Environmental Assessment

Development of Lots 1, 2 + 5 Interlink Industrial Estate, Mamre Road, Erskine Park

October 2007

Prepared by:

Goodman International Limited
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In association with:

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striving for balance between economic, social and environmental ideals…

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CEFTIFICATION BY AUTHOR

Part 3A Environmental Assessment

Prepared under the *Environmental Planning and Assessment Act 1979*

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Project to which Part 3A applies

Application number	07_0093
Project	Proposed Warehouse and Distribution and Industrial Facilities on Development Lots 1, 2 and 5, Interlink Industrial Estate
Proponent name	Goodman International Limited
Proponent address	Level 10, 60 Castlereagh Street SYDNEY NSW 2000
Land to be developed	Part Lot 141 DP 843899 Mamre Road, Erskine Park

Certificate

I certify that I have prepared the contents of this document, and to the best of my knowledge the assessment:

- has been prepared in accordance with the requirements of Part 3A and the Regulations; and
- does not contain false or misleading information.

Signature

Name Colin Rockliff

Date

EXECUTIVE SUMMARY

Goodman International Limited (Goodman) is proposing to develop the remaining undeveloped lots in its Mamre Road Industrial Subdivision, Erskine Park.

The industrial subdivision was approved by the Minister for Planning (the Minister) on 1 March 2007 (Major Project No.06_0253) (the estate-wide project), and is now referred to as 'Interlink Industrial Estate'.

The 64 hectare industrial estate forms part of the Erskine Park Employment Area, which was created in 1993 as a key employment area for Western Sydney. The Erskine Park Employment Area now forms part of the Western Sydney Employment Hub, which is identified in the Sydney Metropolitan Strategy as a key centre for employment growth over the next 25 years.

The Minister's approval for the Interlink Industrial Estate provides for the:

- subdivision of the property to create 6 industrial development lots and one 'biodiversity' lot;
- bulk earthworks over all the development lots;
- estate roads (on Lot 6) and services; and
- development of a distribution centre for Woolworths Limited on Lot 3.

A second major project application (MP 06_0254), for the development of a distribution facility for Kimberly-Clark on Lot 4, was also approved by the Minister on 1 March 2007.

Goodman is now proposing to complete the development of Interlink Industrial Estate through the development of Lots 1, 2 and 5. The project involves:

- development of a warehouse and distribution facility for an unspecified future end-user on Lot 1 – to be developed in 2 stages;
- development of a light industrial and distribution facility for Ubeeco Packaging Solutions Pty Ltd on Lot 2;
- development of a warehouse and distribution facility for Allied Pickfords Pty Ltd on Lot 5A; and
- development of a light industrial/warehouse and distribution facility for an unspecified future end-user on Lot 5B.

The project has a capital investment value of $57.4 million, and would generate 300 jobs during construction and 460 jobs once operational.

The proposal constitutes a 'major project' under Part 3A of the *Environmental Planning and Assessment Act 1979*, and consequently the Minister is the approval authority for the project.

Many of the potential environmental impacts associated with the project have been addressed in the estate-wide project (MP 06_0253), which provides for the establishment and broad servicing of all development lots on the estate. As such, the key environmental aspects for the current project are considered to include:

- noise;
- traffic; and
- visual amenity and landscaping.

Assessment of these and other environmental issues indicates that the project is able to be conducted in a manner that would not result in any significant environmental impacts, or impacts on the amenity of surrounding landusers. In particular, environmental assessment indicates that:

- construction, operational and traffic noise is predicted to meet applicable noise criteria;
- traffic volumes are commensurate with planned volumes for the estate and the Erskine Park Employment Area, and would not result in any significant traffic impacts; and
- the project is not expected to result in any adverse visual impacts, as it:

- complies with the urban design development standards of the *Penrith Development Control Plan 2006*, and is reasonably conservative in terms of scale, bulk and site cover;
- has been designed to a high architectural quality, particularly on key frontages; and
- adopts a high quality landscape plan.

The project is considered to be compatible with the future desired character of the area under the *Penrith Development Control Plan 2006* and the NSW Government's Metropolitan Strategy. The project would have significant social and economic benefits for the local area through the provision of increased employment opportunities and the significant capital investment in the Erskine Park Employment Area.

Accordingly, it is considered that the project represents orderly development of the land. It is respectfully requested that the Minister, having due regard for the information submitted in this Environmental Assessment, grant approval to the project.

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1 INTRODUCTION

1.1 Overview

Goodman International Limited (Goodman) is proposing to develop the remaining undeveloped lots in its Mamre Road Industrial Subdivision, Erskine Park. The industrial subdivision was approved by the Minister for Planning (the Minister) in March 2007 (Major Project No.06_0253). The industrial subdivision is now referred to as 'Interlink Industrial Estate'.

This Environmental Assessment has been prepared by Goodman and PJEP Environmental Planning to assist the Minister's and the Department of Planning's consideration of the proposal under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

1.2 Background

Brickworks Limited (Brickworks) and Goodman have formed a joint development company, BGAI2 Pty Ltd (formerly BMGW2 Pty Ltd), to develop the Interlink Industrial Estate. The 64 hectare site is located off Mamre Road, Erskine Park, and forms part of the Erskine Park Employment Area (see Figures 2.1 to 2.4).

Erskine Park Employment Area covers 540 hectares and was created and zoned in 1993 as a major employment area for Western Sydney. The employment area is now included in the 2,450 hectare Western Sydney Employment Hub, announced by the NSW Government in December 2005 to facilitate and promote economic development and employment within Western Sydney.

On 1 March 2007, the Minister for Planning approved a major project application (MP 06_0253) from Goodman (formerly Macquarie Goodman Management Limited) for the development of the Interlink Industrial Estate. That project, referred to in this Environmental Assessment as 'the estate-wide project', involves:

- subdivision of the 64 hectare property to create:
  - a 'biodiversity lot' on the eastern portion of the site, to be dedicated to the Department of Planning; and
  - 6 industrial development lots on the western portion of the site;
- bulk earthworks over the western portion of the site;
- estate roads (on Lot 6) and services; and
- development of a Liquor Distribution Centre for Woolworths Limited on Lot 3.

A second major project application (MP 06_0254), for the development of a distribution facility for Kimberly-Clark on Lot 4, was also approved by the Minister on 1 March 2007.

The Woolworths and Kimberly-Clark distribution facilities are currently under construction/pre-construction. Once operational the facilities will operate 24 hours a day 7 days a week, and will generate employment for 190 people and 140 people, respectively.

1.3 The Project

Goodman is proposing to develop the remaining undeveloped lots within Interlink Industrial Estate, namely Lots 1, 2 and 5. The project includes:

- development of a warehouse and distribution facility for an unspecified future end-user on Lot 1 – to be developed in 2 stages;
- development of a light industrial and distribution facility for Ubeeco Packaging Solutions on Lot 2;
- development of a warehouse and distribution facility for Allied Pickfords on Lot 5A; and

- development of a light industrial/warehouse and distribution facility for an unspecified future end-user on Lot 5B.

It is noted that the project is based on adjusted internal lot boundaries to those approved under the estate-wide project. The minor adjustments are subject to a separate application to modify Major Project No.06_0253.

The project would complete the development of the Interlink Industrial Estate. The project involves a capital investment in the estate of approximately $57.4 million, and would generate 300 jobs during construction and 460 jobs once operational.

The project is discussed in detail in Section 3.

1.4 The Proponent and End Users

Goodman International Limited (Goodman) is the proponent of the project, and is developing the land on behalf of BGAI2 and the end users of the facilities. Goodman is an integrated property group that owns, develops and manages industrial and business space globally. With total assets of A$35 billion and close to 600 properties under management, Goodman is one of the world's largest listed property groups.

Lots 1 and 5B of Interlink Industrial Estate are proposed to be developed as generic warehousing and distribution/light industrial facilities for unspecified future end-users.

Lot 2 is proposed to be developed on behalf of Ubeeco Packaging Solutions. Ubeeco was formed in 1970 as the United Box Company, and has grown to be one of Australia's foremost packaging companies. Ubeeco manufactures and supplies a range of timber and cardboard packaging products (including pallets, boxes, cases, crates and mailing cartons), as well as supplying wholesale packaging and industrial timbers, and packaging supplies. Ubeeco proposes to utilise Lot 2 for light industrial uses including the manufacture of timber and fibreboard (cardboard) packaging products including (but not limited to) cases, crates, pallets and timber componentry, as well as warehousing and distribution of timber and fibreboard products and packaging supplies.

Lot 5A is proposed to be developed on behalf of Allied Pickfords. Allied Pickfords is Australia's and the world's largest removal company, with over 40 locations in Australia and 800 locations internationally. The proposed facility at Interlink Industrial Estate would form part of Allied Pickford's national storage and distribution network, which typically stores/distributes household and business furniture and sundries.

2 SITE ANALYSIS

2.1 Location and Context

Interlink Industrial Estate (the site) is located off Mamre Road in Erskine Park, and forms part of the Erskine Park Employment Area, which in turn forms part of the Western Sydney Employment Hub (see Figures 2.1-2.3). The Western Sydney Employment Hub (including the Erskine Park Employment Area) is an important regional hub for major logistics, distribution, warehousing and production industries.

The site is approximately 12 kilometres east of Penrith, and is located within the Penrith local government area.

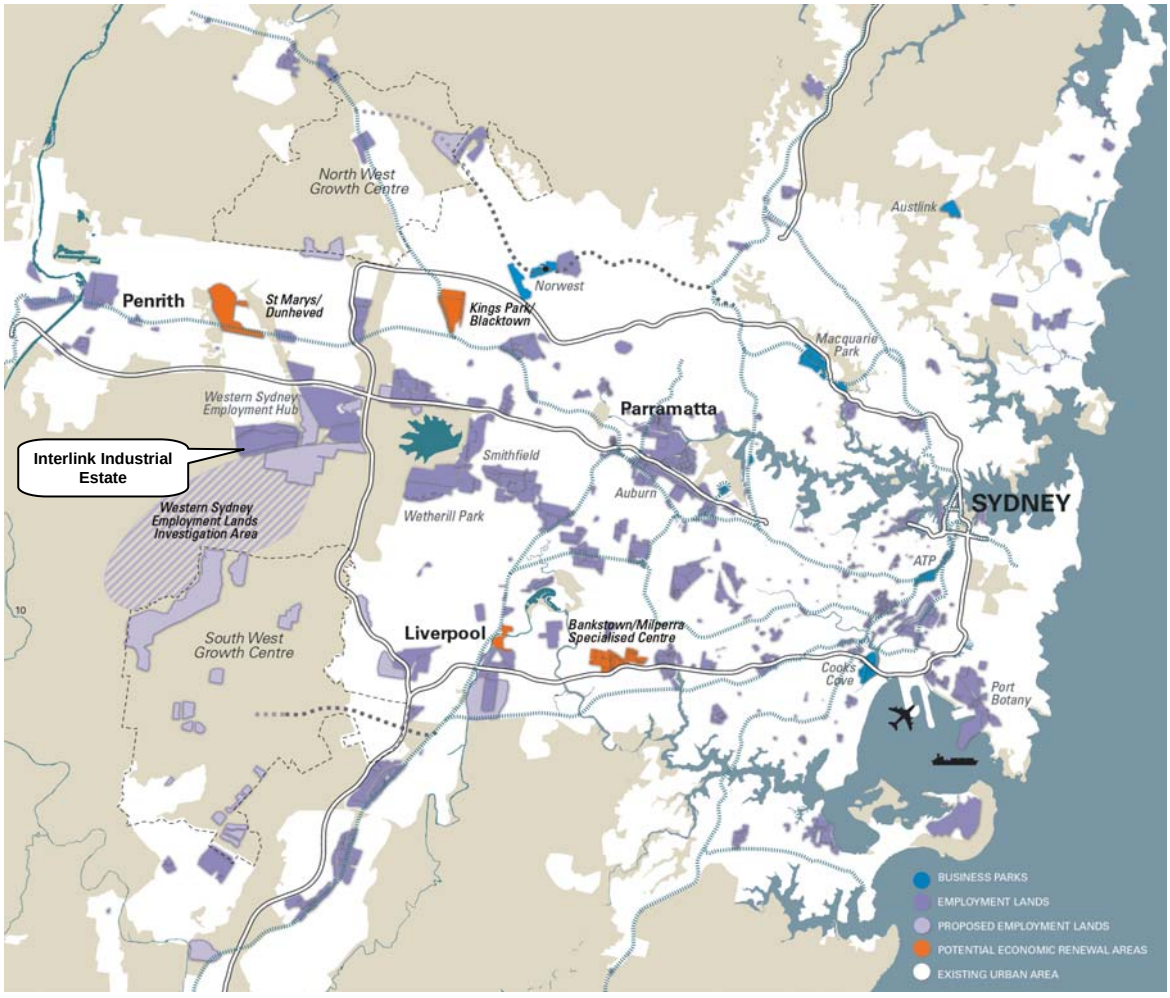

Figure 2.1: *Regional Context Plan, showing Sydney's employment lands (Source: Metropolitan Strategy)*

