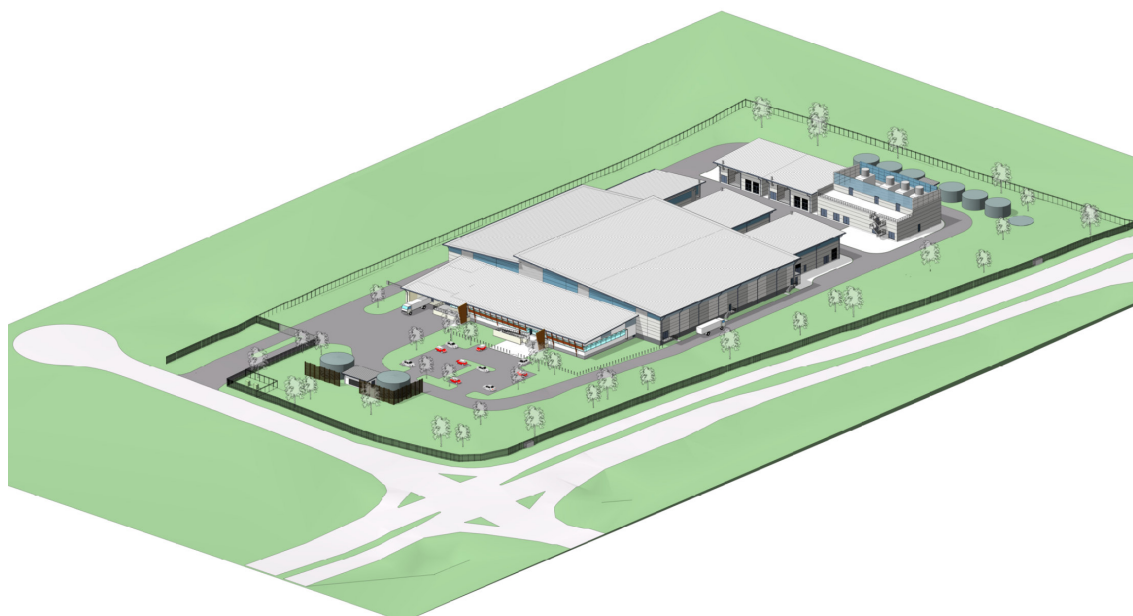




NSW GOVERNMENT
Department of Planning

MAJOR PROJECT ASSESSMENT: Woolworths Erskine Park Data Storage Project



Director-General's
Environmental Assessment Report
Section 75I of the *Environmental Planning and Assessment Act 1979*
December 2008

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EXECUTIVE SUMMARY

Woolworths Limited proposes to establish two new data centres and associated infrastructure within the Western Sydney Employment Hub. The data centres would be located at Eastern Creek and Erskine Park and would be used to store and transfer electronic data related to all of Woolworths' Australian and international businesses, including Woolworths, Safeway, Big W and Dick Smith Electronics. The data centres would serve as back-up facilities to each other.

Woolworths is seeking concurrent approval for the two data centres; but has submitted two separate applications to the Department. This proposal relates only to the data centre at Erskine Park, which has a capital value of \$43 million, and would generate up to 200 jobs during construction and approximately 30 jobs during operation.

The proposal is classified as a major project under Part 3A under the *Environmental Planning and Assessment Act 1979* and consequently requires the Minister's approval.

During the exhibition period, the Department received three submissions on the project from public authorities (none from the general public). These public authorities generally supported the project subject to conditions of approval.

The Department has assessed the merits of the proposal in detail and is satisfied that the environmental impacts of the proposal can be either mitigated or managed to ensure an acceptable level of environmental performance.

Furthermore, the project would assist with the delivery of the State Plan and the Sydney Metropolitan Strategy as the proposed site is located within the strategy's designated employment lands. These lands are intended to be used for industry, research facilities, major warehousing and high technology. The Project is therefore consistent with the objectives of the State Plan and the Sydney Metropolitan Strategy and the Department believes the project is in the public interest and should be approved subject to strict conditions of approval.

1. PROPOSED PROJECT

1.1 Project Background

The Western Sydney Employment Hub (the Hub) spans four local government areas - Fairfield, Penrith, Blacktown and Holroyd (see Figure1). The Hub is located near the intersection of the M4 and M7 motorways, is 2,450 hectares in area and includes zoned employment/industry lands such as the State Environmental Planning Policy 59 (SEPP 59) employment lands at Eastern Creek and the Erskine Park Employment Area.

