldington Road	Proposed lots 6, 8 and 9 Part of Transgrid easement north of Basin B External catchments D and E	Basin A via a culvert under proposed Road 1.
C	Lot 3, on the northwestern corner of proposed Roads 1 and 2	Lots 1, 2, 3 and 4 Road 2 north of the roundabout Part of Road 1 west of the roundabout	Proposed stormwater drainage network in Road 1 and ultimately across the western boundary and into the future stormwater network on the Altis development site.

6.7.3 Trunk Drainage Infrastructure

The Draft Mamre Road Precinct DCP includes indicative locations of trunk drainage infrastructure across the precinct, refer to **Figure 39**. The two indicative trunk drainage lines within the Site are:

- B07 (in the south-eastern portion of the Site and downstream of proposed Basin A) – outflow from Basin A (both piped and via a controlled overflow weir) will be directed to an open channel that will discharge towards the southern boundary of the Site.

- D05 (adjacent to the western boundary of the Site) – outflow from proposed Basin C will be directed to the proposed drainage system in Road 1 and ultimately towards the adjacent Altis development Site (884-928 Mamre Road). The nature and extent of trunk stormwater drainage at the interface between the two development sites will be subject to coordination at the detailed design phase.

AT&L and Costin Roe (the engineering consultants of the Altis Site) have been coordinating the future trunk drainage which runs through the Altis Site (SSD-17647189). The trunk drainage has been coordinated and sized to cater for the storm events. The drawings prepared by Costin Roe on behalf of Altis indicate the 1500 dia connection point for the project discharge point.

Additionally, the Proponent has undertaken consultation with Altis to coordinate key civil design aspects of both sites. The key civil design aspects include internal road alignments between the two sites and stormwater designs to enable connection of the Subject Site to the Altis Site through the proposed road network.

Further details of the coordination between Altis and Frasers are provided in the letter from Altis at **Appendix 33**.

In the unlikely event, the Altis development does not proceed, a temporary gabion level spreader will be provided to sheet flow the water over the boundary to mimic the existing conditions. In either case, it is understood that no easement would be required.

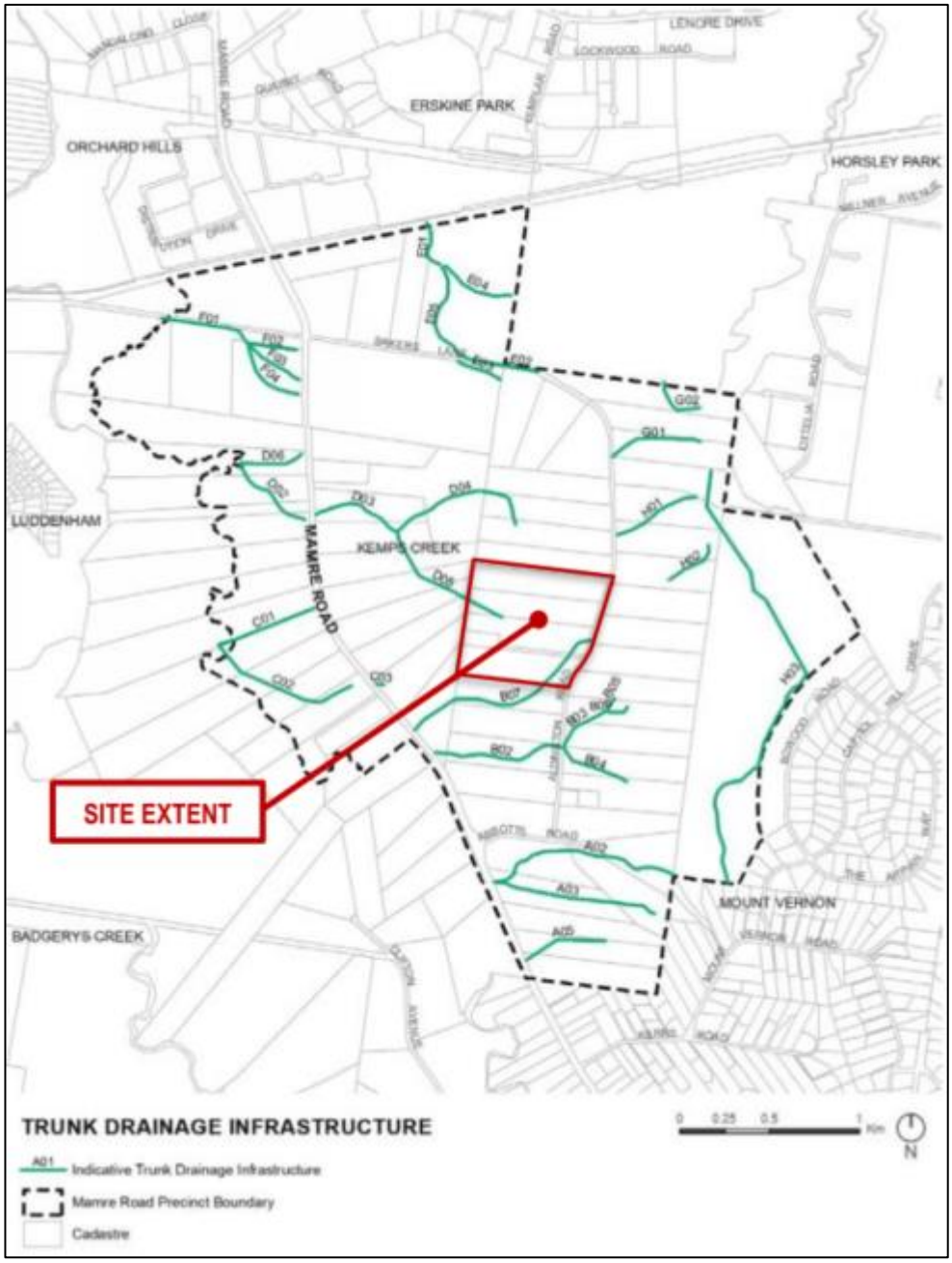


Figure 39 Trunk Drainage Infrastructure identified in the Draft Mamre Road Precinct DCP (Source: AT&L 2021)

6.7.4 Hydrological, Hydraulic and Stormwater Quality Modelling

The Model for Urban Stormwater Improvement Conceptualisation (MUSIC, Version 6.3.0) was used to estimate pollutant loads from the estate based on proposed site development. The model has been developed using the MUSIC-link parameters for Penrith City Council.

A MUSIC model was created to simulate both the pre-development and post-development scenarios. The pre-development model has been developed to estimate the mean annual runoff and pollutant loads under existing conditions, and is based on the broad internal and external catchments under existing conditions.

The post-development scenario model incorporates the following stormwater management measures as outlined in the Water Cycle Management Strategy:

- Rainwater tanks
- Gross Pollutant Traps (GPTs)
- Bio-retention systems
- On-Site Stormwater Detention (OSD) basins
- Estate-wide ponds on proposed lots 3, 7 and 8
- Evaporative misting using rainwater collected in dedicated tanks

The parameters of each stormwater management measure are stipulated in the Water Cycle Management Strategy. The attributes for each of the proposed stormwater management measures have been determined such that they will satisfy the pollutant reduction targets and mean annual runoff volume (MARV) target outlined in Section 6.1 of the Strategy.

MUSIC modelling results presented as mean annual loads at the receiving node indicate that the adopted target reductions are achieved, as shown in **Figure 40** below.

Parameter	Sources – Pre-Development	Sources – Post-Development	Residual Load Post-Development [1]	Reduction (%)	Target Reduction (%) – ESS Music Toolkit [2]	Target Reduction (%) – Penrith DCP
Flow (ML/yr)	58.6	171	**81.6**	52		
TSS (kg/yr)	9440	17800	741	**96**	90	85
TP (kg/yr)	16.8	38.1	7.13	**81**	80	60
TN (kg/yr)	118	374	72.3	**81**	65	45
Gross Pollutants (kg/yr)	168	4690	12.9	**100**	100	90

[1] Target flow reduction based on post-development flow calculated in MUSIC and target MARV of 1.9 ML/ha/yr * 43 ha = 81.7ML/yr
[2] ESS Music Toolkit – Wianamatta provided 2nd August 2021

Figure 40 Summary of MUSIC modelling results (Source: AT&L 2021)

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. **Figure 40** presents the pre-development and post development flow rates for all storm events at the outlet of the proposed OSD basins. The OSD within the basin has been designed to achieve the following outcomes for all pre and post developed cases.

Design Storm Event	Pre-Development Peak Flow Rate (m^3/s) (1)			Post-Development Peak Flow Rate (m^3/s) (2)		
	Discharge Pt 1	Discharge Pt 2	Discharge Pt 3	Discharge Pt 1	Discharge Pt 2	Discharge Pt 3
1 EY	0.53	0.39	0.26	0.51	0.10	0.28
0.2 EY	2.86	1.53	1.26	2.58	0.17	0.37
5% AEP	4.72	2.54	2.02	4.23	0.25	1.47
1% AEP	7.33	3.81	3.07	5.90	0.34	3.06

(1) refer to **Figure 2** for locations of discharge points under existing conditions

(2) refer to **Figure 5** for locations of discharge points under post-development conditions

Figure 41 Pre-development and post-development peak flow rates from the proposed development (Source: AT&L 2021)

A Civil Design Report has also been prepared by AT&L to outline the civil infrastructure requirements for the Proposed Development at the Site.

6.7.5 Earthworks

Based on the Preliminary Geotechnical Investigation undertaken by PSM, the following inferred sub surface soils were encountered across the Site:

- TOPSOIL / topsoil filling to depths of 0.1 - 0.6m
- FILL to depths of 2.3m over parts of the site
- Residual Soil – variably stiff to hard silty clay, to depths in the range 2.5-3.5m
- BEDROCK - initially extremely low to very low strength shale or sandstone at first contact at depths of 0.7

The Site in its existing condition is characterised by steep undulating topography. It is the intent of the Proposed Development to produce several "flat" pads to facilitate the development of large-scale industrial lots as intended by the zoning IN1. This will require earthworks across the site to achieve a benched site.

It is considered that the proposed earthworks design contained within the AT&L documentation provides 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, the proposed earthworks have been designed to minimise, where possible, retaining wall fronting the public roadways. Due to the steep topography, some walls are more than 10m along the northern boundary. Interface design with adjacent developments has also been considered to ensure the most economical and environmentally sustainable solution is achieved subject to owner's consent. A summary of the proposed cut and fill volumes across the Site is provided in **Table 28** below.

Table 28 Summary of proposed cut and fill volumes across the Site	
Item	**Volume (m^3)**
Stripping of existing topsoil	- 96,913
Excavation of existing creeks and dams (to be exported from site)	- 15,000
Net Cut (including topsoil stripping)	- 739,432
Net Fill	+ 779,582
Balance	**- 25,149 (import)**

The cut and fill volumes presented above have been calculated based on the following assumptions:

- 200mm depth of topsoil stripping over the entire Site.

- Any topsoil stripped from the Site can be blended in with cut material to be reused based on AT&L's experience on similar sites within the vicinity and will therefore not need to be exported off site. This will need to be confirmed by a Geotechnical Engineer at the detailed design phase.

All import materials will comply with the requirements of the requirements of the Import Fill Protocol and Geotechnical Specifications for the Development. Topsoil stripping, blending and placement will be completed in accordance with the Geotechnical Engineering Specifications for the project.

6.7.6 Retaining Walls

Where possible, batter slopes will be provided to accommodate level changes. Where this is not possible retaining walls will be constructed along the road, lots and basins based on the current civil and earthworks design. A keystone product or other similar face block will be adopted for all retaining walls and will be detailed in the Civil Works Package (**Appendix 20**). Figures 5-8 of the Civil Engineering Report provide images of the proposed retaining walls.

Retaining is required along the north, east, and southern site boundary where the proposed building pad levels will be altered from existing levels. All retaining walls will be constructed as required to suit the timing and development the earthworks and stormwater basin works. Where the walls are not constructed a batter of 1 in 4 will be maintained for stability purposes. All external batters to the development have been limited to 1 in 4 as a minimum generally, with the maximum localised batter being 1 in 3. Any batter steeper than 1 in 5 shall be vegetated.

It is noted that adjoining neighbours to the north and south have yet to finalise their development scheme and hence retaining walls and temporary batters will be constructed to the boundary until the adjoining pad levels have been confirmed. The batter will then be constructed to suit the adjoining final pad levels.

6.7.7 Internal road network

The internal road network will be designed and constructed in accordance with the Penrith City Council design and construction specifications and the Draft Mamre Road Precinct DCP.

Cul-de-sacs will also be designed and constructed in accordance with the Council guidelines requiring a 16.5m radius on the turn heads and to accommodate 36m long B-Triple. The Design vehicle is to be a 26m long B-Double with a design speed of 60km/hr in the estate roads (with the check vehicle being the 36m long B-Triple. The Draft Mamre Road Precinct DCP requires the east west road (Road No. 1) to be 25.2m with the north south road (Road No. 2) to be 24.0m.

6.7.8 Flooding

As illustrated in Section 8 of the Water Cycle Management Strategy, the development has no creeks or mapped watercourses or any significant external catchments. The entire Site and flows within the Site are being managed via an engineered pipe system along with OSD maintaining pre and post flows. The Proposed Development, including bulk earthworks, construction of a major and minor drainage system and construction of OSD basins, will satisfy the development controls related to flood prone land outlined in Section 2.7 of the Draft Mamre Road Precinct DCP.

The design of major system drainage elements is consistent with the principles of the NSW Government Floodplain Development Manual and Council's Stormwater Drainage Specification for Building Developments. Under the post-development scenario, overland flow will be safely contained within the proposed road reserves and within the Transgrid easement adjacent to Aldington Road.

It is noted that the post-development peak flow rates will be less than the pre-development peak flow rates at each of the discharge points for all design storm events between (and including) the 1EY and the 1% AEP event. Therefore, there will be no flood impact on adjacent properties associated with the proposed development of the Site.

Further details of the water cycle management and civil infrastructure design are provided in **Appendices 8** and **20**.

6.8 TRAFFIC AND TRANSPORT

A Traffic and Accessibility Management Plan has been prepared by Ason Group to establish that the development of the Site further to the Proposed Development is consistent with the relevant access, traffic and parking requirements.

6.8.1 Site Access

Access to the Site will be provided via a roundabout intersection with Aldington Road, with access to the wider road network provided via Mamre Road to the west of the Site, which itself will be upgraded in accordance with the TfNSW Mamre Road Upgrade project.

6.8.2 Mamre Road Precinct Transport and Movement Outcomes

TfNSW is currently in the process of more detailed investigations into the transport network infrastructure required for the rezoning of the Mamre Road Precinct, and specifically road network requirements. The TfNSW investigations include detailed traffic modelling of the Mamre Road Precinct and its connectivity to the broader regional road network, which will also inform the draft Mamre Road Precinct DCP.

In particular, the key infrastructure in the Mamre Road Precinct includes:

- Mamre Road: Mamre Road provides a central north-west access corridor to/through the Mamre Road Precinct
- The rezoning updated SEPP WSEA to rezone additional land SP2 Infrastructure (Classified Road) to facilitate upgrade of Mamre Road.
- Southern Link Road: The Southern Link Road is a proposed east-west link from Wallgrove Road to Mamre Road, connecting the Mamre Road Precinct to the existing WSEA lands (Oakdale, Eastern Creek etc).
- TfNSW is currently finalising a concept design for the Southern Link Road, which along with an assessment of environmental opportunities and constraints analysis, will also investigate the potential for a further extension to the west (of Mamre Road).
- Future Internal Roads: TfNSW has commenced detailed traffic modelling for the Mamre Road Precinct, focusing on its external connections to the regional road network, and the internal road network within the Mamre Road Precinct. The Mamre Road Precinct Rezoning Paper states:
  Future planning as part WSEA Road Network Strategy and planning for the Western Sydney Aerotropolis will identify additional regional transport connections to the precinct. This planning is to include modelling to estimate the traffic generation and distribution of trips to and from the future Western Sydney intermodal terminal.
- Active & Public Transport: There is very little active transport infrastructure within the Mamre Road Precinct at this time. The Mamre Road Preinct Rezoning Paper cites ongoing discussions with local Councils and TfNSW to deliver a cycle network connecting the Precinct to existing urban areas, the future Aerotropolis and WSEA. In this regard, the primary active transport corridor is expected to be designed around Mamre Road itself, with the Mamre Road Upgrade proposing a shared path along its full length, and cycle paths branching along creek lines and into the central portions of the Mamre Road Precinct.

6.8.3 Traffic generation

Ason Group is currently working with TfNSW with regard to the wider Mamre Road Precinct widening relating to traffic generation assumptions for the Mamre Road Precinct. The trip rates have been agreed through this process as suitable for adoption in the assessment for developments in the Mamre Road Precinct. The agreed trip rates with TfNSW are illustrated in **Table 29** below.

Table 29 TfNSW Agreed Trip rates

Time Period	Rate per 100m^2
Daily Trips	2.91
Local Road AM Peak (7am – 8am)	0.23
Local Road PM Peak (4pm – 5pm)	0.24
Site Maximum Generation Rate (All Vehicles)	0.26
Site Maximum Generation Rate (Heavy Vehicles)	0.07

Furthermore, **Table 30** below provides a summary of the Site's traffic generation during the peak hours. A breakdown of the Site's daily traffic profile based on the survey data available is shown in Appendix A of the TMAP.

Table 30 TfNSW Agreed Trip rates

Time Period	Proposed Total Building Area	Rate per 100m^2	Trips
Daily Trips	65,327m^2	2.91	1,901
Local Road AM Peak (7am – 8am)		0.23	150
Local Road PM Peak (4pm – 5pm)		0.24	157
Site Maximum Generation Rate (All Vehicles)		0.26	170
Site Maximum Generation Rate (Heavy Vehicles)		0.07	46

6.8.4 Trip distribution

An Aimsun Subnetwork Assessment was undertaken to understand the distribution of traffic volumes within the 2026 interim Mamre Road Precinct road network, with the turn volumes extracted from the peak hour to undertake a SIDRA Intersection assessment in relation to access to and from Mamre Road. The key intersection with regards to the Site is the Abbotts Road/Mamre Road intersection.

The Mamre Road / Bakers Lane intersection will potentially form one of the key intersections for the Mamre Road Precinct following the upgrade of Bakers Lane to the SLR. Further, this intersection currently also forms the key access intersection into the development site currently known as the Mamre South Precinct (subject to SSD-9522).

While there are many other developments influencing the intersection requirements for the Mamre Road / Bakers Lane intersection, including that within the LOG development sites, the key intersection with regard to the Site is clearly the Abbotts Road intersection with Mamre Road.

Therefore, the remainder of this assessment focuses on the interim upgrades required to the Mamre Road / Abbotts Road intersection to support the initial development of the Site by 2026.

6.8.5 Adjacent Sites – Cumulative Assessment

As part of the traffic assessment, a number of relevant sites within the Precinct are taken into consideration for a cumulative assessment. The relevant sites are illustrated in **Figure 42** and the forecast GFA adopted for the purposes of the 2026 interim assessment are provided in **Table 31**. It is noted that the forecast GFA represent 75% of each of the relevant sites.

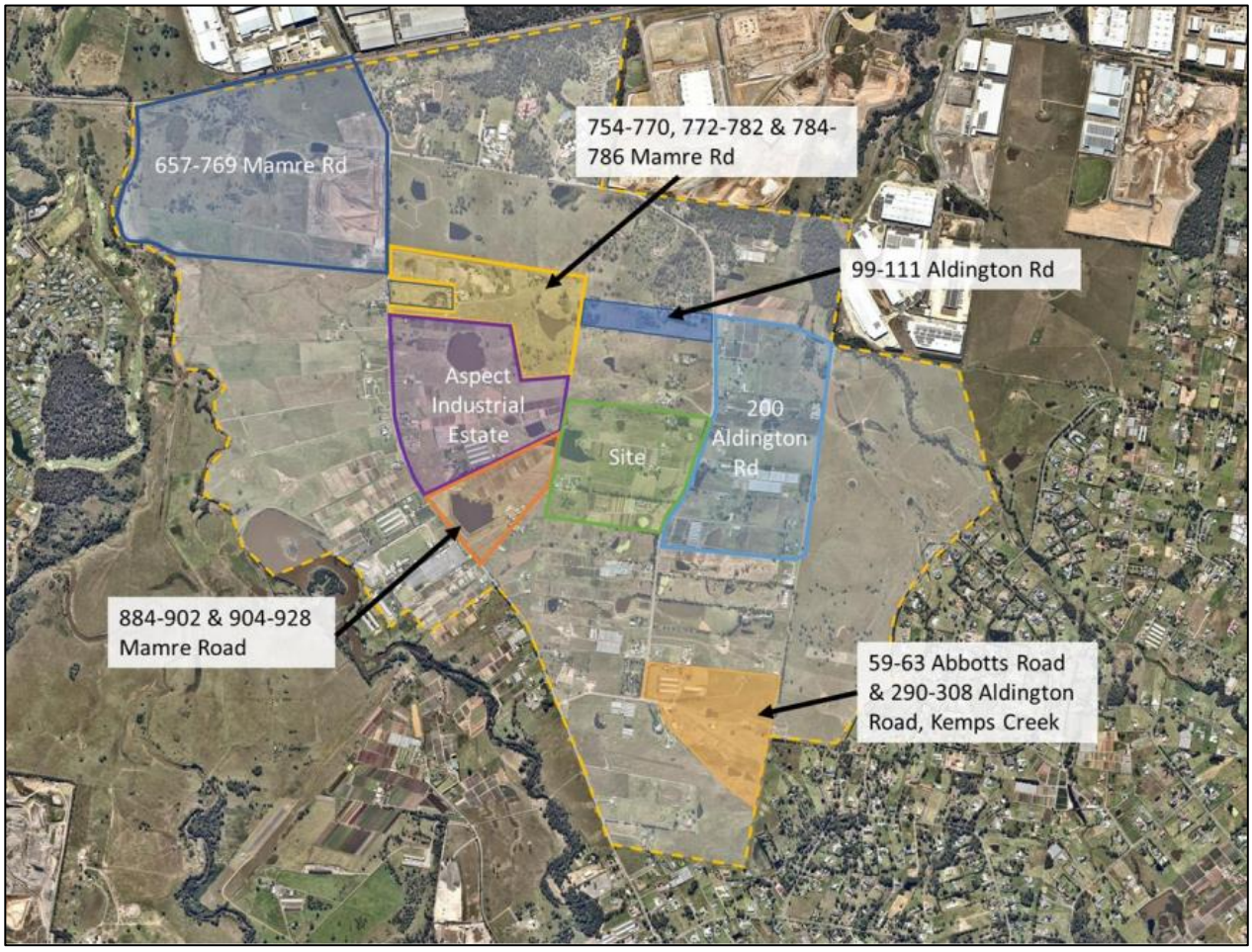


Figure 42 Sites adopted for 2026 Interim Modelling Assessment (Source: Ason Group 2021)

Table 31 Cumulative LOG Sites GFA

ID	Site Address	Reference	GFA (m^2) by 2026
1	657-769 Mamre Road	SSD-9522	242,488
2	754-770, 772-782 & 784-786 Mamre Road	SSD-10272349 plus 772-782 Mamre Road	131,460
3	788-804, 806-824, 826-842, 844-862, & 864-882 Mamre Road	SSD-10448	186,684
4	884-902 & 904-928 Mamre Road	SSD-17647189	61,158
5	59-63 Abbotts Road & 290-308 Aldington Road	SSD-9138102	118,601
6	99-111 Aldington Road	-	25,806
7	155-217 Aldington Road	SSD-17552047	141,699
8	200 Aldington Road	SSD-10479	281,816
	Total		**1,189,712**

As demonstrated in **Table 31**, a total GFA of 1,189,712m^2 is assumed to be completed by 2026 across the Mamre Road Precinct. Based on the trip rates agreed with TfNSW for the purposes of the Precinct modelling assessment, the assumed GFA equates to:

- 2,736 AM peak hour trips; and
- 2,855 PM peak hour trips.

Of particular note, this assessment assumed 141,699m^2 of the Site being developed by 2026, whereas the Proposed Development only seeks consent for 65,327m^2 at this stage, with any further development to be subject to future assessment processes.

6.8.6 Intersection operation

The SIDRA intersection model has been used in this traffic assessment to measure the performance of the future operation of the signalised intersection of Mamre Road and Abbotts Road.

The proposed interim intersection layouts that have been assessed are illustrated in **Figures 43-45**. The operation of key intersections in 2026 on the basis of the above traffic generation is summarised in **Table 32**.