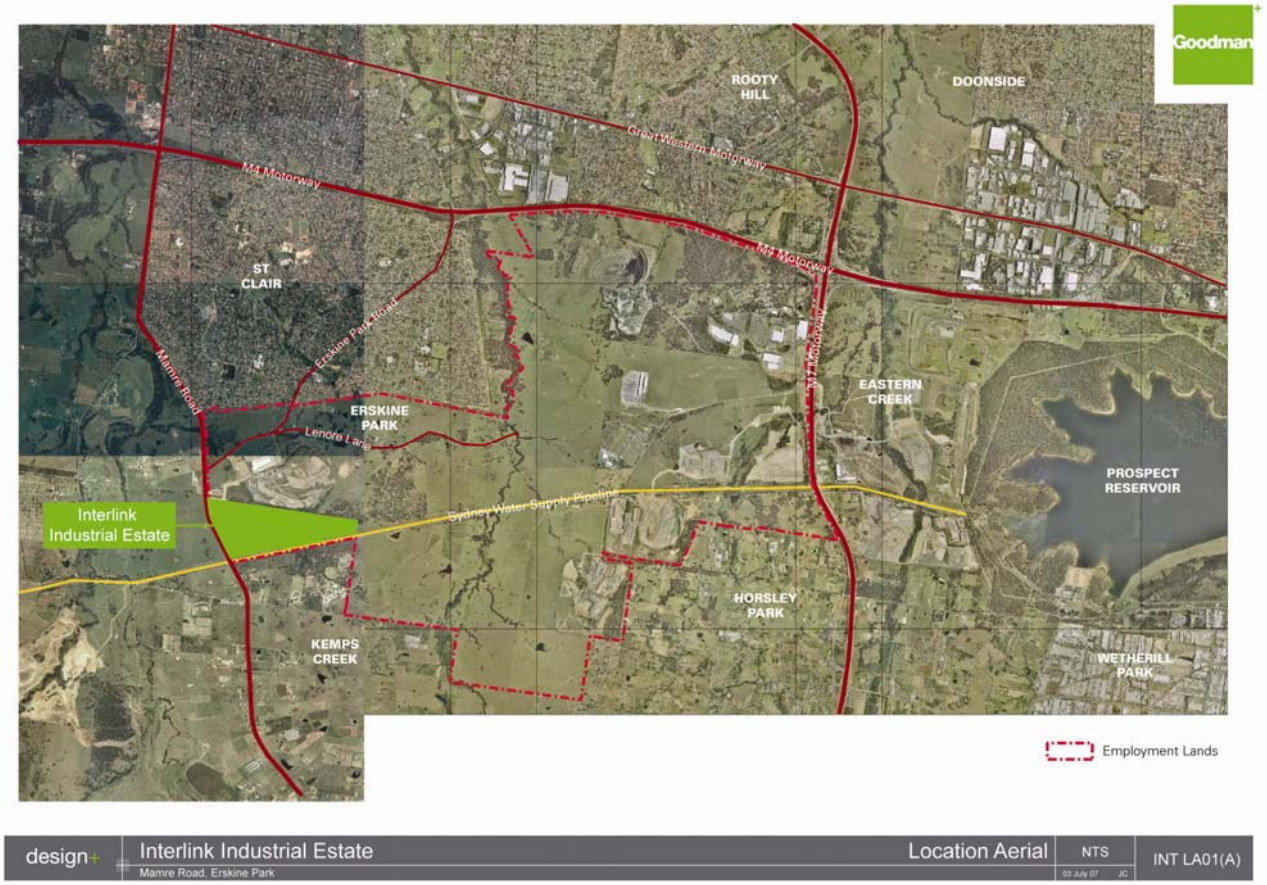

Figure 2.2: *Location Plan*

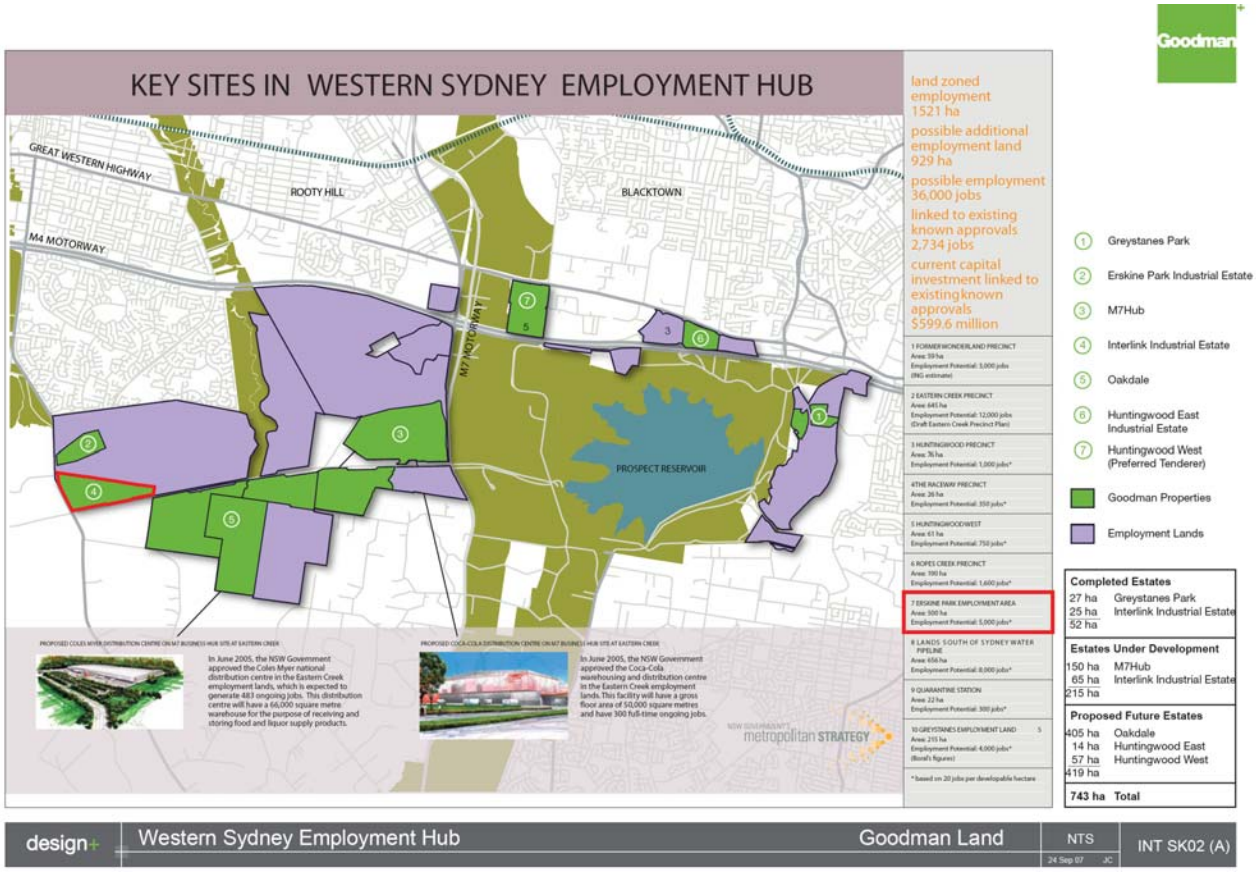

Figure 2.3: *Western Sydney Employment Hub (Source: Metropolitan Strategy)*

2.2 Property Description and Ownership

The site is a triangular shaped allotment, bounded on the western side by Mamre Road, on the northern side by an unformed road reserve and on the southern side by the Sydney Water Pipeline.

The real property description of the site is Lot 141 in DP 843899, and has an area of 64 hectares. The site is owned by BGAI2 Pty Ltd.

The development lots the subject of the current application have the following areas[1]:

- Lot 1: 9.4 hectares;
- Lot 2: 3.2 hectares;
- Lot 5A: 3.4 hectares; and
- Lot 5B: 3.2 hectares.

2.3 Physical Characteristics of the Site

The site is fairly flat, with the elevation across the proposed development lots ranging from 35 metres AHD to about 41 metres AHD. The western half of the developable land currently drains to the west toward Mamre Road, while the eastern half drains in a north-easterly direction toward a small unnamed creek which ultimately drains to South Creek. This unnamed creek is located within the biodiversity lot created under the estate-wide project. There are no significant waterbodies within the developable area of the site.

2.4 Site Conditions and Services

As detailed above in Section 1.2, the subject development lots were created as part of the estate-wide project. That project provides for the bulk earthworks, stormwater drainage, estate road construction, site services installation and estate landscaping to provide fully serviced industrial lots. As such, Development Lots 1, 2 and 5 will be fully serviced and prepared under the estate-wide project, ready for building construction.

Accordingly, many of the environmental issues associated with the proposed project (such as soil and water, flora and fauna, archaeology and heritage), as well as broad site servicing arrangements, have been largely addressed under the previous estate-wide project. For reference purposes, the Environmental Assessment for the estate-wide project is attached in **Appendix E** (as CD-ROM).

The layout of the estate-wide project as approved is shown on Figure 2.4.

2.5 Access and Road Network

Interlink Industrial Estate enjoys good access to Sydney's arterial road network. Access to the site is gained via a major roundabout on James Erskine Drive, which extends off a signalised intersection to Mamre Road. Mamre Road provides direct access to the M4 Motorway approximately 4 kilometres north of the site. The M4 in turn provides direct access to the M7 Motorway approximately 6 kilometres to the east of the site.

It is anticipated that there will be a future link road between Mamre Road and the M7 Motorway which is expected to be established via an upgrade to Lenore Lane, to the north of the site. This

[1] Assuming the adjusted lot boundaries as identified in Section 1.3.

link road forms part of a larger road network project for the Western Sydney Employment Hub, which is being facilitated by the RTA (Major Project No. 06_0166).

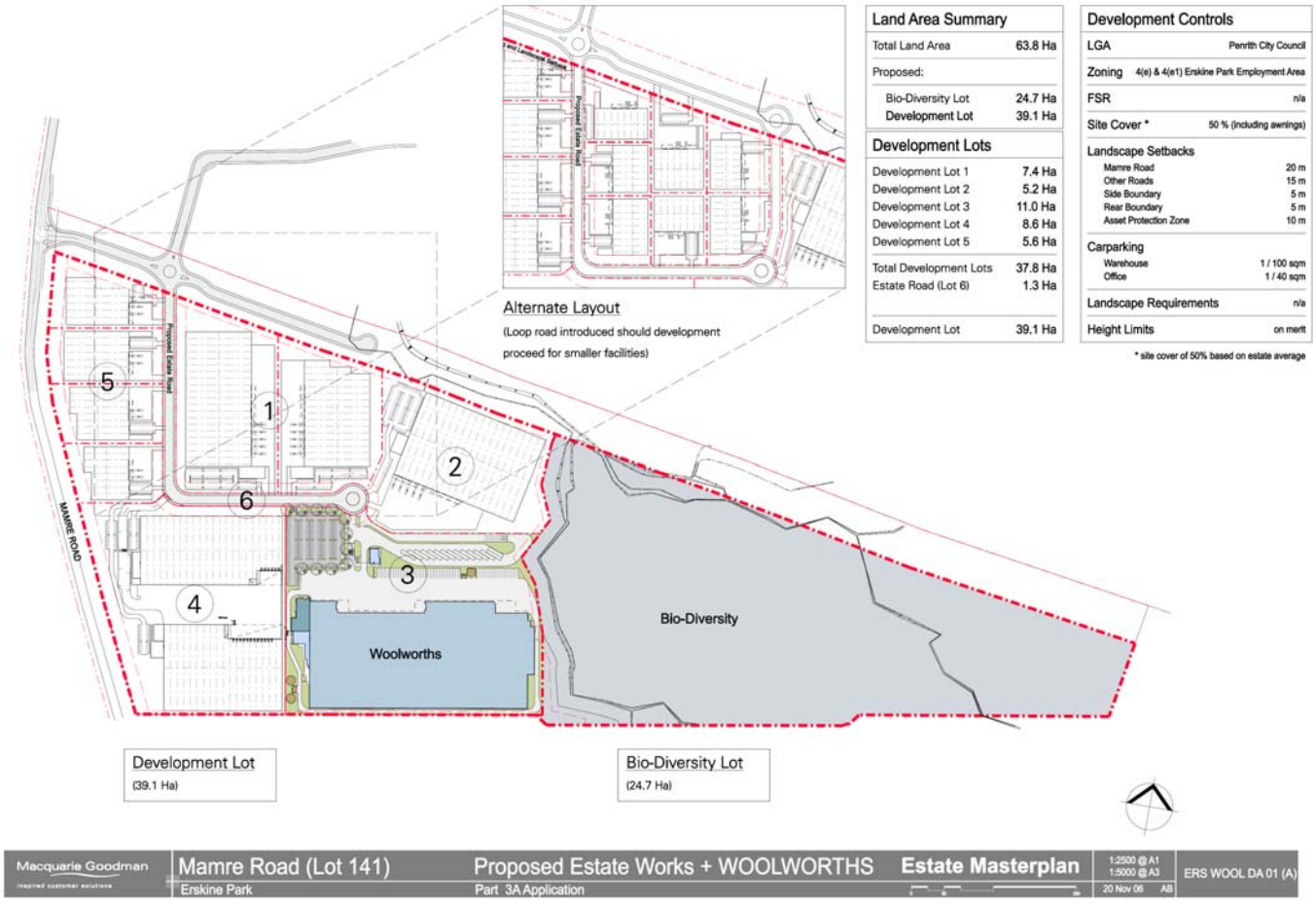

Figure 2.4: *Estate Layout Plan – As Approved*

2.6 Surrounding Land Use

Landuse surrounding the site reflects the changing urban landscape associated with the development of the Erskine Park Employment Area. In particular, historic rural and extractive industry landuse to the north and east of the site is currently undergoing transformation to employment (mainly industrial) landuses.

Existing landuses in proximity to the site include (see Figure 2.2):

- extractive industry and industrial development immediately to the north;
- rural properties on Lenore Lane, approximately 1.2 kilometres to the north-east (within the Erskine Park Employment Area);
- residential areas of St Clair and Erskine Park, approximately 1.5 kilometres to the north;
- rural landuse to the west beyond Mamre Road;
- rural landuse approximately 400 metres to the south beyond the Sydney Water Supply Pipeline easement; and
- Mamre Christian College and Trinity/Emmaus Catholic Schools, and the Emmaus Retirement Village, approximately 800m to the south-east.

3 PROJECT DESCRIPTION

3.1 Proposed Project

Goodman is proposing to develop the remaining undeveloped lots within Interlink Industrial Estate, namely Lots 1, 2 and 5. The project includes:

- construction and use of a warehouse and distribution facility for an unspecified future end-user on Lot 1 – to be developed in 2 stages;
- construction and use of a light industrial and distribution facility for Ubeeco Packaging Solutions on Lot 2;
- construction and use of a warehouse and distribution facility for Allied Pickfords on Lot 5A; and
- construction and use of a light industrial/warehouse and distribution facility for an unspecified future end-user on Lot 5B.

As noted in Section 1.3, the project is based on adjusted internal lot boundaries to those approved under the estate-wide project. The minor adjustments are subject to a separate application to modify Major Project No.06_0253, and are discussed in Section 3.4 below.

The proposed project is illustrated on Figure 3.1, and the individual lot developments are shown on the building plans at the end of this report. Key details of the project are outlined in Table 3.1 below.