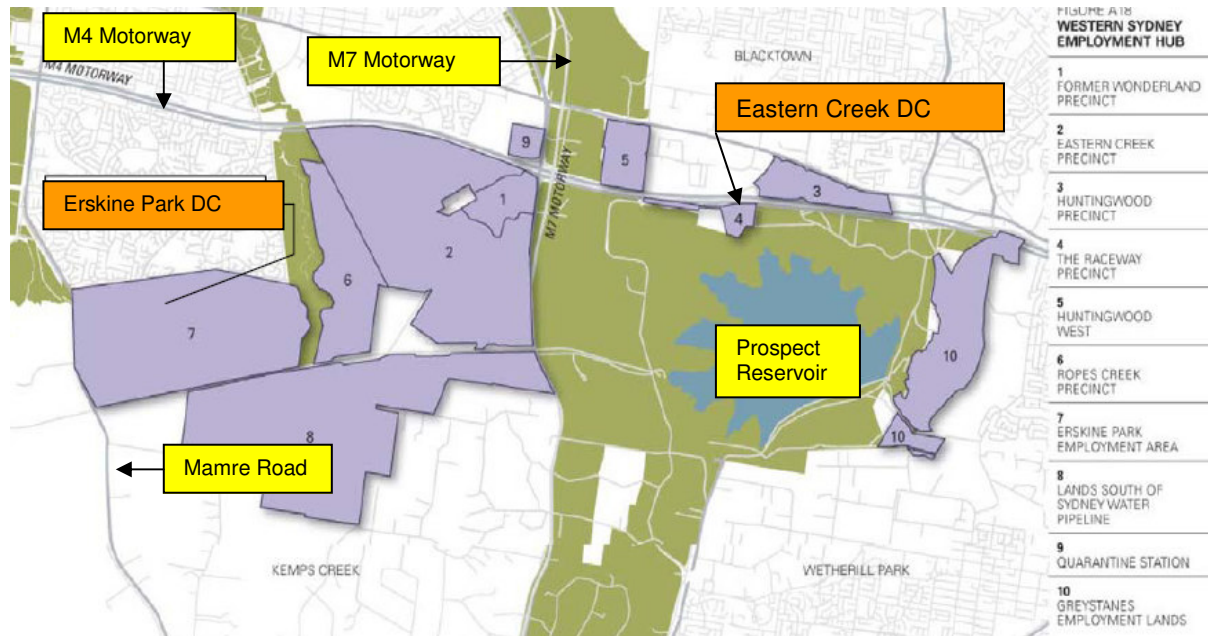


Figure 1: The Western Sydney Employment Hub

The Erskine Park Employment Area is approximately 500 ha in size and forms part of the broader Hub. A number of warehouse and manufacturing facilities have already been approved in the area including a BlueScope facility and the Interlink Industrial Estate.

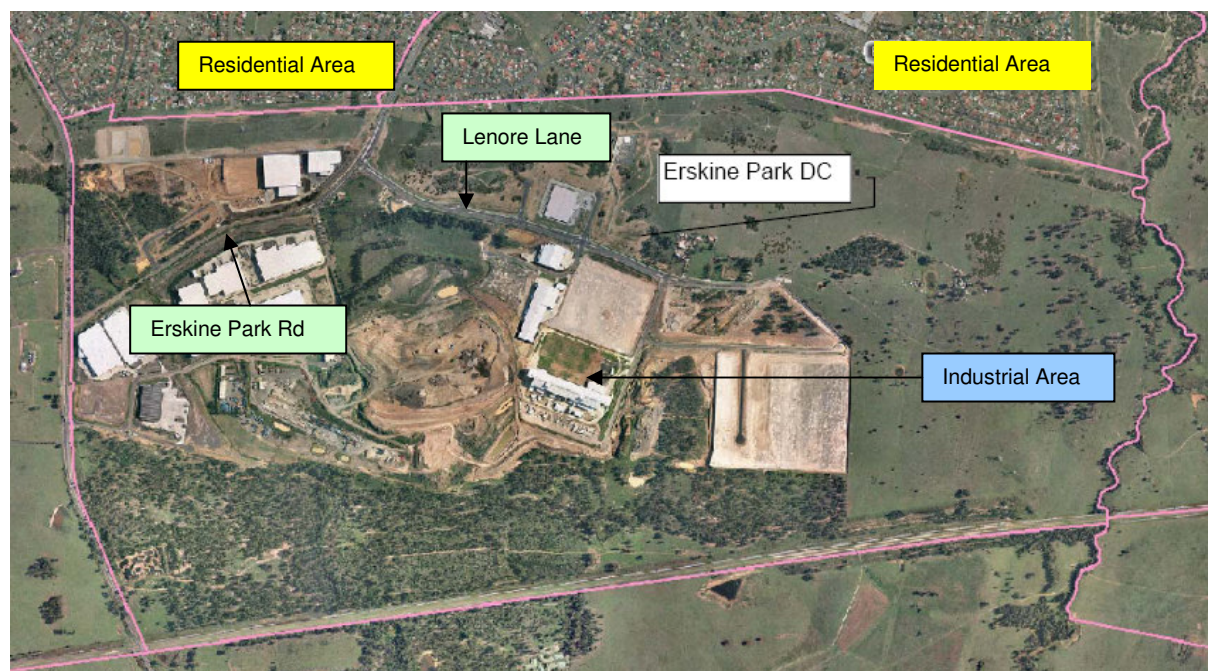


Figure 2: Proposed Project Site

Woolworths Limited is seeking concurrent approval for two separate data storage centres within the Hub; the Erskine Park Data Centre (Erskine Park DC) and the Eastern Creek Data Centre (Eastern Creek DC). Following a strategic review of their operations, Woolworths have determined that two new data centres are required to support the business' growth into the future. The two data centres would be mutually dependant, serving as back-up facilities to each other, and would house computer systems and equipment essential to all of Woolworths' operations, and information essential to national and international food distribution. As such the data centres would be deemed 'critical assets' for Woolworths.