Table 32 Intersection Operations

Intersection	Configuration	Period	AVD	LOS
Mamre Road / Abbotts Road	Signals	AM	10.3	A
		PM	25.1	B
Abbotts Road / Aldington Road	Roundabout	AM	30.2	C
		PM	31.6	C
Aldington Road / Site Access	**Roundabout**	**AM**	**13.2**	**A**
		PM	**13.4**	**A**

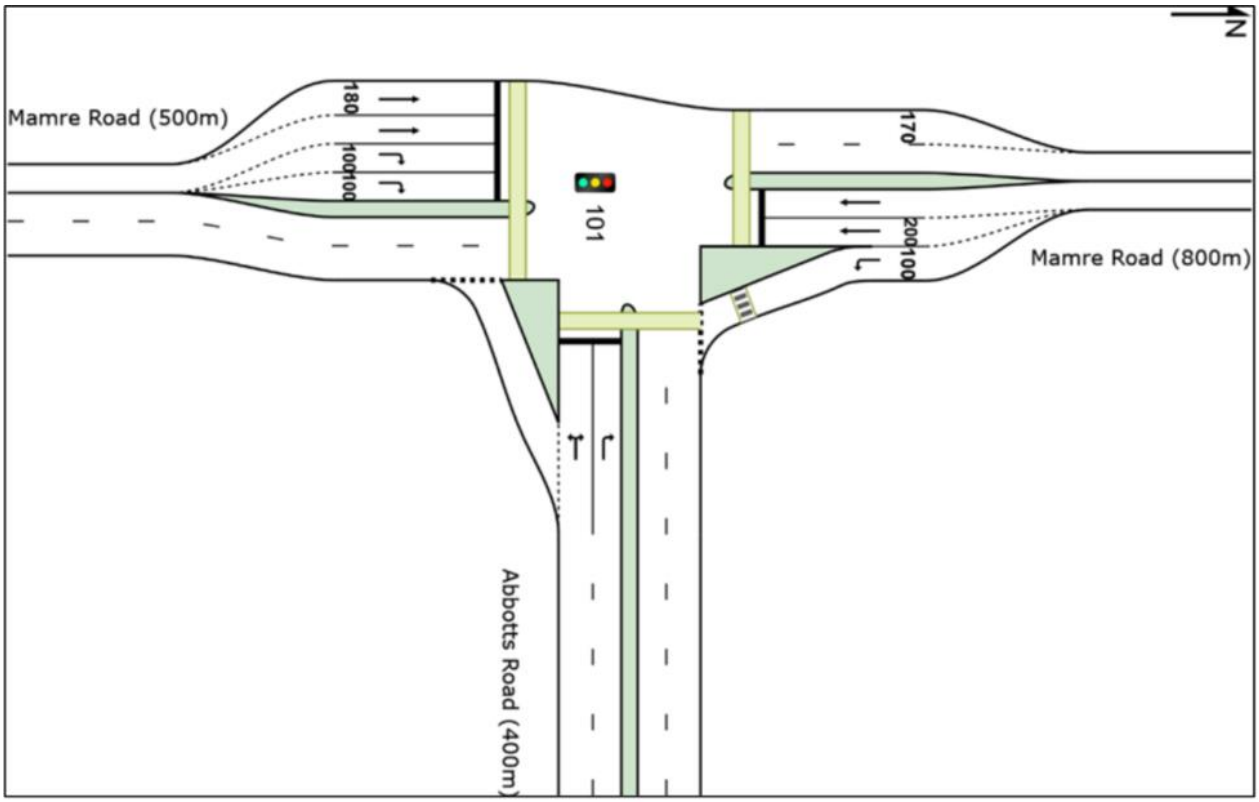


Figure 43 Interim 2026 SIDRA Intersection Layout - Mamre Road/Abbotts Road (Source: Ason Group 2021

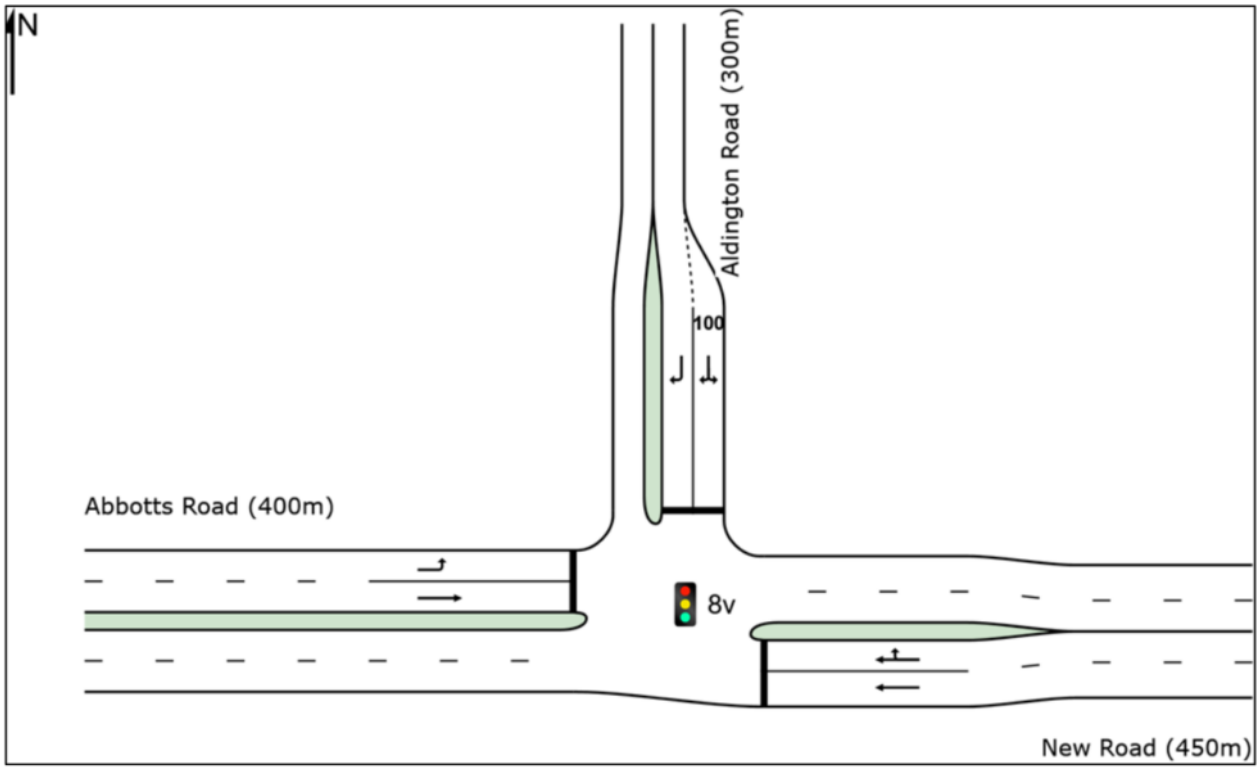


Figure 44 Interim 2026 SIDRA Intersection Layout - Abbotts Road/Aldington Road (Source: Ason Group 2021)

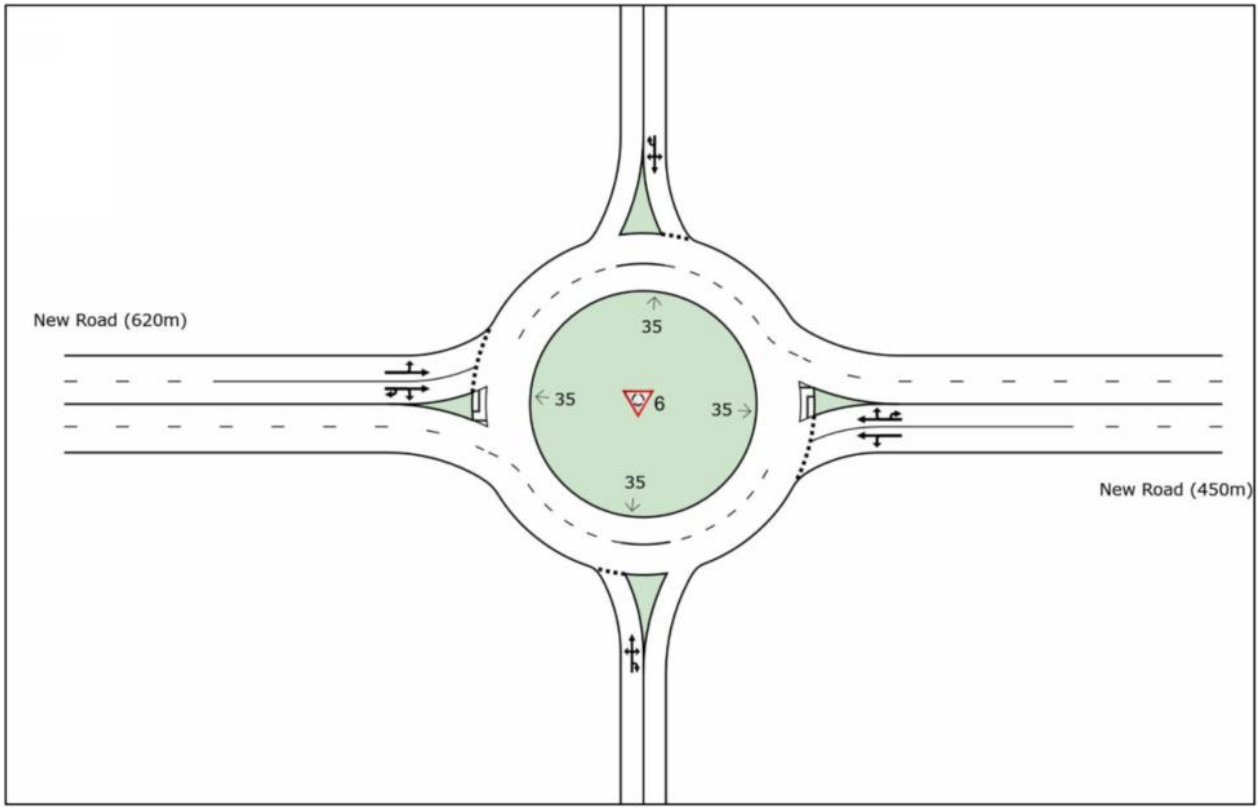


Figure 45 Interim 2026 SIDRA Intersection Layout - Aldington Road/Site Access (Source: Ason Group 2021)

As demonstrated in **Table 32**, the SIDRA analysis indicates that the proposed intersections can accommodate the traffic generation associated with 75% of the traffic associated with the initial development of the relevant LOG sites.

Until the wider Mamre Road Precinct modelling assessment has been completed, further assessment of the network will not provide meaningful results until the background traffic flows and distribution (and the road network required to accommodate them) has been agreed with the relevant stakeholders and is understood.

It is assumed that the ultimate intersection would require additional capacity over that shown by the interim layout assessed. However, this relates to the background traffic flows, rather than the Site itself. The Site represents just 4% of the total area within the Mamre Road Precinct therefore, it is clear that – while the findings of the Mamre Road Precinct modelling are still outstanding – the Proposed Development itself does not warrant the provision of any further network upgrades when considered against the context of the wider Mamre Road Precinct.

Therefore, the assessment has demonstrated that the proposed interim arrangements are sufficient to accommodate the initial stages of development, anticipated by 2026 as a minimum, while the wider upgrades are being finalised and undertaken.

6.8.7 Public transport

Bus services

It is noted that the Site is not directly serviced by public transport at this time. However, opportunities for future connections have been identified, noting again that the Mamre Road Upgrade specifically provides for new bus stops along its entire route. The proposed bus services will ideally integrate with existing bus services in the area, connect to regional centres of Penrith, Mt Druitt and Blacktown, and in the long term, connect to areas such as Leppington in the South West Growth Centre, Prairiewood and the Liverpool to Parramatta T-Way.

While the internal Mamre Road Precinct road network will be finalised further to the outcomes of the TfNSW modelling, it is anticipated that the internal roads will provide greater width to accommodate heavy vehicle movements, which will therefore be bus capable. There are significant opportunities therefore to provide sub-regional services along Mamre Road, as well as services within the MRP itself to maximise the number of sites that lies within 400m of a viable bus service.

Train services

The closest train station to the Site is currently approximately 10km away. However, the Metro Western Sydney Airport will provide 23 kilometres of new railway to link residential areas with jobs hubs and the rest of Sydney's public transport network. While the closest station to the Site will likely be Luddenham Station, located approximately 4km west of the Site, it will significantly improve public transport accessibility to the wider area. This provides an opportunity for bus services to combine with the Metro to improve connectivity to/from the residential areas to the north of the Site.

Bicycle and pedestrian network

At present, shared paths (pedestrian and cycle) are provided along Erskine Park Road and sections of Mamre Road to the north of the Site, but there is little cycling (or pedestrian) infrastructure in Mamre Road between Distribution Drive to the north and Elizabeth Drive to the south.

The Broader Western Sydney Employment Area (BWSEA) Structure Plan provides a detailed outline of future active transport objectives and strategies, acknowledging that the provision of such will be essential to encourage the use of active transport from the outset.

In relation to pedestrian network, due to the current largely undeveloped nature of the land immediately surrounding the Site, pedestrian infrastructure is currently non-existent. Key pedestrian desire lines in the vicinity of the Site would be triggered by connections to future public transport infrastructure, noting the nature of the area being largely industrial and therefore not representing key destinations and attractions for people to walk to.

It is noted that the Mamre Road upgrade project will provide shared cycle and pedestrian pathways along at least one side of the road for its entire length.

6.8.8 Transport Assessment

A review of the key travel modes for those travelling to the locality for work with regard to the surrounding Destination Zone 115184210 within the Horsley Park – Kemps Creek statistical area is included in the Transport and Accessibility Management Plan.

It is evident that the private vehicle (car) is the preferred mode of choice for commuters travelling to work in the area, with 95% travel to work by car with 92% as the driver and 3% as passenger i.e. carpooling. This is reflective of the current nature of the area, which accommodates rural residential properties and agricultural businesses only. However, noting the future land use of the Site as industrial in nature, it is expected that the Journey-to-work data accurately reflects the current trends for travel to places of work at industrial sites.

A Framework Sustainable Travel Plan has been prepared to inform future site-specific travel plans, expected to be implemented for each of the warehouse sites within the proposed Warehouse and Logistics Hub.

6.8.9 Parking Assessment

Car parking

In accordance with the Draft Mamre Road Precinct DCP, the Site is subject to the car parking rates listed in **Table 33**.

Table 33 Draft Mamre Road Precinct DCP Parking Rates

Land Use	Minimum Parking Rate
Warehouse	1 space per 300m^2 or 1 space per 4 employees, whichever is the greater
Industries	1 space per 200m^2 of gross floor area or 1 space per 2 employees, whichever is the greater
Ancillary office	1 space per 40m^2

The proposed carparking provision is outlined in **Table 34** below.

Table 34 Car parking requirements and proposed provision

Building	Land Use	GFA (m^2)	Requirement (spaces)	Currently Proposed
Building 9A	Warehouse	33,095	110	244
	Office	816	20	
	Subtotal	33,991	131	
Building 9B	Warehouse	30,600	102	233
	Office	816	20	
	Subtotal	31,416	123	
Total		**65,327**	**254**	**477**

As demonstrated in **Table 34**, the Proposed Development requires 254 parking spaces and 477 parking spaces are provided, exceeding the requirements of the adopted parking rate. Therefore, the Proposed Development can provide full compliance with the adopted rates.

In addition, two accessible parking spaces will be provided per every 100 spaces in accordance with the Disability (Access to Premises – Buildings) Standards 2010 from the Building Code of Australia (BCA), as well as the accessible parking requirements provided in Appendix B of AS 2890.6.

Bicycle parking

While there is currently a lack of cycle facilities in the area, it is anticipated that such facilities will be developed as part of the broader WESA. Therefore, consideration will be given to providing appropriate bicycle facilities (such as bicycle parking and end of journey facilities) within the Site at the appropriate stage. Given the nature of the Site, it is anticipated that if required, cycle parking could be readily accommodated in the future (when appropriate, to avoid any inefficient use of space).

6.8.10 Access

The design vehicle adopted for the development is a 20m long articulated vehicle for each of the lots proposed.

The check vehicle adopted for the development is a 30m long PBS Type 2 vehicle for each of the lots proposed. The 12.5 metre Heavy Rigid Vehicle has been adopted for the design of fire access trails in accordance with the NSW Fire + Rescue Guidelines.

The proposed car parking area has been designed to accommodate B99 Vehicles as per AS2890.1:2004.

Access driveway

All access driveways (to the proposed road network within the Mamre Road Precinct) have been designed with reference to AS 2900.1 and AS 2890.2 and any other relevant published road design/road engineering guidelines.

Truck access driveways shall be designed to provide for vehicles up to and including a 30m long PBS Type 2 with maximum gradients, maximum rates of change of grades, and maximum crossfalls in accordance with relevant standards applicable at the time when Construction Certification drawings are prepared and/or in accordance with standards applicable at the time of construction.

Car access driveways shall be designed to provide for B99 vehicles, assuming simultaneous movements in accordance with AS 2890.1 and any other relevant Council Engineering Guidelines.

It is anticipated that full access driveway design compliance with AS 2890.1 and AS 2890.2 would form a standard Condition of Consent further to approval.

6.8.11 Construction traffic

During construction, the overwhelming majority of light vehicle trips would occur in the short workforce arrival and departure periods, being (based on the proposed construction hours) 6:30am-7:00am and 6:00pm-6:30pm respectively. As such, any light vehicle movements would occur outside of the existing (commuter) peak periods in the local network.

While it requires further confirmation, at this stage, it is anticipated that a maximum of around 40 workers would be on-site at any one time.

Heavy vehicle traffic would mainly be generated by activities associated with the delivery of construction equipment and delivery and extraction of material for construction works. As the construction programme has yet to be finalised, a worst-case scenario for heavy vehicle movements per day required for the delivery of construction materials to the Site cannot be accurately determined.

However, at this stage, it is estimated that there would be a peak of 170 truck movements a day. These truck movements will occur all day between 7:00am to 6:00pm. Therefore, A maximum peak of 16 truck movements per hour is expected (8 in movements and 8 out movements).

As such, construction could generate a peak of 56 vehicle movements per hour, of which would not coincide with the road network peak.

It is evident that the construction will generate less traffic than the operational stage of the development.

6.9 WASTE

A Waste Management Plan has been prepared by Land & Groundwater Consulting (LG Consult) to outline the management measures of the waste generated as part of the Proposed Development.

6.9.1 Demolition and construction waste

The only significant waste to be generated by the Proposed Development is anticipated to be demolition and construction waste, which will be stored in allocated areas of the Site (refer to **Figures 46** and **47**) and generated during the following construction stages:

- *Demolition and construction of building facility pads, structures and related amenities; and*
- *Amendments to lead-in services including electricity, sewer and potable water.*

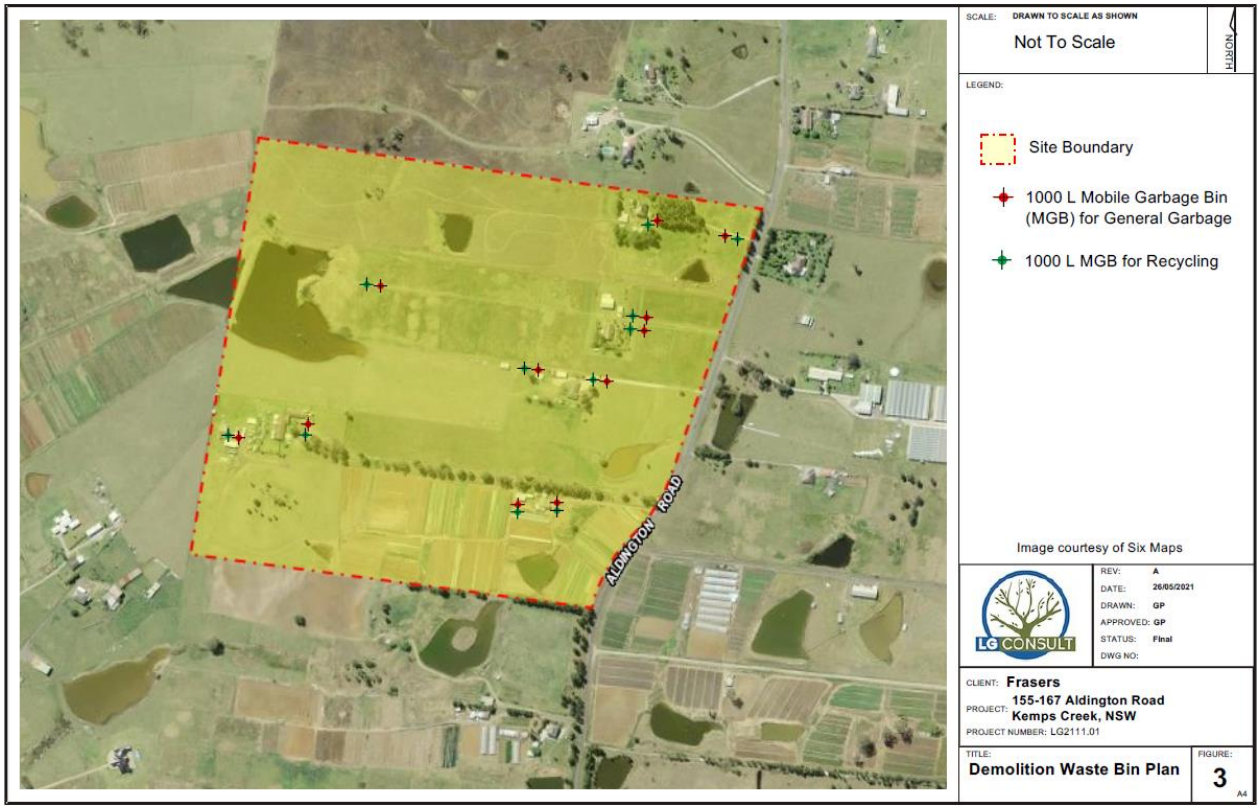


Figure 46 Demolition Waste Bin Plan (Source: LG Consult 2021)

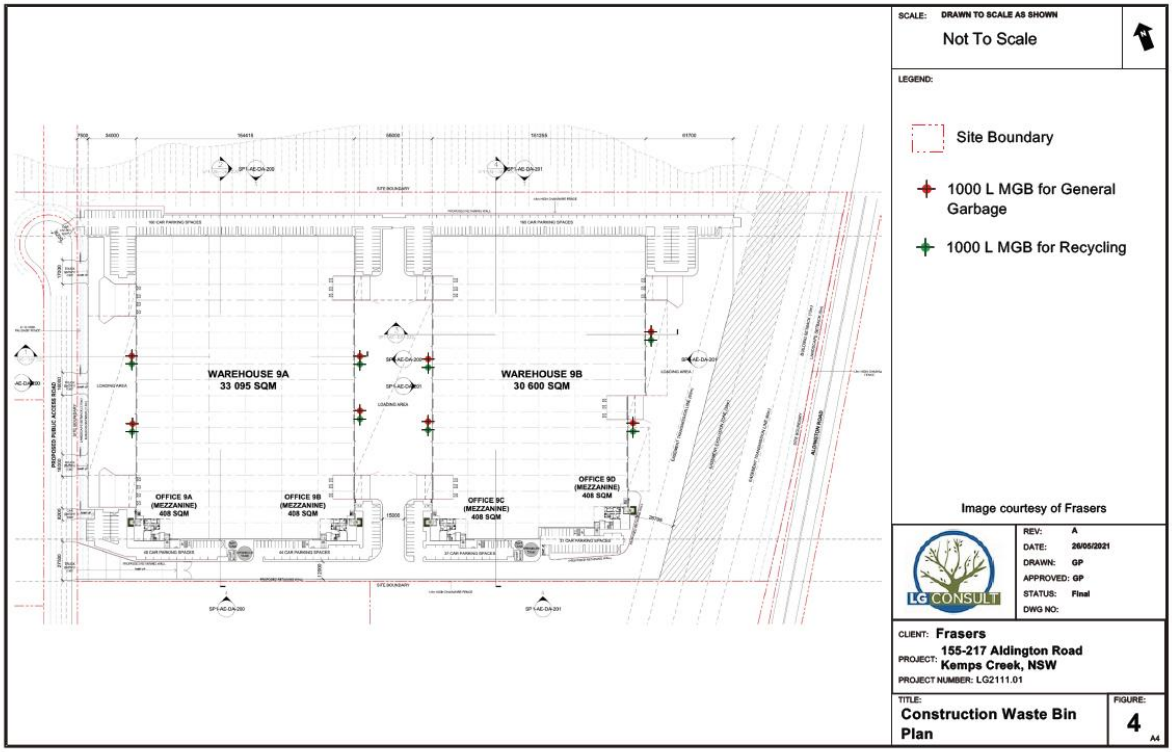


Figure 47 Construction Waste Bin Plan (Source: LG Consult 2021)

The demolition and construction activities are anticipated to generate the following broad waste streams including:

- Excavation material
- Timber, concrete, bricks/pavers, metal, glass
- Furniture, fixtures and fittings
- Garden organics
- Residual waste

The estimated quantities of the above waste streams are detailed within the Waste Management Plan.

6.9.2 Operational waste

All operational waste producing activities such as packaging material, servicing of equipment and employee amenities will be located within the warehouse distribution centre. Waste storage and management facilities will comprise colour coded recycling bins, which will be utilised to dispose off any packaging waste. The recycling bins will be located within the waste management, storage and compaction areas (refer **Figure 48**), and collected by a regulated waste contractor.