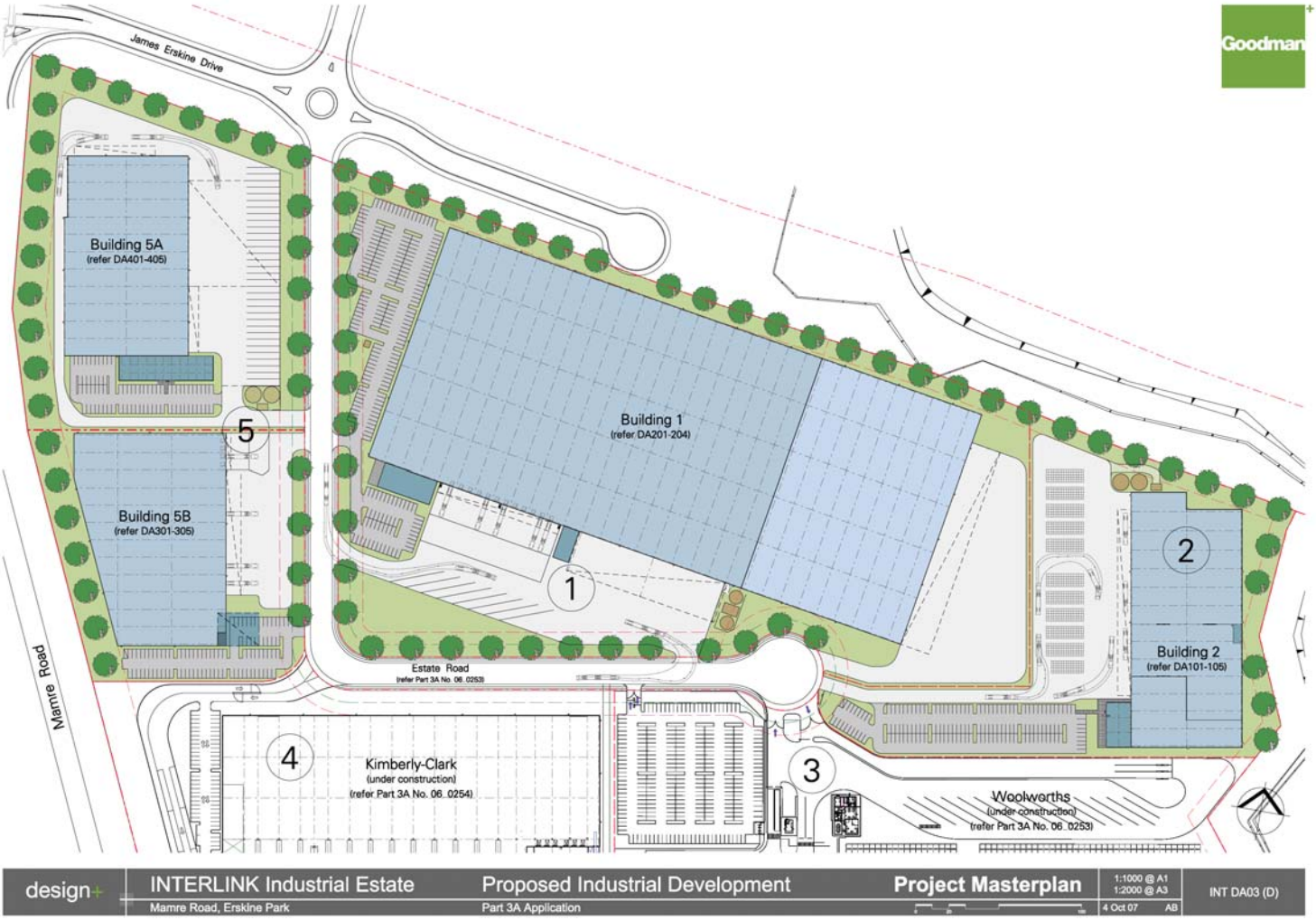

Figure 3.1: *Project Layout Plan*

Table 3.1: *Project Details*

	Lot 1 (Building 1)	***Lot 2 (Building 2)***	***Lot 5A (Building 5A)***	***Lot 5B (Building 5B)***
End User	Unspecified	Ubeeco Packaging Solutions	Allied Pickfords	Unspecified
Proposed Use	Warehousing and distribution	Warehousing and distribution / Manufacturing (packaging products)	Warehousing and distribution	Warehousing and distribution / Light Industry
Areas (m^2)				
- *Site Area*	94,097	31,600	33,928	22,264
- *Warehouse Area*	35,000 (stage 1) 15,000 (stage 2)	10,000	9,000	10,380
- *Office Area*	1,200 (stage 1)	800	850	540
- *Total Building Area*	51,200	10,800	9,850	10,920
- *Awning Area*	2,810 (stage 1) 2,320 (stage 2)	900	3,053	750
- *Hardstand Area*	11,635 (stage 1) 8,690 (stage 2)	9,760	11,613	4,140
- *Other Paved Area*	5,950	4,018	1,932	2,350
- *Landscaping Area*	17,120 (18%)	7,420 (24%)	10,530 (31%)	5,390 (24%)
Site Cover (inc. awning)	59%	37%	41%	52%
No. Office Levels	2	2	1	1 (+ lobby)
Finished Floor Level (m AHD)	39.7	39.7	39.5	39.5
Building Height (m)	Ridge – 13.7 Wall – 10.0	Ridge – 12.6 Wall – 10.5	Ridge – 12.7 Wall – 10.5	Ridge – 12.9 Wall – 10.5
Car Parking Spaces	217	150	77	90
Employees	190*	150**	75**	45*
Hours of operation	24 hours, 7 days	24 hours, 7 days	24 hours, 7 days	24 hours, 7 days
Target Completion Date	Jun 08 (stage 1) Jun 10 (stage 2)	Nov 08	Jun 08	Nov 08
Building Plans	DA201-204	DA101-105	DA401-405	DA301-305

* Based on 20 full time equivalents per developable hectare ** Based on information from end-user

3.2 Description of the Facilities

Development Lot 1 (Building 1)

Lot 1 comprises a 50,000 m^2 warehouse and distribution facility which would be constructed in two stages (see Figure 3.2). The first stage comprises a 35,000m^2 warehouse and a 1,000m^2, two-level ancillary office (plus a 200m^2 dock office). The second stage provides for future expansion of the facility, and comprises a 15,000m^2 extension to the eastern end of the warehouse, plus additional loading docks and truck parking. The first stage is expected to be completed by June 2008, and the second stage is expected to be completed by June 2010 (although this timing would be subject to market demand).

The facility has an east-west alignment, with the office and hardstand located on the southern side of the warehouse facing the internal estate road.

The facility provides separate access/egress points for trucks and cars to minimise the potential for conflict. The facility would provide 217 car parking spaces and 11 truck parking/queuing spaces.

External finishes for the proposed building are shown on Plan DA203. The warehouse walls would comprise a mix of precast concrete panels (painted light grey and dark grey) and Colorbond sheeting (colours 'surfmist', 'windspray' and 'ironstone', with 'manor red' accents), and the roofing would comprise Zincalume roof sheeting with 10% translucent roof sheeting. The office façade would comprise a mix of Alucobond cladding (colours white and dark metallic silver) and aluminium framed glazing.

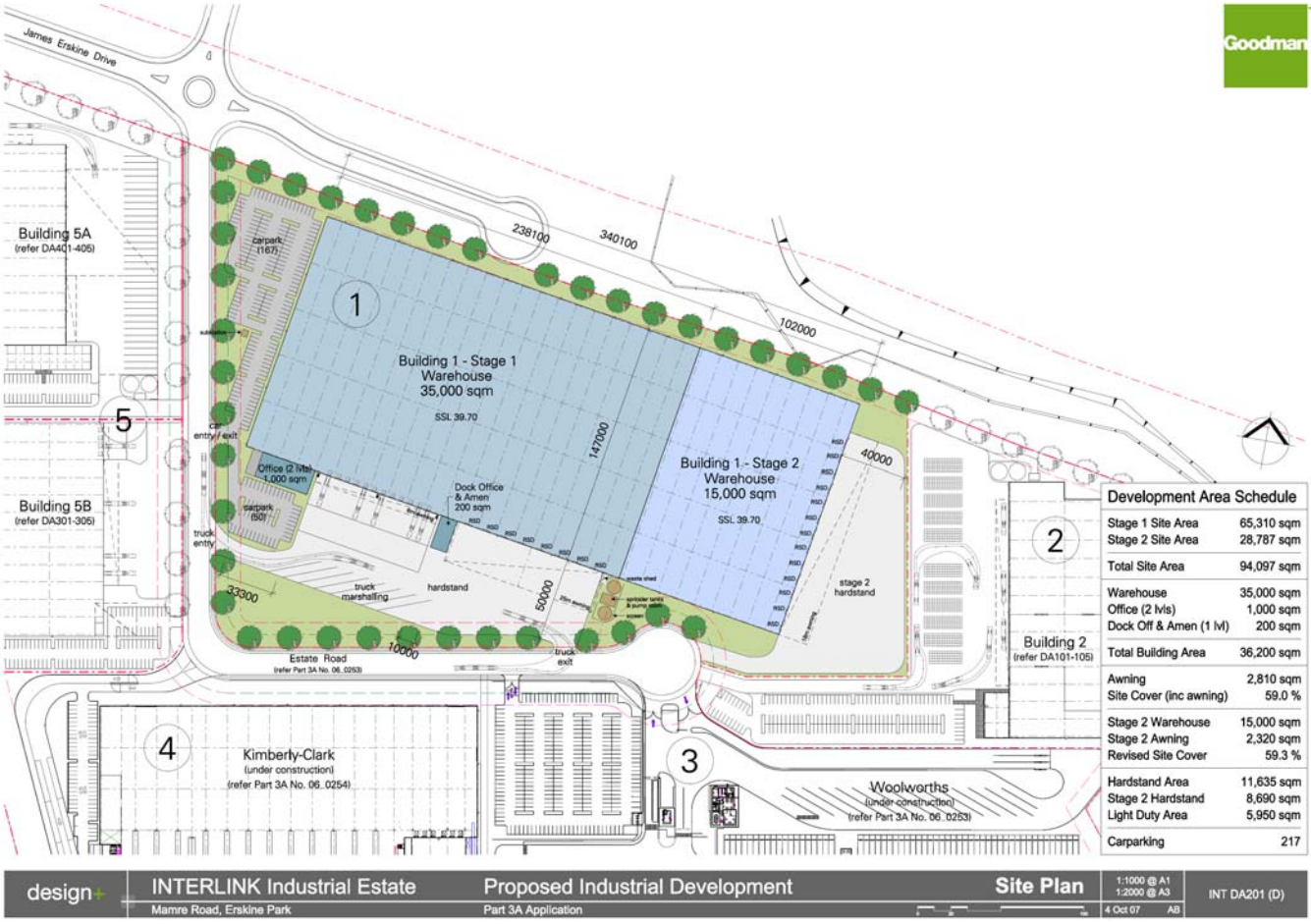

Figure 3.2: *Lot 1 Site Layout Plan*

Development Lot 2 (Building 2)

Lot 2 comprises a 10,000 m^2 manufacturing and warehouse facility, plus an ancillary office of 800m^2 (see Figure 3.3). The facility would be used by Ubeeco Packaging Solutions for the manufacture of timber and fibreboard packaging products including (but not limited to) cases, crates, pallets and timber componentry, as well as the warehousing and distribution of these and other packaging products. External storage of packaging products would also be undertaken on the facility's hardstand area.

The facility has a north-south alignment, with the office and hardstand located on the western side of the warehouse.

The facility provides for largely separated access/egress for cars and trucks, with 150 car parking spaces and ample on-site truck parking.

External finishes for the proposed building are shown on Plans DA103 and DA104. The warehouse walls would comprise a mix of precast concrete panels (painted deep blue) and Colorbond sheeting (colours 'surfmist' and 'deep ocean', with 'blue ridge' accents), and the roofing would comprise Zincalume roof sheeting with 10% translucent roof sheeting. The office façade would comprise a mix of Alucobond cladding (colours white and dark metallic silver, with red accents) and aluminium framed glazing.

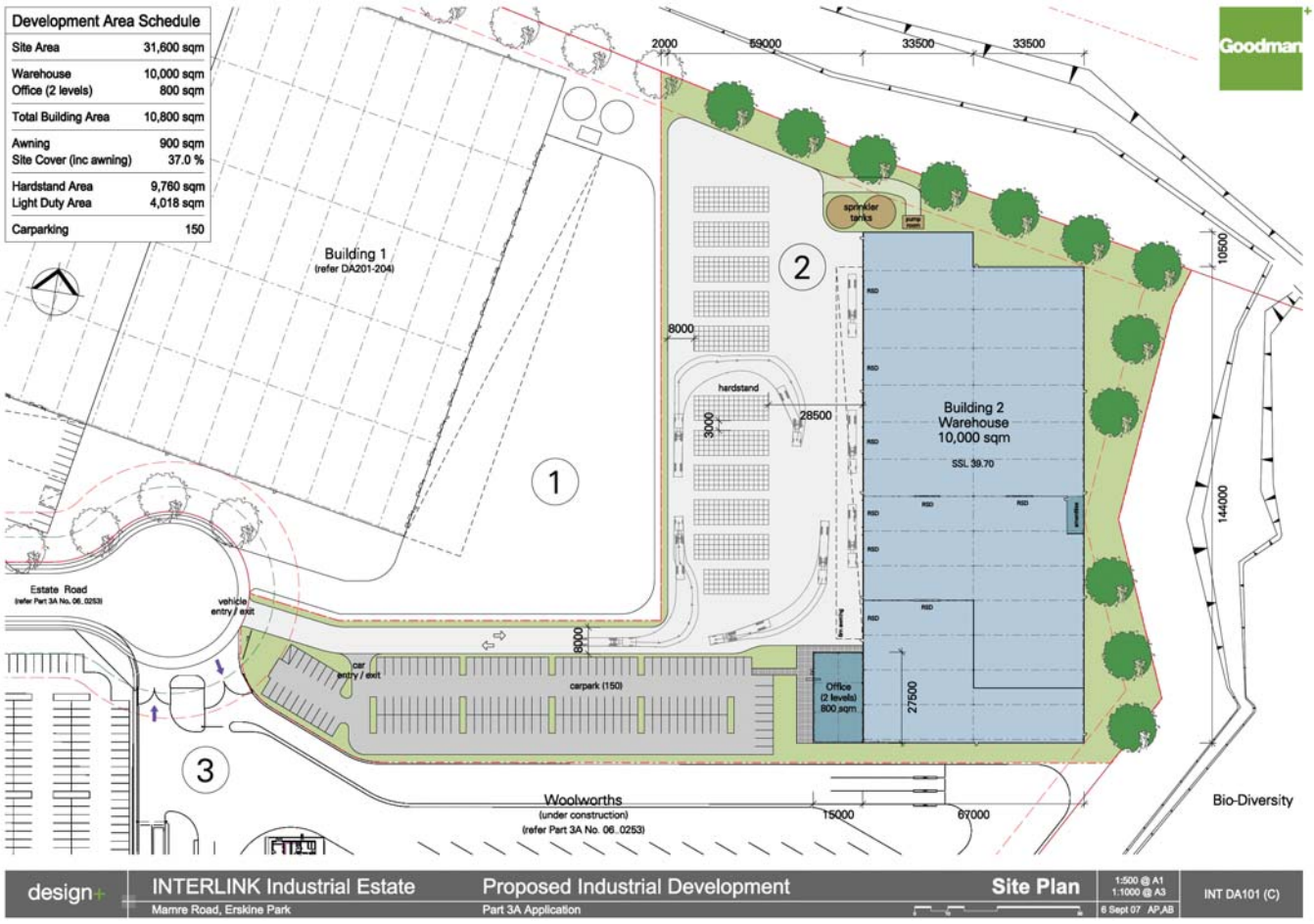

Figure 3.3: *Lot 2 Site Layout Plan*

Development Lot5A (Building 5A)

Lot 5A comprises a 9,000 m^2 warehouse and distribution facility, plus an ancillary office of 850m^2 (see Figure 3.4). The building includes an extended 3,520m^2 awning on the eastern side of the building, to provide for all-weather loading and external storage (in containers). The facility would be used by Allied Pickfords for the storage and distribution of household and business removal products, as part of Allied Pickfords' logistics and removal business.

The facility has a north-south alignment, with the office located on the southern side of the warehouse and the hardstand on the eastern side facing the internal estate road.

The facility provides for largely separated access/egress for cars and trucks, and would provide 77 car parking spaces and 33 truck parking spaces.

External finishes for the proposed building are shown on Plans DA403 and DA404. The warehouse walls would comprise a mix of precast concrete panels (painted dark grey and orange), Colorbond sheeting (colours 'surfmist', 'windspray' and 'night sky', with orange accents) and translucent (Dampalon) sheeting (in various tones), and the roofing would comprise Zincalume roof sheeting with 10% translucent roof sheeting. The office façade would comprise a mix of Alucobond cladding (colours white and dark metallic silver) and aluminium framed glazing. Translucent sheet screening would be provided to the water tanks and pump room on the front boundary.

Figure 3.4: *Lot 5A Site Layout Plan*

Development Lot5B (Building 5B)

Lot 5B comprises a 10,380m^2 warehouse and distribution facility, plus an ancillary office of 540m^2 (see Figure 3.5). The facility would be used by an unspecified future end-user for general warehouse and distribution and/or light industrial activities.

The facility has a north-south alignment, with the office located in the south-eastern corner of the warehouse and the hardstand on the eastern side facing the internal estate road.

The facility provides separate access/egress for cars and trucks, and would provide 90 car parking spaces and ample truck parking/queuing spaces.

External finishes for the proposed building are shown on Plans DA303 and DA304. The warehouse walls would comprise a mix of precast concrete panels (painted dark grey), Alucobond cladding (colours dark grey with green accents) and Colorbond sheeting (colours 'surfmist', 'windspray' and 'ironstone', with green accents), and the roofing would comprise Zincalume roof sheeting with 10% translucent roof sheeting. The office façade would comprise a mix of Alucobond cladding (colours white and dark metallic silver, with green accents) and aluminium framed glazing.