1.2 Project Description

The proposed Erskine Park DC is located in the Erskine Park Employment Area, 12kms south-east of Penrith and located with the Penrith local government area (see Figure 2). Woolworths is seeking approval for this proposal independently from the Eastern Creek DC under part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act), and this assessment relates only to the Erskine Park DC.

The Erskine Park DC has a building area of approximately 11,750 m² and would be used as a data storage facility including uninterrupted power supply, diesel back-up power, chiller (for system cooling requirements) and office facilities.

Data would be stored in three main 'data storage halls' containing computers, servers and equipment which would store and distribute data across all Woolworths' businesses. This proposal seeks approval for the three main data storage halls constructed in stages according to demand (as depicted in Figure 4).

Due to security concerns, the proposed Data Centre buildings have been carefully designed to ensure that they have optimal security in place and reduced vulnerability to vandalism and damage. The proposed security measures include perimeter fencing, detailed landscaping, gates to control entry to the site, a closed circuit TV network, security lighting and an internal security authorisation system.

The major components of the project are summarised in Table 1 and depicted in Figure 3. The project is described in full in the Woolworths Erskine Park DC Environmental Assessment (EA), which is attached as Appendix D.

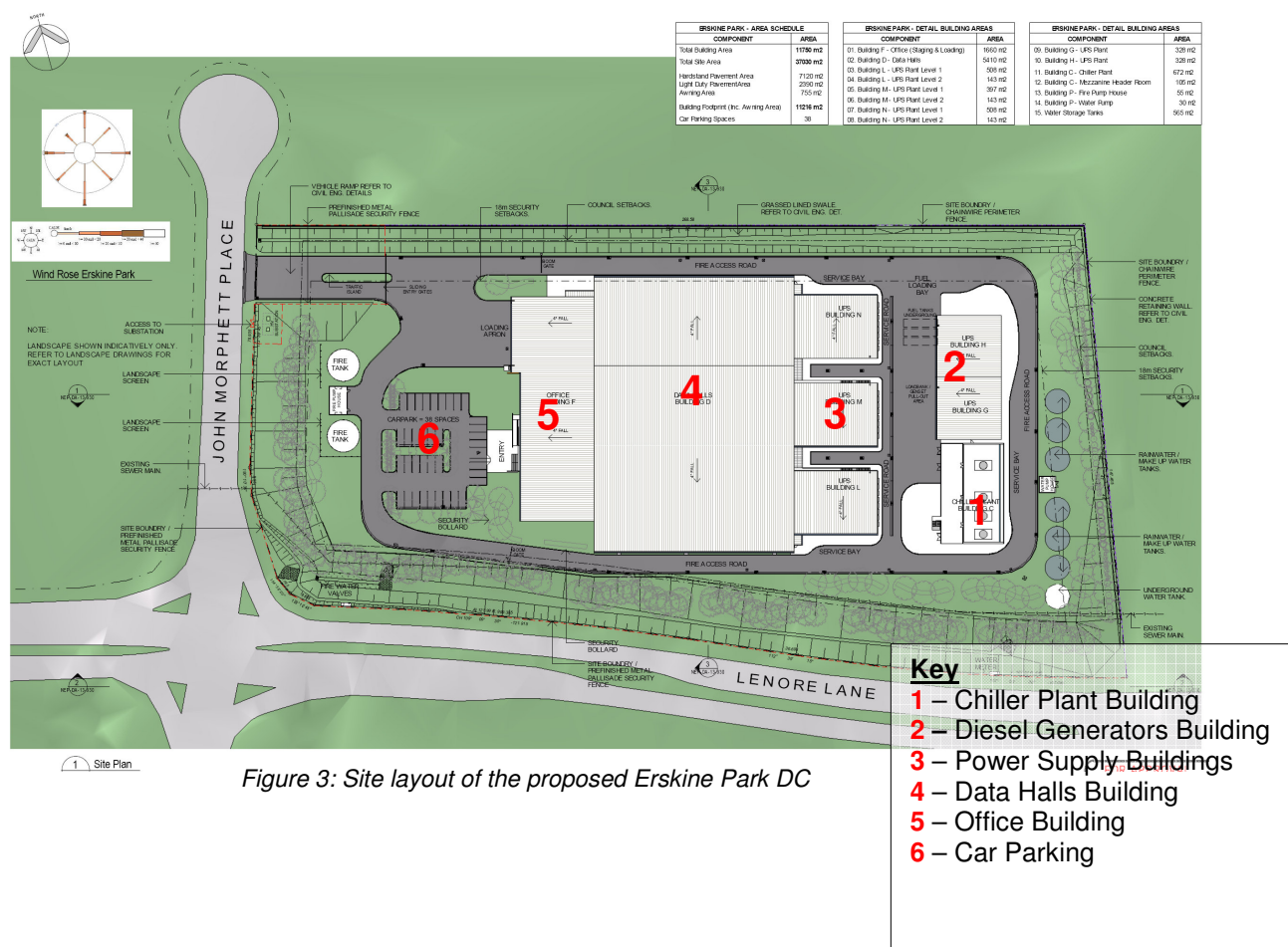


Table 1: Major components of the project

Aspect	Description
Project Summary	Construction and operation of a data centre at Erskine Park including 3 data storage halls with uninterrupted power supply and detached chiller, back-up power, storage facilities, general office and amenities. The total building footprint is 12,216 m² (including awnings).