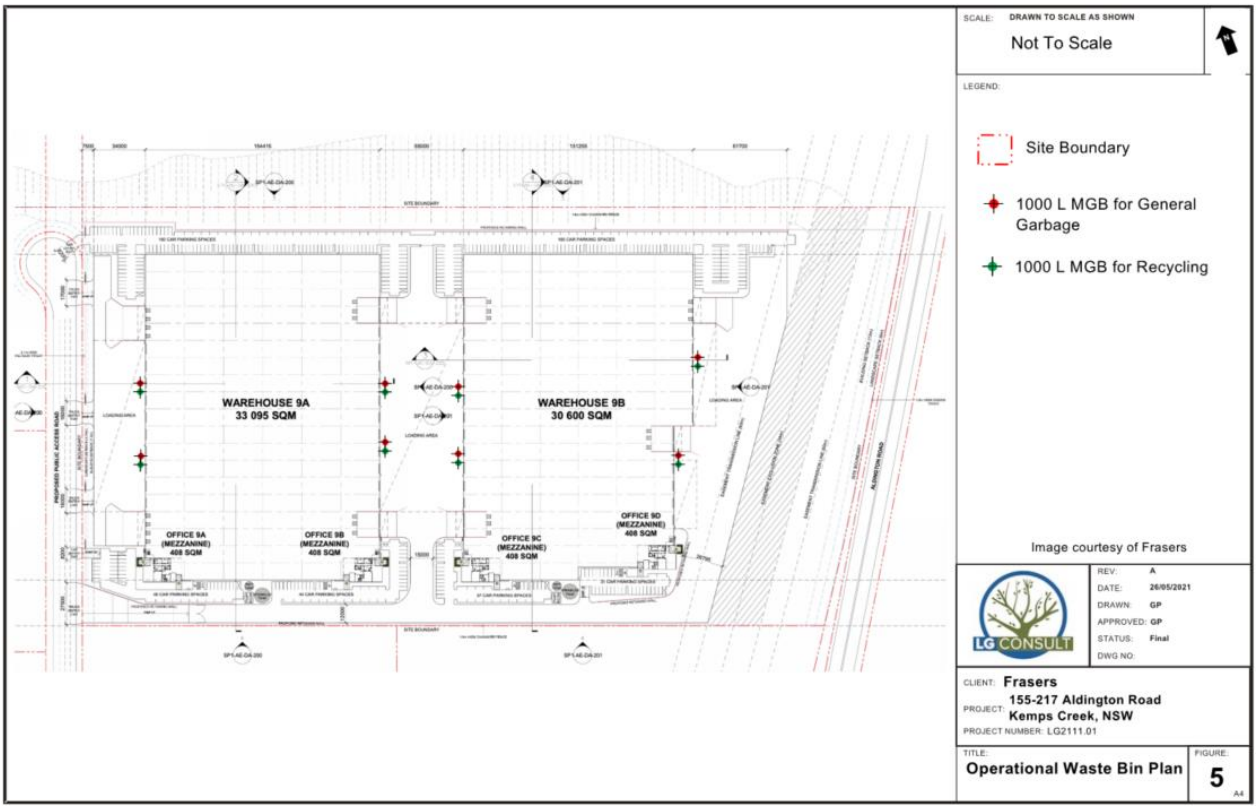


Figure 48 Operational Waste Bin Plan (Source: LG Consult 2021)

Small amounts of operational waste are anticipated to be generated, for which the broad waste streams are summarised as follows:

- Paints/PVC tubing
- Packaging
- Containers (cans, plastic, glass)
- Paper/cardboard

The weekly estimated quantities of the above waste streams are detailed within the Waste Management plan.

Further details are provided at **Appendix 21**.

6.10 NOISE AND VIBRATION

An Acoustic Report has been prepared by Acoustic Works to assess environmental noise impacts associated with the Proposed Development.

6.10.1 Receivers and Noise Monitoring Locations

Receiver locations in proximity to the development

Based on the acoustic assessment, the nearest sensitive receiver locations were identified as follows:

1. A two storey residential dwelling is located adjacent the northern site boundary at 141 Aldington Road.
2. Single and two storey residential dwellings are located adjacent the western site boundary from 826-862 Mamre Road, with an SSD lodged to demolish one of these and construction an industrial warehouse estate.

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.
5. A single storey residential dwelling is located adjacent the southern site boundary at 219-251 Aldington Road.
6. Aldington Road separates the site from single and two-storey residential dwellings from 198-256 Aldington Road, with SSDs lodged to demolish these and construct industrial warehousing estates.
7. Aldington Road separates the site from a two-storey residential dwelling to the east at 180-196 Aldington Road, with an SSD lodged to demolish the dwelling and construct part of an industrial warehousing estate.
8. Aldington Road separates the site from a two-storey residential dwelling to the east at 162-178 Aldington Road, with an SSD lodged to demolish the dwelling and construct part of an industrial warehousing.

These locations were chosen as they are the nearest sensitive receivers to the Proposed Development. The locations of the identified sensitive receivers are illustrated in **Figure 49** below.

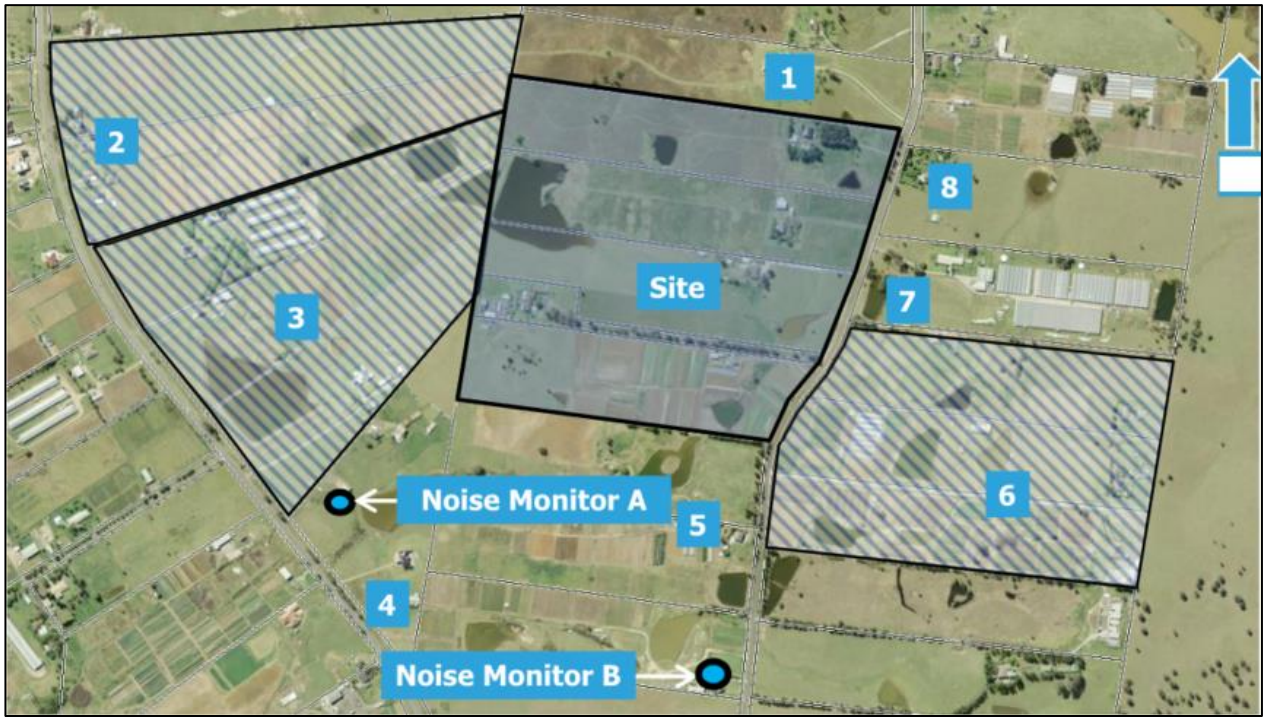


Figure 49 Receiver and noise monitoring locations (Source: Acoustic Works 2021)

Although multiple dwellings are grouped for receivers 2, 3 and 6, to ensure a conservative assessment all calculation of noise impacts were assessed to the nearest dwelling within the nominated area. The receivers nominated in **Figure 49** are the nearest and worst-affected sensitive receivers to the site in the Mamre Road Precinct.

Other receivers identified by DPIE

The nearest sensitive receivers of the types identified by DPIE (other than residential receivers) are as follows:

A. Emmaeus Catholic College is located approximately 1.8km to the north of the Site.
B. Emmaeus Retirement Village is located approximately 2km to the north of the Site.
C. Mamre Anglican School is located approximately 1.8km to the north of the Site.

D. A childcare centre is located approximately 3.5km to the north of the Site.
E. A golf club is located approximately 3.3km to the west of the Site.
F. St. Narsai Assyrian Christian College is located approximately 3.4km to the east of the Site.
G. Peter and Paul Assyrian Church is located approximately 5km to the east of the Site.
H. Irfan College is located approximately 4.6km to the south of the Site.
I. Christadelphian Heritage College is approximately 4.3km to the south of the Site.

In addition to the nominated receivers, 3D noise modelling in **Section 6.10.3.3** of this EIS and Section 8.3 of the Acoustic Report also includes surrounding residential receiver not identified by DPIE. **Figure 50** illustrates the DPIE identified sensitive receivers.

Figure 50 DPIE-identified sensitive receivers (Source: Acoustic Works 2021)

Further, residential zones in Mount Vernon, Luddenham, Kemps Creek, Badgerys Creek and Horsley Park have been assessed for sleep disturbance.

6.10.2 Noise Criteria

6.10.2.1 Penrith City Council, SEPP WSEA and AS 2021:2015

The relevant noise criteria were determined in accordance with the PDCP2014, SEPP WSEA, AS 2021:2015: Acoustics – Aircraft noise intrusion – Building siting and construction and the NSW Noise Policy for Industry 2017.

In accordance with Clause 33D(3)(b) and (c), the consent authority must consider the location of the development in relation to the criteria set out in Table 2.1 (Building Site Acceptability Based on ANEF Zones) in AS 2021:2015 and must be satisfied that the development will meet the indoor design sound levels set out in Table 3.3 (Indoor Design Sound Levels for Determination of Aircraft Noise Reduction) in AS 2021:2015.

Given that the Site is located outside of the 20-25 ANEF Contour for the Western Sydney Airport, the Proposed Development satisfies the requirement of Clause 33D(3)(b) under SEPP WSEA. In relation to Clause (3)(c), an assessment is required to determine compliance with the indoor sound design levels specified in Table 3.3 of AS 2021:2015.

6.10.2.2 Noise Policy for Industry

Assessment of noise in accordance with NSW EPA Noise Policy for Industry (2017) has two main components: intrusiveness and amenity criteria. These are compared to each other (after conversion of amenity noise level to LAeq,15min equivalent level) to determine the overall project noise trigger level.

Intrusiveness noise criteria

The intrusiveness noise levels of the close proximity receivers are as follows:

Table 35 Intrusiveness noise levels

Time period	Criteria $L_{eq(15min)}$ dB(A)	
	Receivers 1 & 5 to 8	Receivers 2 to 4
Day (7am-6pm Mon-Sat; 8am-6pm Sun)	46	43
Evening (6pm-10pm)	50	42
Night (10pm-7am Sun-Fri, 10pm-8am Sat)	43	39

Amenity noise levels in areas near an existing or proposed cluster of industry

No industrial noise sources are currently operating in the vicinity of the nearest receivers, therefore existing industrial noise levels are more than 5dB below the relevant recommended amenity noise level and the modified formula would apply.

To determine the cumulative criteria for the proposed development, the following must be considered:

- Each masterplan development will undertake calculation to account for the cumulative (combined) noise impacts from onsite activities associated with their development including all individual lots within the Site to sensitive receivers. The assessment takes into account the cumulative effect of the development without the need to adjust the amenity criteria for the masterplan development individual lots.
- The surrounding area may be considered as a greenfield area, with individual developments in the surrounding area comprised of multiple lots for each Development Application. Each assessment when assessed by the acoustic engineer will combined all noise sources from the lots within the Site to determine the noise impacts, therefore accounting for the cumulative effect of their development regardless of the number of lots proposed within the Site.
- Therefore, to determine the cumulative criteria, the potential number of development sites need to be considered, not the individual warehouses located within each development to calculate any adjustments to the criteria.
- The combined noise impacts from each development take into account the cumulative effect regardless of how many warehouse/buildings are located within the development site, the analysis includes all noise impacts occurring simultaneously in the analysis. Therefore, to calculate the adjustment for the cumulative criteria, consideration is required based on the number of developments in proximity to the receiver, not individual buildings.
- Once the cumulative criteria have been established using the above method, if individual assessment for buildings within the development site are undertaken, then the cumulative criteria must be adjusted. The same cumulative criteria used for the masterplan for a single building within the site cannot be used, adjustment to the criteria must account for the number of building/lots within the Site to ensure the individual building/lot assessment complies with the criteria. This means the cumulative criteria must be adjusted based on the number of lots within the development site to ensure the overall site still complies with the criteria used for the masterplan assessment.

Based on the review of the area, there is the potential for up to 5 masterplan development sites to impact the immediate receivers considered in this assessment. This number will increase for receivers located at greater distances, but it should also be understood that noise from the sites will be further attenuated due to screening and increased separation distances, making noise impacts from the sites imperceptible. Based on the interactive mapping tool on the NSW Major Projects website, there is potential for up to 78 nearby masterplan developments sites to impact more distant receivers considered in this assessment.

Based on Sections 2.4 and Section 2.4.2 of the Noise Policy for Industry, the recommended amenity noise criteria to the immediate receivers surrounding the Site and accounting for the cumulative effect as shown in **Table 36** below.

Table 36 Amenity Noise Levels – Receivers 1 to 8

Time period	Recommended Amenity Noise Level	Adjusted (Cumulative) Amenity Criteria
	Criteria $L_{eq(period)}$ dB(A)	Criteria $L_{eq(15min)}$* dB(A)
Day	60	56
Evening	50	46
Night	45	41

To account for the cumulative impact of the multiple industrial developments planned in the surrounding area, the adjusted amenity criteria would apply to the nearby receivers. Different level would apply to the receivers and is described in Section 7.7.7 of the Acoustic Report.

*Note In accordance with Sections 2.2 and 2.4 of the policy, a +3dBA correction was added to convert $L_{Aeq,period}$ to $L_{Aeq,15min}$.

Project specific noise criteria – Close proximity receivers

As the intrusiveness criteria is lower than the cumulative amenity criteria for the daytime period, the intrusiveness criteria has been used for this time period for a conservative assessment. Therefore the project noise trigger levels accounting for the cumulative effect of the Site and surrounds are as follows:

Table 37 Project-specific criteria – Receivers 1 to 8

Time period	Criteria $L_{eq(15min)}$ dB(A)	
	Receivers 1 & 5 to 8	Receivers 2 to 4
Day	43	46
Evening	42	46
Night	39	41

Sleep disturbance

The sleep disturbance noise levels for receivers located in proximity to the Site are as follows:

Table 38 Sleep disturbance criteria

Time period	Receivers 1 & 5 to 8		Receivers 2 to 4	
	Criteria $L_{eq(15min)}$ dBA	Criteria L_{AFmax} dBA	Criteria $L_{eq(15min)}$ dBA	Criteria L_{AFmax} dBA
Night	40	52	44	54

Long-term cumulative noise impacts to distant receivers in the Mamre Road Precinct

The receivers nominated in **Section 6.10.1** are the nearest sensitive receivers in the Mamre Road Precinct, with other sensitive receivers in Mount Vernon, Horlsey Park, Kemps Creek or Luddenham located further away and in locations screened from the Site. The applicable criteria for these receivers in detailed in **Figure 51** below. The Intrusiveness Criteria are not presented as the cumulative amenity criteria are below the minimum RBLs in all cases.

Receiver	Amenity Criteria $L_{eq(period)}$ dB(A)			Cumulative Amenity Criteria $L_{eq(15min)}$ dB(A)			Sleep disturbance criteria L_{Amax} dB(A)
	Day	Evening	Night	Day	Evening	Night	Night
A (Emmaeus Catholic College)	35 internal / 45 external*			16 internal / 26 external			-
B (Emmaeus Retirement Village)	55	45	40	36	26	21	52
C (Mamre Anglican School)	35 internal / 45 external*			16 internal / 26 external			-
D (Childcare Centre)	35 internal / 45 external*			16 internal / 26 external			-
E (Golf Club)	55			36			-
F (St Narsai Assyrian College)	35 internal / 45 external*			16 internal / 26 external			-
G (St Peter and Paul Assyrian Church)	40 internal / 50 external*			21 internal / 31 external			-
H (Irfan College)	35 internal / 45 external*			16 internal / 26 external			-
I (Christadelphian Heritage College)	35 internal / 45 external*			16 internal / 26 external			-
J (Mount Vernon Residential Receivers)	55	45	40	36	26	21	52
K (Horsley Park Residential Receivers)	55	45	40	36	26	21	52
L (Kemps Creek Residential Receivers)	55	45	40	36	26	21	52
M (Badgerys Creek Residential Receivers)	55	45	40	36	26	21	52
N (Luddenham Residential Receivers)	50	45	40	31	26	21	52

Figure 51 Cumulative Amenity Criteria (Distant Receivers) (Source: Acoustic Works 2021)

*Note that for receivers where the assessment location is internal a 10dBA reduction from external to internal noise levels was assumed in accordance with Section 2.6 of the Noise Policy for Industry (2017).

It is anticipated that compliance with the above criteria would be difficult to certify through measurements, therefore the criteria would only be used to assess predicted contributions from the development site to distant receivers.

6.10.2.3 NSW Road Noise Policy 2011

The NSW Road Noise Policy outlines the criteria for any increase in the total traffic noise level at the location due to a proposed project or traffic generating development. Therefore, the following criteria applies:

Table 39 Relative increase criteria for residential land uses			
Road Category	**Type of project/development**	**Total traffic noise level – dB(A)**	
		Day (7am to 10pm)	**Night (10pm to 7am)**
Local roads	Existing Residences affected by **additional traffic** on existing freeways/arterial/sub-arterial roads generated by land use developments	$L_{Aeq,15hour}$ 55 (external)	$L_{Aeq,9hour}$ 50 (external)

In addition to the assessment criteria outlined in Tables 3-5 of the NSW Road Noise Policy, any increase in the total traffic noise level at a location due to a proposed project or traffic-generating development must be considered. Residences experiencing increases in total traffic noise level above the relative increase

criteria in Table 6 of the policy should also be considered for mitigation as described in Section 3.4 of the policy, with the criteria presented in **Table 40**.

Table 40 Relative increase criteria for residential land uses

Road Category	Type of project/development	Total traffic noise level increase – dB(A)	
		Day (7am to 10pm)	Night (10pm to 7am)
Freeway/arterial/sub-arterial roads and transitways	New road corridor/redevelopment of existing road/land use development with the potential to generate additional traffic on existing road	Existing traffic $L_{Aeq(15hr)}$ + 12dB (external)	Existing traffic $L_{Aeq(9hr)}$ + 12dB (external)

6.10.3 Environmental Assessment

6.10.3.1 Itemised Noise Sources

To model noise levels from each warehouse, the following assumptions were made:

- Warehouse heights of approximately 10m above concrete pad level.
- Warehouses constructed using a 4m high concrete tilt wall with the remaining height to use standard sheet metal construction.
- 2 trucks entering and exiting each lot every 15 minutes (3 trucks for Lots 9A+9B) including associated activities.
- Forklifts operating continuously in each lot, both indoors and outdoors including reverse alarms.
- 10 cars entering or exiting each lot every 15 minutes. (15 cars for Lots 9A+9B).
- Mechanical plant was assumed to be operating continuously and located on the roof of the office areas.

Levels for the individual events were calculated over a 15 minute-period (including all applicable corrections at the receivers for the modelling) with the resulting LAeq,15min values used for the assessment. The itemised noise source list is presented in **Table 41**.

Table 41 Itemised Noise Sources

Source Description	Source type	Sound Power L_W	Sound Power L_{Wmax}*	Source height above ground RL (m)
Truck Passby	Line	60.1dBA/m	83dBA	1
Truck Venting Airbrake	Point	110dBA	113dBA	2.5
Truck Door Closure	Point	92dBA	93dBA	2.5
Truck Reversing including alarm	Line	78dBA/m	104dBA	2.5
Truck Starting	Point	97dBA	101dBA	1
Forklift activities including reverse alarm	Line	72dBA/m	104dBA	1
Mechanical Plant Deck	Point	77dBA	79dBA	1
Car starting	Point	84dBA	86dBA	0.5
Car door closure	Point	83dBA	86dBA	0.5
Car driving on asphalt <30km/h	Line	47dBA/m	80dBA	0.5

*Note that Lmax events were assessed as point sources at worst-case locations in relation to each receiver.

6.10.3.2 Cumulative Noise Impact Assessment (Nearest Receivers)

The following assessment of noise impacts to sensitive receivers is based on the criteria established using the cumulative criteria specified in Section 2.4.2 of the Noise Policy for Industry. The noise source levels at the receiver locations are shown in **Table 42**. LAeq results are not shown where the calculated total is less than 0dBA.

Table 42 Project specific noise levels (Receivers 1 to 8)

Receiver	Project Specific Criteria $L_{eq, 15min}$ dBA			Predicted Noise Impact $L_{eq, 15min}$ dBA			Complies (Yes/No)		
	Day	Evening	Night	Day	Evening	Night	Day	Evening	Night
1	43	42	39	43	41	34	Yes	Yes	Yes
2	46	46	41	39	37	29	Yes	Yes	Yes
3	46	46	41	43	41	33	Yes	Yes	Yes
4	46	46	41	41	39	32	Yes	Yes	Yes
5	43	42	39	41	40	32	Yes	Yes	Yes
6	43	42	39	35	34	26	Yes	Yes	Yes
7	43	42	39	41	39	31	Yes	Yes	Yes
8	43	42	39	38	37	29	Yes	Yes	Yes

Compliance with the cumulative impact criteria is predicted for all onsite activities at the receiver locations during the proposed operating hours on the condition the recommendations detailed in Section 12 of the Acoustic Report are implemented.

Figures 52-54 below present a graphical representation of the predicted noise levels.