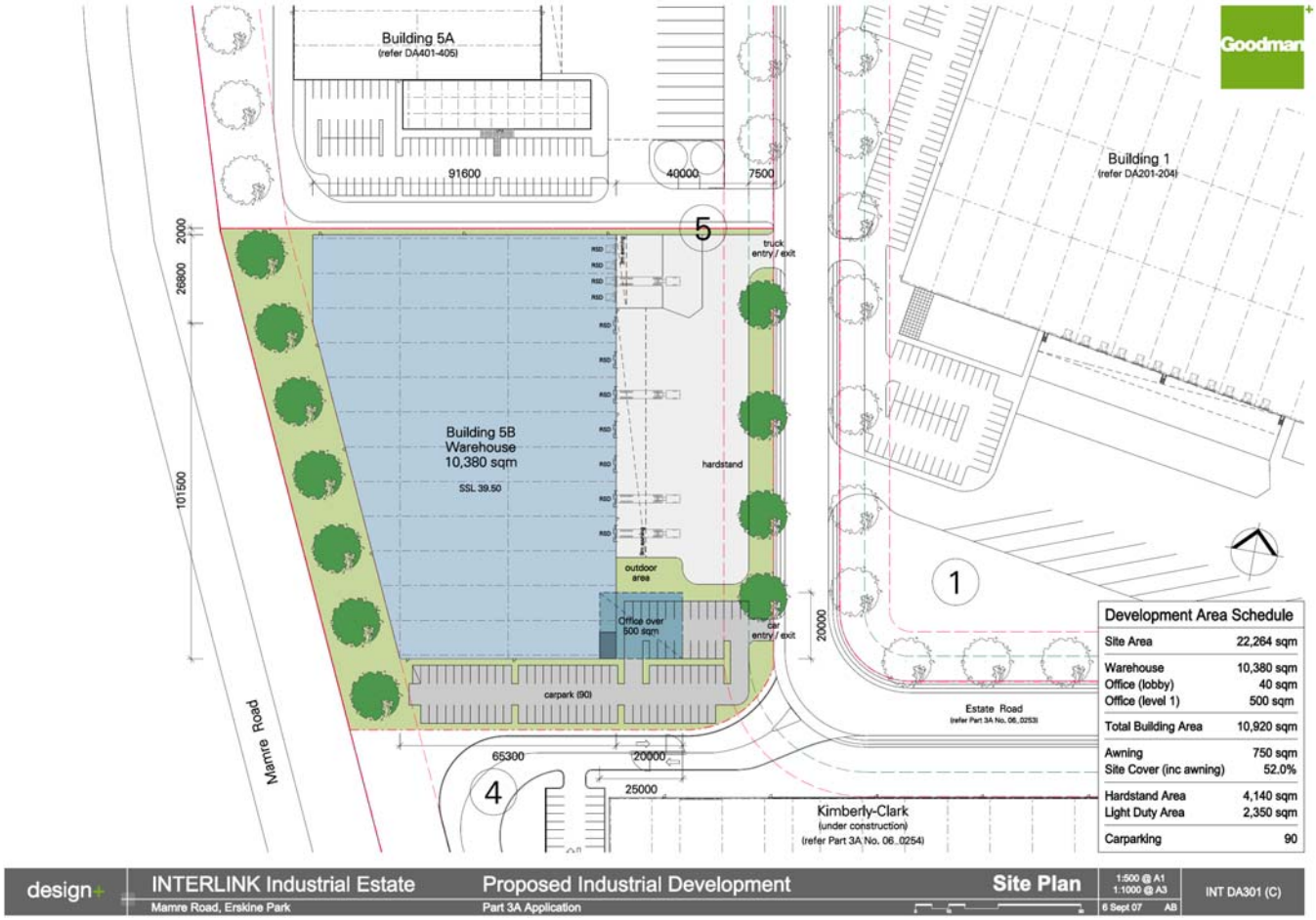

Figure 3.5: *Lot 5B Site Layout Plan*

3.3 Construction Works

The broad-level bulk earthworks, stormwater drainage, estate road construction and site services installation required for the development lots have been previously approved under the estate-wide project.

Construction works associated with the project are therefore limited to those works required for development of the light industrial and warehousing facilities themselves, which would include:

- detailed earthworks;
- facility construction;
- detailed site servicing; and
- on-lot landscaping.

There are no significant constraints to undertaking these construction works. The existing site services available to the site – including electricity, gas, communications, water and reticulated sewer – would adequately service the project without the need for significant augmentation or upgrade.

Stormwater drainage would be undertaken in accordance with the approved Stormwater Management Plan for the estate-wide project. This would include provision for roof and hardstand stormwater to be collected, stored and discharged separately (see Section 3.10 below for further detail).

3.4 Lot Boundaries

The project requires a small change to the boundary between Development Lots 1 and 2 to accommodate the proposed facilities. The proposed amendment is shown on Figure 3.1, while the approved lot boundary is shown on Figure 2.4. Essentially, the change involves moving the boundary approximately 104 metres to the east. The drainage easement along this boundary would move with the boundary change.

As stated in Section 3.1, approval for the amended internal lot boundaries is being sought separately via an application to modify the estate-wide project (Major Project No.06_0253).

3.5 Hours of Operation

All of the facilities are proposed to operate up to 24 hours a day, 7 seven a week, 365 days a year.

Construction works would be undertaken in accordance with the hours as stipulated in the Department of Environment and Climate Change's (DECC's) *Environmental Noise Control Manual*, namely:

- 7:00am to 6:00pm Monday to Friday;
- 8:00am to 1:00pm Saturdays; and
- no work on Sundays or public holidays.

Construction works that are inaudible at surrounding receivers may be undertaken outside these times.

3.6 Capital Investment

The project has a capital investment value of $57.4 million.

3.7 Employment

The project would generate 460 jobs once fully operational. Employment numbers for each facility are detailed in Table 3.1 above.

The construction phase of the project would generate approximately 300 full time equivalent jobs.

3.8 Access and Circulation

The project does not involve any change to existing site access arrangements, which were approved under the estate-wide project.

Access to each of the proposed facilities would be via the Estate Road. Internal circulation has been designed as far as practicable to separate car and truck movements, in order to minimise the potential for conflict.

All facilities provide for trucks and cars to enter and leave the lots in a forward direction, with generous internal hardstand to enable efficient truck access and circulation. In addition, all facilities have been designed to provide adequate internal truck parking/queuing spaces, with no reliance on on-street parking/queuing.

3.9 Parking

The project would provide a total of 534 car parking spaces. Parking spaces for each facility are detailed in Table 3.1 above.

All parking spaces would be appropriately sealed and linemarked.

3.10 Resource Use Management

3.10.1 Rainwater Harvesting

Goodman, together with other landowners in the Western Sydney Employment Hub, are currently planning a regional rainwater harvesting project (separate to the current project) which aims to collect roofwater from buildings in the employment hub and transfer the collected water to Prospect Reservoir to supplement Sydney's potable water supplies. Analysis indicates that the project would boost Sydney's water supply by over 6 billion litres of water per year, or about 1% of Sydney's water demand.

The project would participate in this regional rainwater harvesting project, if the harvesting project proceeds. In this regard, all of the proposed facilities would include provision for roof and hardstand stormwater to be collected, stored and discharged separately. Unless detailed planning dictates otherwise, the roof stormwater infrastructure would include:

- a rainwater collection system with a design capacity for the 1 in 20 year (critical duration) storm event; and
- roof water reservoirs or storage tanks with a capacity of at least 440kL/ha of roof services or 190kL/ha gross land area (whichever is larger), and the ability to discharge flows (by way of pumped rising mains or gravity mains) to any regional rainwater harvesting infrastructure at a rate of 11.6L/s per megalitre of storage.

This specification is consistent with other recently approved projects in the Western Sydney Employment Hub.

3.10.2 Water Conservation

To conserve potable water as far as practicable, the proposed facilities would incorporate the following measures:

- roof stormwater would be collected and used on-site for non-potable uses including irrigation, truck washing and toilet flushing (excess water would be exported to the regional rainwater harvesting scheme); and
- water efficient toilets, urinals and tap fittings would be installed throughout the buildings.

3.10.3 Energy Conservation

To minimise energy use and greenhouse gas emissions, the facilities would incorporate the following measures:

- roofing would comprise 10% translucent sheeting;
- offices have been designed to maximise natural lighting through generous use of glazing; and
- energy efficient lighting and occupancy sensing lighting controls would be installed throughout the facilities.

In addition, the buildings have been orientated and designed taking into consideration solar access, with facilities avoiding western orientations where possible. Where this is unavoidable (ie. the Ubeeco facility on Lot 2), the building facades would be treated (with awnings) to manage solar access.

3.11 Landscaping

Landscaping would be undertaken in accordance with the Landscape Concept Plan for the project (see Plan 0731). Refer to Section 6.7 for further detail on the landscaping principles.

3.12 Signage

Business identification and directional signage would be installed on the building facades and site entries, however detailed plans of the proposed signage are not known at this time.

Prior to installing any signage on the site, Goodman proposes to submit detailed plans of the proposed signage to the Department of Planning for approval. The plans would be prepared in consultation with Penrith Council, and would be generally consistent with the development standards in the *Penrith Development Control Plan 2006*.

4 PLANNING CONTEXT

4.1 Environmental Planning and Assessment Act 1979

4.1.1 Major Project

The proposal is classified as a major project under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act), because it involves development for the purpose of storage or distribution centres with a capital investment value of more than $30 million, and therefore triggers the criteria in Clause 12 of Schedule 1 of *State Environmental Planning Policy (Major Projects) 2005*.

The Minister for Planning has formed the opinion that the proposal is development of a kind that is described in Schedule 1 of the Major Project SEPP. Consequently, the Minister for Planning is the approval authority for the project.

4.1.2 Permissibility

The land subject to the project application is zoned 4(e) 'Employment' and 4(e1) 'Employment-Restricted' under the *Penrith Local Environmental Plan (Erskine Park Employment Area) 1994*.

The project, as development for the purpose of light industry/warehousing and distribution, is permissible in these zones, with consent.

4.1.3 Public Exhibition

Under Section 75H(3) of the EP&A Act, the Director-General of the Department of Planning (Director-General) is required to make this Environmental Assessment publicly available for at least 30 days.

During the exhibition period interested stakeholders will be able to make a submission on the proposed project. Under clause 8B of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) the Director-General's assessment report is required to include copies of these submissions, or a summary of the issues raised in the submissions. Section 75J(2) of the EP&A Act requires the Minister to consider the Director-General's report (and the reports, advice and recommendations contained in it) when deciding whether or not to approve the carrying out of the project.

4.1.4 Environmental Planning Instruments

Section 75I(2) of the EP&A Act requires that the Director-General's assessment report consider the provisions of State Environmental Planning Policies (SEPPs) and other environmental planning instruments that are relevant to the project.

The following environmental planning instruments have been considered during the preparation of the Environmental Assessment:

- *SEPP No.11 – Traffic Generating Developments;*
- *SEPP No.33 – Hazardous and Offensive Development;*
- *SEPP No.55 – Remediation of Land;*
- *SEPP No.64 – Advertising and Signage;*
- *Draft SEPP No.66 – Integration of Land Use and Transport;*
- *SEPP (Major Projects) 2005;*
- *Sydney Regional Environmental Plan (SREP) No 20 – Hawkesbury-Nepean River*; and
- *Penrith Local Environmental Plan (Erskine Park Employment Area) 1994.*

Consideration of these instruments is provided below. It is considered that the project is able to be conducted in a manner that is consistent with the aims, objectives and provisions of all of the applicable instruments.

4.2 State Environmental Planning Instruments

4.2.1 SEPP No.11 – Traffic Generating Developments

SEPP 11 ensures that the RTA is given the opportunity to make representation on certain traffic generating development applications before a consent authority makes a determination on the proposal.

The project is affected by the provisions of SEPP 11, as it involves 'the erection of a building for the purposes of industry where the gross floor area of the building is or exceeds 20 000 square metres (Schedule 1(f)). As such, in accordance with clause 7 of the SEPP the consent authority will be required to refer the application to the RTA for its consideration.

It is noted that the RTA has been consulted regarding the estate-wide project application.

Traffic impact assessment undertaken for the project (see Section 6.6) indicates that the project is unlikely to result in any significant traffic related impacts.

4.2.2 SEPP No.33 – Hazardous and Offensive Development

SEPP 33 provides definitions for hazardous and offensive industry to enable decisions on developments to be made on the basis of merit, rather than on industry type per se.

The proposed facilities would not involve the storage, distribution or use of significant quantities of dangerous goods or hazardous substances. Nor are any of the facilities expected to emit a polluting discharge (eg. noise or odour) in a manner which would have a significant adverse impact in the locality or on the existing or likely future development on other land.

Accordingly, it is considered that the project does not constitute a 'potentially hazardous industry' or 'potentially offensive industry', and that the project is able to be conducted in a manner that is consistent with the aims and objectives of SEPP 33.

4.2.3 SEPP No.55 – Remediation of Land

SEPP 55 aims to provide for a statewide planning approach to the remediation of contaminated land, and in particular, to promote the remediation of contaminated land for the purpose of reducing risk of harm to human health or any other aspect of the environment.

Clause 7 of the SEPP requires a consent authority to consider whether the land to which a project/development application relates is contaminated, and if the land is contaminated, to be satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation), prior to granting consent.

The potential for site contamination on the subject land has been addressed in the estate-wide project. The Phase 1 site assessment undertaken for that project found that the land is not contaminated and is fit for the intended use. As such, the project is able to be conducted in a manner that is consistent with the aims, objectives and provisions of SEPP 55.

4.2.4 SEPP No.64 – Advertising and Signage

SEPP 64 aims seeks to ensure that any signage associated with a development, including any advertisement, that is visible form a public place is compatible with the desired amenity and visual character of an area, is suitably located and is of a high quality and finish.

The only signage proposed under this project involves building identification signs and business identification signs as defined in the policy. Clause 9 of the SEPP provides that an assessment of matters identified in Schedule 1 is not required for building identification signs and business identification signs.

The proposed building and business identification signage is considered to be consistent with the aims and objectives of SEPP 64. As discussed in Section 3.12, Goodman has committed to the preparation of detailed signage plans in consultation with Penrith Council, and to the satisfaction of the Director-General.

4.2.5 Draft SEPP No.66 – Integration of Land Use and Transport

Draft SEPP 66 is designed to apply to any development having a gross floor space of more than 1,000 square metres. The aims of the policy are to ensure that urban structure, building forms, land use locations, development designs, subdivision and street layouts help achieve the following planning objectives:

(a) improving accessibility to housing, employment and services by walking, cycling and public transport,
(b) improving the choice of transport and reducing dependence solely on cars for travel purposes,
(c) moderating growth in demand for travel and distances travelled especially by car,
(d) supporting the efficient and viable operation of public transport services,
(e) Providing for the efficient movement of freight.

The development site is considered ideal for the proposed project because of local considerations (established industrial area, and existing road system) and regional factors (proximity to the Sydney Metropolitan Motorway system – M4, M5 & M7).

It is considered that the project would assist in achieving the above objectives, particularly (a) because of its proximity to the employment areas of Western Sydney, and (e) because of the efficiencies gained in the movement of freight.

4.2.6 SEPP (Major Projects) 2005

SEPP (Major Projects) 2005 aims to identify projects of State or regional planning significance that are of a kind that the approval and assessment process under Part 3A of the EP&A Act should apply.

As stated in Section 4.1.1 above, the project constitutes a class of development in Schedule 1 of the SEPP. Consequently, the Minister is the approval authority for the project.

4.3 Regional Environmental Plans

4.3.1 Sydney Regional Environmental Plan No 20 – Hawkesbury-Nepean River

SREP 20 aims to protect the environment of the Hawkesbury-Nepean river system by ensuring the impacts of future land uses are considered in a regional context. The site is located in the South Creek catchment identified under the SREP.

The SREP does not contain any provisions that substantially govern the carrying out of the project and it is considered that the project is able to be conducted in a manner that is consistent with the aims, planning considerations and provisions of the SREP.