Data Storage Facility	The key components of the data centre include: 3 data storage halls; - attached two storey uninterruptible power supply (UPS) rooms to service each data hall; and - attached ancillary office, storage areas, workshops and amenities; - a detached diesel Emergency Power Generation (EPG) Building; - a detached two storey central chiller plant building; and - ancillary plant, services and facilities. - provision of 38 car parking spaces.
Earthworks and site access	Creation of a level building pad, retaining wall construction and site access/car parking.
Staging	Stage 1 includes construction of the main data storage building shell, the EPG building shell, the chiller plant building shell and external works. Stage 1 also includes the fit-out of the first data storage hall and ancillary facilities. Stages 2 and 3, the installation of the second and third internal data halls and ancillary facilities would be undertaken according to demand (See Figure 4).
Stormwater Management	Roof rainwater harvesting tanks, an on site gross pollutant trap (GPT), bio-retention swale, detention basin and stormwater discharge via existing pipes to Lenore Land and John Morphet Place.
Traffic	Operational traffic would produce a maximum 56 vehicle movements daily, including 30-40 employee car movements per day, 10-12 maintenance vehicle movements and 2-4 delivery vehicle movements.
Employment	Peak construction workforce - 200 Estimated operational workforce – 30
Capital Value	\$43 million.
Construction	Construction of the facility is expected to take approximately 12 months.
Hours of Operation	Operations would take place 24 hours a day, 7 days a week.

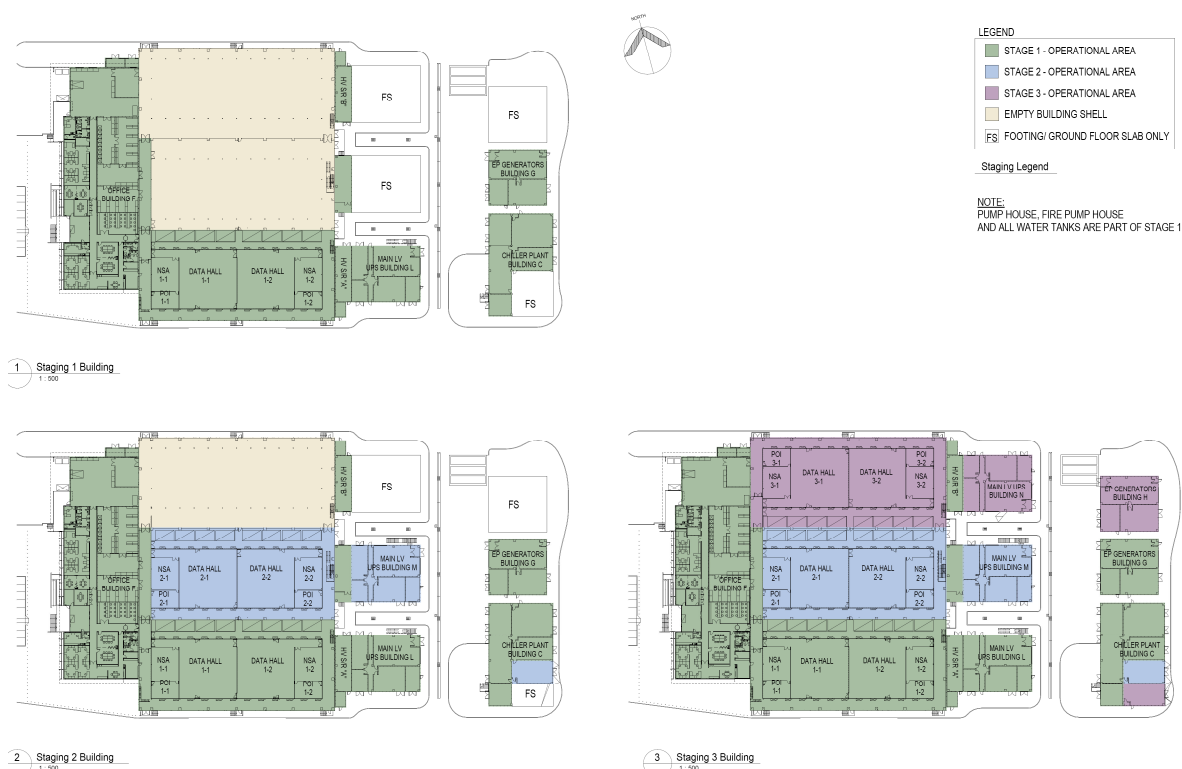


Figure 4: Staging of construction

1.3 Project Setting

The proposed development site owned by Valad Property Group Limited (Valad) is located at Lot 8 John Morphet Place, as shown in Figure 3. The site has an approximate area of 3.7 hectares and is located approximately 12km east of the Penrith CBD (see Figure 2).