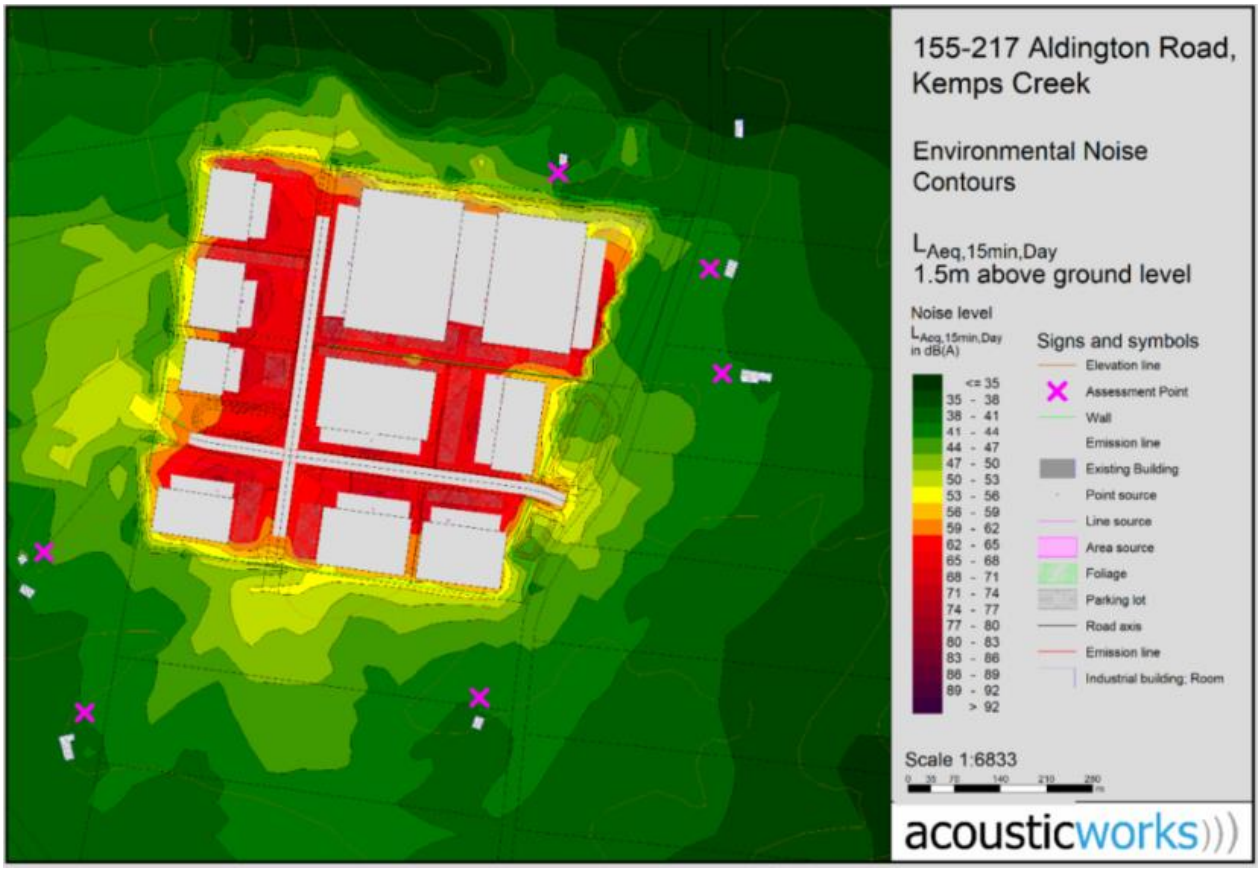


Figure 52 $L_{Aeq, 15min}$ noise contours (Day) - Receivers 1 to 8 (Source: Acoustic Works 2021)

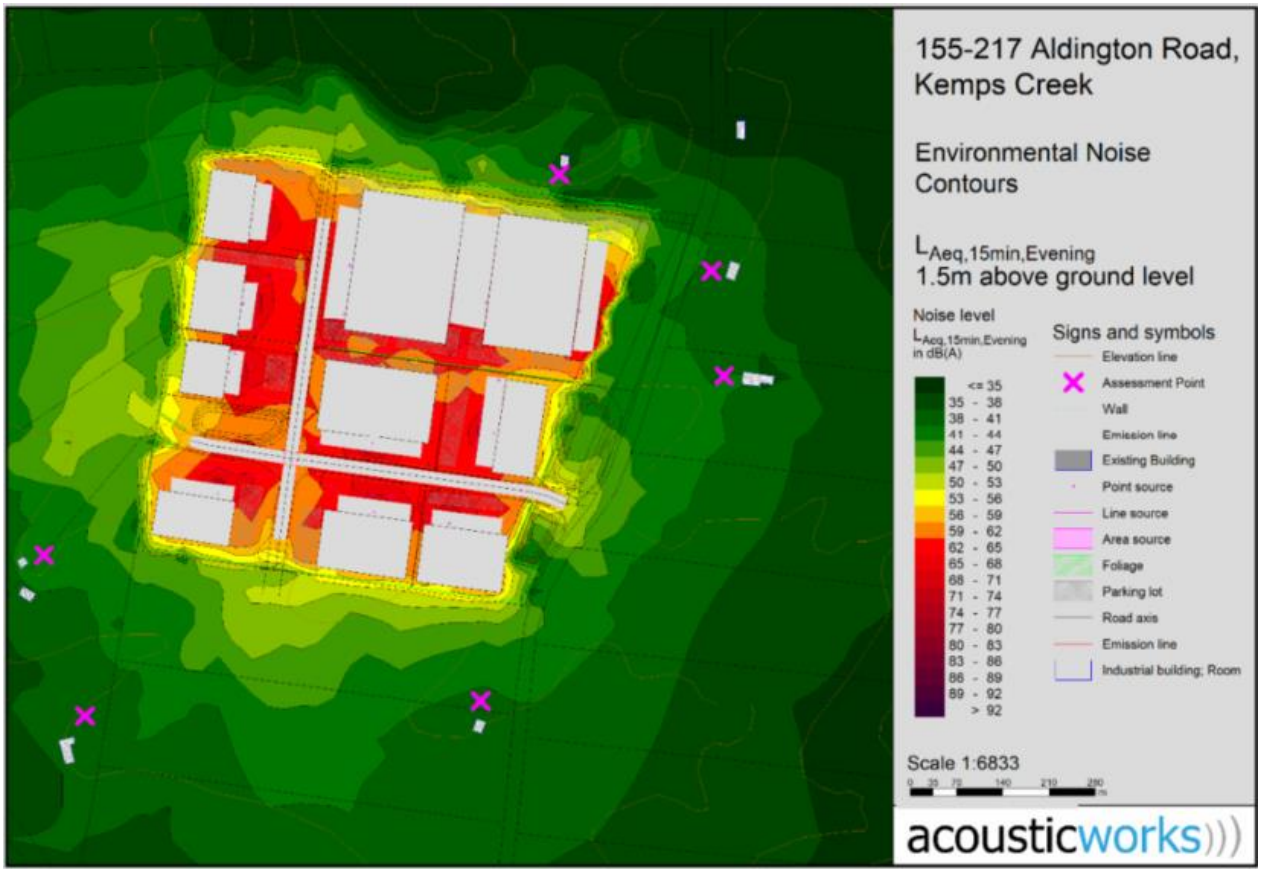


Figure 53 $L_{Aeq,\ 15min}$ noise contours (Evening) - Receivers 1 to 8 (Source: Acoustic Works 2021)

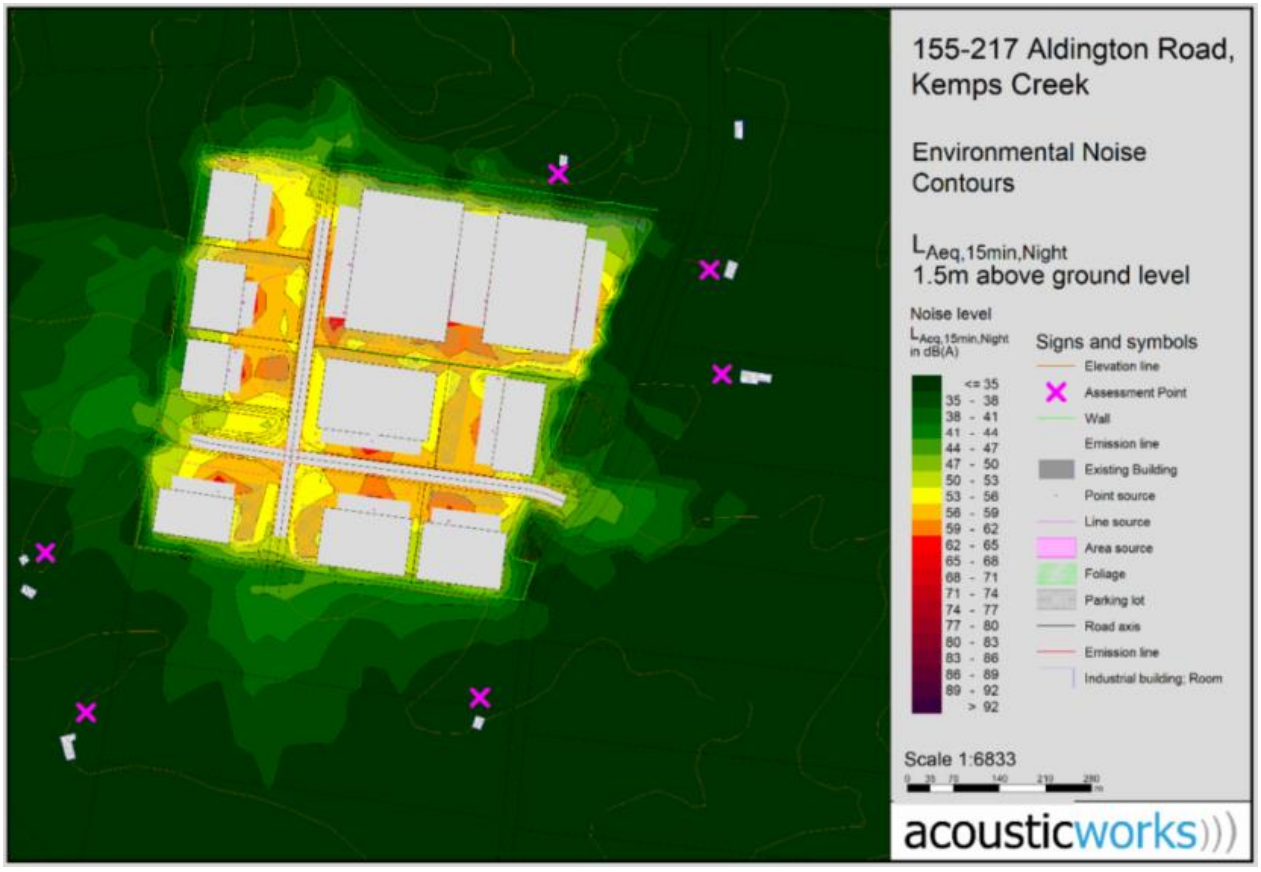


Figure 54 $L_{Aeq,\ 15min}$ noise contours (Night) - Receivers 1 to 8 (Source: Acoustic Works 2021)

6.10.3.3 Cumulative Noise Impact Assessment (Distant Receivers)

The predicted cumulative noise impacts to receivers A to F is shown in **Table 43**. L_{Aeq} results are not shown where the calculated total is less than 0dBA.

Table 43 Project specific noise levels (Receivers 1 to 8)

Receiver	Project Specific Criteria $L_{eq, 15min}$ dBA			Predicted Noise Impact $L_{eq, 15min}$ dBA			Complies (Yes/No)		
	Day	Evening	Night	Day	Evening	Night	Day	Evening	Night
A	16 internal / 26 external			16 / 26	-	-	Yes	Yes	Yes
B	36	26	21	25	24	15	Yes	Yes	Yes
C	16 internal / 26 external			16 / 26	-	-	Yes	Yes	Yes
D	16 internal / 26 external			11 / 21	-	-	Yes	Yes	Yes
E	36	36	36	24	22	14	Yes	Yes	Yes
F	16 internal / 26 external			11 / 21	-	-	Yes	Yes	Yes
G	21 internal / 31 external			4 / 14	2 / 12	- / 5	Yes	Yes	Yes
H	16 internal / 26 external			5 / 15	3 / 13	- / 5	Yes	Yes	Yes
I	16 internal / 26 external			10 / 20	6 / 3	- / 8	Yes	Yes	Yes
J	36	26	21	20	20	12	Yes	Yes	Yes
K	36	26	21	19	17	8	Yes	Yes	Yes
L	36	26	21	16	14	6	Yes	Yes	Yes
M	36	26	21	12	10	2	Yes	Yes	Yes
N	36	26	21	20	17	10	Yes	Yes	Yes

Compliance with the cumulative impact criteria is predicted for all onsite activities at receivers A to F during the proposed operating hours on the condition the recommendations detailed in Section 12 within the Acoustic Report are implemented. **Figures 55-57** below provide a visual representation of the predicted noise levels.

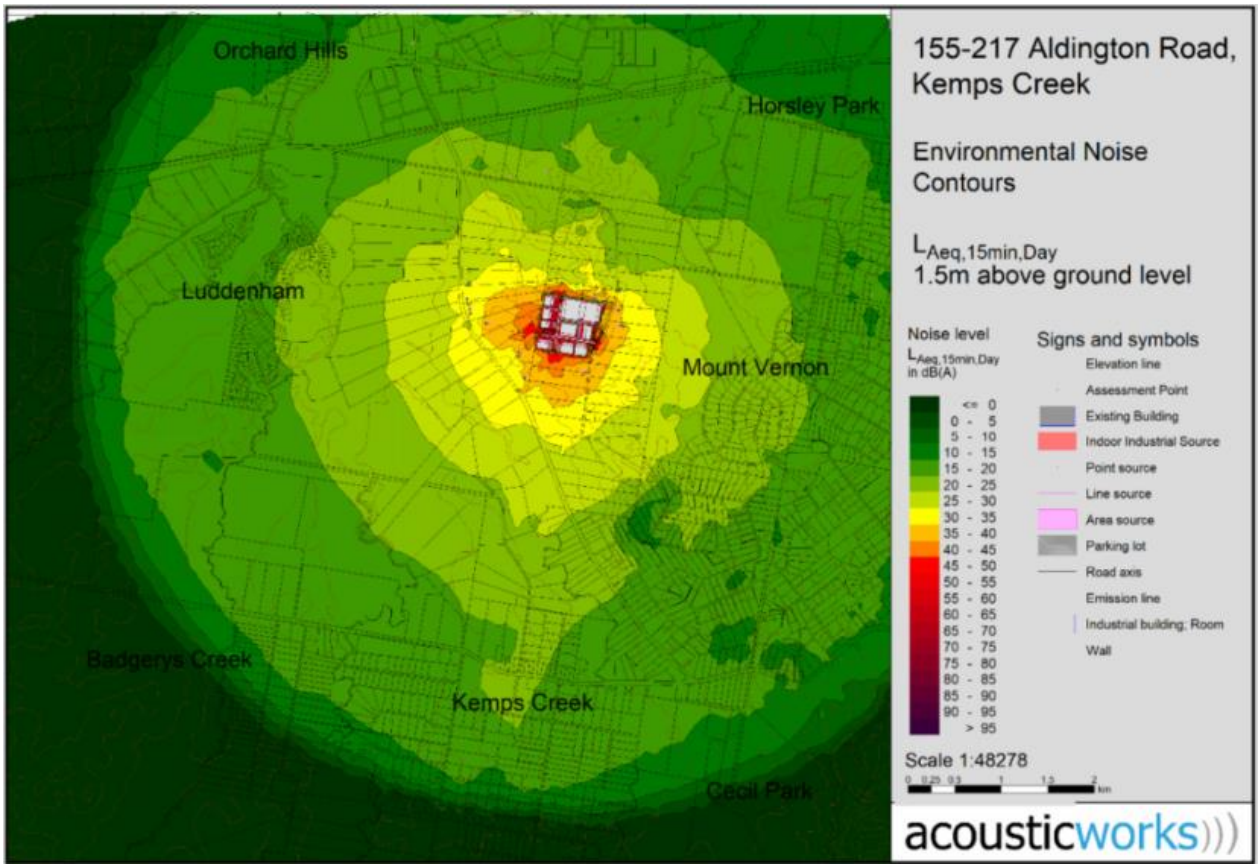


Figure 55 $L_{Aeq, 15min}$ noise contours (Day) - Distant Receivers (Source: Acoustic Works 2021)

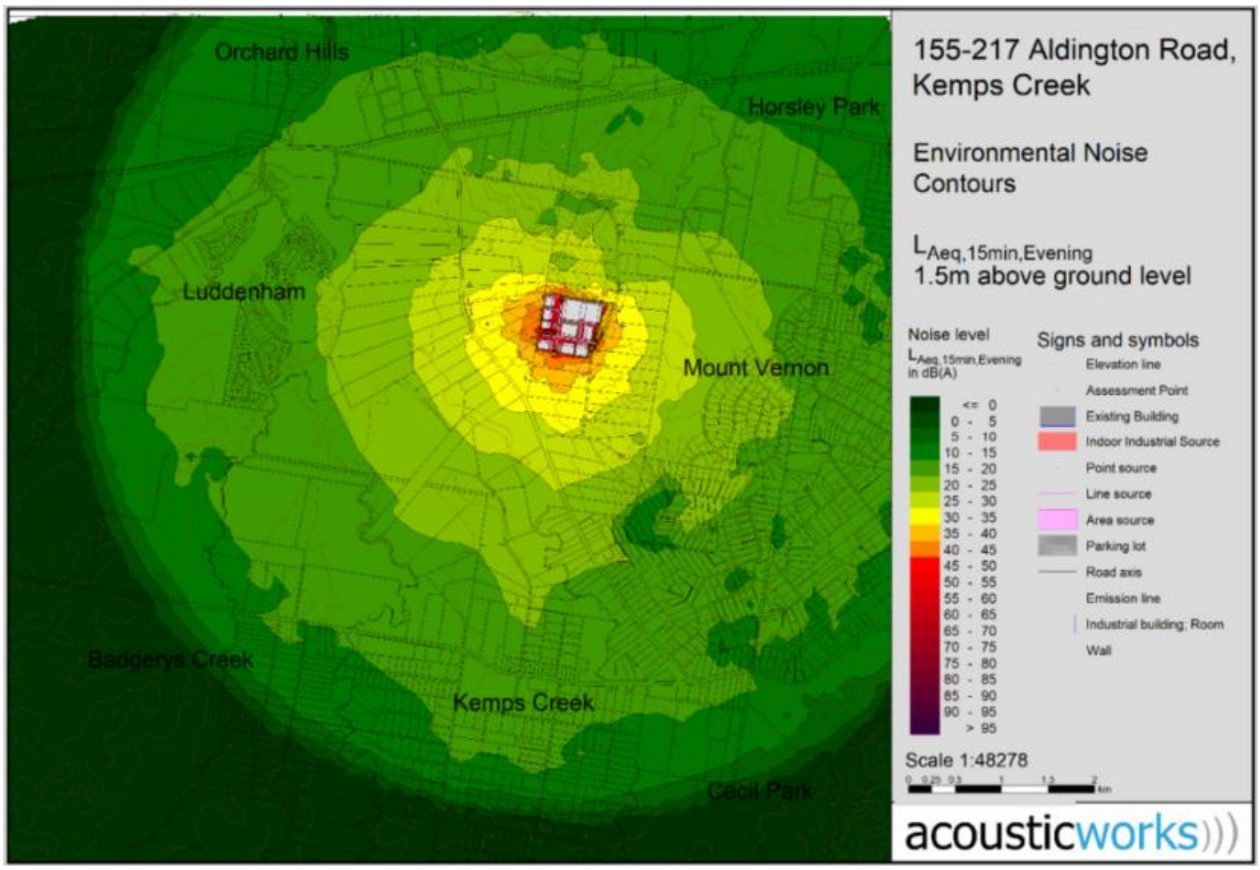


Figure 56 $L_{Aeq,\ 15min}$ noise contours (Evening) - Distant Receivers (Source: Acoustic Works 2021)

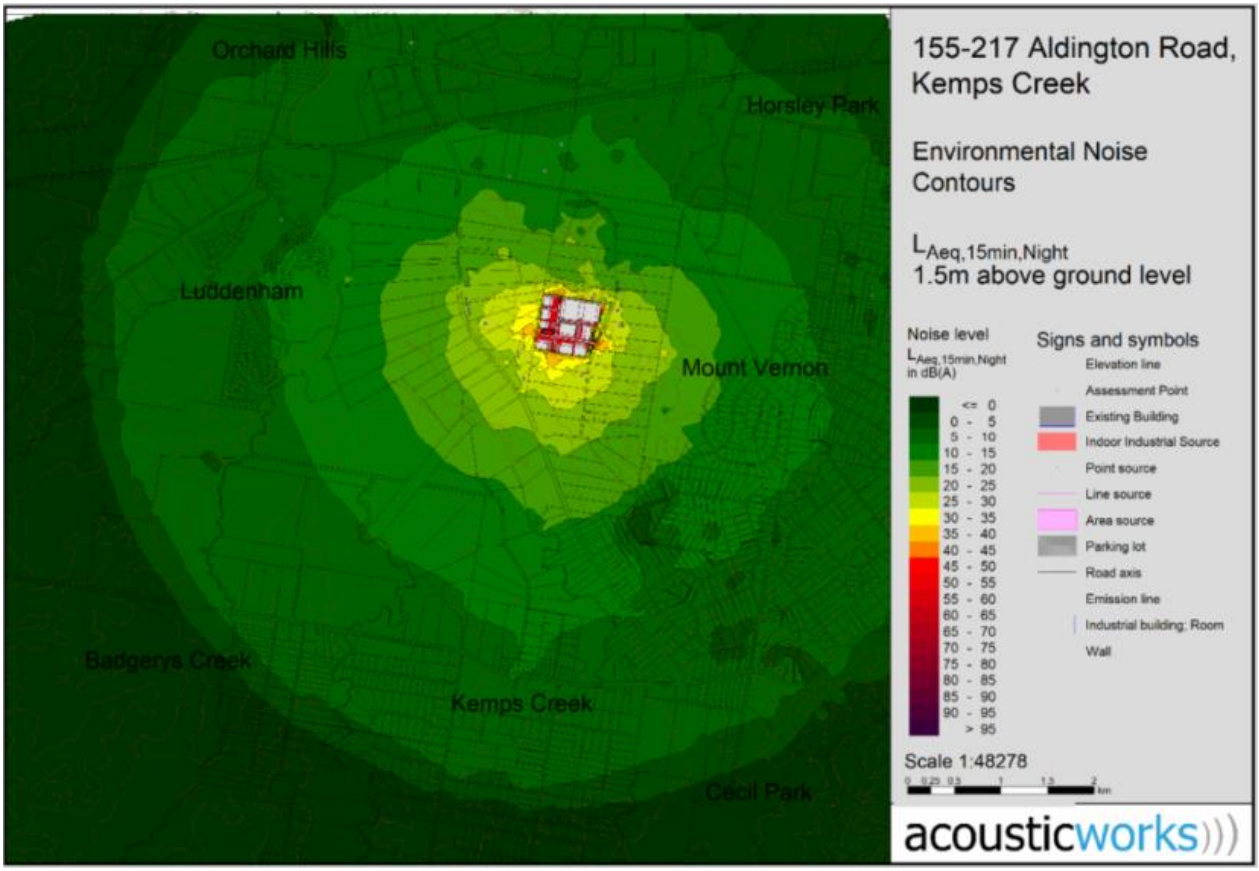


Figure 57 $L_{Aeq,\ 15min}$ noise contours (Night) - Distant Receivers (Source: Acoustic Works 2021)

In relation to the sleep disturbance criteria, compliance is predicted for all onsite activities at the receiver locations for 24/7 operation on the condition the recommendations detailed in Section 9 of the Acoustic Report are implemented. The noise source levels are predicted levels of noise at the receiver locations are shown in **Figures 58-61**.

Receiver	Receivers 1. 141 Aldington Road (N) 2. 826-862 Mamre Road (W) 3. 864-928 Mamre Road (W) 4. 930-966 Mamre Road (W) 5. 219-251 Aldington Road (S) 6. 198-256 Aldington Road (E) 7. 180-196 Aldington Road (E) 8. 162-178 Aldington Road (E) Description	Lwmax dB(A)	LAmax adj,T ext... dB(A)	Complies Lmax dB(A)
				52
	Truck door closing	93	29	Yes
1	Truck idle	103	39	Yes
	Truck air brakes	113	49	Yes
	Truck manouevring	93	29	Yes
	Truck reverse alarm	104	40	Yes
	Truck starting	101	37	Yes
	Forklift passby	104	40	Yes
	Forklift reverse	101	37	Yes
	Forklift unloading	93	29	Yes
	Car door closure	86	22	Yes
	Car passby	80	16	Yes
	Car start	86	22	Yes
				52
	Truck door closing	93	32	Yes
2	Truck idle	103	42	Yes
	Truck air brakes	113	52	Yes
	Truck manouevring	93	32	Yes
	Truck reverse alarm	104	43	Yes
	Truck starting	101	40	Yes
	Forklift passby	104	46	Yes
	Forklift reverse	101	43	Yes
	Forklift unloading	93	35	Yes
	Car door closure	86	28	Yes
	Car passby	80	22	Yes
	Car start	86	28	Yes
				52
	Truck door closing	93	31	Yes
3	Truck idle	103	41	Yes
	Truck air brakes	113	51	Yes
	Truck manouevring	93	31	Yes
	Truck reverse alarm	104	42	Yes
	Truck starting	101	39	Yes
	Forklift passby	104	49	Yes
	Forklift reverse	101	46	Yes
	Forklift unloading	93	38	Yes
	Car door closure	86	31	Yes
	Car passby	80	25	Yes
	Car start	86	31	Yes
				52
	Truck door closing	93	48	Yes
4	Truck idle	103	38	Yes
	Truck air brakes	113	48	Yes
	Truck manouevring	93	28	Yes
	Truck reverse alarm	104	39	Yes
	Truck starting	101	36	Yes
	Forklift passby	104	49	Yes
	Forklift reverse	101	46	Yes
	Forklift unloading	93	48	Yes
	Car door closure	86	41	Yes
	Car passby	80	35	Yes
	Car start	86	41	Yes

Figure 58 Sleep Disturbance noise levels (Receivers 1 to 4) (Source: Acoustic Works 2021)

Receiver	Receivers 1. 141 Aldington Road (N) 2. 826-862 Mamre Road (W) 3. 864-928 Mamre Road (W) 4. 930-966 Mamre Road (W) 5. 219-251 Aldington Road (S) 6. 198-256 Aldington Road (E) 7. 180-196 Aldington Road (E) 8. 162-178 Aldington Road (E) Description	Lwmax dB(A)	LAmax adj,T ext... dB(A)	Complies Lmax dB(A)
				52
	Truck door closing	93	37	Yes
5	Truck idle	103	47	Yes
	Truck air brakes	113	57	No
	Truck manouevring	93	37	Yes
	Truck reverse alarm	104	48	Yes
	Truck starting	101	45	Yes
	Forklift passby	104	47	Yes
	Forklift reverse	101	44	Yes
	Forklift unloading	93	36	Yes
	Car door closure	86	39	Yes
	Car passby	80	33	Yes
	Car start	86	39	Yes
				52
	Truck door closing	93	31	Yes
6	Truck idle	103	41	Yes
	Truck air brakes	113	51	Yes
	Truck manouevring	93	31	Yes
	Truck reverse alarm	104	42	Yes
	Truck starting	101	39	Yes
	Forklift passby	104	47	Yes
	Forklift reverse	101	44	Yes
	Forklift unloading	93	36	Yes
	Car door closure	86	29	Yes
	Car passby	80	23	Yes
	Car start	86	29	Yes
				52
	Truck door closing	93	32	Yes
7	Truck idle	103	42	Yes
	Truck air brakes	113	52	Yes
	Truck manouevring	93	32	Yes
	Truck reverse alarm	104	43	Yes
	Truck starting	101	42	Yes
	Forklift passby	104	45	Yes
	Forklift reverse	101	42	Yes
	Forklift unloading	93	44	Yes
	Car door closure	86	37	Yes
	Car passby	80	31	Yes
	Car start	86	37	Yes
				52
	Truck door closing	93	32	Yes
8	Truck idle	103	42	Yes
	Truck air brakes	113	52	Yes
	Truck manouevring	93	32	Yes
	Truck reverse alarm	104	43	Yes
	Truck starting	101	40	Yes
	Forklift passby	104	49	Yes
	Forklift reverse	101	46	Yes
	Forklift unloading	93	38	Yes
	Car door closure	86	41	Yes
	Car passby	80	35	Yes
	Car start	86	41	Yes