4.4 Local Environmental Plans

4.4.1 Penrith LEP (Erskine Park Employment Area) 1994

As mentioned above, the land subject to the project application is zoned 4(e) 'Employment' and 4(e1) 'Employment-Restricted' under the *Penrith Local Environmental Plan (Erskine Park Employment Area) 1994*. It is noted that although the land subject to the application (ie. Lot 141, DP 843899) includes land zoned 4(e1), the proposed development lots (ie. Lots 1, 2 and 5) are situated on land wholly zoned 4(e).

The objectives of the 4(e) zone include:

(a) to prohibit certain development which is likely to have an adverse environmental effect on the amenity of adjoining localities, and
(b) to provide opportunities for a diverse range of employment generating activities, and
(c) to accommodate office and retail activities which are primarily intended to service persons working in the Erskine Park Employment Area, and
(d) to permit development for the purposes of recreation facilities, child care centres or community facilities in association with, or independent of, other permitted development to serve the needs of the workforce of the Area and the adjoining residential communities, and
(e) to prohibit development of land for any purpose if, as a result of carrying out the development, there will be direct vehicular access between that land and either Erskine Park Road or Mamre Road, and
(f) to promote development of land with frontage to Mamre Road and Erskine Park Road if the buildings or works resulting from the carrying out of the development will, by their architectural and landscape design, enhance the rural scenic character of those roads and their roles as gateways to the City of Penrith.

The objectives of the 4(e1) zone include:

(a) to prohibit certain development which is likely to have an adverse environmental effect on the amenity of adjoining localities, and
(b) to promote development which does not have an adverse environmental effect on the adjoining residential and rural communities arising from air, noise or other pollution, and
(c) to permit retail activities which are:
  (i) compatible with the concept of the employment area, and
  (ii) unlikely to prejudice the viability of existing business centres,
  or are primarily intended to service persons working in the Erskine Park Employment Area, and
(d) to permit office development of a type which:
  (i) would not be readily located in a traditional business zone, and
  (ii) would be unlikely to prejudice the viability of existing business centres, and
(e) to permit development for the purposes of recreation facilities, child care centres and community facilities in association with, or independent of, other permitted development to serve the needs of the workforce of the Area and the adjoining residential and rural communities, and

(f) to prohibit development of land for any purpose if, as a result of carrying out the development, there will be direct vehicular access between that land and either Erskine Park Road or Mamre Road, and

(g) to promote development of land with frontage to Mamre Road and Erskine Park Road if the buildings or works resulting from the carrying out of the development will, by their architectural and landscape design, enhance the rural scenic character of those roads and their roles as gateways to the City of Penrith.

The project is considered to be consistent with these objectives.

The LEP contains a number of special provisions requiring a consent authority to consider a range of matters when considering applications for development. These matters include impacts associated with air, water, noise or other pollution, as well as visual amenity, waste management, hazardous substances, energy efficiency, transport efficiency and provision of services.

Further, the LEP requires a consent authority, when considering development on zone 4(e1), to consider a number of matters relating to:

- building height, scale, siting and character;
- screening of goods, plant and equipment;
- building appearance when viewed from dwellings;
- noise generation;
- nuisance associated with hours of operation, traffic movement, parking or lighting;
- privacy for residential areas;
- parking provision; and
- landscaping.

Consideration of these matters is provided in this Environmental Assessment. Based on this assessment it is considered that the project is able to be conducted in a manner that is consistent with the special provisions of the LEP.

4.5 Development Control Plans

4.5.1 Penrith Development Control Plan 2006

Penrith Development Control Plan (DCP) 2006 provides detailed guidance for development within the Penrith LGA. Section 6.14 of the DCP applies to development within the Erskine Park Employment Area, and has the following objectives:

(a) Provide a framework that will lead to a high standard of development in the Erskine Park Employment Area encouraging local employment and creating an area which is pleasant, safe and efficient to work in;

(b) Ensure that development takes account of the physical nature of the local environment, particularly Ropes Creek, ridgelines and the natural landscape;

(c) Ensure that development does not result in pollution of waterways and in particular of Ropes Creek and South Creek;

(d) Promote the development of a visually attractive physical environment where the form, scale, colour, shape and texture of urban elements are managed in a way which will achieve an aesthetically pleasing balance which does not adversely affect the amenity of the existing residential areas;

(e) Identify and provide for public amenities and service infrastructure to accommodate development in the Erskine Park Employment Area;

(f) Promote the creation of a landscaped area within the electricity transmission easement to act as a buffer between the employment zones and the residential communities;

(g) Establish environmental criteria and controls for development within the area to ensure that the environmental quality of adjoining areas is not compromised;
(h) Ensure that development is consistent with the objectives of the Threatened Species Conservation Act with particular regard to the endangered ecological communities, flora and fauna present on the site;
(i) Facilitate conservation of urban bushland; and
(j) Protect, restore and enhance riparian corridors within the Erskine Park Employment Area.

An assessment of project against the provisions of Section 6.14 of the DCP is provided in the following table.

Table 4.1: *Penrith DCP Compliance*

DCP Section	***Issue***	***Key Development Standards***	***Complies (Yes or No)***	***Comments***
2.0	Drainage	• Development to comply with Council's preferred drainage/flooding/water quality system.	Yes	• Drainage is governed by the estate-wide Stormwater Management Plan, which is required to be developed in consultation with Council; • Refer to Section 6.1.
3.0	Subdivision	• Applicable minimum allotment size is 10,000sqm; • Minimum frontage is 60m.	Yes	• Proposed subdivision approved under estate-wide project; • All lots (with amended internal lot boundaries) have minimum lot size >10,000m^2.
4.0	Transport and Carparking	• Access roads to be generally in accordance with Council's traffic strategy; • All parking to be provided on site; • Details off-street parking requirements (see Section 5.6).	No	• Proposed roadways approved under estate-wide project; • Project includes provision for all parking on site, however the proposed parking provision does not comply with the DCP parking requirements; • Refer to Section 6.6.
5.1	Height	• Maximum height for buildings in the 4(e) zone to be determined on merits.	Yes	• Maximum building height is 13.7m, and is considered to meet the height objectives; • Refer to Section 6.7.
5.2	Site Coverage	• Site coverage shall not exceed 50%; • Where land is included in biodiversity areas, that land can be included in site coverage calculations.	Yes	• The proposed buildings range in site cover from 37% to 59%, and averages 47%; • However, when the biodiversity lot is taken into consideration, the total site cover for the completed Interlink Industrial Estate (excluding the estate road) is approximately 42%.
5.3	Setbacks	• Applicable setbacks are: - Mamre Road, 20m; - Other Roads, 15m; - Rear and Side Bdy's, 5m; - Water Supply Pipeline, 5m. • Where the property has frontage to more than one road, a variation to setbacks on the secondary road frontage may be considered; • Accessways and driveways permitted in setbacks, except setbacks to designated roads (eg. Mamre Road)	No	• The project has been designed to comply with all applicable setback controls as far as practicable; • Minor areas of accessway, driveway and carparking would be located within the setback to secondary road frontages (ie. on the estate road), however a setback of at least 7.5 metres would be maintained to this road; • Refer to Plan DA03 and building plans.

DCP Section	*Issue*	*Key Development Standards*	*Complies (Yes or No)*	*Comments*
5.4.2	Architectural / Design	• Merit issue. Urban Design matters identified include: - Quality of building design and materials; - Single construction materials may be limited to 50% of wall surface area; - External materials to have a reflectivity index <20%; - Application of energy efficient design principles; - Articulation of walls to provided variation in streetscapes; - External material colours.	Yes	• Proposed buildings have been designed in accordance with the development standards; • Refer to Section 6.7 for statement on architectural treatments.
5.4.3	Siting/ Building Orientation	• Buildings not to intrude into skyline when viewed from adjoining residential areas; • Elevations oriented to residential areas to be minimised; • Design and layout of buildings to consider local climatic considerations; • Avoid overshadowing of adjoining areas.	Yes	• Proposed buildings are well separated (1.5km) from the residential area of Erskine Park and St Clair to the north, and the building heights are not considered to be excessive; • Proposed buildings avoid western orientations where possible, and where unavoidable (ie. Ubeeco facility), treatments will be provided to manage solar access; • Proposed buildings do not impede solar access to adjoining buildings or properties.
5.5	Signage and Estate Entrance Walls	• Signage to be high quality; • Estate entrance walls to be provided in strategic locations in accordance with DCP's Traffic Strategy.	Yes	• All building signage would be of high quality, details of which would be provided at detailed design stage (refer to Section 3.12); • Provision has been made for the proposed estate entrance wall in the north-western corner of the site.
5.6	Lighting	• Lighting effects to be contained within the property.	Yes	• The proposed lighting would comply with the requirements of *AS 4282-1997 Control of Obtrusive Effects of Outdoor Lighting*.
5.7	Fencing	• Security fencing on front boundary to be located generally behind the landscape setback.	Yes	• All fencing would comply with the DCP requirements.
5.8	Services	• Satisfactory arrangements to be made for all services.	Yes	• There are no significant constraints to servicing the project; • Refer to Section 3.3.
6.0	Environment Quality	• Details standards for Noise pollution, waste management, soil erosion and sediment control, air pollution, storage and handling of chemical substances, stormwater pollution control, energy conservation, contaminated land, and trading/operating hours.	Yes	• Project is able to be conducted in broad compliance with the development standards; • Refer to Section 5.

DCP Section	*Issue*	*Key Development Standards*	*Complies (Yes or No)*	*Comments*
7.0	Biodiversity	• Details flora and fauna assessment standards and provisions for development to be in accordance with the Biodiversity Management Strategy.	Yes	• Project is consistent with the Biodiversity Management Strategy/Plan; • Refer to Section 6.4.
8.0	Landscaping	• Details development standards for site landscaping.	Yes	• Project Landscape Plan has been prepared in accordance with the DCP; • Refer to Section 6.7.

4.6 Developer Contributions Plans

4.6.1 Erskine Park Employment Area Section 94 Contributions Plan

Penrith City Council's *Erskine Park Employment Area Development Contributions Plan*, prepared under Section 94 of the EP&A Act, was adopted by Council in March 2005. Developer contributions for this area are levied on a per developable hectare basis for the following services and facilities:

- Drainage/Water Quality;
- Roads and Traffic Management; and
- Administration.

It is noted that developer contributions for the development of the entire Interlink Industrial Estate were resolved in the estate-wide project. The approval for that project requires Goodman to pay Council $5,384,422 as contributions payable under the *Erskine Park Employment Area Development Contributions Plan* (as revised).

It is noted that the estate-wide project approval also requires contributions toward roadworks in the Western Sydney Employment Hub totalling some $3.5 million, as well as contributions toward the creation of the biodiversity corridor (see Section 6.4 for detail).

As developer contributions for Interlink Industrial Estate have already been resolved, no further contributions are payable for the project.

5 CONSULTATION AND IDENTIFICATION OF KEY ISSUES

Development of Interlink Industrial Estate has been subject to detailed consultation with government authorities, service providers, surrounding landowners and the wider community.

In particular, detailed consultation has occurred as part of the estate-wide project and the subsequent Kimberly-Clark project. This consultation has occurred during the preparation of the project applications, during the assessment of the project applications, and during the post-approval development stage of the projects.

Based on this consultation, it is considered that Goodman and the relevant stakeholders have gained a good appreciation of the key issues relevant to development of the estate.

Stakeholders consulted, and the key issues raised by or considered to be of relevance to these stakeholders, are listed in Table 5.1 below.

Table 5.1: *Previous Interlink Industrial Estate Consultation and Issues Raised*

Stakeholder	***Key Issues***
Department of Planning	General planning and environmental issues; layout and design; traffic and parking; soil and water; noise; air quality; biodiversity; visual amenity (design and landscaping)
Department of Environment and Climate Change	General environmental protection; noise; air quality; biodiversity; Aboriginal cultural heritage
Department of Water and Energy	Riparian area protection; soil and water
Roads and Traffic Authority	Traffic and parking
Penrith City Council	Biodiversity; soil and water; traffic and parking; visual amenity (design and landscaping)
Commonwealth Department of the Environment and Water Resources	Biodiversity
Special Interest Groups and the General Public	Soil and water; biodiversity; traffic and parking

As discussed in Section 6 below, many of these issues have been addressed as part of the estate-wide project.

With regard to the current project, the Department of Planning and Penrith City Council have been consulted during the preparation of the Environmental Assessment. As the project is not predicted to result in any significant impacts to surrounding landusers (see Section 6), no additional 'pre-lodgement' consultation with surrounding landusers has been undertaken, nor is considered to be necessary.

The key issues identified for assessment in the current project are outlined in the Director-General's environmental assessment requirements (see **Appendix A**), and include:

- traffic and parking;
- soil and water;
- noise;
- air quality; and
- visual amenity (inc. layout and design).

These issues, along with other environmental issues of relevance to the project, are addressed in Section 6 below.

6 ENVIRONMENTAL IMPACTS

6.1 Soil and Water

Potential soil and water impacts associated with the project have been largely assessed and addressed as part of the estate-wide project, which provides for the preparation of the development lots ready for building construction, including bulk earthworks.

As part of the estate-wide project, the following soil and water aspects were considered in detail:

- erosion and sedimentation;
- site contamination;
- salinity;
- stormwater management;
- flooding; and
- water recycling (rainwater harvesting).

The Minister's approval for the estate-wide project includes a number of conditions relating to soil and water management, including requirements on Goodman to:

- prepare and implement an Erosion and Sediment Control Plan for the project;
- prepare and implement a Stormwater Management Plan for the project;
- use soft engineering designs for stormwater outlets in riparian areas consistent with the DWE's *Watercourse and Riparian Area Planning, Assessment and Works Design Guideline*; and
- provide the necessary infrastructure on site to enable roof and hardstand stormwater to be collected, stored and discharged separately to a regional rainwater harvesting scheme.

The soil and water assessment undertaken for the current project has been prepared with reference to the assessment undertaken for the estate-wide project, and the management planning required under that project approval. The Environmental Assessment for the estate-wide project is attached in **Appendix E** for reference purposes.

6.1.1 Erosion and Sedimentation

As stated above, erosion and sedimentation issues have been addressed as part of the estate-wide project, and include a requirement on Goodman to prepare and implement an Erosion and Sediment Control Plan (ESCP) for the project.

A separate or supplementary ESCP would be prepared for the proposed project, incorporating the specific details of the proposed buildings.

It is noted that the site of the proposed development is not adjacent or in proximity to any significant watercourses, and is not considered to present a significant risk via erosion and sedimentation. A small unnamed ephemeral creek is located to the east of Development Lot 2, within the biodiversity lot. The estate-wide project provides for a 20 metre core riparian zone to be maintained to this creek. The proposed ESCP will include measures to prevent sediment discharge to this waterbody.

6.1.2 Site Contamination

The potential for site contamination was assessed as part of the estate-wide project. A Phase 1 Site Contamination Assessment was undertaken for that project by Environmental Investigation Services Pty Ltd (see Appendix E).

The site contamination assessment included site history investigation, literature review, site inspection and soil sampling. The assessment found no evidence of soil contamination on the site and concluded that the site is suitable for its intended industrial use, and that further investigations of the land are not warranted.

6.1.3 Salinity

Potential salinity impacts have been assessed as part of the estate-wide project. A salinity assessment was undertaken for that project by Environmental Investigation Services Pty Ltd (see Appendix E).

The assessment, which included limited soil sampling, encountered non-saline to slightly saline soils, but anticipated that groundwater is likely to be extremely saline.

To address the potential issue of high salinity levels in groundwater and its impact on the industrial development, the estate-wide Stormwater Management Plan adopts a variety of remedial actions, including:

- ensuring adequate cover to the reinforcements;
- ensuring suitable cover to stormwater pipes; and
- lining bioretention/detention basins with an impervious material to prevent the rising of saline groundwater.