The site is within the Erskine Park Employment Area, which is fairly remote from any established residential areas (the Erskine Park suburban area is around 500m north of the site). Figure 2 depicts the site's surrounding land use including:

- an industrial property about 100m to the east containing a truck repair business and 2 dwellings;
- a second residential dwelling 100m to the west of the site which is heritage listed and not inhabited;
- employment lands to the north and south of the site;
- John Morphet Place and developed employment lands to the West of the site.

The site is located within a subdivision approved by Penrith City Council in 2004 which contains 8 industrial lots. The roads and estate stormwater infrastructure works, utilities and services (including water, sewer, electricity, gas and telecoms) have been completed.

The site is for the most part cleared, but does contain approximately 1.31 hectares of the Cumberland Plain Woodland Endangered Ecological Community (EEC) and a threatened plant species (*Grevillea juniperina*). This vegetation would be cleared as part of this proposal but the impacts have been adequately offset through the *Penrith Development Control Plan (DCP)*, as discussed in Section 5.

1.4 Project Need

The proposed Erskine Park and Eastern Creek DC's are essential for the growth of the Woolworths group which operates more than 3000 stores across Australia and New Zealand and employs around 180,000 people.

The Erskine Park DC is one half of a mutually dependant pair designed to house world's best practise information technology and associated components such as telecommunications.

Woolworths have assessed several sites for suitability but elected for the two sites within the Hub as they fulfil their requirements which include reliable utility services, security and a large and highly skilled workforce within the surrounding suburban areas.

The Project would bring a greater diversity of employment opportunities within the Western Sydney Employment Hub which is currently dominated by warehouse and storage facilities.

1.5 State Plan and Sydney Metropolitan Strategy

The project is consistent with the goals and priorities of the State Plan, and in particular priorities P1 (increased business investment) and E5 (jobs closer to home).

The Project is consistent with the goals and priorities of the Sydney Metropolitan Strategy as the site will provide for new economic activity in Western Sydney and in particular, development within the designated employment lands.

2. STATUTORY CONTEXT

2.1 Major Project

The project is classified as a major project under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act) because it is development of a kind that is described in Schedule 1 of *State Environmental Planning Policy (Major Projects) 2005* – namely development for the purposes of container storage facilities, or storage or distribution centres that have a capital investment value of more than \$30 million.

Consequently, the Minister is the approval authority for the project.

2.2 Permissibility

Under Section 75J(3) of the EP&A Act, the Minister cannot approve the carrying out of a project that would be wholly prohibited under an environmental planning instrument.

The Project is permissible with consent under the *Penrith Local Environmental Plan 1994 (Erskine Park Employment Area)*, in the 4(e1) Employment Restricted Zone.

Consequently, the Minister may approve the project.

2.3 Public Exhibition

Under Section 75H(3) of the EP&A Act, the Director-General is required to make the environmental assessment of a project publicly available for at least 30 days.

After accepting the environmental assessment for the project, the Department:

- made it publicly available from Friday 17 October 2008 until Tuesday 18 November 2008:
 - on the Department's website;
 - at the Department's Information Centre;
 - at the Penrith City Council Offices; and
 - at the Nature Conservation Council Offices in Sydney.
- notified relevant State government authorities and Penrith City Council by letter;
- notified landowners in the vicinity of the site about the exhibition period by letter; and
- advertised the exhibition period in the Penrith Press.

This satisfies the requirements in Section 75H(3) of the EP&A Act.

During the assessment process the Department also made a number of documents available for download on the Department's website. These documents included the:

- project application;
- Director-General's requirements for the environmental assessment of the project; and
- the EA.

2.4 Environmental Planning Instruments

Under Section 75I of the EP&A Act, the Director-General's report is to include a copy of or reference to the provisions of any:

- *State Environmental Planning Policy* (SEPP) that substantially govern the carrying out of the project and;
- environmental planning instrument that would (but for Part 3A) substantially govern the carrying out of the project and that have been taken into consideration in the environmental assessment of the project.

The Department has assessed the proposal against the relevant provisions of several environmental planning instruments and is satisfied that none of these SEPPs substantially govern the carrying out of this project (see Appendix E).

2.5 Objects of the Environmental Planning and Assessment Act, 1979

The Minister's consideration and determination of the application must be consistent with the relevant provisions of the EP&A Act, including the objects set out in the Act's section 5. The objects of most relevance to the Minister's decision on whether or not to approve the proposed project are found in section 5(a)(i), (ii), (iv), (vi) and (vii). They are:

'The objects of this Act are:

(a) to encourage:

- (i) the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment,*

- (ii) *the promotion and co-ordination of the orderly and economic use and development of land,*
- (iv) *the provision of land for public purposes,*
- (vi) *the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats, and*
- (vii) *ecologically sustainable development”.*

The Department has fully considered the objects of the EP&A Act, including the encouragement of ESD, in its assessment of the application.

The assessment integrates all significant economic and environmental considerations and seeks to avoid any potential serious or irreversible damage to the environment.