Figure 59 Sleep Disturbance noise levels (Receivers 5 to 8) (Source: Acoustic Works 2021)

Receiver	Receivers: B - Emmaeus Retirement Village, J - Mount Vernon, K - Horsley Park, L - Kemps Creek, M - Badgerys Creek, N - Luddenham — Description	Lwmax dB(A)	LAmax adj,T ext.. dB(A)	Complies Lmax dB(A)
				52
	Truck door closing	93	21	Yes
B	Truck idle	103	31	Yes
	Truck air brakes	113	41	Yes
	Truck manouevring	93	21	Yes
	Truck reverse alarm	104	32	Yes
	Truck starting	101	29	Yes
	Forklift passby	104	32	Yes
	Forklift reverse	101	29	Yes
	Forklift unloading	93	21	Yes
	Car door closure	86	14	Yes
	Car passby	80	8	Yes
	Car start	86	14	Yes
				52
	Truck door closing	93	28	Yes
J	Truck idle	103	38	Yes
	Truck air brakes	113	48	Yes
	Truck manouevring	93	28	Yes
	Truck reverse alarm	104	39	Yes
	Truck starting	101	36	Yes
	Forklift passby	104	39	Yes
	Forklift reverse	101	36	Yes
	Forklift unloading	93	28	Yes
	Car door closure	86	21	Yes
	Car passby	80	15	Yes
	Car start	86	21	Yes
				52
	Truck door closing	93	25	Yes
K	Truck idle	103	35	Yes
	Truck air brakes	113	45	Yes
	Truck manouevring	93	25	Yes
	Truck reverse alarm	104	36	Yes
	Truck starting	101	33	Yes
	Forklift passby	104	36	Yes
	Forklift reverse	101	33	Yes
	Forklift unloading	93	25	Yes
	Car door closure	86	18	Yes
	Car passby	80	12	Yes
	Car start	86	18	Yes

Figure 60 Sleep Disturbance noise levels (Receivers B, J & K) (Source: Acoustic Works 2021)

Receiver	Receivers: B - Emmaeus Retirement Village, J - Mount Vernon, K - Horsley Park, L - Kemps Creek, M - Badgerys Creek, N - Luddenham — Description	Lwmax dB(A)	LAmax adj,T ext.. dB(A)	Complies Lmax dB(A)
				52
	Truck door closing	93	23	Yes
L	Truck idle	103	33	Yes
	Truck air brakes	113	43	Yes
	Truck manouevring	93	23	Yes
	Truck reverse alarm	104	34	Yes
	Truck starting	101	31	Yes
	Forklift passby	104	34	Yes
	Forklift reverse	101	31	Yes
	Forklift unloading	93	23	Yes
	Car door closure	86	16	Yes
	Car passby	80	10	Yes
	Car start	86	16	Yes
				52
	Truck door closing	93	23	Yes
M	Truck idle	103	33	Yes
	Truck air brakes	113	43	Yes
	Truck manouevring	93	23	Yes
	Truck reverse alarm	104	34	Yes
	Truck starting	101	31	Yes
	Forklift passby	104	34	Yes
	Forklift reverse	101	31	Yes
	Forklift unloading	93	23	Yes
	Car door closure	86	16	Yes
	Car passby	80	10	Yes
	Car start	86	16	Yes
				52
	Truck door closing	93	25	Yes
N	Truck idle	103	35	Yes
	Truck air brakes	113	45	Yes
	Truck manouevring	93	25	Yes
	Truck reverse alarm	104	36	Yes
	Truck starting	101	33	Yes
	Forklift passby	104	36	Yes
	Forklift reverse	101	33	Yes
	Forklift unloading	93	25	Yes
	Car door closure	86	18	Yes
	Car passby	80	12	Yes
	Car start	86	18	Yes

Figure 61 Sleep Disturbance noise levels (Receivers L-N) (Source: Acoustic Works 2021)

6.10.3.4 Vibration Predictions

Potential vibration and acceleration impacts were assessed to determine typical levels within a set distance of the activity to the receiver with a maximum combined Peak Particle Velocity of level less than 1mm/s predicted based on the equipment in operation. The level of impact may change depending on the ground composition, example stone/rock or concrete will allow higher levels of ground vibration than soft soil. It is recommended a strict management plan is implemented to allow a proactive approach to addressing complaints including vibration monitoring of activities if complaints are received.

In consideration of the Proposal in relation to vibration impacts, the following recommendations are recommended by Acoustic Works:

- The surrounding residential receivers located in proximity to the Site are separated from the roads and Site by soil, with reasonable separation distances from onsite activities and local roads. The human exposures and Peak Particle levels are predicted to be below the criteria nominated in section 7.6 within the Acoustic Report with no further treatments required.
- The surrounding lots within the development are predicted to comply with the criteria based on the proposed warehousing activities. Note if vibrating plant is proposed within the development then induvial assessment is recommended of the equipment to determine minimum treatment requirements.
- If compliant are received for onsite activities from any of the sensitive receiver we recommend that compliance monitoring is undertaken as detailed in Section 12.3 within the Acoustic Report.

6.10.3.5 Road Traffic Noise

With respect to road traffic noise, the existing annual average daily traffic volume for Aldington Road is estimated to be approximately 2,000 vehicles per day. Based on the Transport and Accessibility Management Plan prepared by Ason Group (**Appendix 9**), the development is predicted to generate an additional 1,901 vehicle trips per day.

Existing road traffic noise levels exceed the criteria at the façade of residences located closer to the road. When accounting for the additional trips predicted to be generated by the development, no additional exceedances are predicted at the façade of residences along Aldington Road. Note that this does not include traffic generated by other nearby proposed industrial developments.

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.

6.10.4 Recommendations

6.10.4.1 Operational Noise

The noise assessment indicates that 24-hour operation of the Site is predicted to comply with the assessment criteria on the condition that the following recommendations are implemented:

- Acoustic barriers shall be constructed to the height and extent shown in **Figure 62**. 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/m^2 and shall be free of gaps and holes.

- It is recommended that assessment of the visual impact of the proposed temporary barrier design prior to construction. Recommendations to improve visual impact shall not under any circumstances compromise the overall acoustic performance of the battier, with the construction and materials to meet the requirements outlined in the point above.

- All acoustic barriers are only required while the residential dwellings adjacent to the Site boundaries are occupied. As it is likely the surrounding dwellings will be purchased for future industrial developments, 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 may be removed.

- A reduction in barrier height may be possible once layouts for Lots 1 to 8 are finalised, with the potential for buildings to be oriented to provide additional acoustic screening. It is recommended that individual acoustic assessments are undertaken by a qualified acoustic consultant for each lot when plans, elevations and layouts are finalised.

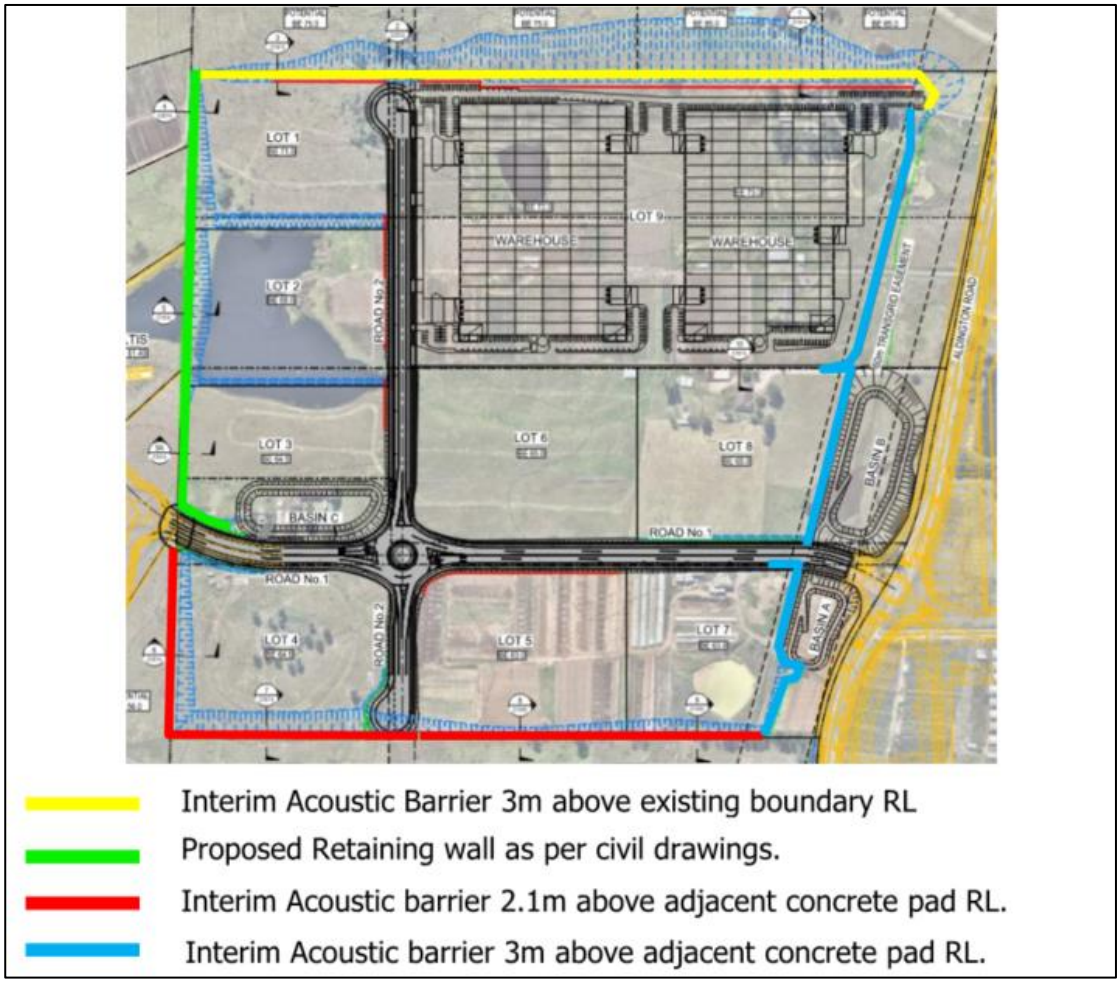


Figure 62 Recommended Acoustic Barriers (Source: Acoustic Works 2021)

If childcare centres, bars, manufacturing, workshops or factory production is proposed for any of the warehouses then additional individual acoustic assessments may be required to ensure that proposed warehouse building construction will adequately attenuate internal noise sources.

6.10.4.2 Minimum Building Construction

Warehouses shall be constructed using concrete tilt walls to a height of 4m above pad level RL, with the remainder of the construction to use standard sheet metal construction.

6.10.4.3 Onsite Mechanical Plant

No information regarding mechanical services was available at the time of the assessment, but a preliminary assessment based on measurements of similar developments predicted that similar plant would comply on

the condition the recommendations of this report are implemented. Any new mechanical plant shall be designed to comply with the criteria nominated in Section 7 of the Acoustic Report.

It is recommended that once mechanical plant selection is finalised, an assessment by qualified acoustic consultant be conducted prior to installation to determine any requirements for acoustic treatments.

6.10.4.4 Vibration

Vibration associated with truck activity and onsite activities is predicted to comply with the relevant NSW guidelines at the nearest sensitive receivers. It is recommended that any vibrating equipment used onsite is adequately isolated to prevent vibration issues to nearby receivers and is reviewed by a qualified acoustic consultant. If complaints are received for vibration, it is recommended the management controls nominated in Section 12.3 of the Acoustic Report and **Section 6.10.4.5** below are implemented.

6.10.4.5 Compliance Vibration Monitoring Procedure

To ensure the vibration monitoring is effective, it is recommended the following:

- All vibration monitors will be set to a maximum measurement interval of 5 minutes and record over the period commencing over the entire day and be located onsite and at the sensitive receiver location.
- The client shall provide a list of relevant management 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 for human exposure and peak particle velocity, 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 without recharge.
- Attended vibrations measurement will be undertake for the affected site to determine existing levels of specific equipment to help identify 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 DPIE.

6.10.4.6 Aircraft Noise

Based on the predicted noise impacts presented in Section 11 within the Acoustic Report, no further treatments would be required. If uses other than those addressed in Section 7.3 within the Acoustic Report are proposed, assessment of indoor noise levels may be required.

6.10.4.7 Noise Management Plan

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, it is recommended an acoustic assessment is conducted to determine suitable mitigation strategies and/or acoustic treatments.

Overall, it is concluded that based on the results of the investigation, the masterplan is predicted to be acoustically satisfactory for the 24 hour operation of the Site, on the condition the recommendations detailed in Section 12 of the Acoustic Report are implemented. Further details of the acoustic assessment are provided in the Acoustic Report at **Appendix 15**.

6.10.5 Noise and Vibration Management Plan

A Construction Noise and Vibration Management Plan (CNVMP) has been prepared by Acoustic Works to provide a noise management plan and recommendations for noise control during earthworks and construction of the Proposed Development.

6.10.5.1 Predicted Noise Levels

Predicted noise associated with the earthworks and construction of the proposed development has been assessed based on the source noise levels and procedures contained in AS2436-2010, as well as the results of previous noise measurements and assessments conducted by Acoustic Works.

Calculations are done based on the earthworks and construction activities being at the closest relevant distance to each existing receiver.

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 process 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.

Earthworks noise levels are predicted to 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.

In relation to construction noise, construction noise levels are predicted to potentially be above the noise affected level of 36dBA 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.

6.10.5.2 Vibration Predictions

The following recommendations are provided in relation to vibration impacts:

- A two storey residential dwelling at 141 Aldington Road to the north and a single storey residential dwelling at 219 Aldington Road to the south:
    - Given the separation distance of the development to the dwelling its recommended proactive monitoring of any issues in relation to complaints is undertaken to ensure no adverse impacts are experienced by the tenants. Vibration impacts may occur depending on the type of equipment in use onsite, this would be most likely occur during earthworks, specifically levelling of the site including excavation and vibrating rollers used for levelling. Based on the existing building construction vibration levels are predicted to comply with the nominated criteria of 10mm/s, it is recommended that dilapidation assessment is undertaken prior to works being conducted including vibration monitoring if complaints are received.
- 162-256 Aldington Road separated from the Site by Aldington Road and single and two storey residential dwellings to the west at 930-966 Mamre Road:
    - The dwellings are located at reasonable separation distance from the works with impacts from vibration predicted below the criteria. It is recommended that dilapidation assessment is undertaken prior to works being conducted, refer to **Figure 63**.

6.10.5.3 Recommendations

It is recommended a dilapidation assessment is prepared for the numbered locations in **Figure 63** before works proceed.

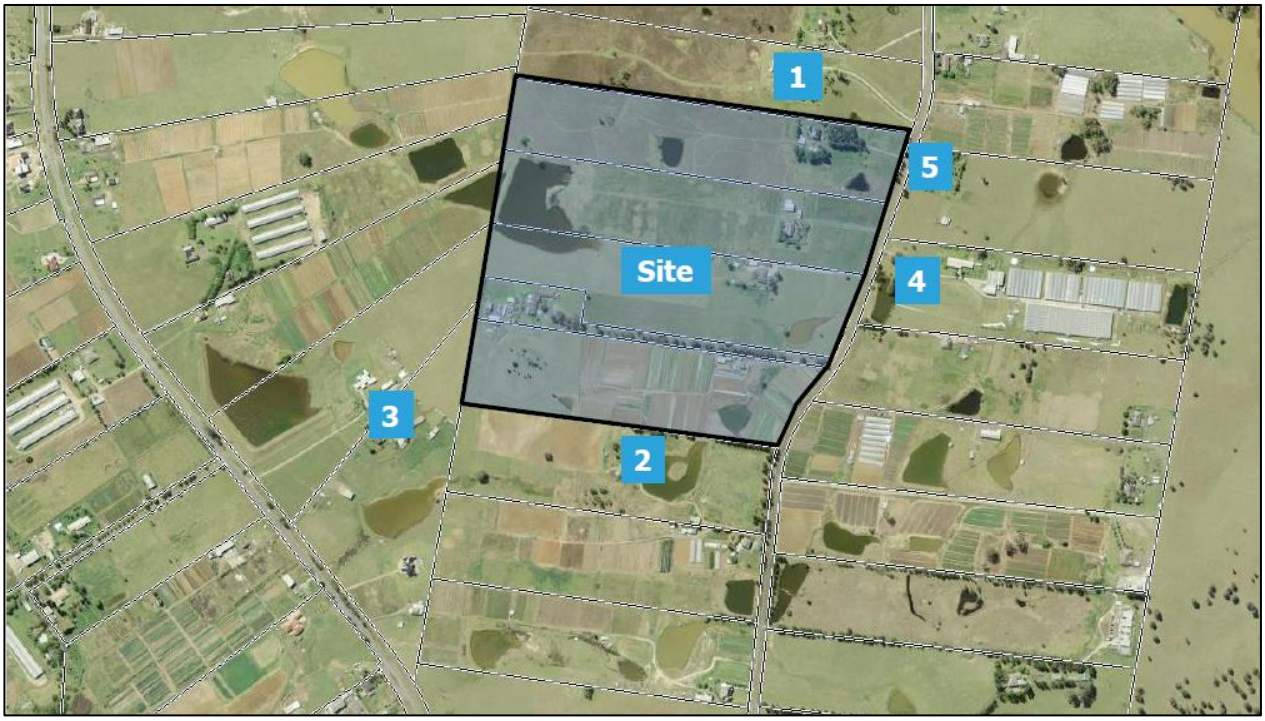


Figure 63 Receiver and noise monitoring locations (Source: Acoustic Works 2021)

6.10.5.4 Vibration Control

Due to the proximity of the proposed construction works in relation to nearby buildings (in particular to the south at 219 Aldington Road and north at 141 Aldington Road), it is recommended within the Construction Noise and Vibration Management Plan that vibration monitoring is only undertaken at these locations ifcomplaints are received. 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 as follows:

- Excavators – if vibration levels are triggered by the movement of excavators onsite, it is recommended they reduce their movement speed onsite and maintain a minimum separation distance of 50 metres from the nearest sensitive receivers for vehicle movement.

- Dump trucks – during the earthworks for the development, it is recommended the trucks maintain a minimum 50 metre separation distance to the building's sensitive receivers when not located on the main road.

- If equipment causes vibration levels to be triggered multiple times at the monitoring location that exceed the maximum allowable criteria, the works/equipment responsible will cease with an investigation to determine management controls to prevent exceedances in the future. These may include but not limited to minimum separation distances being set from the receiver, construction of a ditch along the boundary to reduce the vibration path and possibly reducing the speed of equipment movement onsite.

- During all works onsite, the nominated person will keep a log regarding any SMS events from the vibration monitors including exceedances of the criteria and the equipment causing the issue. Immediate action will be taken to minimise the potential for the exceedance occurring again.

6.10.5.5 Recommended Acoustic Treatments and Management Principles

For the majority of the works it is expected that noise will generally comply with the highly noise affected limit of 75dB(A) LAeq 15min for residential receivers. There is the potential for the works to exceed the noise affected limit of 48dBA LAeq 15min. In particular, noise from concrete trucks and pumps are calculated to have the highest potential impact to receiver locations. Therefore close liaising with nearby residences would be recommended, with unattended noise monitoring to be conducted at Receivers 1, 3, 4 & 8 for a period of two weeks if compliant are received. Other receivers located further away from the site are predicted to comply.

Due to proximity of northern and southern receiver buildings (Receivers 1 and 5), in the event of a complaint for vibration, unattended monitoring during construction works should be undertaken for a two week period to ensure vibration levels are compliant with the criteria nominated in Section 5.6 of the CNVMP.

Further details are provided within the CNVMP at **Appendix 15**.

6.11 AIR QUALITY, GREENHOUSE GAS AND ODOUR

An Air Quality Impact Assessment has been prepared by Northstar Air Quality to examine and identify whether the impacts of the construction and operation of the Proposed Development may adversely affect local air quality, and to estimate the greenhouse gas (GHG) emissions from the Proposed Development and identify the associated mitigation opportunities.

In accordance with the requirements of the NSW EPA, several receptors have been identified and the receptors adopted for use within this Air Quality Impact Assessment are presented in **Figures 64** and **65** below. It is noted that a number of identified residential receptors will change status in the coming years as the area is developed to become an increasingly commercial/industrial area. However, for the purposes of this assessment, the receptors are assumed to be residential, which represents a worst case in terms of construction and operational impacts.

Rec	Location	Land use	Location (UTM)	
			mE	mS
R1	235-251 Aldington Road, Kemps Creek	Residential	296 047	6 252 191
R2	198A Aldington Road, Kemps Creek	Residential	296 399	6 252 559
R3	162-178 Aldington Road, Kemps Creek	Residential	296 377	6 252 877
R4	3 Imperata Close, Kemps Creek	Industrial	297 157	6 253 795
R5	258-270 Aldington Road, Kemps Creek	Residential	296 537	6 251 947
R6	23-29 Bowood Road, Mount Vernon	Residential	297 380	6 251 639
R7	412 Bowood Road, Mount Vernon	Residential	297 678	6 252 392
R8	35-37 Greenview Place, Mount Vernon	Residential	298 125	6 252 777
R9	141-153 Aldington Road, Kemps Creek	Residential	296 128	6 253 026
R10	99-11 Aldington Road, Kemps Creek	Residential	296 089	6 253 475
R11	772-782 Mamre Road, Kemps Creek	Residential	294 926	6 253 516
R12	844-862 Mamre Road, Kemps creek	Residential	294 807	6 252 804
R13	904-928 Mamre Road, Kemps Creek	Residential	295 331	6 252 416
R14	930B Mamre Road, Kemps Creek	Residential	295 410	6 252 147

Note: The requirements of this AQIA may vary from the specific requirements of other studies, and as such the selection and naming of receptor locations, may vary between technical reports. This does not affect or reduce the validity of those assumptions.

Figure 64 Receptor locations used in the study (Source: Northstar Air Quality 2021)

Figure 65 Population density and sensitive receptors surrounding the Subject Site (Source: Northstar Air Quality 2021)

6.11.1 Air Quality Assessment

The Proposed Development's emission to air would be likely to be generated as described below.

Construction Phase:

The total volume of the construction required for the Proposed Development is anticipated to be approximately 963,900m^3, assuming a combined total footprint of the warehouses and office areas of 64,260m^2 and a maximum building height of 15m.

The associated risks of impacts from demolition, construction, track-out and construction traffic have been assessed using the published guidance in IAQM Guidance on the Assessment of Dust from Demolition and Construction developed in the United Kingdom by the Institute of Air Quality Management (IAQM), and adapted by Northstar Air Quality for use in Australia.

The assessment identified a medium risk of health or nuisance impacts during demolition works and construction works. A range of standard mitigation measures are proposed within the Air Quality Impact Assessment to ensure that short-term impacts associated with construction activities are minimised.

Operational Phase:

The following activities are anticipated to result in potential emissions to air:

- Movement of vehicles around the internal roadways of the Site on paved road surfaces;
- Diesel combustion emissions from the consumption of diesel fuel, in the truck movements importing and exporting materials. The potential emissions would include particulate matter (as PM10 and PM2.5) and oxides of nitrogen (NOX), including nitrogen dioxide (NO2). There would additionally be some less significant emissions of carbon monoxide (CO), sulphur dioxide (SO2) and air toxics (including benzene and 1,3-butadiene) but for the purposes of this assessment, it is comfortably assumed that the principal gaseous pollutants would be particulate matter and NOX.

The prediction of potential impacts associated with operational activities has been performed in general accordance with the requirements of the NSW Approved Methods (NSW EPA 2017), using an approved and appropriate dispersion modelling technique. The estimation of emissions has been performed using referenced emission factors.

The potential incremental impacts (i.e. without consideration of assumed background air quality conditions) at all the identified receptor locations are presented in the following predictions:

- Incremental impact – relates to the concentrations predicted as a result of the operation of the Proposed Development in isolation.
- Cumulative impact – relates to the concentrations predicted as a result of the operation of the Proposed Development PLUS the background air quality concentrations discussed in Section 4.4 of the Air Quality Impact Assessment.

One minor exceedance representing 0.2 % of the relevant 24-hour PM10 criterion is predicted, although this is not likely to eventuate in reality, and is driven by existing high background concentrations.

6.11.2 Greenhouse Gas Assessment

The activities/operations being performed, as part of the Proposed Development, which have the potential to result in emissions of GHG are presented in **Figure 66** below.

Proposal Component	Scope	Emission Source Description
Consumption of purchased electricity	2	Emissions associated with the generation of electricity from fossil fuel combustion

Figure 66 Greenhouse gas emission sources (Source: Northstar Air Quality 2021)

A minor quantity of scope 1 emissions, associated with the consumption of unleaded fuel, diesel fuel or natural gas, would be anticipated during the operation of the warehouses. At this stage of development, that quantity is not able to be quantified exactly.

Emissions of GHG from the source identified in **Figure 66** have been calculated using activity data for the source per annum (i.e. per kilowatt-hour (kWh) of electricity) and the relevant emission factor for each source.

The assumptions relating to activity data are outlined in **Figure 67** below. This value represents the operation of all warehouses and offices within the Site. This has been based on data for similar facilities in NSW, VIC and QLD as provided by Frasers. These data indicate that the operation of similar facilities result in the consumption of 34.5 $kWh \cdot m^{-2}$ of floor space per year, averaged across seven facilities. This average value is close to the NSW value of 37.4 $kWh \cdot m^{-2}$ of floor space per year (Frasers, pers. comm.) and is considered to be appropriate.