With the adoption of these measures, and prudent erosion and sediment control measures, it is considered that salinity risks are able to be effectively managed for the project.

6.1.4 Stormwater Management

Broad drainage management has been addressed as part of the estate-wide project. In this regard, a Stormwater Management Plan for the estate has been prepared by Henry & Hymas Civil and Structural Engineers Pty Ltd which addresses the following:

- water quantity;
- water quality; and
- salinity.

(It is noted that the Stormwater Management Plan included in the Environmental Assessment for the estate-wide project has since been updated and approved as part of the post approval requirements for the estate-wide project. The approved Stormwater Management Plan (May 2007) is included in Appendix E for reference.)

As outlined in the Stormwater Management Plan, a large portion of the site currently drains directly to the west towards Mamre Road. This run-off is currently conveyed by an existing culvert under Mamre Road to downstream receiving waters, and ultimately to South Creek.

However, in consultation with Penrith Council, the Stormwater Management Plan provides that the approved Kimberly Clark facility (MP 06_0254) will discharge to Mamre Road, and the remainder of the site (including the whole of the site subject to this project application) will discharge to the unnamed creek on the eastern side of Development Lots 2 and 3 (see Figure 6.1).

To ensure that post-development flows do not exceed pre-development flows, and to ensure the controlled discharge of stormwater from the site, the Stormwater Management Plan provides for each development lot to be serviced by an on-site detention (OSD) system, and outlines the permissible site discharges (PSD) for various flow events. Based on these PSD, the required OSD has been estimated at 300m^3/ha. The site of the proposed project provides adequate space to accommodate this OSD requirement. Detailed design of the OSD system is proposed to be

provided as a revision to the Stormwater Management Plan, to be prepared for the approval of the Department of Planning prior to the commencement of construction associated with the project. As noted in Section 3.4, the drainage easement along the boundary of Lots 1 and 2 would be relocated to follow the revised lot boundary.

The Stormwater Management Plan also provides for "at-source" pollution controls to be implemented to ensure stormwater quality meets the retention criteria in the Penrith DCP 2006. Such measures may include:

- litter baskets;
- gross pollutant traps (GPTs);
- sediment pits;
- grassed swales;
- vegetation buffers; and
- bioretention basins/swales.

It is proposed that a combination of the above be employed for the project. Detailed design of the water polishing system, including modelling of the pollutant retention rates, would be included in the proposed revision to the Stormwater Management Plan.

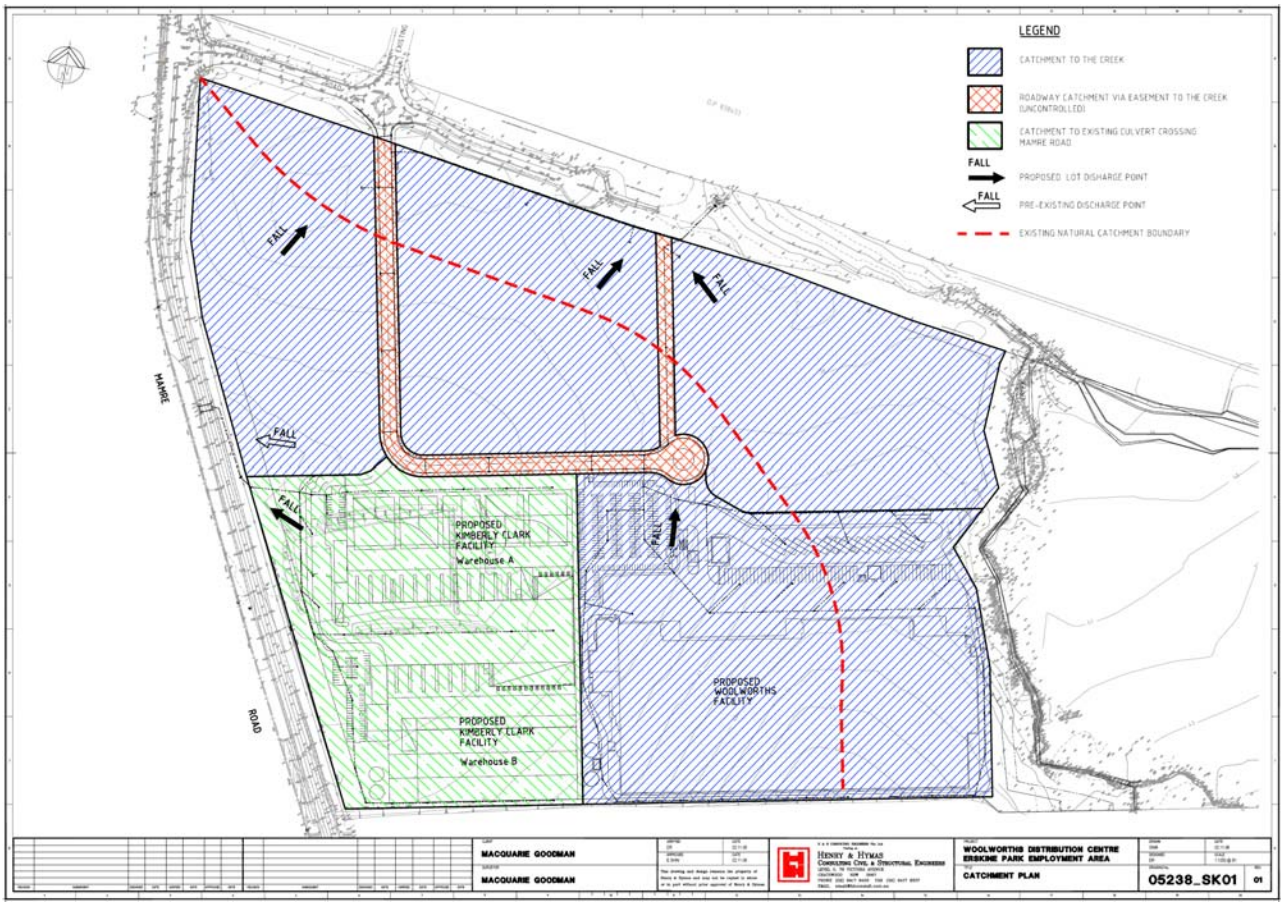

Figure 6.1: *Approved Estate Drainage Layout Plan*

6.1.5 Flooding

The Stormwater Management Plan identifies the 100 year flood level associated with the unnamed creek on the eastern side of Development Lots 2 and 3 as being at an RL of 39.2 metres AHD at the north east corner of the site. The Stormwater Management Plan provides that

the finished floor level (FFL) for the development lots in the north east corner should be at least 39.7m AHD (ie. the 100 year flood level plus a freeboard of 500mm).

The proposed buildings on Lots 1 and 2 have a minimum FFL of 39.7m AHD, and therefore comply with the minimum levels recommended in the Stormwater Management Plan.

6.1.6 Soil and Water Pollution

The proposed facilities do not involve processes that entail a significant risk of soil or water pollution. The proposed Ubeeco facility on Lot 2 is the only facility involving manufacturing activities. These manufacturing activities – including pallet, crate and box manufacture/repair from timber materials – are not considered to present a significant risk of pollution, nor is the proposed external storage of timber products.

The remaining facilities would be involved in standard warehousing and distribution activities, and are not expected to present a significant risk of pollution. The proposed facilities do not involve the storage of significant amounts of dangerous goods or hazardous materials.

Notwithstanding, the potential for soil and water pollution associated with the operation of the facilities would be mitigated by:

- adoption of the source management controls detailed in Section 6.1.4 above; and
- storage of all dangerous goods and hazardous materials in accordance with the Dangerous Goods Code and *AS 1940-2004: The storage and handling of flammable and combustible liquids*.

6.2 Noise

Interlink Industrial Estate is located within the Erskine Park Employment Area, an area which is currently undergoing a transformation from historical rural and extractive industry landuses to employment (predominantly industrial) landuse. Current landuse surrounding the site reflects this changing urban landscape, with surrounding landuses including industrial, extractive industry, rural and special uses (including 3 schools and a retirement village).

Sensitive receivers in the vicinity of the site include:

- the residential area of Erskine Park and St. Clair, approximately 1.5km to the north;
- rural properties, approximately 400m to the south;
- Mamre Christian College and Trinity/Emmaus Catholic Schools, and the Emmaus Retirement Village, approximately 800m to the south-east; and
- rural properties on Lenore Lane, approximately 1.2km to the north-east.

As detailed in Section 3, the project seeks approval for 24 hour, 7 day operations for all proposed facilities.

To assess the potential noise impacts associated with the project on the sensitive receivers, a Noise Impact Assessment has been undertaken by Heggies Pty Ltd, and is attached as **Appendix B**. The assessment includes consideration of construction, operational and traffic related noise, and has been undertaken in accordance with applicable noise guidelines including the DECC's:

- *Industrial Noise Policy (INP)*;
- *Environmental Noise Control Manual*; and
- *Environmental Criteria for Road Traffic Noise*.

A summary of the findings of the noise impact assessment is provided below.

6.2.1 Construction Noise

It is anticipated that construction of each of the proposed facilities would take less than 26 weeks. However, the total construction period associated with all of the facilities is expected to extend beyond 26 weeks. The main noise-generating construction works would include detailed earthworks, and to a lesser extent building construction.

Predicted construction noise levels at the nearest residential areas are provided in Table 6.1 below, along with the applicable criteria. The noise levels were predicted assuming construction evenly distributed around the site and focused at the north western corner, which presents the worst case scenario for nearby residents. The modelling assumes the Kimberly Clark and Woolworths warehouses are already constructed, which provides some shielding to the south.

Table 6.1: *Construction Noise Predictions dB(A) $L_{A10(15\ mins)}$*

Receiver	***Construction criterion***		***Predicted Noise Level***
	4-26 weeks	***>26 weeks***	
Horseshoe Circuit, St Clair	53	48	40
Blackwell Ave, St Clair	53	48	40

The noise predictions indicate that the project's construction noise emissions would be well within accepted criteria, and as such the project is not expected to result in any construction noise impact.

6.2.2 Operational Noise

Operational noise emissions have been modelled using the Environmental Noise Model (ENM) software. The assessment modelled worst case noise emissions under calm and temperature inversion conditions, as:

- INP assessable winds (slight, stable winds), which tend to increase noise impact, are not a feature of the area; and
- temperature inversions, which also tend to increase noise impact, are a feature of the area.

Predicted operational noise levels at the nearest residential areas are provided in Table 6.2 below, along with the applicable criteria.

Table 6.2: *Operational Noise Predictions dB(A) $L_{Aeq\ (15\ mins)}$*

Receiver Location	***Period***	***Predicted Noise Level***		***Criterion***
		Calm Weather	***Temperature Inversion***	
Pine Creek Circuit, St Clair	Day	<30	n/a	48
	Evening	<30	n/a	46
	Night	<30	<30	39
	Morning Shoulder	<30	<30	44
Blackwell Ave, St Clair	Day	<30	n/a	48
	Evening	<30	n/a	43
	Night	<30	<30	39
	Morning Shoulder	<30	<30	44
Lenore Lane, Erskine Park	Day	<30	n/a	48
	Evening	<30	n/a	43
	Night	<30	<30	39
	Morning Shoulder	<30	<30	44
Emmaus Retirement Village, Kemps Creek	Day	<30	n/a	48
	Evening	<30	n/a	43

Receiver Location	*Period*	*Predicted Noise Level*		*Criterion*
		Calm Weather	*Temperature Inversion*	
	Night	<30	<30	39
	Morning Shoulder	<30	<30	44
Emmaus College Playground, Kemps Creek	When in use	<30	n/a	55
Mamre Road, south-east of site	Day	<30	n/a	48
	Evening	<30	n/a	46
	Night	<30	<30	39
	Morning Shoulder	<30	<30	44

Note:
- Day is the period from 7am to 6pm on Monday to Saturday, and 8am to 6pm on Sundays and public holidays;
- Evening is the period from 6pm to 10pm;
- Night is the period from 10pm to 7am on Monday to Saturday, and 10pm to 8am on Sundays and public holidays; and
- Morning Shoulder is the period from 6am to 7am.

The modelling indicates that the operation of the project would comfortably comply with the applicable noise criteria during all time periods and weather conditions.

Sleep Disturbance

In addition to the above operational noise emissions, which are based on average noise levels over a 15 minute period, sudden or short-lived noise emissions at night have the potential to result in sleep disturbance. Such sudden noise emissions associated with the project might include metal on metal contact or truck reversing alarms.

The noise impact assessment includes consideration of these noise sources. The assessment found that the highest L_{Amax} noise level at any residential receiver is predicted to occur in the presence of a temperature inversion. External noise levels up to L_{Amax} 37 dBA may occur at Blackwell Avenue and Pine Creek Circuit residences in this situation. These predicted noise levels would comfortably meet the applicable sleep disturbance noise criterion of 49 dBA.

6.2.3 Traffic Noise

Traffic noise assessment indicates that the project would increase existing traffic noise levels on Mamre Road by a negligible 0.6 dBA during the daytime and 0.8 dBA during the night. This increase is unlikely to be perceptible to residential receivers on Mamre Road, and meets the requirements of the *Environmental Criteria for Road Traffic Noise* (ie. less than 2dB increase).

6.3 Air Quality

The main sources of air emissions associated with the operation of the project would be vehicle and plant emissions. These emissions would be typical of a warehouse/distribution or light industrial environment, the levels of which are not expected to be significant.

Dust emissions during construction works – the majority of which would be associated with bulk earthworks – have been addressed as part of the estate-wide project. The approval for that project requires Goodman to prepare and implement a Dust Management Plan for the project. The proposed project would be managed in accordance with this Dust Management Plan, which includes standard best practice techniques to minimise dust emissions during construction, including:

- minimising the area of disturbance as far as practicable during works;
- minimising drop heights for materials being worked on the site;
- keeping exposed surfaces moist at all times;

- rehabilitating/revegetating disturbed surfaces as soon as practicable; and
- ensuring that trucks are covered and do not track sediment onto public roads.

6.4 Flora and Fauna

Flora and fauna issues have been addressed as part of the estate-wide project. That project provides for the establishment, maintenance and long term conservation of a 24 hectare 'biodiversity lot' on the eastern portion of the Interlink Industrial Estate site (see Figure 2.4), in part to compensate for the vegetation clearing required to establish the industrial estate, including the proposed development lots.

A Biodiversity Management Plan has been prepared on behalf of the Erskine Park Employment Area landowners which establishes a biodiversity corridor and management framework for the whole of the employment area (see Figure 6.2). The biodiversity lot forms an integral component of this broader biodiversity corridor.

The project is not expected to have any significant impact on the biodiversity lot, or the broader biodiversity corridor managed under the Biodiversity Management Plan. It is considered that the project is able to be conducted in a manner that is consistent with the Biodiversity Management Plan.

The Landscape Plan for the project (see Section 6.7) has been prepared to complement and integrate with the ecological values of the biodiversity lot, which comprises high quality Cumberland Plain Woodland, an endangered ecological community (EEC) listed under the NSW *Threatened Species Conservation Act 1995* and the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*. In this regard, the Landscape Plan utilises species that are found within the Cumberland Plain Woodland EEC.

Figure 6.2: *Erskine Park Employment Area Biodiversity Corridor*

6.5 Archaeology and Heritage

Aboriginal archaeology and heritage issues have been addressed as part of the estate-wide project. Archaeological assessment for that project identified 9 Aboriginal sites/objects on the Interlink Industrial Estate site, all comprising isolated artefacts or artefact scatters. Of these sites/objects:

- 5 are located within the biodiversity lot;
- 1 is located on the site of the approved Woolworths facility; and
- 2 are located within the area of the proposed project (on Lots 1 and 2).