Woolworths have also considered a number of alternatives to the proposed project (including the alternative of not proceeding), and considered the project in the light of the principles of ESD.

2.6 Statement of Compliance

Under Section 75I of the EP&A Act, the Director-General's report is required to include a statement relating to compliance with the environmental assessment requirements for the project.

The Department is satisfied that the environmental assessment requirements have been complied with.

3. ISSUES RAISED IN SUBMISSIONS

During the exhibition period, the Department received 3 submissions on the proposal (see Appendix C), from public authorities (Sydney Water, Penrith City Council and Roads and Traffic Authority). No submissions from members of the public have been received on the proposal.

Penrith City Council (Council) raised a concern about the lack of appropriate landscaped screening of the security fencing adjacent to the road. This has been discussed further in Section 4 below.

The RTA and Sydney Water provided conditions of approval for the project.

The Department has considered the general recommendations of the various agencies, and where necessary, incorporated them into the recommended conditions of approval.

4. ASSESSMENT

4.1 Compliance with development controls

The project has been assessed against the requirements of the *Penrith Development Control Plan 2006*, and is consistent with the relevant development controls except for the requirements for car parking (discussed in Table 2 under 'Transport') and security fencing.

Woolworths have proposed to provide 2.1m high black, chain wire and barbed wire fence on the property boundary including adjacent to Lenore Lane. Lenore Lane will ultimately become a major link between the Erskine Park Employment Area and the M4 Motorway.

Council raised concerns that the proposed fence, in its location right on the property boundary, would detract from the visual amenity of the area. The Penrith DCP requires that fencing is located behind a landscaped setback area. Council have also requested that the fire tanks are screened with timber screens and mature landscaping (rather than timber screens only).

Woolworths met with Council to discuss their concerns and have agreed to provide a black palisade fence adjacent to Lenore Drive and John Morphet Place which would improve the overall appearance

of the fence. Woolworths however, would prefer not to move the fence behind the setback area as required by Council because the distance from the fence to the buildings is designed to delay potential intruders and allow the onsite security guards time to respond to a breach of the perimeter. Given that the proposed data centre would support their businesses internationally, Woolworths consider that security is paramount to the operation of the facility and that moving the fence would undermine the proposed security measures for the data centre.

In response to Council's concerns about the visual impacts of the proposed fencing and landscaping, Woolworths have provided the Department with a 'photomontage' of the site with landscaping at 3 years maturity, as viewed from the intersection of Lenore Lane with John Morphett Place (see Figure 5).



Figure 5: The proposed data centre with landscaping at three years maturity.

The Department considers that the proposed data centre, with maturing landscaping, will present a high quality architectural and landscape design. Figure 5 illustrates that the majority of the building would be screened by large eucalypt trees (and smaller shrubs) on the perimeter which are endemic to the Cumberland Plain Woodland EEC. Furthermore, the Department understands that the entire site (including the landscaping) has been designed to ensure maximum security for the site which is essential to manage any threat to Woolworths' data.

The Department considers that the proposed fencing and landscaping is acceptable and would not degrade the amenity of the locality. Furthermore, the Department understands the important role of the facility for Woolworths' businesses and the significance of the security measures for the site, and thus supports Woolworths in this instance.

4.2 Summary of Other Impacts

The Department has assessed the project, in accordance with the requirements of Clause 8B of the *Environmental Planning and Assessment Regulation 2000*, and considers that all other potential impacts of the project can be suitably managed to ensure an acceptable level of environmental performance (see Table 2).

Table 2: Other Impacts

Aspect	Comment	Recommended Conditions
Noise	- Construction is expected to last 12 months, with testing and commissioning expected to take a further six months. Noise levels have been predicted assuming the worse case earthworks phase, and are predicted to meet the relevant construction noise criteria. - The two largest contributors to operational noise are the cooling towers and, during operation, the stand-by diesel generators. - Under worse case conditions, the project would exceed the noise criteria at the Erskine Park residential areas and the dwelling to the east. - The proponent has recommended mitigation	The Proponent must comply with the specified construction and operational noise limits.