Development	Proposal Component	Assumptions	Activity	Units
Proposal	Consumption of purchased electricity	Based on information provided by Frasers (averaging 34.5 $kWh \cdot m^{-2} \cdot year^{-1}$)	2 216 970	kWh

Figure 67 Calculated activity data (Source: Northstar Air Quality 2021)

Emission factors used for the assessment of GHG emissions associated with the operation of the Proposed Development have been sourced from the NGA Factors (DISER, 2020) (refer to **Figure 68** below).

Emission Scope	Emission Source	Emission Factor
Scope 2	Electricity (NSW)	0.81 kg CO_2-e$\cdot kWh^{-1}$

Figure 68 Greenhouse gas emission factors (Source: Northstar Air Quality 2021)

6.11.3 Odour Assessment

Given the nature of the development at the Site, it is not anticipated that odour would be emitted in any significant quantity during construction. Any potential contamination identified through detailed site investigation would be managed to ensure that no odour would impact upon surrounding residences. The operation of the Site is considered not likely to be significantly odorous. All goods would be stored within the warehouse and any waste materials would be stored appropriately and removed from site on a daily basis. In light of the above, odour has not been considered further as part of this Air Quality Impact Assessment.

6.12 BIODIVERSITY

A Biodiversity Development Assessment Report (BDAR) (**Appendix 10**) has been prepared by Ecologique to assess the current condition and significance of the native vegetation on Site.

Identification of plant community types (PCTs) within the subject land was confirmed during site surveys with reference to the BioNet Vegetation Classification database and data collected from floristic and site integrity plot/transects in accordance with Section 2 of the Biodiversity Assessment Method (BAM)(2020).

Three PCTs have been allocated to the native vegetation present within the subject land:

1. *Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion (PCT 835); and*
2. *Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion (PCT 849); and*
3. *Phragmites australia and Typha orientalis coastal freshwater wetlands of the Sydney Basin Bioregion (PCT 1071) - allocated to farm dam areas containing native macrophytes.*

Additionally, planted and exotic vegetation are also identified within Site. The location of the native vegetation and PCTs within the Site are illustrated in **Figure 69** below.

Figure 69 Subject land vegetation (Source: Ecologique 2021)

6.12.1 Impacts of the Proposal on biodiversity values

The Proposed Development will directly impact on approximately 1.27 ha of native vegetation (commensurate with two PCTs and attributed to a third PCT).

Indirect impacts are generally those that affect areas outside of the development footprint but occur as a result of the development, and which impact on native vegetation, threatened ecological communities, threatened species and their habitat. In summary, the indirect impacts primarily relate to increased sedimentation, introduction of weeds and pathogens, noise, dust or light spill. Notwithstanding, as addressed in the BDAR, the identified indirect impacts are predominantly of low risks and could be mitigated through the implementation of appropriate mitigation measures.

6.12.2 Impacts on serious and irreversible impacts

Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion (PCT 849) is identified in the Threatened Biodiversity Data Collection (TBDC) as a serious and irreversible impact (SAII) entity.

PCT 849 is one of two grassy woodland communities that are included in the critically endangered Cumberland Plain Woodland (CPW). The other community being Grey Box - Forest Red Gum grassy woodland on shale of the southern Cumberland Plain, Sydney Basin Bioregion (PCT 850).

CPW along with Broad-leaved Ironbark – Grey Box – Melaleuca decora grassy open forest on clay/gravel soils of the Cumberland Plain, Sydney Basin (PCT 724) comprise the nationally listed Cumberland Plain Shale Woodlands and Shale Gravel Transition Forest, which is also a critically endangered community under the EPBC Act.

In relation to PCT 849 as an SAII entity, areas of PCT 849 that would be cleared as a result of the Proposed Development are relatively small and isolated patches of low condition vegetation. It should be noted that under the Draft Cumberland Plain Conservation Plan, the subject land is identified as land that will be certified for development.

Collectively up to 0.76 ha of PCT 849 (in two separate locations) will be directly impacted as a result of the Proposed Development. This equates to a minimum and maximum of 0.006% and 0.003% (respectively) of the minimum (11,200 ha) and maximum (29,813 ha) of estimated geographic extent of the threatened ecological communities (TEC) in NSW.

The remaining, isolated area TEC comprises a small area of PCT 829 to the north of the subject land, which is less than 0.5ha in extent. There will be negligible if any impact on the distance between isolated areas of the TEC or dispersal distance for native flora species (characteristic of the TEC), and any impact on connectivity, fragmentation or perimeter ratio for the remaining areas of the TEC as a result of the development.

Table 43 below summarises the impacts that the Proposed Development requires an offset for.

Table 44 Ecosystem credit offsetting requirements

PCT	TEC	Area of impact (ha)	Credits required
849 - Cumberland shale plains woodland	Cumberland Plain Woodland in the Sydney Basin Bioregion	0.73	12
835 - Cumberland riverflat forest	River-flat Eucalypt Forest on Coastal Floodplains of the NSW North Coast, Sydney Basin and SE Corner Bioregions	0.2	3
1071 - Coastal freshwater wetlands	Freshwater Wetlands on Coastal Floodplains of the New South Wales North Coast, Sydney	3.3#	3

	Basin and South East Corner Bioregions (Part); Listed BC Act, E: Sydney Freshwater Wetlands in the Sydney Basin Bioregion (Part)		

Total estimated area of all farm dams (including open water zones), whereas previous areas for PCT 1071 represent areas of native vegetation present in farm dams.

No species credit species have been identified as requiring an offset.

Further, approximately 38.7 ha of the subject land does not require an offset. This area includes market gardens, cleared residential land, planted native and exotic vegetation and pasture/exotic weed areas.

Mitigation

Mitigation of construction impacts will be specified within a project specific Construction and Environmental Management Plan (CEMP). The following general areas are included in a CEMP but will vary depending on a Site's environment and as required by consent conditions:

- Air quality;
- Construction noise and vibration;
- Fill importation;
- Waste management;
- Soil and water plan;
- Erosion and sediment control; and
- Flora and fauna management.

The direct and permanent impact on 1.27 ha of native vegetation will be mitigated through a range of measures, which are to be specified in a fauna and flora management plan (FFMP). As a subplan to the CEMP, the FFMP will specify biodiversity related procedures, which would include, but may not be limited to, the following:

- Pre-clearance and clearance management;
- Fauna rescue and relocation protocol;
- Euthanasia protocol;
- Dam decommissioning;
- Weed and pathogen control;
- Unexpected finds protocol; and
- Monitoring and reporting strategies.

The above will be dealt with as post approval requirements following issue of development consent.

6.12.3 Dam Decommissioning

A Dam Decommissioning Management Plan has been prepared by Biosis to guide the decommissioning of five farm dams within the Site. Specifically, the location of the farm dams within the Site is illustrated in **Figure 70** below.

Name	Area (m²)	Perimeter (m)
Lot 25a	1191	139
Lot 25b	2585	186
Lot 27	2925	277
Lot 28	22727	657
Lot 33b	1888	171
Lot 33a	2772	207

Figure 70 Location of farm dams (Source: Ecologique 2021)

Options for dam water disposal include irrigating onto land, reuse on site, reuse during construction, removal to an authorised waste management facility, and discharge into the stormwater drainage system or local creek.

As there is no watercourse within the subject land, it is most likely that dewatering would be staged in line with development progress and provide a source of water for initial dust suppression and soil conditioning.

Irrigation of surrounding land will be feasible for the smaller dams, with the larger Dam Lot 28 recommended as a water supply for dust suppression and soil conditioning (as far as practical), refer to **Table 44** below.

Table 45 Dewatering options

Name	Area (m^2)	Dewatering option
Lot 25a	1,191	Irrigation of surrounding land
Lot 25b	2,585	Irrigation of surrounding land
Lot 27	2,925	Irrigation of surrounding land
Lot 28	22,727	Dust suppression and soil conditioning
Lot 33b	1,888	Irrigation of surrounding land
Lot 33a	2,772	Irrigation of surrounding land

Prior to commencement of dewatering, the timeframe for discharge should take into consideration the absorption capacity of the soils (such as the Design Irrigation Rate (DIR) in Australian Standard 1547:2012).

Overall, the proposed dam decommissioning activities will not result in any pollution of waters as there are no proximal watercourses into which dam water can be discharged.

The preferred option for disposal of dam water is a combination of on-site irrigation and use for dust suppression and soil conditioning, however this may not be practical for all dams. Discharge to the stormwater drainage system will require additional consideration of water quality (to ensure it is of a quality permissible for discharge) and water quantity information (e.g. details of quantity and flow rate of discharge).

Site investigations of the subject land have concluded that decommissioning of dams will not impact on any threatened species or habitat of importance to any threatened species. Clearing of native vegetation present within the dams is being offset under the NSW Biodiversity Offset Scheme, as stipulated in the BDAR. Further details are provided in the Dam Decommissioning Management Plan at **Appendix 10**.

6.12.4 Weed Eradication and Control Management

A Weed Eradication and Control Management Plan has been prepared by Biosis to detail the procedure to identify, manage and control the potential for introduction and/or spread of weeds during the construction of the Proposed Development and address the Proponent's General Biosecurity Duty (GBD) and the Draft Mamre Road Precinct DCP controls with respect to management of Weed of National Significance (WONS).

The type of weeds present within the Site is illustrated in **Figure 71** below.

Figure 71 Subject land weeds (Source: Ecologique 2021)

Overall, the proposed development will involve substantial earthworks to facilitate industrial subdivision. Consequently, the primary method of weed control will be mechanical in association with bulk earthworks. Targeted chemical control will be limited to larger and /or woody weeds as required.

The risk of introducing or spreading weeds will be minimised during construction through the implementation of mitigation measures identified in Section 4 of the Weed Eradication and Control Management Plan. The risk of weeds re-establishing during the operational phase of the development will be mitigated through the establishment and ongoing maintenance of the proposed development's landscaping.

The proposed development is unlikely to result in the introduction or spread of priority weeds and/or WONS. Further details are provided within the Weed Eradication and Control Management Plan at **Appendix 10**.

6.13 SOCIO-ECONOMIC IMPACTS

A Social Impact Assessment (SIA) has been prepared by SLR Consulting to provide a summary of the assessment of social impact of the Proposed Development. Communications and consultation undertaken to inform the SIA has been undertaken in accordance with the Community and Stakeholder Participation Strategy (CSPS) prepared for the Proposed Development.

This SIA has been prepared under the guidance of the *Social Impact Assessment Guideline for State significant mining, petroleum production and extractive industry development* (DPIE 2017) (The Guideline) and the *Draft Social Impact Assessment Guideline* (DPIE 2020) (The Draft Guideline).

A number of ancillary and adjacent occupiers are identified as the primary stakeholders to the development and the broader community (for example users of the surrounding road network) identified as secondary stakeholders to the development. The identified stakeholder properties are illustrated in **Figure 72**.

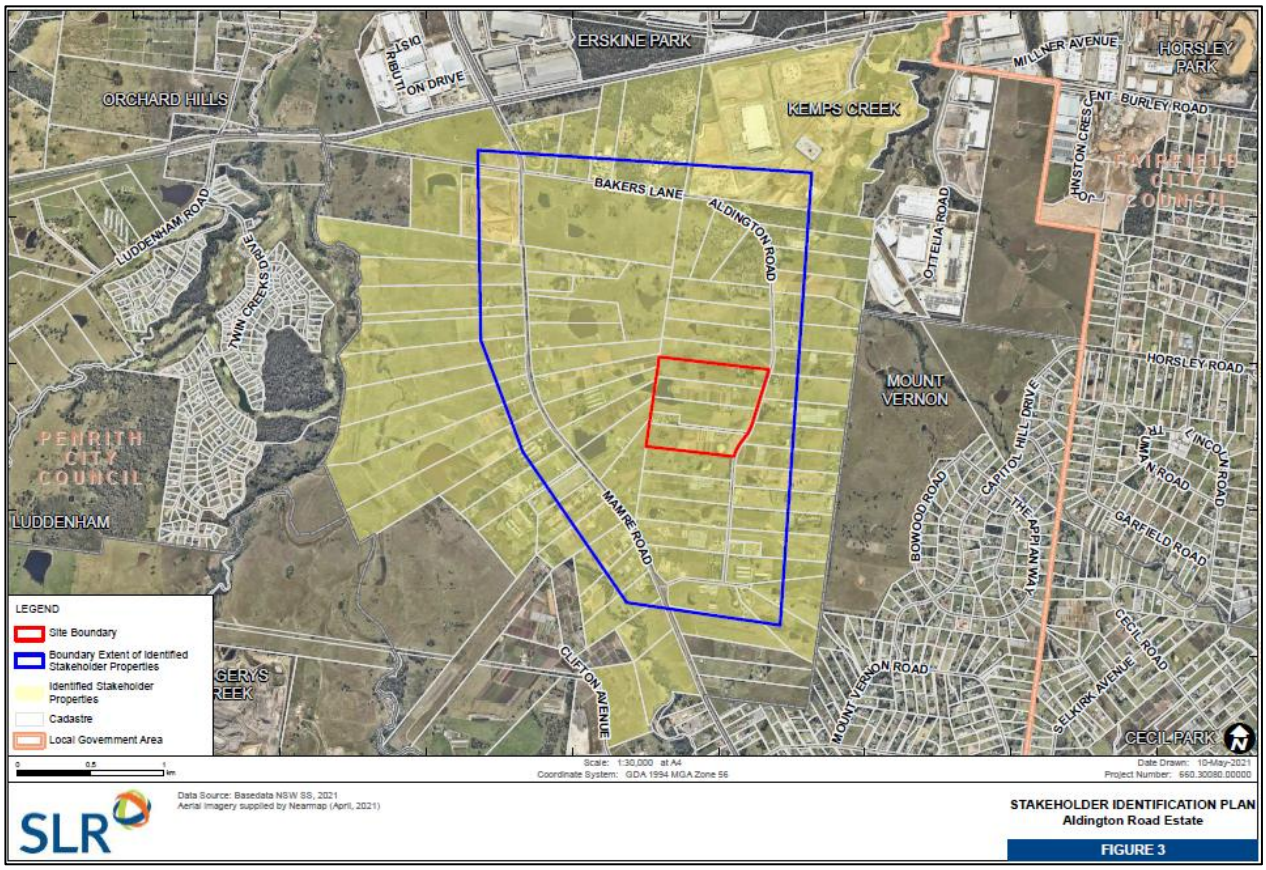


Figure 72 Stakeholder Identification Plan (Source: SLR Consulting 2021)

As outlined in the CSPS, the following methods of engagement are to be utilised to consult on the Proposed Development during the planning stage of the development.

- **Letterbox Drop** – Letters were distributed by post to all proximate properties providing a brief summary of the proposed Project and outlining the options available for communication and consultation during the planning stage of the Project.

- **Email Notification** – Email correspondence was distributed to a number of identified Bakers Lane Stakeholders, with a brief introductory email and attached letter providing a summary of the proposed Project and outlining the options available for communication and consultation during the planning stage of the Project.

- **Agency Consultation Letter** – email correspondence was distributed to identified Agency Stakeholders by the consultants engaged to prepare the EIS for the Project. The emailed correspondence included a brief introductory email, summary letter and plans of the development and invited Agency review and comment on the Proposed Development.

Early consultation was also undertaken with numerous agency and public authority stakeholders. A list of the consulted agencies are as follows:

- Environment, Energy and Science Group (EES)
- Crown Lands
- Department of Primary Industries (DPI) Agriculture
- DPI Fishers
- Endeavour Energy
- Environment Protection Authority
- Fire and Rescue NSW
- Heritage NSW – Heritage Council

- NSW Aboriginal Land Council
- Rural Fire Service
- Sydney Water
- Transport for NSW
- Water Group including Natural Resources Access Regulator (NRAR)
- Western City and Aerotropolis Authority
- Western Sydney Airport
- Western Sydney Planning Partnership
- NSW DPIE – Central (Western) Team, Place Design and Public Spaces Group
- NSW DPIE – Green and Resilient Places, Place Design and Public Spaces Group
- WaterNSW
- Penrith City Council

A summary of the consultation undertaken with each agency is provided in **Section 5.2** of this EIS. It is noted at the time of preparing this EIS that a response from DPIE policy team was outstanding with respect to the strategic planning considerations for the precinct. Any comments in this respect will be addressed following exhibition.

The social locality and baseline study for the Proposed Development has been determined utilising a desktop assessment of the following data sources:

- Australian Bureau of Statistics (ABS) Data;
- Material from similar projects in the general locality; and
- Relevant local, State and Commonwealth strategic plans and policies.

Based on the data analysed, the social baseline for the Proposed Development and surrounding area is considered to be a precinct under land use and subsequent social and economic transition. It is noted that at the 2016 census date, the shift from agriculture to industry was in its infancy or had not commenced, with results showing an aging population of lower economic advantage residing in the immediate precinct. An analysis of local, State and Commonwealth strategic plans and policies reveals a strategic framework in place to facilitate the land use transition of the area whilst the analysis of existing projects in the area shows that the transition has commenced, and the social and economic implications of the transition continue to be assessed and where required mitigated.

In relation to the economic impact, it is the strategic intent of the NSW Government to transition the Mamre Road Precinct from predominantly agricultural and rural land uses to an industrial precinct, facilitated by State and local strategic planning and policy. This transition is expected to provide broad economic benefit through the provision of employment opportunities for residents of Western Sydney closer to people's homes and its general contribution to the NSW economy.

As demonstrated through the EIS, the Proposed Development has been designed to be consistent with the strategic intent for the precinct and proposes the development of this site for industry and warehousing. The outcome of the Project will include the provision of employment opportunities to Western Sydney residents and a contribution to the economic and rational development of the site in line with the desired future for the Mamre Road Precinct.

Following the social baseline study and community consultation undertaken, the potential social impacts of the Proposed Development were identified and categorised into their level of significance, pursuant to the Draft Guidelines. This SIA further outlines the mitigation or enhancement measures proposed as part of the Proposed Development and concludes that with implementation, the potential negative social impacts identified can be adequately managed and mitigated.

To manage and mitigate negative impacts, it is recommended that measures proposed within the prepared impact assessments for the Proposed Development be implemented and monitored for ongoing compliance.

It should also be recognised that there are long term, positive social and economic impacts resulting from the Project, through the provision of employment and business opportunity in the immediate and broader Western Sydney community.

6.14 ABORIGINAL CULTURAL HERITAGE

An Aboriginal Cultural Heritage Assessment (ACHA) (**Appendix 17**) and an Archaeological Assessment (**Appendix 18**) have been prepared by Biosis pertaining to the Proposed Development.

As identified in **Figure 73**, there are 117 Aboriginal cultural heritage sites registered with the Aboriginal Heritage Information Management System (AHIMS) register within the vicinity of the study area, with no registered Aboriginal sites within the study area.

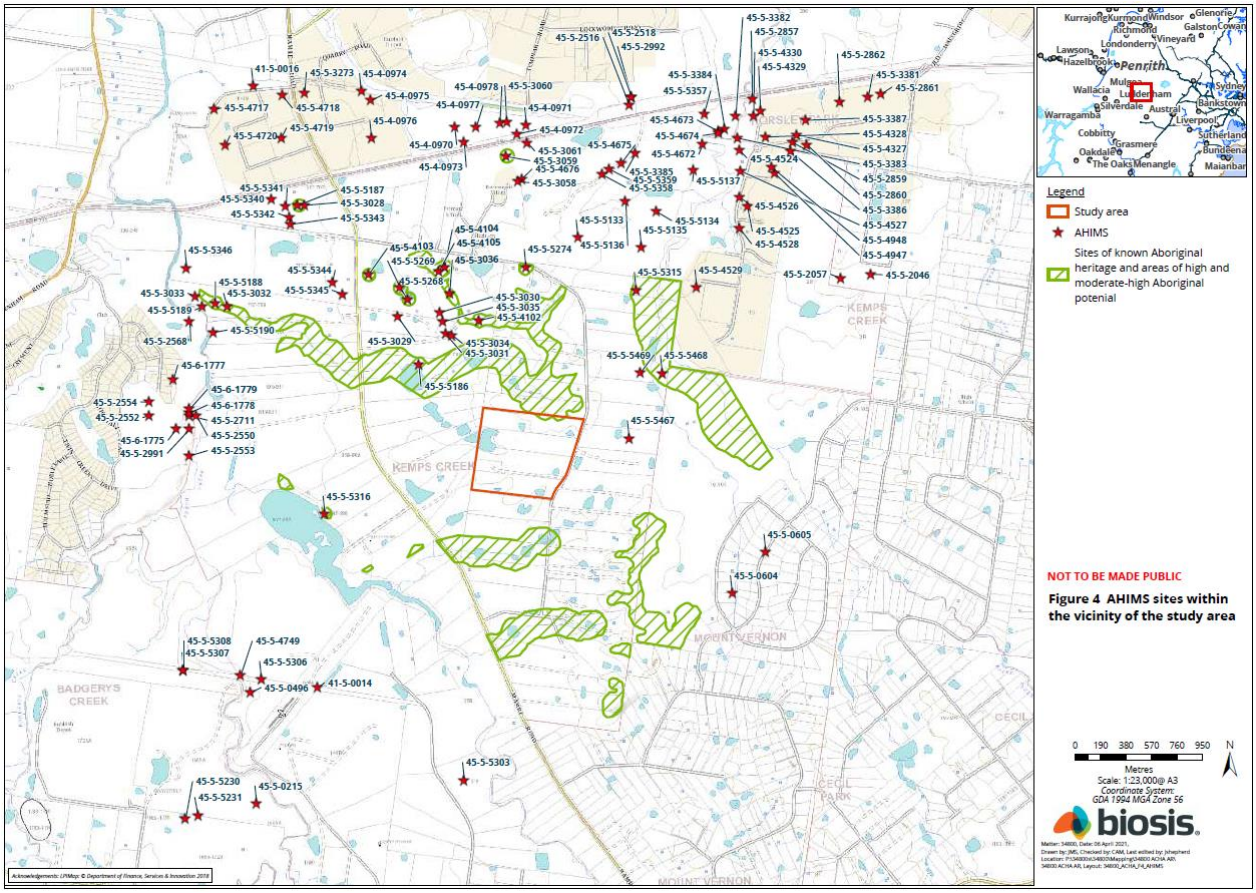


Figure 73 AHIM Sites within the vicinity of the study area (Source: Biosis 2021)

The Aboriginal community was consulted regarding the heritage management of the Proposed Development throughout its lifespan. Consultation has been undertaken as per the process outlined in the DECCW document, *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010a). Aboriginal consultation for this project is currently ongoing and updates to this report will be made following completion of each stage of consultation.

The ACHA undertook background research for the proposed study area. Key considerations arising from the background research include:

- *Aboriginal sites located in the headwaters of upper tributaries (first order watercourse) are likely to represent a background scatter.*
- *Aboriginal sites located in the middle reaches of minor tributaries (second order watercourses) are likely to represent single events, for example, one-off camping locations or knapping episodes.*
- *Aboriginal sites located in the lower reaches of tributary creeks (third order watercourses) are likely to represent repeated occupation, knapping events and more concentrated activities.*

- *Large artefact scatters may be identified up to 200 – 250 metres away from water courses.*

A field investigation was undertaken by Biosis which identified one area of potential archaeological deposit (PAD) on a relatively undisturbed, flat, hill crest at the headwaters of two first order creek lines. Steven Randall from the Deerubbin Local Aboriginal Land Council (LALC) participated in the field investigation and noted an area of PAD (Aldington PAD 1). He recommended further assessment in this area. Steven also noted the remainder of the study area was very disturbed as a result of market gardening and hence would be less likely to contain Aboriginal objects.

Test excavations were undertaken at Aldington PAD 1 in August 2021. These works identified a total of two artefacts from the 16 test pits that were excavated. Overall, soils across the extent of the testing area were shallow, reaching an average of 190 millimetres and a maximum of 300 millimetres. One Aboriginal site AHIMS 45 -5-5238/Aldington Road PAD 1 was identified as a result of these test excavations. The results of the test excavations support predictive modelling for the region, having identified a low density artefact scatter (AHIMS 45-5-5238/ Aldington Road PAD 1) within a flat hill crest landform, within approximately 100-250 metres of two first order creek lines which have been heavily disturbed by damming activities.

AHIMS 45 -5-5238/Aldington Road PAD 1, was identified as having low scientific significance. The site contains moderate levels of disturbance from land clearance, ploughing and cattle grazing and the soil profile was consistent across the area. The low density scatter is considered a common site type in the region with limited potential to contribute further information about Aboriginal occupation and land use within the local region.

The PAD contains moderate levels of disturbance from land clearance, ploughing and cattle grazing. The low density scatter is considered a common site type in the region with limited potential to contribute further information about Aboriginal occupation and land use within the local region. The archaeological significance of this PAD has been assessed low.

The details of the PAD is summarised in **Table 45** below.

Table 46 Site details

AHIMS site no.	Site type	Significance	Type of harm	Degree of harm	Site specific recommendations
AHIMS 45-5-5238 / Aldington Road PAD 1	PAD	Low	Direct	Total loss of value	No further works following SSD approval. Development of a long term Care and Control Agreement.

