

# **Visual Impact Management Plan**

## **Badgerys Creek Quarry**

**Prepared for:**

**Goodman Property Services (Australia) Pty Ltd**

The Hayesbery  
1-11 Hayes Road  
Rosebery NSW 2018

Version No: V1.0

20 January 2026

## DOCUMENT VERIFICATION

**Project Title:** Badgerys Creek Quarry Visual Impact Management Plan

**Project Number:** GDM01-003 - V1.0

**Project File Name:** GDM01-003 Visual Impact Management Plan

| Version | Comment                                                                              | Date       | Prepared                          | Approved                       |
|---------|--------------------------------------------------------------------------------------|------------|-----------------------------------|--------------------------------|
| V.01    | 2022 VIMP<br>Previous approved VIMP<br>Amended following DPHI<br>Review and Comments | 22/09/2022 | Ben<br>Gluszkowski<br>(Geoscapes) | Ben Gluszkowski<br>(Geoscapes) |
| V0.2    | 2025 Update                                                                          | 20/11/2025 | T Krause<br>(IEMA)                | C. Jones (IEMA)                |
| V1.0    | Updated to reflect DPHI<br>feedback on figures                                       | 20/01/2026 | L. Sharp<br>(IEMA)                | C Jones (IEMA)                 |

**Goodman Property Services (Australia) Pty LTD**

ABN 69 000 123 071

GPO Box 4703 Sydney NSW 2001

E: info-au@goodman.com

T: 02 9230 7400 | W: au.goodman.com



## CONTENTS

|                                                               |           |
|---------------------------------------------------------------|-----------|
| <b>Document verification .....</b>                            | <b>i</b>  |
| <b>GLOSSARY AND ABBREVIATIONS .....</b>                       | <b>iv</b> |
| <b>Acronyms.....</b>                                          | <b>v</b>  |
| <b>1. Introduction .....</b>                                  | <b>6</b>  |
| 1.1. Context.....                                             | 6         |
| 1.2. Background.....                                          | 7         |
| 1.3. Purpose and Scope .....                                  | 7         |
| 1.4. Key Approval / Area Definitions .....                    | 8         |
| 1.5. Updates in 2025 VIMP.....                                | 9         |
| <b>2. Statutory Requirements .....</b>                        | <b>12</b> |
| 2.1. Project Approval Conditions (MP10_0014) .....            | 12        |
| 2.2. Environment Protection Licence (EPL) 648 Conditions..... | 14        |
| 2.3. Other Relevant Legislation .....                         | 14        |
| <b>3. Consultation .....</b>                                  | <b>15</b> |
| 3.1. Pre-2025 Consultation .....                              | 15        |
| 3.2. 2025 Consultation .....                                  | 16        |
| <b>4. Baseline Environment .....</b>                          | <b>17</b> |
| <b>5. Visual Impact Assessment.....</b>                       | <b>18</b> |
| 5.1. Previous Visual Impact Assessments.....                  | 18        |
| 5.2. 2025 Visual Impact Assessment.....                       | 18        |
| 5.3. Methodology .....                                        | 18        |
| 5.3.1. Visual Receptor Sensitivity .....                      | 18        |
| 5.3.2. Magnitude of Change .....                              | 19        |
| 5.3.3. Visual Impact Significance.....                        | 20        |
| 5.4. Visual Impact Significance at Sensitive Receptors.....   | 20        |
| <b>6. Visual Mitigation Measures .....</b>                    | <b>26</b> |
| 6.1. Strategic Framework for Environmental Management .....   | 26        |
| 6.2. Visual Mitigation Measures.....                          | 26        |
| 6.3. Lighting .....                                           | 26        |
| <b>7. Landscape Management strategy .....</b>                 | <b>27</b> |
| 7.1. Landscaping Management Measures.....                     | 27        |
| 7.2. Earth Mound Planting .....                               | 27        |
| <b>8. Complaints Handling Procedure .....</b>                 | <b>29</b> |
| 8.1. Procedure .....                                          | 29        |
| <b>9. Reporting and Review .....</b>                          | <b>30</b> |
| 9.1. Regular Reporting.....                                   | 30        |
| 9.1.1. Information Required on the Website .....              | 30        |

|            |                                                        |           |
|------------|--------------------------------------------------------|-----------|
| 9.2.       | <i>Annual Review</i> .....                             | 30        |
| 9.3.       | <i>Incident Notification and Reporting</i> .....       | 31        |
| 9.4.       | <i>Non-Compliance Notification and Reporting</i> ..... | 31        |
| 9.5.       | <i>Independent Environmental Audits</i> .....          | 32        |
| 9.6.       | <i>Plan and Program Revision</i> .....                 | 32        |
| <b>10.</b> | <b>Training and Resource Requirements</b> .....        | <b>33</b> |
| <b>11.</b> | <b>Roles and Responsibilities</b> .....                | <b>34</b> |
| <b>12.</b> | <b>References</b> .....                                | <b>35</b> |