The location of the sites/objects is shown on Figure 6.3.

To manage these known Aboriginal sites/objects, the approval for the estate-wide project requires Goodman to prepare and implement an Aboriginal Heritage Management Plan in consultation with the DECC and Deerubbin Local Aboriginal Land Council. This management plan is required to, amongst other things, specify the procedures to be implemented for the salvage excavation of all the artefacts on the site, including the artefacts within the area of the proposed project.

The project would be undertaken in accordance with the provisions of the approved Aboriginal Heritage Management Plan.

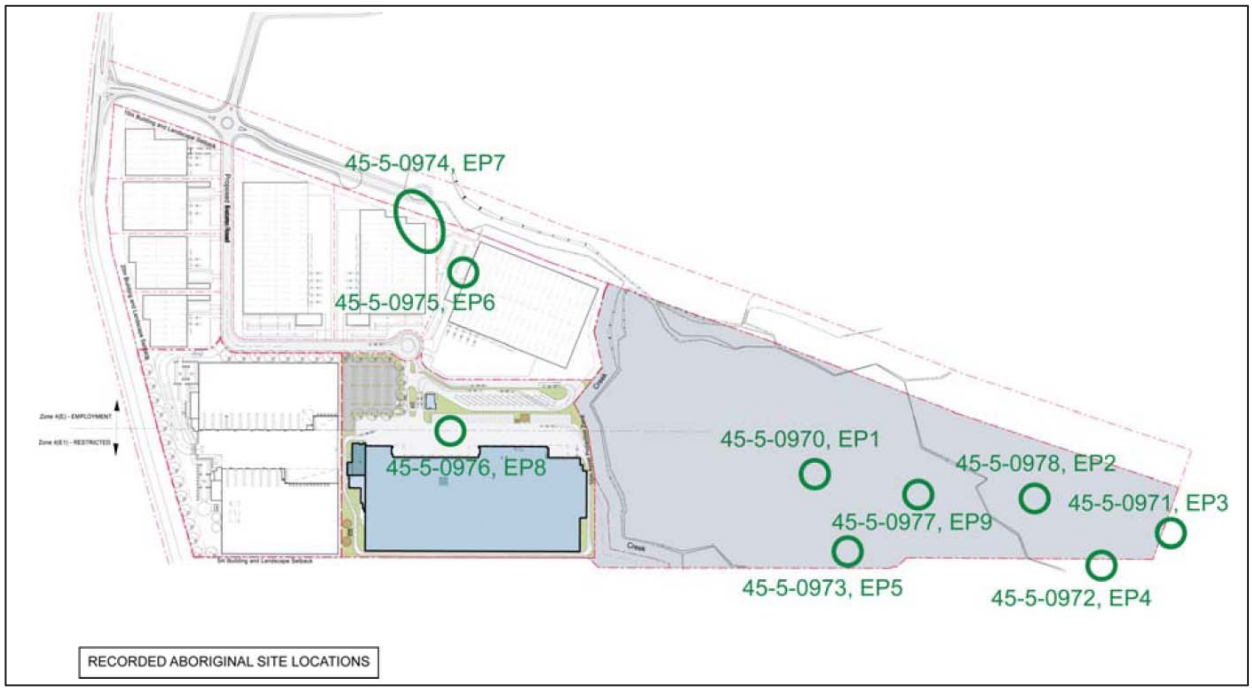

Figure 6.3: *Recorded Aboriginal Sites (over estate layout plan as approved)*

6.6 Traffic and Parking

A Traffic Impact Assessment for the project has been undertaken by specialist traffic consultants TEF Consulting Pty Ltd, and is attached as **Appendix C**. A summary of this assessment is provided below.

6.6.1 Traffic Impacts

Traffic generation associated with the project has been estimated based on a combination of:

- information provided by end-users (Lots 2 and 5A);
- generic rates for warehouses and factories provided in the RTA's *Guide to Traffic Generating Developments* (Lot 1); and
- for Lot 5B, the trip rates used for Lot 5A, on a pro-rata basis based on floorspace.

The Traffic Assessment notes that the generic rates adopted from the RTA guidelines are likely to be conservatively high, given that the RTA rates are based on surveys conducted in 1979/80 (prior to the trend toward larger warehouses with lower staff density), and that one of the adopted model sites had considerably greater than typical traffic generation due to a retail component. Accordingly, it is likely that the Traffic Assessment presents a worst case scenario for traffic impact associated with the project.

The assessment indicates that the project would generate between 233 and 301 trips (267 on average) during the morning peak period and between 160 and 206 trips (183 on average) during the afternoon peak period.

Strategic transport planning for the Erskine Park Employment Area has been based on a traffic generation rate for the employment area of 15 trips per hectare (as agreed by the RTA and Penrith Council). Accordingly, traffic generation at or below this rate could be considered to have no negative effect on the surrounding road network. Project traffic generation based on the strategic planning rate is provided in the following table.

Table 6.3: *Project Traffic Generation Based on Adopted Rates for the EPEA*

Development Lot	***Site Area (ha)***	***Total Trips***
Lot 1 – Unspecified End-User	9.4	141
Lot 2 – Ubeeco Packaging Solutions	3.2	48
Lot 5A – Allied Pickfords	3.4	51
Lot 5B – Unspecified End-User	2.2	33
Total	**18.2**	**273**

Comparison of the predicted trip rates and the strategic planning trip rates indicates that the project would generate traffic within the planning level of 273 trips per hour (267 and 183 trips per hour on average for the morning and afternoon 2-hour peak periods respectively).

Accordingly, the project is not expected to have any negative effects on the surrounding road network.

The Traffic Assessment also includes consideration of the traffic generation for the whole of Interlink Industrial Estate, based on the planning rate of 15 trips/ha and traffic generation predictions for the project and the approved Woolworths and Kimberly Clark facilities. This comparison is provided in the following table.

Table 6.4: *Interlink Traffic Generation Rates: Traffic Predictions versus Strategic Planning Rates*

Project	***Total Trips***
Based on TEF and Traffix Assessments	
Woolworths	36
Kimberly Clark	20
Development of Lots 1, 2 + 5	301
Total Interlink Industrial Estate	357
Based on 15 trips/ha Rate	
Total Interlink Industrial Estate	587

The above comparison shows that collectively all individual developments within Interlink Industrial Estate are likely to generate considerably less traffic than envisaged in the course of the strategic planning process for the Erskine Park Employment Area. Consequently, the Traffic Assessment concludes that the project, and the development of the entire Interlink Industrial Estate, would have no negative effect on the surrounding road network.

Although the project does not involve any changes to local roads, construction works do have the potential to cause minor impacts to the local road network, such as temporary delays. To ensure that any impacts are appropriately managed, Goodman would prepare and implement a Construction Traffic Management Plan, to be prepared in consultation with Penrith City Council.

6.6.2 Parking

The Traffic Assessment includes an assessment of parking provision in consideration of the development standards in *Penrith Development Control Plan (DCP) 2006* and the RTA's *Guide to Traffic Generating Developments* (2002).

The assessment notes that the parking provision rates in the DCP are greater than those recommended by the RTA, and with regard to warehouses, are 3 times greater. These rates are considered to be unreasonable, particularly for larger warehouses which typically have a lesser employee density than smaller facilities.

The proposed parking provision for the project has been based on consideration of the RTA and DCP guidelines, together with:

- information provided by end-users (Lots 2 and 5A); and
- information provided by likely (but unconfirmed) tenants and/or Goodman experience (Lots 1 and 5B).

The proposed parking provision, together with the requirements of the Penrith DCP 2006 and the RTA Guide (2002), are shown in the following table.

Table 6.5: *Proposed Parking Provision*

Lot	***Landuse***	***Required Parking Space Rate***		***Total Required[1]***		***Proposed Spaces***
		Penrith DCP	***RTA Guide***	***Penrith DCP***	***RTA Guide***	
1	Warehouse	1 per $100m^2$	1 per $300m^2$	497	171	217
2	Warehouse / Manufacturing	1 per $100m^2$ / $70m^2$	1 per $300m^2$ / $100m^2$	124	54	150
5A	Warehouse	1 per $100m^2$	1 per $300m^2$	96	33	77
5B	Warehouse / Light industry	1 per $100m^2$ / $70m^2$	1 per $300m^2$ / $100m^2$	120	53	90
Total				837	311	534

1 The required spaces are based on the floor areas listed in Table 3.1 and shown on the building plans.

As shown, the proposed parking provision for each facility fully satisfies and exceeds the RTA requirements while being sufficiently close to fulfilling the DCP requirements as well, except Lot 1 where the DCP requirements are significantly higher.

It is noted that the development on Lot 1 is proposed in two stages. To ensure that parking provision is adequately provided for Lot 1, Goodman has committed to reviewing the need for additional parking spaces prior to the expansion of the facility.

The Traffic Assessment also included a review of the proposed parking, access and loading arrangements for the project against the relevant Australian Standards. The review identified a small number of recommended improvements to the parking and access arrangement to ensure

the safe and efficient movement around the facilities. These recommended improvements have been adopted by Goodman and are shown on the relevant building plans.

The Traffic Assessment concludes that, subject to the proposed parking review of Lot 1 before the Stage 2 development on that lot, the project satisfactorily addresses parking requirements and may thus be supported on parking grounds.

6.7 Visual Amenity and Landscaping

The project involves the development of large industrial buildings which, if not planned and designed appropriately, have the potential to impact on the visual amenity of the locality.

The main visual receivers in the vicinity of the site include:

- employment-related landusers immediately to the north;
- residents of rural properties, approximately 400m to the south;
- residents, students and workers associated with the Mamre Christian College and Trinity/Emmaus Catholic Schools, and the Emmaus Retirement Village, approximately 800m to the south-east; and
- commuters on Mamre Road, and residents of rural properties, to the west of the site.

The residential areas of Erskine Park and St Clair, approximately 1.5km to the north of the site, do not have any significant views to the site.

Employment/industrial landusers immediately to the north of the site would have direct views to the site and the proposed buildings. Although these receivers are not considered as sensitive to visual impacts as residential or other public receptors, visual impacts on these receivers would nonetheless be mitigated by the design and landscaping measures outlined below.

Residents and other landusers to the south of the site would have only minor views to the proposed buildings, as the vast majority of these views are blocked by the approved Woolworths and Kimberly Clark facilities (on Development Lots 3 and 4 respectively), and the vegetation on the biodiversity lot.

The key visual receivers in relation to the project are considered to be commuters on Mamre Road, and existing and further landusers to the west of Mamre Road.

The project's visual impacts on these and other receivers would be mitigated through the implementation of a range of measures, including:

- building setbacks that generally comply with the Erskine Park Employment Area DCP standards, including:
  - buildings on Lot 5 would be setback from Mamre Road by a minimum of 20 metres;
  - buildings would be setback from James Erskine Drive and the northern boundary by at least 15 metres;
- building heights would be kept to reasonable levels (maximum proposed ridge height is 13.7 metres and maximum proposed wall height is 10.5 metres);
- buildings on Lot 5 would be oriented such that hardstand and loading/activity areas face the internal estate road rather than Mamre Road;
- average site cover for the proposed buildings is 47%, which is within the 50% development standard in the Erskine Park Employment Area DCP;
- ensuring a high quality architectural design to the buildings (see Section 6.7.1 below); and
- ensuring a high quality landscape design to the development lots (see Section 6.7.2 below).

With the adoption of these measures, it is considered that the project would not result in any significant visual impact to surrounding visual receivers, and that the project would not adversely affect the visual amenity of the locality.

6.7.1 Architectural Design Statement

The proposed facilities have been designed in-house by Goodman's Design+ Team. The architects have incorporated a range of architectural elements – through design and materials – to ensure that the buildings contribute to the development of a high quality and contemporary industrial estate. The architects have been particularly conscious of the need to provide a quality presentation to Mamre Road and James Erskine Drive, with the incorporation of elements to break up the scale and bulk of these facades.

Details of the proposed building materials, colours and architectural forms are provided on the building elevations (see building plans at the end of this report). A design statement from the project architect is presented below:

"The distinctive qualities of the industrial buildings naturally create a unique and powerful architectural style. The idea for this proposal is to visit and advance these qualities in a celebrative form. The concept is also to establish a strong sense of estate theme so that multiple users and branding can be accommodated within a controlled framework.

Particular attention was made to the facades of buildings fronting Mamre Road and James Erskine Drive. Addressing the overall scale and experience along Mamre Road, the proposed buildings are read in conjunction with the existing approved Kimberly Clark building. Facades containing a combination of vertical expression balanced by horizontal elements generate an overall pattern that is read across all four buildings. Given that the experience of the buildings from Mamre Road is through high movement and relatively distant views, localised articulation is therefore unnecessary unless related to an overall pattern of the street.

Approaching the estate from the James Erskine Drive, the estate entry experience is established by signature entry elements such as signage, landscape elements and a sense of gateway formed by the extruded forms of Buildings 1 and 5A. Consistent with the proposed design approach, the forms of the buildings are expressed in a celebrative fashion.

Upon entering the estate, the main road is addressed by lined trees, quality landscaping, lighting and controlled signage. It is an inherit part of the site where the day to day activities of the warehouses and interaction of people which provides its articulation and interest.

Despite the office component to warehouses being in different shapes and locations (as a result of specific tenant requirements) the design remains cohesive by the use of consistent materials, colours, feature blade walls and specific roof elements."

6.7.2 Landscaping

A Landscape Plan and Landscape Design Statement have been prepared for the project by ESD Land Management Pty Ltd, and are attached in **Appendix D**. The Landscape Plan has been prepared to be consistent with the Estate Landscape Masterplan (approved in the estate-wide project), and the approved Landscape Plans for the Woolworths and Kimberly-Clark facilities.

Although the site is largely cleared of vegetation (as approved under the estate-wide project to prepare the site for development), the site would once have been representative of the Sydney Coastal River Flat Forest, / Alluvial Woodland and Cumberland Plain Woodland / Shale Plains Woodland communities. Both Sydney Coastal River Flat Forest and Cumberland Plain Woodland

are listed as endangered ecological communities under the *Threatened Species Conservation Act 1995*.

The Landscape Plan includes a planting schedule that includes species from these vegetation communities, to supplement and integrate with existing remnants in the vicinity of the site, including the biodiversity lot to the east of the site.

The Landscape Plan has also been designed to provide an effective visual screen to Mamre Road, in a manner that is consistent with the landscaping strategy for the approved Kimberly-Clark facility.

The principles of the landscape design, as outlined in the Landscape Design Statement, include:
General Principles
a) provide an attractive and functional public domain;
b) visually unify and enhance the existing environment;
c) promote safe and secure use of the site for both every-day users and visitors;
d) provide vegetation screens and visual relief from large-scale "bulk" buildings through appropriate species choice and placement;

Sustainable Design Principles
e) use of endemic and ecologically appropriate plant species that will reduce irrigation, maintenance requirements, and the use of pesticides and herbicides. It will complement the remnant endemic vegetation on site and suitability for local fauna;
f) the planting of lawns will be minimised and more drought tolerant native groundcovers and grasses will be encouraged as an alternative to lawns;
g) using irrigation systems that utilise drip irrigation systems;
h) using quality, long lasting materials;
i) using soils and mulches manufactured with recycled waste;
j) no noxious plants or plants known to be invasive or which become invasive will be planted;
k) shading western building facades with vegetation within bushfire protection constraints will be encouraged;
l) tree planting to shade roadways and paved areas to reduce heat absorption will be encouraged; and
m) generally soft landscaping will be preferred to large areas of hard landscaping.

6.8 Wastes and Hazards

None of the proposed facilities are expected to generate significant quantities of waste other than general solid and putrescible waste, and sewage waste. No liquid trade waste is expected to be generated, and none of the facilities would store or use significant quantities of dangerous goods or hazardous materials.