Prior to any development impacts occurring within the study area, the following is recommended:

Recommendation 1: No further works within AHIMS 45-5-5238/Aldington Road PAD 1
AHIMS 45-5-5238/Aldington Road PAD 1 will be impacted by the proposed development. Further testing and salvage of this site is not recommended.

As per Section 4.41 of the EP&A Act an Aboriginal Heritage Impact Permit (AHIP) under the NPW Act is not required for SSD projects authorised by a development consent. The proposed works may therefore proceed with caution in accordance with recommendations 2 to 5, following SSD approval.

All works undertaken within AHIMS 45-5-5238/Aldington Road PAD 1 must comply with the SSD DA approval for the project.

Recommendation 2: Discovery of Unanticipated Aboriginal Objects
All Aboriginal objects and Places are protected under the NSW National Parks and Wildlife Act 1974 (NPW Act). It is an offence to disturb an Aboriginal site without a consent permit issued by Heritage NSW, Department of Premier and Cabinet (Heritage NSW) or SSD approval issued by DPIE. Should any 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 Registered Aboriginal Parties (RAPs).

Recommendation 3: Discovery of Unanticipated Historical Relics
Relics are historical archaeological resources of local or State significance and are protected in NSW under the Heritage Act 1977 (Heritage Act) or SSD approval issued by DPIE. Relics cannot be disturbed except with a permit or exception/exemption notification. Should unanticipated relics be 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. The Heritage Council will require notification if the find is assessed as a relic.

Recommendation 4: 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:

1. *Immediately cease all work at that location and not further move or disturb the remains.*
2. *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.*
3. *Not recommence work at that location unless authorised in writing by Heritage NSW.*

Recommendation 5: Long term care agreement
The establishment of a long term care agreement in consultation with RAPs should 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 Industrial have 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 Ecologically Sustainable Development (ESD) and intergenerational equity and more importantly ensures that recovered artefacts are managed according to the wishes of RAPs.

Recommendation 6: Continued consultation with RAPs
As per the consultation requirements, it is recommended that Frasers Property Industrial should continue to inform RAPs about the management of Aboriginal cultural heritage sites within the study area throughout the life of the project.

6.15 HISTORIC (EUROPEAN) HERITAGE

A Historical Heritage Assessment (**Appendix 16**) has been prepared by Biosis to assess if the Proposed Development is likely to have a significance impact on the historical heritage.

A search of heritage databases was conducted to identify any heritage listings within the study area. This included a search of the State Heritage Register (SHR), Commonwealth Heritage List (CHL), National Heritage List (NHL), Section 170 heritage registers and PLEP2010. These searches revealed that no heritage listed items were present in the study area.

A summary of heritage listings in the vicinity of the Site is illustrated in **Table 47** and **Figure 74**.

Table 47 Summary of heritage listings in the vicinity of the study area

Site number	Site name	Address/Property description	Location from study area	Listings – Individual item	Significance

832	The Fleurs Radio Telescope site	885A Mamre Road, Kemps Creek, Lot 21 DP 258414	1.2 kilometres south west	LEP	Local
I4	Brick farmhouse	282 Aldington Road, Kemps Creek, Lot 142 DP 1033686	600 metres south east	SEPP	Local
I3	Gateposts to Colesbrook	269 Mamre Road, Kemps Creek, Lot 8 DP 253503	500 metres south	SEPP	Local
I2	Bayley Park, house	919 – 929 Mamre Road, Kemps Creek, Lot 35 DP 258414	400 metres south west	SEPP	Local

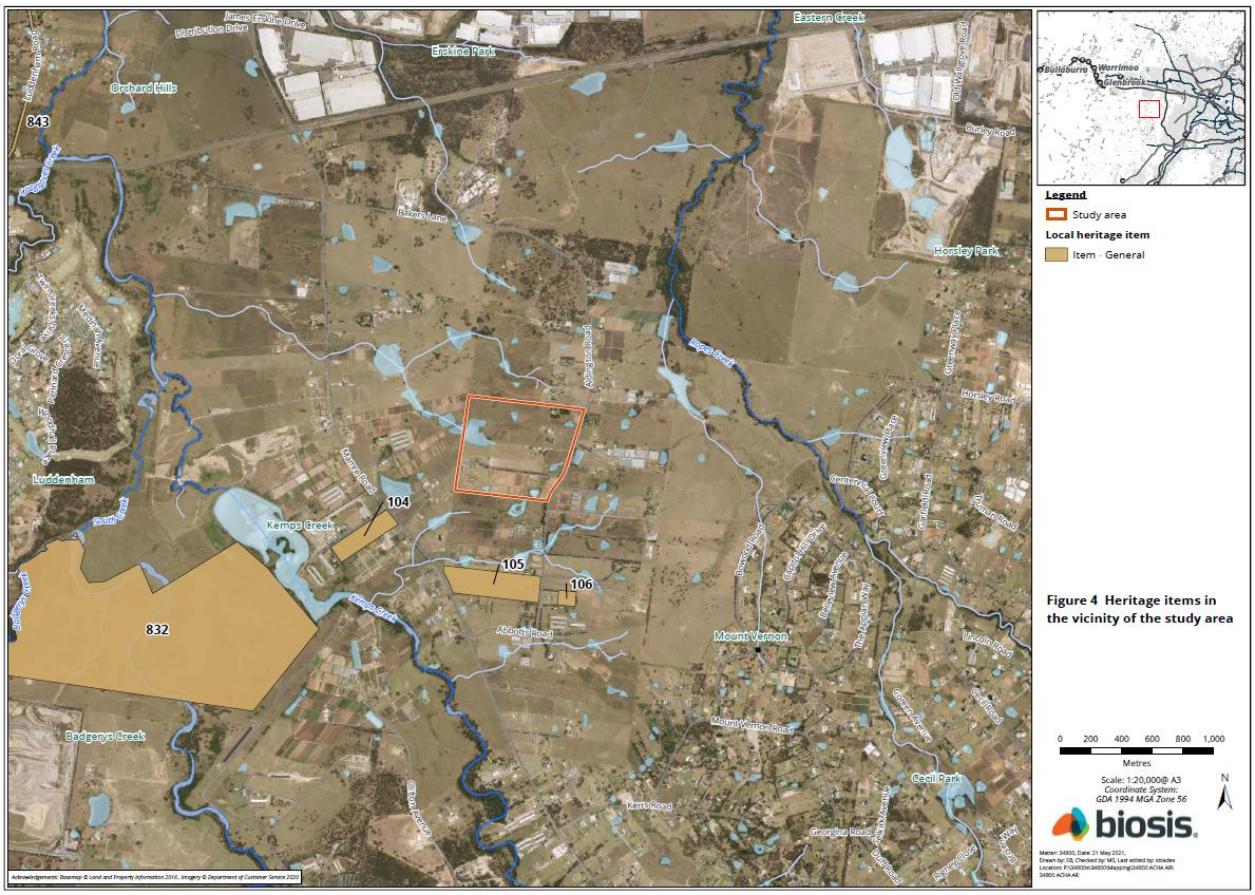


Figure 74 Heritage items in the vicinity of the study area (Source: Biosis 2021)

In relation to archaeological assessment, it is noted that the potential archaeological remains in the study area are associated with agriculture and domestic themes. Demolished buildings may have archaeological remains but high disturbance from development and gardening may have removed the archaeological deposit. Archaeological evidence associated with this 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 these remains will still be present in the study area.

The archaeological evidence associated with the domestic theme include current residential and rural structures such as sheds and houses. Historical research and a field survey have identified that these structures have largely been constructed post 1970s and are a common element still present throughout the Western Sydney region. These structures were not associated with a specific level of significance and would not contribute information that is not already available and are of low significance.

Based on the historical heritage assessment undertaken, the following recommendations are made by Biosis:

Recommendation 1 The proposed works may proceed with caution
There are no recorded items of heritage significance in or adjacent to the study area. Works can proceed in the study area with caution as it has been assessed as possessing low archaeological potential. Should unexpected archaeological remains be uncovered during the course of the proposed works, Recommendation 2 should be implemented.

Recommendation 2 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. Should unanticipated historical archaeology be 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. The Heritage Council will require notification if the find is assessed as a relic.

6.16 HAZARD AND RISKS

A SEPP 33 Assessment has been prepared by Riskcon Engineering to identify whether the quantities of Dangerous Goods (DG) proposed for storage in the warehouse exceeds the SEPP 33 threshold and in the event the warehouse exceeds the SEPP 33 DG threshold values, to recommend a Preliminary Hazard Analysis study to be prepared.

As addressed in the SEPP 33 Assessment, the analysis was conducted based on a limited quantity of DGs stored and handled at each warehouse, noting that the development has considered the potential for warehouse tenants to store and handle limited DGs as part of their operations.

The analysis identified that the quantity of DGs held at each warehouse did not exceed the storage threshold levels listed in "Applying SEPP33". It was also identified that the relatively low quantity of DGs stored and handled at the warehouse, and the type of operations proposed at the warehouse (i.e. warehouse is not dedicated DG storage facilities), it was unlikely to result in the maximum permissible transport quantity and number of vehicle operation listed in "Applying SEPP33". In addition to the DG 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.

Hence, based on the assessment conducted in this study, it is concluded that SEPP33 does not apply to the proposed development. Based on the assessment conducted in this study and the results indicating that SEPP33 does not apply to the warehouse within the development, it is concluded that the requirements of the Hazard and Risk Section of the SEARs have been addressed.

The details of the fire and life safety systems which would be installed to service the development are documented to satisfy the National Construction Code (Building Code of Australia or BCA) and are described in the BCA report, submitted with the development documentation. Additional fire and life safety systems are installed to comply with the requirements of the relevant Australian Standards. Where the site operates as a Distribution Centre (DC), AS/NZS 3833:2007 (Ref.4) will apply, where the site is not classified as a DC the individual standards relevant to each of the DGs stored and handled will apply. Based on compliance with the relevant Australian Standards, it is concluded that the risks are considered to be effectively controlled.

Notwithstanding, it is recommended in the SEPP 33 Assessment that, should a tenant require to store and handle additional DGs to those listed for the proposed warehouse on Lot 9, a review of the application of SEPP 33 should be conducted, and a Preliminary Hazard Analysis should be performed in accordance with Hazardous Industry Planning Advisory Paper No. 6 should it be identified that SEPP 33 applies to the proposed warehouse on Lot 9.

Further details of the SEPP 33 Assessment are provided at **Appendix 14**.

6.17 BUSHFIRE

A Bushfire Assessment Report has been prepared by Peterson Bushfire to provide assessment and recommendations to ensure compliance with the relevant bushfire protection legislation and policy.

The Site is identified as Bushfire Prone Land – Vegetation Category 3 as shown in **Figure 75**, which represents potential grassland hazard in this instance and reflects the predominance of cleared properties surrounding. Any development proposal within a lot containing mapped bushfire prone land (i.e. bushfire prone property) is to comply with the requirements of Planning for Bush Fire Protection 2019 (PBP) (RFS 2019).

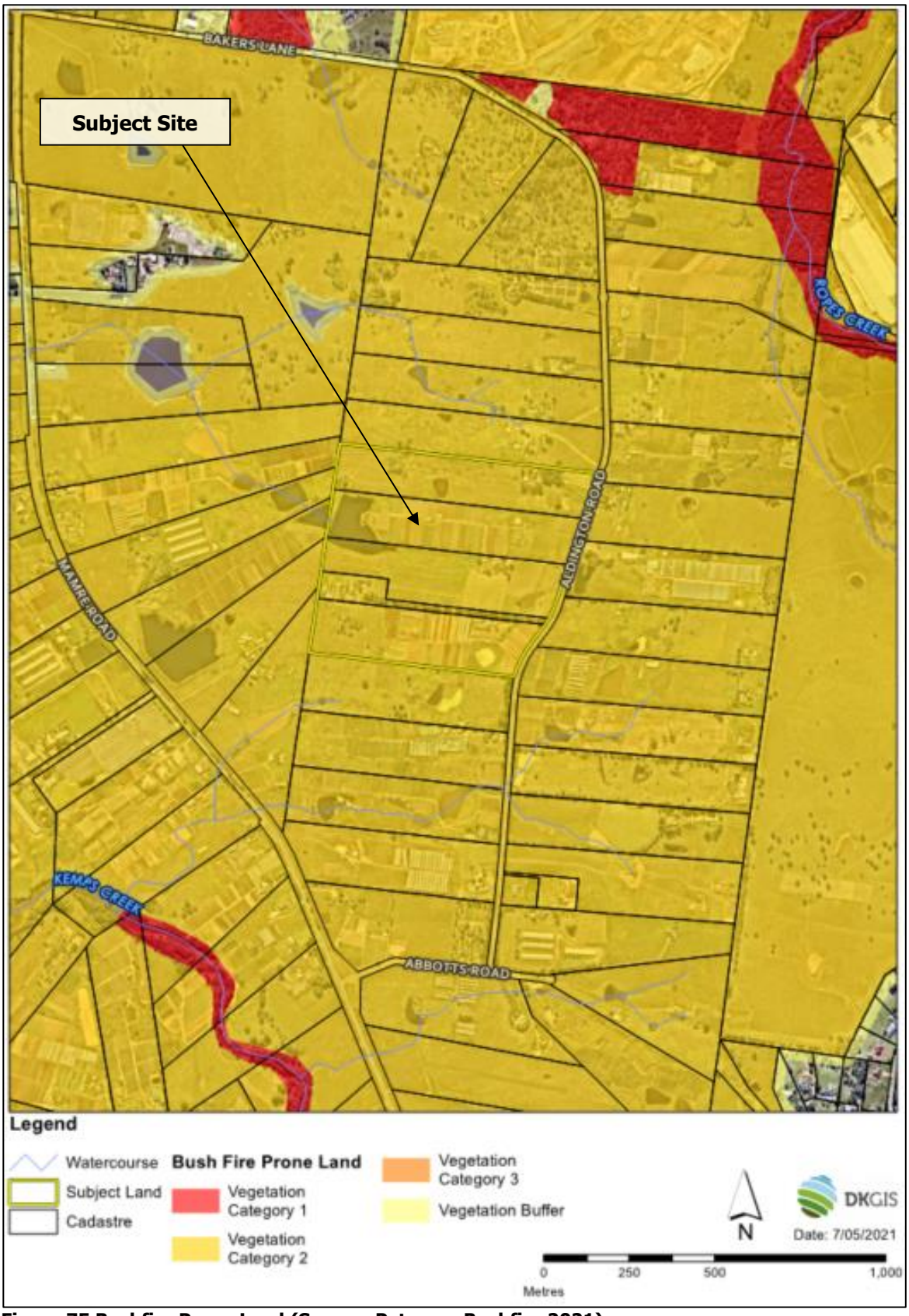


Figure 75 Bushfire Prone Land (Source: Peterson Bushfire 2021)

The Site is surrounded by cleared lands consisting of paddocks and managed areas. The bushfire threat is the potential for the paddocks to present a grassland hazard. The grassland hazards will eventually be removed as development progresses across the Mamre Road Precinct, however must be addressed in the interim.

The 'effective slope' influencing fire behaviour has been assessed in accordance with the methodology specified within PBP. The effective slopes under the surrounding grassland hazards are within the PBP slope class of 'downslope 0-5 degrees' or 'upslope/flat' as mapped on **Figure 76**.

Figure 76 Bushfire Hazard Analysis (Source: Peterson Bushfire 2021)

As stated within Section 8.3.1 of PBP, the National Construction Code (NCC) does not provide for any bushfire specific performance requirements for the type of development or use proposed. As such the Asset Protection Zone (APZ) and building construction requirements (i.e. Bushfire Attack Levels – BALs) of PBP and AS 3959-2018 not apply as deemed-to-satisfy provisions for bushfire protection. However, PBP does require the consideration of a managed hazard-separation area for firefighting purposes referred to as 'defendable space'. Relying on a defendable space in lieu of an APZ is deemed acceptable whereby construction satisfies NCC building and structural fire requirements.

The warehouse development will be separated from the grassland hazard adjacent to the north by the 6 m wide fire access road within a boundary setback exceeding 25 m. An adequate defendable space is therefore provided. Additional provisions for bushfire protection are not required. Future warehouses within proposed Lots 1-5 and 7 will require a minimum 6 m wide fire access road which will provide vehicular access between warehouses and the external boundary to the subject land if a grassland hazard is still present on the adjoining properties. The defendable space and entire site are to be maintained to achieve the performance requirement of an Inner Protection Area (IPA) as described by Appendix 4 of PBP.

Further, PBP requires an assessment of the Proposed Development against four objectives in Section 8.3.1 as listed below:

- *Provide safe access to/from the public road system for firefighters providing property protection during a bush fire and for occupant egress for evacuation*
- *Provide suitable emergency and evacuation (and relocation) arrangements for occupants of the development*
- *Provide adequate services of water for the protection of buildings during and after the passage of bush fire, and to locate gas andelectricity so as not to contribute to the risk of fire to a building*
- *Provide for the storage of hazardous materials away from the hazard wherever possible*

The assessment concludes that all four objectives are satisfied with the adoption of the recommendations listed in the Bushfire Assessment Report. The following recommendations are made within the Bushfire Assessment Report:

1. Public road design and construction is to comply with Table 5.3b of PBP.

2. The entire site is to be maintained to achieve the performance requirement of an Inner Protection Area (IPA) as described by Appendix 4 of PBP. The following landscaping specifications have been designed to achieve the IPA at this site:

   a. Trees:
   i. Trees at maturity should not touch or overhang the building;
   ii. 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.

   b. Shrubs:
   i. Ensure gaps in the vegetation, such as between garden beds, to prevent the spread of fire towards the building;
   ii. Clumps of shrubs should be separated from glazing and doors by a distance of at least twice the height of the vegetation.

   c. Groundcovers:
   i. Grass should be kept mown (as a guide grass should be kept to no more than 100mm in height);
   ii. Leaves and vegetation debris should be regularly removed;
   iii. Organic mulch is not to be used within 1 m of a building.

3. The proposed public roads require fire hydrants to be installed to comply with *AS 2419.1 – 2005 Fire Hydrant Installations - System Design, Installation and Commissioning* (AS 2419).

4. 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).

5. Any gas services are to be installed and maintained in accordance with *AS/NZS 15962014 The storage and handling of LP gas*.

6. Hazardous or combustible materials are not to be stored externally.

In light of the above, it is concluded that, with the adoption of the above recommendations, the Proposed Development will comply with Planning for Bush Fire Protection 2019 (PBP).

6.18 AIRPORT SAFEGUARDING

An Aeronautical Impact Assessment (AIA) (**Appendix 25**) has been prepared by Landrum & Brown Worldwide (Australia) Pty Ltd to consider the likely impact of the development in accordance with the National Airspace Safeguarding Framework (NASF) Guidelines.

As addressed in the AIA, the Proposed Development with proposed buildings to a maximum height of approximately 87m AHD and temporary construction crane activity to approximately 105m AHD will not infringe the prescribed airspace of Western Sydney Airport; inhibit the development of other instrument approach procedures; infringe any Building Restricted Area for navigation aids; adversely impact upon Air Traffic control Surveillance systems; or adversely impact on the safe operation of Western Sydney Airport. The Proposed Development is located outside of the lighting zones surrounding the airport and is unlikely to cause any hazard from sunlight reflections. It is also outside the adopted Public Safety Area template and building wind shear assessment area. The Proposed Development is also unlikely to increase the potential for wildlife collisions with aircraft and is located within acceptable ANEF contours.

As such, the Proposed Development is unlikely to impact on any future aviation developments in the area.

6.19 INFRASTRUCTURE REQUIREMENTS

A Service Infrastructure Assessment has been prepared by Landpartners to consider the relevant infrastructure requirements to facilitate the future operation of the Site.

6.19.1 Potable Water

The estimated potable water demand is outlined as follows:

- Average Day Demand 71kl/day
- Max Day Demand 110kl/day

Initial supply from Erskine Park Elevated system until the Cecil Park system is augmented and trunk water mains are constructed along Mamre Road from Elizabeth Drive.

A 100mm water main exists in Aldington Road on the eastern side of the road. No impact will occur to this main due to development activity on the Subject Site.

6.19.2 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 Road 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.

6.19.3 Waste water

The waste water demand is estimated to be 64kl/day. Sydney Water servicing to provide Sewer Pump Station by 2024 to service the southern catchment of the Mamre Road precinct. The subject site falls within the southern catchment.

There is currently no waste water assets within the area and therefore no waste water assets will be impacted on the Proposed Development.

6.19.4 Electricity

Endeavour Energy will have operational 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 outside the site to 22KV in Q3 2022. This will provide supply to the development.

The existing electrical infrastructure consist of overhead electrical supply. These assets will be reconstructed underground in conjunction with the expected road reconstruction Aldington Road and located within the normal Endeavour Energy corridor allocated within the road reserve. A pole mounted substation will be replaced by a padmount substation within the development site.

6.19.5 Telecommunication

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.

The existing Telco services are located on the opposite side of Aldington Road of the Subject Site. Undergrounding of the assets will occur across the frontage of the subject site in conjunction with road reconstruction of Aldington Road. The existing telco services on the opposite side of Aldington Road will remain in place until developers on the east side of Aldington Road undertake road reconstruction.

Further details of the site infrastructure assessment are provided in **Appendix 23**.

6.20 PLANNING AGREEMENT / CONTRIBUTIONS

A VPA is proposed to be entered into with DPIE for the development which relates to the satisfactory arrangements for the provision of regional infrastructure. A VPA offer was made to DPIE in June 2021, followed up by additional information as requested by DPIE on 22 July 2021. It is noted that the offer has been referred to DPIE's internal legal team for preparation of a draft VPA. Further information on the proposed VPA with DPIE is provided at **Appendix 32**.

Further, as previously discussed, Frasers, ESD, Fife Capital and Stockland (LOG-E) propose to enter in a VPA with Penrith City Council in relation to the Aldington and Abbots Road upgrade works. LOG-E has been in consultation with Council to develop a concept design of the Aldington and Abbots Road upgrades as part of a VPA offer. A VPA offer was made to Council on 9 July 2021 and there has been ongoing discussions between the stakeholders and Council regarding the delivery of the upgrade works. Further information on the proposed VPA with Council is provided at **Appendix 31**.

6.21 ECOLOGICALLY SUSTAINABLE DEVELOPMENT AND ENERGY EFFICIENCY

An Ecologically Sustainable Development (ESD) Report has been prepared by Frasers Property Industrial Construction to identify opportunities to achieve ESD with the development.

A series of sustainable design strategies across nine themes have been identified in relation to the following:

1. Transport

2. Stormwater
3. Materials
4. Water
5. Indoor environment quality
6. Noise
7. Energy efficiency
8. Waste
9. Land use and ecology impact

Considerations and recommendations under each theme are outlined in Table 1 within the ESD Report.

Further, the Proposed Development is committed to achieve 5-star Green Star 'Design & As-Built' certification (Australian Excellence). A Green Star Performance will be pursued during the design, construction and ongoing operation phases of the building.

In addition, in order to achieve a 5-star Green Star rating, a building must achieve an exemplary level of energy efficiency through multiple design aspects. The main sources of energy used in a typical distribution warehouse include:

- Mechanical ventilation of warehouse and storage areas;
- Air conditioning of office area;
- Internal and external lighting; and
- Office and warehouse equipment

The above constitute around 80% of a typical warehouse facility energy consumption.

A number of initiatives have been identified to improve energy efficiency. The design aspects of the initiatives relate to ventilation, solar design, energy sources, air condition design, lighting, appliances and equipment.

In order to reduce greenhouse gas emissions, the following approach will be incorporated to the Proposed Development:

1. Design for reduced emissions which includes the selection of lower greenhouse gas intensive building materials;
2. Design for improved energy efficiency (refer to Section 3) to minimise greenhouse gas emissions through operations; and
3. Purchase certified carbon offsets.

It is noted that a series of mitigation measures have been developed to reduce greenhouse gas emissions in response to the scope of emissions, including direct emissions, indirect emissions and other indirect emissions. Details of the greenhouse gas mitigation measures are provided in Section 3.3 of the ESD Report.

Further details of the mitigation measures identified to improve energy efficiency, reduce greenhouse gas emissions and potable water demand are included in the ESD Report at **Appendix 19**.

6.22 BUILDING CODE OF AUSTRALIA & FIRE ENGINEERING

A BCA Design Compliance Report has been prepared by Modern Building Certifiers (MBC) to carry out a detailed assessment of the proposed warehouse or distribution centre in Proposed Lot 9 against the requirements of the National Construction Code (NCC) Series (Volume 1) – Building Code of Australia (BCA) 2019 Amdt 1 Deemed-to-Satisfy (DtS) prescriptive provisions.

The BCA Design Compliance Report notes that the Proposed Development will be subject to compliance with the relevant requirements of the BCA as in force at the time that the application for Construction Certificate is made.

Further details of the assessment are provided in the BCA Design Compliance Report at **Appendix 24**.