Aspect	Comment	Recommended Conditions
	measures which include acoustic mufflers and silencers, which would reduce noise to ensure compliance with the noise criteria. The Department is satisfied that any potential noise impacts can be managed and/or mitigated.	
Erosion and Sediment Control	- The Project will involve earthworks across the site to create a level building pad for the construction of the data centre; including the importation of 50,000m³ virgin excavated natural material and small amount of inert waste. An Erosion and Sediment Control Plan has been developed in accordance with appropriate guidelines to manage erosion and sedimentation risk. - The Department considers that the proposed erosion and sedimentation controls are appropriate and that any potential impacts would be minimal.	- The Proponent must not pollute nearby waters. - The proponent shall undertake the project in accordance with the Erosion and Sediment Control Plans.
Groundwater and Salinity	- Groundwater was found to be very saline at a depth of 2.3m below surface, which is typical of the region. - The Salinity Assessment and Management Plan outlines measures which would ensure that salinity is effectively managed, such as minimising soil cuts below 2m, minimising irrigation which would raise the groundwater table and ongoing monitoring of the groundwater.	To ensure that there are no impacts on groundwater and salinity, the proponent shall undertake the Project in accordance with the Salinity Assessment Management Plan and prepare a comprehensive Groundwater Monitoring Program, to the satisfaction of the Director-General.
Stormwater Management	- Site concept stormwater management plans have been prepared which include roof rainwater harvesting, and on-site treatment such as a gross pollutant trap (GPT), a detention basin, grassed swales and bioretention trench. Stormwater would ultimately flow to South Creek through established piped stormwater infrastructure in John Morphett Place and Lenore Lane. - A Water Management Plan has been developed for the site which includes water conservation and recycling measures designed to reduce demand for potable water. - The plan includes details for the rainwater harvesting system which would have capacity to store 450,000 litres of water in total. - All harvested water is expected to be used by the large cooling towers. - The Department considers that the proposed stormwater management system is appropriate, however, Woolworths should be required to consult with Council during detailed design of the system to ensure that Council's standards and policies are met.	- The Project shall be undertaken in accordance with the concept Stormwater Management Plan, and further detailed design shall be undertaken in consultation with Council, to the satisfaction of the Director-General. - The project shall be undertaken in accordance with the Water Management Plan as described in the EA.
Flora and Fauna	- The site is predominantly ex-pasture land, but does contain approximately 1.31 hectares of Cumberland Plain Woodland, an endangered ecological community (EEC). All of the vegetation would be removed to establish the building pad. - The removal of the EEC has already been accounted for and offset through the <i>Penrith Development Control Plan 2006 (Erskine Park Employment Area)</i> which provides for designated biodiversity areas and corridors within the EPEA. DECC and Council are	The Proponent shall develop a <i>Grevillia juniperina</i> management plan, prior to construction, to salvage, propagate and plant cuttings, to the satisfaction of Greening Australia (who is managing the EPEA biodiversity areas) and the Director-General.

Aspect	Comment	Recommended Conditions
	satisfied that the removal of vegetation has been adequately offset. - Up to 180 <i>Grevillia juniperina</i> plants, (listed as vulnerable under the <i>Threatened Species Conservation Act 1995</i>) are present on the site. Woolworths is committed to propagating cuttings from the site to be used in landscaping on site and also within the biodiversity corridors of the EPEA. - The Department considers that flora and fauna impacts of the project have been appropriately offset and that the measures proposed by Woolworths would ensure that the biodiversity within the EPEA is protected and enhanced.	
Transport	- The Proposed car parking spaces (38) exceed the RTA guidelines but are less than Council requirements. Council however, did not raise any issues with the car parking and considering that there would be up to 30 employees on site at any time when the centre is operational (15 on-site staff plus another 15-20 closely affiliated staff) the Department considers that car parking is adequate. - The overall traffic impacts of the Erskine Park Employment Area have been assessed and the new road network has been designed to cater for the development within the employment areas. The project would generate up to 24 small vehicles during the morning and afternoon peak hours which is considered to be low as a similar sized warehouse or factory is expected to generate up to 70 vehicles during the peak periods. - The Department therefore considers that traffic impacts are minimal.	During the project, the Proponent shall ensure that the project does not result in any vehicles queuing on the public road network.
Greenhouse Gas (GHG)	- The GHG emissions for the site would be approximately 160,000 tonnes of CO₂ annually; mainly due to electricity consumption and particularly for cooling requirements. - Woolworths have adopted a Power Usage Effectiveness (PUE) target of 1.8 for the site (comparable to a best practice PUE of 1.75 for Australian climate conditions), which can be obtained mainly through the use of a range of measures designed to reduce the energy requirements of the cooling system. - The Department considers that Woolworths should be required to investigate further measures to reduce energy consumption to obtain a PUE of 1.75, once fully operational.	The Proponent shall prepare and implement an Energy Efficiency Program for the Project to ensure that the Project would operate at industry best practice over time.
Waste	- The project would not generate a significant amount of waste during construction or operations. Waste generation would be avoided through construction planning and operational wastes would be disposed of or recycled according to the Waste Management Plan for the site. - The Department considers that waste impacts are minimal.	- The Proponent shall ensure that operational waste is managed according to the Waste Management Plan for the Woolworths Data Centre. - All waste generated on the site during the project should be classified in accordance with the DECC's Environmental Guidelines and disposed of to a facility that may lawfully accept the waste.
Hazards	Diesel for back-up power supply would be stored on site in three 50,000L underground storage tanks.	The Proponent shall store diesel fuel in accordance with the appropriate Australian Standards

Aspect	Comment	Recommended Conditions
		and Dangerous Goods Code.
Air quality	- Minor emissions are expected due to vehicle and diesel generator use; dust could be created from construction activities. - Woolworths have committed to development of a sustainable transport plan for the site which would include car pooling initiatives and encouraging use of public transport and bicycle use.	- The Proponent should minimise dust generated by the project. - The Proponent shall develop and implement a Work Place Travel Plan.

5. RECOMMENDED CONDITIONS OF APPROVAL

The Department has prepared recommended conditions of approval for the project which are summarised in Appendix A and included in Appendix B.