The proposed Ubeeco facility would generate some timber and scrap metal (strapping) waste, however this waste stream is not expected to generate any significant environmental risk.

All facilities would minimise and recycle wastes where practicable, in accordance with internal management systems. Waste storage facilities would be provided for each building in locations that are appropriately screened from public areas.

To ensure that effective waste management planning, Goodman would prepare and implement a Waste Management Plan for the project in consultation with Penrith City Council.

The eastern side of Lot 2 does present some bushfire hazard associated with fires emanating from the biodiversity lot. To minimise this hazard, an Asset Protection Zone (APZ) comprising a defendable space of at least 20 metres, would be maintained on the eastern side of Lot 2, as shown on the Landscape Plan.

7 DRAFT STATEMENT OF COMMITMENTS

7.1 Overview and Definitions

If approved and acted upon, Goodman will undertake the project in accordance with the following commitments.

The following defines some of the terms and abbreviations used in the Statement of Commitments:

Approval	The Minister's approval to the project (Project Application No.07_0093)
BCA	Building Code of Australia
Council	Penrith City Council
DECC	Department of Environment and Climate Change
Department	Department of Planning
Director-General	Director-General of the Department (or delegate)
DCP	Penrith Development Control Plan 2006
DWE	Department of Water and Energy
EA	*Environmental Assessment: Development of Lots 1, 2 + 5, Interlink Industrial Estate, Mamre Road, Erskine Park*, dated September 2007
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regulation	*Environmental Planning & Assessment Regulation 2000*
Goodman	Goodman International Limited, or its successors in title
Minister	Minister for Planning
Project	The development as described in the EA
Site	Land to which the project application applies

7.2 Administrative Commitments

Commitment to Minimise Harm to the Environment

7.2.1 Goodman will implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction and/or operation of the project.

Terms of Approval

7.2.2 Goodman will carry out the project generally in accordance with the:

a) EA;
b) plans listed in Table 7.1 below;
c) statement of commitments; and
d) conditions of the approval.

Table 7.1: *Site Plans*

Development Lot	***Plan No.***	***Plan Title***
Project Masterplan	INT DA03(D)	Project Masterplan
	INT DA04(D)	Estate Elevations
Lot 1	INT DA201(D)	Site Plan
	INT DA202(D)	Roof Plan
	INT DA203(D)	Elevations
	INT DA204(D)	Typical Cross Section

Development Lot	*Plan No.*	*Plan Title*
Lot 2	INT DA101(C)	Site Plan
	INT DA102(C)	Roof Plan
	INT DA103(C)	Elevations – Sheet 1
	INT DA104(C)	Elevations – Sheet 2
	INT DA105(C)	Typical Cross Section
Lot 5A	INT DA401(C)	Site Plan
	INT DA402(C)	Roof Plan
	INT DA403(C)	Elevations – Sheet 1
	INT DA404(C)	Elevations – Sheet 2
	INT DA405(C)	Typical Cross Section
Lot 5B	INT DA301(C)	Site Plan
	INT DA302(C)	Roof Plan
	INT DA303(C)	Elevations – Sheet 1
	INT DA304(C)	Elevations – Sheet 2
	INT DA305(C)	Typical Cross Section

7.2.3 If there is any inconsistency between the above, the conditions of the approval shall prevail to the extent of the inconsistency.

7.2.4 Goodman will comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of:

a) any reports, plans, strategies, programs or correspondence that are submitted in accordance with the approval; and
b) the implementation of any actions or measures contained in these reports, plans, strategies, programs or correspondence.

Structural Adequacy

7.2.5 Goodman will ensure that all new buildings and structures on the site are constructed in accordance with the relevant requirements of the BCA.

Note: Under Part 4A of the EP&A Act, Goodman is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&A Regulation sets out the requirements for the certification of the project.

Protection of Public Infrastructure

7.2.6 Goodman will:

a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the project; and
b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the project.

Operation of Plant and Equipment

7.2.7 Goodman will ensure that all plant and equipment used on the site is:

a) maintained in a proper and efficient condition; and
b) operated in a proper and efficient manner.

Pre-Operation Compliance Audit

7.2.8 Prior to the commencement of operations, Goodman will submit work as executed plans to the Department for all the development associated with the project. These plans will be

prepared by a suitably qualified and experienced expert, and include plans showing the work as executed plans laid over the approved plans to demonstrate that the project has been carried out in accordance with the approved plans.

7.3 Specific Environmental Commitments

Soil and Water

Erosion and Sediment Control

7.3.1 During construction, Goodman will carry out all reasonable and feasible measures to minimise soil erosion and the discharge of sediment from the site to downstream waters.

7.3.2 Goodman will prepare and implement an Erosion and Sediment Control Plan for the project in consultation with Council, and to the satisfaction of the Director-General. This plan will:

a) be submitted to the Director-General for approval prior to construction;
b) detail the erosion, sediment and pollution control measures and practices to be implemented during construction of the project;
c) demonstrate that erosion and sediment control measures will conform with, or exceed, the relevant requirements and guidelines provided in Landcom's (2004) publication *Managing Urban Stormwater – Soils and Construction*;
d) include an erosion monitoring program during construction of the project; and
e) specify measures to address erosion, should it occur, and to rehabilitate/stabilise disturbed areas of the site.

Stormwater Management

7.3.3 The design of any stormwater outlets into a riparian zone or watercourse and their spillways will be a soft engineering design and will be consistent with the DWE's guideline *Watercourse and Riparian Area Planning, Assessment and Works Design Guideline.*

7.3.4 Prior to the commencement of construction, Goodman will review, and if necessary revise, the Stormwater Management Plan for the Interlink Industrial Estate approved under MP 06_0253, in consultation with Council, and to the satisfaction of the Director-General.

7.3.5 Prior to the commencement of operations, or as otherwise approved by the Director-General, Goodman will provide the necessary infrastructure on site to enable roof and hardstand stormwater to be collected, stored and discharged separately to the satisfaction of the Director-General.

Notes: Unless the Director-General agrees otherwise, the roof stormwater infrastructure will include:

- *a rainwater collector system with a design capacity for the 1 in 20 year (critical duration) storm event; and*
- *roof water reservoirs or storage tanks with a capacity of at least 440KL/ha of roof services or 190 KL/ha gross land area (whichever is larger), and the ability to discharge flows (by way of pumped rising mains or gravity mains) to any regional rainwater harvesting infrastructure at a rate of 11.6 l/s per megalitre of storage.*

7.3.6 During operations, Goodman will participate in any regional rainwater harvesting initiatives to the satisfaction of the Director-General.

Note: This participation will involve making the roof stormwater infrastructure on site available for connection to any regional rainwater harvesting infrastructure.

Transport

Construction Traffic Management Plan

7.3.7 Goodman will prepare and implement a Construction Traffic Management Plan in consultation with Council, and to the satisfaction of the Director-General. This plan will:

a) be submitted to the Director-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.

Internal Road Network and Parking

7.3.8 Goodman will ensure that the internal road network and parking associated with the project are designed, constructed and maintained in accordance with the latest versions of the Australian Standards *AS 2890.1:2004*, *AS 2890.2:2002* and AUSTROADS.

7.3.9 Goodman will ensure that all parking generated by the project is accommodated on site. No vehicles associated with the project will be allowed to park on the public road system at any stage.

Lot 1 Stage 2 Parking Review

7.3.10 Prior to the commencement of construction of the stage 2 expansion of the building on Lot 1, Goodman will undertake a review of parking requirements for the expanded facility, and if required, provide additional on-site car parking spaces, to the satisfaction of the Director-General.

Vehicle Queuing

7.3.11 During the project, Goodman will ensure that project does not result in any vehicles queuing on the public road network.

Visual Amenity

Signage

7.3.12 Prior to installing any signage on the site, Goodman will submit detailed plans of this signage to the Director-General for approval. These plans will be prepared in consultation with Council, and be generally consistent with the requirements in the DCP. Following approval, Goodman will ensure that the signage is installed in accordance with the approved plans.

Fencing

7.3.13 Prior to installing any fencing on the site, Goodman will submit detailed plans of this fencing to the Director-General for approval. These plans will be prepared in consultation with Council, and be generally consistent with the requirements in the DCP. Following approval, Goodman will ensure that the fencing is installed in accordance with the approved plans.

Landscaping

7.3.14 During the project, Goodman will:

a) maintain the landscaping on the site to the satisfaction of the Director-General; and

b) ensure that the landscaping on the site does not impede driver sight distance of vehicles entering or leaving the site.

Lighting

7.3.15 Goodman will ensure that the lighting associated with the project:

a) complies with the latest version of Australian Standard *AS 4282(INT) - Control of Obtrusive Effects of Outdoor Lighting*; and

b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.

Noise

7.3.16 Goodman will only carry out construction on the site between 7am and 6pm Monday to Friday, and 7am and 1pm on Saturdays. No construction will be allowed on site on Sundays or public holidays.

Note: Construction works which are inaudible at any residence may be carried out outside these times.

7.3.17 During the project, Goodman will ensure that noise from the project does not exceed the noise limits presented in Table 7.2.

Table 7.2: *Project Noise Limits (dB(A))*

Noise Assessment	***Day***	***Evening***	***Night***	
Location	$L_{Aeq\ (15\ minute)}$	$L_{Aeq\ (15\ minute)}$	$L_{Aeq\ (15\ minute)}$	$L_{A1(1\ minute)}$
Horseshoe Circuit	48	46	39	49
Blackwell Avenue	48	43	39	49

Notes:

- *For the purposes of this condition, day is defined as the period from 7am to 6pm, Monday to Saturday, and 8am to 6pm, Sundays and Public Holidays. Evening is defined as the period from 6pm to 10pm. Night is defined as the period from 10pm to 7am, Monday to Saturday, and 10pm to 8am, Sundays and Public Holidays.*
- *Noise emission limits apply under meteorological conditions of wind speeds up to 3 m/s at 10 metres above ground level or temperature inversions conditions of 3°C/100m and wind speed up to 2 m/s at 10 metres above the ground. To determine compliance with the LAeq(15 minute) noise limits, noise from the project will be measured at the most affected point within the residential boundary, or at the most affected point within 30 metres of the dwelling where the dwelling is more than 30 metres from the boundary. To determine compliance with the LA1(1 minute) noise limits, noise from the project will be measured at 1 metre from the dwelling façade.*
- *However, where it can be demonstrated that direct measurement of noise from the project is impractical, the DECC may accept alternative means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy). The modification factors in Section 4 of the NSW Industrial Noise Policy will also be applied to the measured noise levels where applicable.*

Air Quality

Construction Traffic

7.3.18 During construction, Goodman will ensure that:

a) all trucks entering or leaving the site with loads 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 kept clean.

Dust Management

7.3.19 During the project, Goodman will carry out all reasonable and feasible measures to minimise the dust generated by the project.

Waste

7.3.20 During the project, Goodman will implement reasonable and feasible measures to minimise the waste generated by the project.

7.3.21 Goodman will prepare and implement a Waste Management Plan for the project in consultation with Council, and to the satisfaction of the Director-General. This plan will:

a) be submitted to the Director-General for approval prior to the commencement of construction;
b) be consistent with the requirements in the DCP; and
c) detail the measures that will be implemented to minimise waste generation associated with the project.

Environmental Management Strategy

7.3.22 Goodman will prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Director-General. This strategy will:

a) be submitted to the Director-General for approval prior to the commencement of construction;
b) describe in broad terms the proposed environmental management strategy for the project;
c) identify the person who would be responsible for overseeing the environmental management of the project, and provide contact details for this person;
d) describe the procedures that would be implemented to:
    - keep the relevant agencies informed about the progress of the project;
    - receive, handle, respond to, record and report any complaints about the project;
    - resolve any disputes that may arise during the project; and
    - respond to any non-compliances.

7.3.23 Goodman will update this strategy to the satisfaction of the Director-General:

a) prior to operations on the site; and
b) every 3 years thereafter, or as directed by the Director-General.

8 PROJECT JUSTIFICATION AND CONCLUSION

8.1 Consideration of Alternatives

Alternatives to carrying out the project in the proposed manner include:

- developing the site to a lesser scale;
- developing the site to a higher scale;
- undertaking development for a different purpose on the site; and
- not undertaking the project at all.

In terms of project scale, it is noted that:

- the average site coverage for the project is 47%, which is below the 50% maximum site cover permitted under the *Penrith DCP 2006*;
- the proposed buildings have a maximum ridge height of 13.7 metres (and 12.9 metres for buildings fronting Mamre Road), which is not considered excessive, and is below the height of other approved buildings in the estate (ie. the approved Woolworths facility has a ridge height of 13.7 metres, and the Kimberly-Clark buildings have a maximum height of 22.7 metres); and
- the proposed building layout and scale has been designed in accordance with the constraints of the site, and the current and forecast market demand for employment land in the Erskine Park Employment Area.

Accordingly, it is considered that the proposed scale of the project provides a reasonable balance between maximising the development and employment opportunities of the site whilst ensuring that the amenity of the surrounding area is not adversely affected.

In terms of potential alternative development purposes, it is noted that:

- the proposed buildings would be used for light industrial and warehousing/distribution purposes, which are permissible forms of development on the land;
- environmental assessment indicates that the project is able to be undertaken in a manner that would not adversely affect the environment or surrounding landusers; and
- there is considerable current market demand for the proposed facilities on the site, which would generate significant socio-economic benefits, including the creation of 460 direct full-time jobs.

Accordingly, it is considered that the proposed development purposes (ie. light industrial and warehousing/distribution) represent reasonable and orderly development of the land.

Not undertaking the project at all is not considered to be a reasonable alternative, as:

- the land is subject to an approval (MP 06_0253) to prepare the site for the proposed project;
- the project is not predicted to have any significant impacts on the environment or surrounding landusers; and
- not undertaking the project would negate the project's significant socio-economic benefits, including the creation of 460 direct full-time jobs and a capital investment of $57.4 million in the Erskine Park Employment Area.

8.2 Project Justification

Interlink Industrial Estate forms a key component of the Erskine Park Employment Area, which was created and zoned in 1993 as a major employment area for Western Sydney. The Erskine Park Employment Area in turn forms part of the Western Sydney Employment Hub, identified in

the Sydney Metropolitan Strategy as a key centre for employment growth in Western Sydney over the 25 year period to 2030. The Western Sydney Employment Hub is expected to create up to 36,000 jobs for the people of Western Sydney.

The project would complete the development of Interlink Industrial Estate, thus delivering the strategic planning goals for a considerable portion of the Erskine Park Employment Area. The project involves a capital investment in the estate of some $57.4 million, and is expected to generate 300 jobs during construction and 460 direct jobs during operations.

Environmental assessment indicates that the project is able to be conducted in a manner that would not result in any significant environmental impacts, or adversely affect the amenity of the surrounding area.

The site is well suited to the project, as it is zoned for employment uses, is subject to an existing approval which prepares the site for the project, and has access to all required services and utilities.

On balance, it is considered that the project represents the orderly and reasonable development of the land, and is therefore in the public interest.

8.3 Conclusion

Having regard to all the salient environmental, social and economic issues, it is considered that the project represents orderly development of the land. It is respectfully requested that the Minister for Planning, having due regard for the information submitted in this document, grant approval to the application for the project.

PLANS

APPENDIX A

DIRECTOR-GENERAL'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

APPENDIX B

NOISE IMPACT ASSESSMENT

APPENDIX C

TRAFFIC IMPACT ASSESSMENT

APPENDIX D

LANDSCAPE DESIGN STATEMENT

APPENDIX E

ENVIRONMENTAL ASSESSMENT FOR ESTATE-WIDE PROJECT