PART G PLANNED MANAGEMENT AND MITIGATION MEASURES FOR THE PROPOSED DEVELOPMENT

By:	Frasers Property Industrial
In relation to:	Proposed State Significant Development Application (Proposed Warehouse and Logistics Hub)
Site:	155-217 Aldington Road, Kemps Creek (Lot 33 DP258949 and Lots 25-28 DP 255560)

Frasers, plan to undertake the construction and operation of the proposed Warehouse and Logistics Hub, in accordance with the following:

Below prescribes some of the terms and abbreviations used in this Statement, including:

Approval	The Minister's Approval of the Proposed Development
BCA	Building Code of Australia
Council	Penrith City Council
Department	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EP&A Act	*Environmental Planning and Assessment Act 1979*
Project	The Proposed Development as described in this EIS
Proponent	Frasers Property Industrial
Secretary General	Secretary General of the Department (or delegate)
Site / Subject Site	Land to which the application applies
WorkCover	NSW WorkCover

7.1 ADMINISTRATIVE COMMITMENTS

Commitment to Minimise Harm to the Environment

1. Frasers will commit to implement all reasonable and feasible measures, to prevent and / or minimise any harm to the environment, that may result from the construction or operation of the Proposed Development.

Construction Certificates

2. Frasers will ensure that a staged approach will be taken to obtain relevant Construction Certificates with respect to the respective construction stages.

Occupation Certificate

3. Frasers will ensure that an Occupation Certificate, are obtained prior to the occupation of each section of the warehouse building.

Terms of Approval

4. Frasers would carry out the Project generally in accordance with the:

    a) Environmental Impact Statement;
    b) Drawings prepared by Frasers;
    c) Management and Mitigation Measures;
    d) Any Conditions of Approval (including operational use of the Site 24/7).

5. If there is any inconsistency between the above, the Conditions of Approval shall prevail to the extent of the inconsistency.

6. Frasers would ensure compliance with any reasonable requirement(s) of the Secretary of the Department of Planning, Industry and Environment arising from the Department's assessment of:

    a) Any reports, plans, programs, strategies or correspondence that are submitted in relation to this Approval; and
    b) The implementation of any recommended actions or measures contained in reports, plans, programs, strategies or correspondence submitted by the Project Team as part of the application for Approval.

Structural Adequacy

7. Frasers would ensure that all new buildings and structures on the Site are constructed in accordance with the relevant requirements of the BCA.

Operation of Plant and Equipment

8. Frasers would ensure that all plant and equipment used on-site, is maintained and operated in proper and efficient manner, and in accordance with relevant NSW EPA noise emission criteria and Australian Standards.

Construction Traffic Management Plan

9. Frasers would ensure that a Construction Traffic Management Plan (CTMP) is prepared and submitted to the NSW DPIE. This plan would:

    a) be submitted to the Secretary-General for approval prior to the commencement of construction;
    b) describe the traffic volumes and movements to occur during construction;
    c) detail proposed measures to minimise the impact of construction traffic on the surrounding network, including driver behaviour and vehicle maintenance; and,
    d) detail the procedures to be implemented in the event of a complaint from the public regarding construction traffic.
    e) be in accordance with the CTMP submitted as part of the subject SSD Application.

Construction Environmental Management Plan

10. Prior to the commencement of construction, a Construction Environmental Management Plan (CEMP) would be prepared that addresses the following:

    a) Land Contamination;
    b) Air Quality;
    c) Waste Classification;
    d) Erosion and Sediment Control; and,
    e) Materials Management Plan.

Monitoring the State of Roadways

11. The Proponent will monitor the state of roadways leading to and from the Subject Site and will take all necessary steps to clean up any adversely impacted road pavements as directed by Council.

Waste Receipts

12. A permanent record of receipts for the removal of both liquid and solid waste from the site should be kept and maintained up to date at all times. Such records will be made available to authorised person upon request.

7.2 SPECIFIC ENVIRONMENTAL COMMITMENTS

General Noise Recommendations

13. Construction on the Subject Site would only be undertaken between 7am and 6pm Monday to Friday, and 8am and 1pm on Saturdays. No construction will be permitted at the Subject Site on Sundays or public holidays. The following specific measures are proposed throughout the construction and operational phases of development:

    a) Prompt response to any community issues of concern;
    b) Noise monitoring on-site and within the surrounding areas;
    c) Refinement of on-site noise mitigation measures and plant operating procedures where practical;
    d) Preparation of a formal noise management plan including noise monitoring program;
    e) For equipment with enclosures (i.e. compressor rooms) ensure door and seals are well maintained and kept closed when not in use;
    f) Keep plant and equipment well maintained, regular inspection and maintenance of equipment to ensure it is good working order;
    g) Equipment not to be operated until it is maintained or repaired;
    h) Regularly train workers (i.e. toolbox talks) to use equipment in ways to minimise noise;
    i) Operate mobile plant in a quiet, efficient manner;
    j) Switching off vehicles and plant when not in use; and,
    k) Incorporate clear signage at the site including relevant contact numbers for community enquiries.

Construction Noise Recommendations

14. Allowable construction hours as follows:
    - Monday to Friday 7am to 6pm
    - Saturday 8am to 1pm
    - No work on Sundays or public holidays

15. 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.

16. 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.

17. 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.

18. Any moveable vibrating plant (e.g. compressors) should be located as far as practical from the adjacent residential premises.

19. 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.

20. 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.

Construction Traffic

21. During construction:

    a) all trucks entering or leaving the Site with loads, will have their loads covered;
    b) trucks associated with the project do not track dirt onto the public road network; and,
    c) the public roads used by these trucks are to be kept clean.

Contamination

22. A Remedial Action Plan (RAP) is prepared and implemented to address identified contamination risks, manage the removal of the AGSTs in Lot 27, address unexpected finds during development and set out requirements to validate the site is suitable for the intended use;
23. An interim Asbestos Management Plan (AMP) is required to manage asbestos risks on and in soil in accordance with WHS Regulation requirements, until such time as asbestos risks are removed or require long term management following remediation; and
24. Given the presence of ACM in building material it is recommended that a Hazardous Building Material Surveys (HBMS) be undertaken prior to any demolition of existing site structures.

Dust Management

25. During the construction phase of the project, all reasonable and feasible measures to minimise dust generation by the project. These include:

Source	Control Measures
General	
Visual Inspection	Carry out visual inspections of the Subject Site during site preparatory and construction activities and employ measures (where necessary) to minimise any visible air pollution generated by the Project.
Regular Maintenance	Regularly inspect and perform maintenance on dust control using the latest technologies (i.e. water sprays nozzles) and measures to ensure the effectiveness of such controls.
Erosion Control Structures	Silt and other material removed frequently from around erosion control structures to ensure deposits do not become a dust source.
Vegetated Buffers	Retain existing vegetation, where appropriate and implementing additional vegetated buffers around the boundary of the Site to provide a physical barrier to the transportation of pollutants in the direction of sensitive receptors.
Waste Materials	Cleared vegetation, demolition materials and other combustible waste material will not be burnt on-site.

	All waste materials be appropriately contained (in skips, bins) and covered during adverse weather conditions and handled in accordance with the Subject Site's Waste Management Plan.
Wind Blown Dust Sources	
Disturbed Areas	– Disturb only the minimum area necessary. – Stabilise all disturbed areas as soon as practicable to prevent or minimise windblown dust. – Regularly assess weather conditions to identify adverse weather conditions that are unfavourable in terms of dust levels at receptor locations surrounding the Site (such as on dry days, during strong winds, particularly north easterly winds blowing in direction of the school(s) along Bakers Lane).
Stockpile/s	– Water sprays and/or covers will be employed for material stockpiles, particularly during adverse weather conditions, to minimise dust generation. – Stockpiles will be covered overnight. – Use of chemical dust suppressants will also be used where necessary. – Fencing, bunding or shelterbelts will be used to reduce ambient wind speeds (in some areas).
Transportation (Trucks)	– Truck loads will be covered with tarpaulin or lid prior to transport of dusty materials by road. – Minimise truck queuing and unnecessary trips through logistical planning of materials delivery and work practices. – Reduce vehicle / truck idling times. – Maintain a following distance of trucks of 20 seconds minimum to allow for dust clouds generated by the lead truck to dissipate. – Install a truck wheel wash or shaker grid to remove any loose dirt.
Activity Generated Dust Sources	
Internal Road Dust	– Roads and trafficked areas will be watered down using a water-cart and/or sprinklers to minimise the generation of dust. – Haulage vehicles will be restricted to the most direct route and minimal manoeuvring areas to prevent indiscriminate driving over non-active areas. – Haul roads and hard stand areas will have designated speed limits (i.e. generally 20 km/hour). – Enforce speed limits on all on-site vehicles to minimise wheel-generated dust. – Stabilise access roads and work areas as soon as practicable to prevent or minimise windblown dust. – Maintain roads on a regular basis to ensure roads are clearly marked, pot holes and corrugations are eliminated, and extra material build up is removed or redistributed on the road. – Chemical dust suppressants used where necessary.
External Road Dust	– Vehicles causing dirt tracks out onto main roads would be cleaned on a regular basis to prevent this becoming an additional source of dust. – Material spillages would be cleaned up promptly.
Excavation	– Apply water sprays to trucks and loading points for dust suppression.
Loading and Dumping	– Dump heights will be minimised wherever possible (reduce to 8 m).

Plant and Equipment	– All plant and equipment used during activities will be maintained and operated in a proper and efficient condition. – Reduce idling times of trucks and other machinery. – Fixed plant should be located as far from local receptors as possible.
Excessive Dust Events	
Internal Roads	– Employ additional water spraying / water carts. – Further reduce speed on haul roads during high winds. – Halt traffic movements.
Stockpiles	– Cover stockpiles of material.
Project Site	– Temporarily halt activities and resume once weather conditions have improved.

Waste Management

26. Frasers will ensure that all waste generated on-site during operation is classified in accordance with the Office of Environmental and Heritage's *Waste Classification Guidelines: Part 1 Classifying Waste* and disposed of to a facility that may lawfully accept the waste.

Erosion and Sediment Control

27. Frasers will install silt traps during the construction phase to ensure there are no pollutants or sediments that exit the site or unacceptable impacts result on surrounding vegetation or waterways.

Protection of Vegetation

28. Frasers will mark the clearance boundaries prior to commencement of construction to ensure that there is no unnecessary removal of vegetation.

Aboriginal Heritage

29. Based on the ACHAR, Aldington PAD 1 has been identified as an area with potential to contain Aboriginal objects. If impact to this area cannot be avoided the subsurface investigations (test excavations) will be required prior to the commencement of impacts.

30. Unexpected Aboriginal objects remain protected by the National Parks and Wildlife Act 1974. If any such objects, or potential objects, are uncovered in the course of the activity that are not covered by an AHIP, all work in the vicinity should cease immediately. A qualified archaeologist should be contacted to assess the find and Heritage NSW and DLALC must be notified.

31. If human remains, or suspected human remains, are found in the course of the activity, all work in the vicinity should cease, the site should be secured and the NSW Police and the Office of Environment and Heritage NSW should be notified.

32. The establishment of a long term care agreement in consultation with RAPs should be developed to ensure the artefacts identified as part of the ACHAR are adequately cared for. The artefacts are to be reburied on Site as requested by the RAPs. The proposed location for reburial is to be provided to RAPs. Reburial of artefacts is to occur after completion of the proposed works on Site.

33. As per the Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (DECCW 2010b), it is recommended that the proponent provides a copy of this draft report to the Aboriginal stakeholders and considers all comments received. The proponent should continue to inform these groups about the management of Aboriginal cultural heritage sites within the study area throughout the life of the project.

Ecologically Sustainable Development

34. Frasers would investigate the following ESD measures in respect of:

(a) Energy & Greenhouse Gas Emissions.
(b) Potable water reduction.
(c) Minimising waste to landfill.
(d) The Indoor Environment.
(e) Occupant amenity and comfort.
(f) Land Use and Ecology.
(g) Emissions.
(h) Building Management.

Bushfire Protection

35. Frasers will ensure that:

- Public road design and construction is to comply with Table 5.3b of PBP.

- The entire site is to be maintained to achieve the performance requirement of an Inner Protection Area (IPA) as described by Appendix 4 of PBP. The following landscaping specifications have been designed to achieve the IPA at this site:

a. Trees:
iii. Trees at maturity should not touch or overhang the building;
iv. 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.

b. Shrubs:
iii. Ensure gaps in the vegetation, such as between garden beds, to prevent the spread of fire towards the building;
iv. Clumps of shrubs should be separated from glazing and doors by a distance of at least twice the height of the vegetation.

c. Groundcovers:
iv. Grass should be kept mown (as a guide grass should be kept to no more than 100mm in height);
v. Leaves and vegetation debris should be regularly removed;
vi. Organic mulch is not to be used within 1 m of a building.

- The proposed public roads require fire hydrants to be installed to comply with *AS 2419.1 – 2005 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).

- Any gas services are to be installed and maintained in accordance with *AS/NZS 15962014 The storage and handling of LP gas*.

- Hazardous or combustible materials are not to be stored externally.

Biodiversity

36. Frasers will ensure mitigation as follows in relation to biodiversity:

a) Mitigation of construction impacts will be specified within a project specific Construction and Environmental Management Plan (CEMP). The following general areas are included in a CEMP but will vary depending on a Site's environment and as required by consent conditions:

- Air quality;
- Construction noise and vibration;
- Fill importation;
- Waste management;
- Soil and water plan;
- Erosion and sediment control; and
- Flora and fauna management.

b) The direct and permanent impact on 1.27 ha of native vegetation will be mitigated through a range of measures, which are to be specified in a fauna and flora management plan (FFMP). As a subplan to the CEMP, the FFMP will specify biodiversity related procedures, which would include, but may not be limited to, the following:

- Pre-clearance and clearance management;
- Fauna rescue and relocation protocol;
- Euthanasia protocol;
- Dam decommissioning;
- Weed and pathogen control;
- Unexpected finds protocol; and
- Monitoring and reporting strategies.

Noise

37. Frasers will ensure that:

a) Acoustic barriers shall be constructed to the height and extent shown in **Figure 61** of the EIS. 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.

PART H PROPOSED DEVELOPMENT JUSTIFICATION

The Proposed Development is justified on environmental, social and economic grounds and is compatible with the locality in which it is proposed. Refer to **Part F** of this EIS, that provides detail regarding the justification of the environmental, social and economic impacts of the Proposed Development.

This SSD Application is considered supportable on this basis for the following reasons:

1. **Supports State, Regional and Local Planning Objectives**

The Proposed Development is consistent with the objectives, provisions and vision contained within *A Metropolis of Three Cities – Greater Sydney Region Plan*; *the Western City District Plan*; and *State Environmental Planning Policy (Western Sydney Employment Area) 2009.* It demonstrates an ability to provide employment in an area already earmarked for employment through both State and Regional planning policies.

2. **Demonstrates an Appropriate Use of a Permissible Development**

The Proposed Development would retain and contribute to the growth of new industry for the immediate locale as well as the wider WSEA and the wider Western Sydney Region. The industrial and logistics Sector is an important economic driver and job generator for Western Sydney as a region, as well as the WSEA and its surrounding area, supporting functional land uses that supports large scale warehouse and logistics development.

The Proposed Development complements significant government investment in infrastructure. Indeed, it delivers many of the strategic planning objectives enunciated throughout State Strategies, e.g. SEPP WSEA. The Proposed Development would be a highly appropriate and compatible response to the strategic goals and objectives of the whole region as set out in *A Metropolis of Three Cities – Greater Sydney Region Plan;* and the *Western City District Plan*. These documents envisage economic growth and employment-generating land uses at this location.

3. **Minimises Environmental Impacts**

Specialist consultants have all assessed all of the potential impacts of the Development and determined that the Proposed Development can be undertaken with minimal environmental and adverse impacts pertaining to the regional road network; acoustic outputs; air quality; biodiversity; and other neighbours with respect to visual amenity. The commissioned reports have collectively concluded that no significant risk to the locality would result from the Proposed Development. Where impacts have been identified, these fully-developed strategies are set out in detail for mitigation. These measures are described in **Part G** of this EIS.

4. **Creates Compatibility with Surrounding Development**

The land use (warehouse or distribution centre) for the purposes of a Warehouse and Logistics Hub, is considered compatible with existing uses surrounding the Subject Site on adjoining land, as well as land located throughout the wider WSEA. The investigations undertaken as part of this SSD Application conclude, that no significant cumulative impacts will occur from the proposed use of the Site, for the purposes of a Warehouse and Logistics Hub. Rather, the proposed use would be complementary to the surrounding development within the IN1 General Industrial zone.

5. **Delivers Ecologically Sustainable Development**

The principles of Ecologically Sustainable Development as outlined in Clause 7(4) of the EP&A Regulation have been carefully considered in the formulation of this Proposed Development and are addressed as follows:

Precautionary Principle

After careful assessment by both the Project team and Expert Consultants, it is concluded that no unmanageable threat or irreversible damage to the environment, would result due to the Proposed Development.

Inter-generational Equity

The Project Team and Consultants have examined the overall effects of the Proposed Development on the Natural Environment and the existing Built Environment at and around the Proposed Development. The project Team has examined Flora and Fauna; Bushfire; Traffic, Aboriginal Cultural Heritage and European Heritage, Flooding, Water Quality and Quantity, Acoustics, Vibration, Hazards and Risks, Air Quality, Social Impacts and Waste Management. This detailed assessment has concluded that no unreasonable use of resources, affectation of environmental processes or prevention of the use of land for future generations would occur from the Proposed Development. Indeed, the Proposed Development would improve the economies of the region through both substantial investment and new employment, thereby improving the inter-generational equity.

Conservation of Biological Diversity and Ecological Integrity

This EIS has commissioned overall detailed assessments of the Site's Biodiversity. These reports were carried out by Ecologique and have concluded that for the Proposed Development, the areas that are impacted are proposed to be offset by Biodiversity credits.

Improved Valuation, Pricing and Incentive Mechanisms

The Proposed Development would enable new cost efficiencies, through the timely provision of a Warehouse and Logistics Hub, with a total investment (including infrastructure and land) value for this SSD Application of some $86 Million (excluding GST).

Environmental Management

The Proposed Development implements significant and elaborate measures that avoid, contain and address any possible air-quality impacts; noise impacts; waste and pollution; through avoidance; better design and management. This is exemplified through acoustic measures; waste management control practices; and erosion-and-sediment control measures, which will be implemented throughout both the construction and operational phases of the Proposed Development.

PART I CONCLUSION

The Proposed Development is defined as SSD pursuant to Schedule 1, Part 12 of SRD SEPP. In developing the Site for a Warehouse and Logistics Hub, this Application fully satisfies all requisite provisions of qualification as SSD. The Proposed Development is a category defined with SRD SEPP, namely a warehouse or distribution centre, for the purposes of a Warehouse and Logistics Hub; it also has a CIV over $50 Million.

The Proposed Development, for the purposes of a Warehouse and Logistics Hub, is considered to be entirely consistent with the Objects of the EP&A Act under Section 1.3, particularly, the notion of promoting the orderly and economic development of the land (Subject Site). The Proposed Development is considered to form a sequential (orderly) representation and formal extension to the already developed industrial and employment precincts of the WSEA. In this regard there are existing industrial developments already located throughout the WSEA, including approved and proposed development within the Mamre Road Precinct in close proximity to the Subject Site. Additionally, in the promotion of employment-generating opportunities throughout the construction and operational phases, the Proposed Development further delivers on the rationale of full economic utilization and proper and orderly development of the land for its intended purpose namely industrial and employment uses.

Based on the specialist studies and extensive investigations carried out for the Proposed Development, it is concluded:

1. **Strategic and Statutory Context** – The Proposed Development aligns with the strategic planning framework, namely *A Metropolis of Three Cities*, and the *Western City District Plan*. Consistency is achieved through the provision of employment, and implementation of Ecologically Sustainable Development measures that contribute to create a new and leading-edge form of development, for the purposes of a Warehouse and Logistics Hub.

   In terms of the statutory context, the Proposed Development is entirely consistent with the Objects of the Act pursuant to Section 1.3 of the EP&A Act in that it represents an orderly and sequential development. The appropriateness of the Proposed Development is also demonstrated through full compliance with SEPP WSEA in that it achieves the employment generating outcomes envisaged for the Site with minimal impact on surrounding land uses and the environment.

2. **Suitability of the Site** – The Site is highly suitable for the Proposed Development as it can be serviced in the immediate term. The Site has limited constraints in terms of flooding, heritage and ecology. Further, the EIS sets out recommendations and mitigation measures (where necessary), to account for identified potential impacts. Given the assessment undertaken the Site is considered highly suitable for the proposed use owing to its ready ability to provide employment; its excellent access arrangements to the regional road network; it is suitable contextual setting; and its impact on the environment it would impose. The Environmental Assessment concludes that the Site is highly suited for its intended land use.

3. **Community and Stakeholder Engagement** – A comprehensive community engagement strategy has been executed, which involved virtual meetings and phone interviews with Penrith City Council and community members. All nearby residents were also notified of the Proposed Development with no objections received. All matters raised by the agencies have been comprehensively addressed throughout this EIS.

4. **Noise and Vibration** – Noise monitoring carried out and the project specific criteria established establishes that the proposed development can successfully co-exist with all surrounding land uses, subject to appropriate management and mitigation measures. Construction noise and vibration is able to be suitably managed by way of conditions of consent and management plans.

5. **Urban Design and Visual Assessment** – As clearly demonstrated in the submitted Architectural Plans, the Proposed Development provides a superior urban design outcome that sets a desirable precedent for future development in the locality. The Landscape and Visual Impact Assessment also

confirms that there will be no unacceptable amenity impacts given the scale, form and overall positioning of the Warehouse and Logistics Hub building on the Site.

6. **Air Quality** - The Air Quality Impact Assessment, demonstrates that there is a low risk of health or nuisance impacts during construction works. However, a range of standard mitigation measures have been recommended to ensure that short term impacts associated with construction activities are minimised.

   In terms of operational impacts, these are considered minimal given the low impact nature of the data storage uses. It is noted that vehicle usage will be reduced where feasible and practical.

7. **Infrastructure Requirements** – The Site can be appropriately serviced.

8. **Traffic and Transport** – Sufficient access and parking arrangements are provided for in the proposed development. Additionally, traffic generation has been assessed and it is considered that the existing road networks in close proximity to the Site can continue to operate at a satisfactory Level of Service.

9. **Soils and Water** – The Subject Site is deemed suitable for the Proposed Development's land use. This is attributed to the underlying Site conditions and historical land use.

   Water reuse and rainwater harvesting has been considered for the Proposed Development. Rainwater tanks will be provided for the warehouse building.

   The water cycle management strategies will include; water quantity; water quality; flooding; water supply; and erosion and sediment control. These measures provide an optimal stormwater management outcome for the Site proposed under the subject Proposed Development.

10. **Waste** – A Waste Management Plan has been provided which considers construction and operational waste measures to be undertaken for the Proposed Development. All built form proposed has considered the provision for waste management areas to ensure the effective management and disposal of waste can occur.

11. **Ecologically Sustainable Development** – The principles of Ecologically Sustainable Development have been incorporated in the Proposed Development through the incorporation of a number of sustainable design strategies across nine themes, including:

    - Transport;
    - Stormwater;
    - Materials;
    - Water;
    - Indoor environment quality;
    - Noise;
    - Energy efficiency;
    - Waste; and
    - Land use and ecology impact.

In addition, the Proposed Development is committed to achieve a 5-star Green Star 'Design & As-Built' certification (World Leadership).

12. **Heritage** – Both a Historic Heritage Impact Statement and ACHAR have been completed which confirm that the Site has low Aboriginal and Historical heritage significance:

    - Historical Heritage – There are no items of heritage significance which preclude the Development from proceeding; and
    - Aboriginal Heritage – Following extensive field work and consultation with the RAPs, a series of recommendations were made which identified that no registered Aboriginal sites are located

within the Subject Site, with a potential archaeological deposit (PAD) requiring further assessment to determine significance if impacts cannot be avoided.

13. **Biodiversity** – the BDAR concludes, that the Proposed Development is considered unlikely to reduce viability of any adjacent native vegetation and associated habitats due to edge effects, noise dust or light spill and / or disturbance to breeding habitats. It is identified that a total of 18 ecosystem credits are required to be offset.

14. **Greenhouse Gas and Energy Efficiency** – The Proposed Development can be constructed and operated so as to not prejudice the sustainability of the built form, and to minimise impacts upon the environment (both direct and indirect emissions have been considered).

15. **Planning Agreement and Development Contributions** –The Proposed Development would be subject to Council's future Section 7.11 Contributions Plan. Satisfactory arrangements under Clause 29 will be sought by way of a VPA with the Minister.

16. **Bushfire** – The Proposed Development is capable of complying with the relevant provisions from the PBP 2019.

Based on the findings of this EIS, it is concluded that the Proposed Development supports the continued development of jobs in the Western Sydney Region. The Proposed Development contributes to the retention and growth of warehouse and industrial development, across both NSW and Australia. The Proposed Development is therefore considered suitable from both a local and regional context and is both orderly and appropriate, based on social, cultural, economic and environmental considerations. It also satisfies all requisite regulatory requirements for flooding, biodiversity, bushfire, traffic, air quality emissions, Dangerous Goods and noise & vibration impacts.

Given all of the above reasons and the satisfaction of both of the Objects of the EP&A Act and the aims of WSEA, it is recommended that the Proposed Development, for the purposes of a Warehouse and Logistics Hub, be supported by the NSW DPIE, as appropriate and orderly employment-generating development.