These conditions are required to:

- prevent, minimise, and/or offset adverse impacts of the project;
- set standards and performance measures for acceptable environmental performance;
- ensure regular monitoring and reporting; and
- provide for the ongoing environmental management of the project.

Woolworths Limited does not object to the imposition of the recommended conditions.

6. CONCLUSION

The Department has assessed the merits of the project having regard to the objects of the EP&A Act, and the principles of ecologically sustainable development, and where necessary conditions of approval were recommended to address any residual concerns. With the implementation of the recommended conditions of approval, the Department is satisfied that the impacts of the project can be mitigated and/or managed to ensure an acceptable level of environmental performance.

The Department recognises the importance of the Data Centre Projects to Woolworths' businesses as they would house computer systems and information essential to national and international operations. Importantly, the Department also notes that the project would assist with the delivery of the *State Plan* and the *Sydney Metropolitan Strategy*, as the site is located within the strategy's designated employment lands and would employ 200 workers during construction and up to 30 workers during operation. The Project would also support and contribute to growth and diversity within the Hub's significant warehousing industries.

Consequently, the Department believes that the project is in the public interest, and should be approved subject to conditions.

7. RECOMMENDATION

It is RECOMMENDED that the Minister:

- **consider** the findings and recommendations of this report;
- **approve** the project subject to conditions; and
- **sign** the instrument of approval (see Appendix B).

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Chris Ritchie
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Major Project Assessment

Sam Haddad
Director-General

APPENDIX A – SUMMARY OF CONDITIONS OF APPROVAL

Aspect	Condition	Requirement
Schedule 2: Specific Environmental Conditions		
Noise	10-11	Provides working hours for construction and noise limits for operation.
Soil and Water	12-14	Requires compliance with Section 120 of the <i>Protection of the Environment Operations Act 1997</i> and implementation of the soil and water management plans that have been submitted with the EA.
Flora and Fauna	18	Requires the implementation of a <i>Grevillea juniperina</i> Management Plan.
Transport	19-22	Requires the provision of bicycle racks and a Work Place Travel Plan. Prohibits vehicles queuing on public roads.
Energy efficiency	26	Requires the implementation of an energy efficiency program for the Project.
Waste	19	Requires implementation of the Waste Management Plan submitted with the EA.
Site Security	21	Requires an installation of a chain wire fence between the site boundary and Prospect Reservoir.
Schedule 2: Environmental Reporting		
Incident Reporting	32-33	Provides incident reporting requirements.

APPENDIX B – CONDITIONS OF APPROVAL

APPENDIX C – SUBMISSIONS

APPENDIX D – ENVIRONMENTAL ASSESSMENT

APPENDIX E – CONSIDERATION of ENVIRONMENTAL PLANNING INSTRUMENTS

1 **SEPP (Infrastructure) 2007**

SEPP (Infrastructure) 2007 aims to ensure the RTA is made aware of and allowed to comment on projects for developments listed in Schedule 3 of the SEPP. Schedule 3 identifies development including industry with a site area of more than 20,000m², or any purpose with a capacity of 200 or more motor vehicles. The project therefore triggers the Infrastructure SEPP. The project was referred to the RTA for comment in accordance with the Infrastructure SEPP.

2 **SEPP No.33 – Hazardous and Offensive Development**

The Department is satisfied that the project does not represent a 'potentially offensive industry' or a potentially hazardous industry' as defined under clause 3 of SEPP 33. The proposed facilities are not expected to involve the storage, distribution or use of significant quantities of dangerous goods or hazardous substances.

3 **SEPP No.64 – Advertising and Signage**

The Department has recommended conditions to ensure detailed signage plans are prepared in consultation with Penrith City Council and to the satisfaction of the Director-General. The Department is satisfied the building and identification signage will be consistent with the aims and objectives of SEPP 64.

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

Draft SEPP 66 "aims 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 Department is satisfied the proposal is not contrary to the above objectives and considers the project would help achieve objective a) by providing employment lands within the Western Sydney Employment Hub and objective e) through the sites proximity to the Orbital Motorway Network.

5 **Draft SEPP (Western Sydney Employment Hub) 2008**

The proposal is consistent with the aims of the Draft SEPP (WSEH) as it will assist in meeting the objectives of the Sydney Metropolitan Strategy, provide for new economic activity in Western Sydney and provide for efficient land use in the employment lands. Despite this the SEPP does not apply to the proposal as it has not yet commenced.

6 **Sydney Regional Environmental Plan No 20 – Hawkesbury-Nepean River**

The site is located in the South Creek catchment identified under the SREP. The Department is satisfied the proposal does not conflict with the aims of the plan as the Stormwater Management will ensure that post-development flows do not exceed pre-development flows and water polishing will ensure any water discharged meets stormwater quality guidelines.

7 **Penrith Local Environmental Plan 1994 (Erskine Park Employment Area)**

Penrith Local Environmental Plan provides development controls for development in the Erskine Park Employment Area. The proposed facility is located in land zoned 4(e) (Employment Zone). The objectives of the zone are to provide opportunities for a diverse range of employment generating activities. The Department is satisfied that the proposed facility is consistent with the objectives of the zone.