## TABLES

|                                                                  |    |
|------------------------------------------------------------------|----|
| Table 1: VIMP Structure .....                                    | 7  |
| Table 2: Key Approval / Area Definitions .....                   | 8  |
| Table 3: MP10_0014 Conditions Relevant to the VIMP .....         | 12 |
| Table 4: Pre 2025 Consultation .....                             | 15 |
| Table 5: Visual Receptor Sensitivity .....                       | 19 |
| Table 6: Magnitude of Change Criteria .....                      | 20 |
| Table 7: Visual Impact Significance .....                        | 20 |
| Table 8: Visual Impact Significance at Sensitive Receptors ..... | 22 |
| Table 9: Weed Maintenance Schedule .....                         | 27 |
| Table 10: Roles and Responsibilities .....                       | 34 |

## FIGURES

|                                             |    |
|---------------------------------------------|----|
| Figure 1: Site Location (IEMA, 2025) .....  | 10 |
| Figure 2: Site Layout (Mod 6 Consent) ..... | 11 |
| Figure 3: Viewpoint Locations .....         | 21 |

## GLOSSARY AND ABBREVIATIONS

The following are commonly used terms and definitions used throughout this document.

| Term                        | Definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Department                  | NSW Department of Planning, Housing and Infrastructure                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Development                 | The development described in the documents listed in condition 3 of Schedule 2 and includes Quarrying Operations, Brickmaking Activities and rehabilitation activities                                                                                                                                                                                                                                                                                                                                       |
| EA                          | Environmental Assessment titled Boral Badgerys Creek Continued Operation of Quarry and Brick Making Facility (Volumes 1 – 3), prepared by AECOM and dated November 2010, and associated Response to Submissions titled Boral Badgerys Creek Continued Operation of Quarry and Brick Making Facility – Submissions Report, prepared by AECOM and dated June 2011                                                                                                                                              |
| EA (Mod 1)                  | Environmental Assessment titled Boral Badgerys Creek Quarry and Brick Making Project, Application Number: 10_0014, prepared by Boral Property Group and dated 5 November 2012                                                                                                                                                                                                                                                                                                                                |
| EA (Mod 2)                  | Environmental Assessment titled Badgerys Creek Brick Making Facility Modification 2 Environmental Assessment prepared by Element Environment and dated November 2017, the associated the Response to Submissions prepared by Element Environment and dated February 2018, and additional information provided by Element Environment dated 8 March 2018                                                                                                                                                      |
| EA (Mod 3 and 4)            | Environmental Assessment titled CSR Advanced manufacturing hub – Modification 3 Environmental Assessment prepared by Element Environment and dated March 2019, Environmental Assessment titled CSR Advanced manufacturing hub – Modification 4 Environmental Assessment prepared by Element Environment and dated March 2019, the associated Response to Submissions Reports prepared by Element Environment and dated October 2019, and additional information provided by CSR Limited and dated 5 May 2020 |
| ENM                         | Excavated Natural Material                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Magnitude of Change         | The magnitude of the change to a landscape receptor or visual receptor                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Modification 3 and 4        | The modifications to the development, as described in EA (Mod 3 and 4)                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Modification Report (Mod 5) | The Modification Report titled Badgerys Creek Quarry and Brick Making Project   Modification 5 prepared by Element Environment dated October 2021 and further response prepared by CSR Building Products Limited dated December 2021                                                                                                                                                                                                                                                                         |
| Modification Report 6       | Modification Report titled “Badgerys Creek Quarry and Brick Making Project Modification 6”, dated 3 September 2024. Prepared by Element Environment and letter dated 7 November 2024                                                                                                                                                                                                                                                                                                                         |
| Quarrying operations        | The extraction, processing, stockpiling and transportation of extractive materials carried out on the site and the associated removal and/or emplacement of vegetation, topsoil and overburden                                                                                                                                                                                                                                                                                                               |
| Quarry products             | Includes all saleable quarry products, including raw materials, but excludes bricks, tailings, other wastes and rehabilitation material for use on the site                                                                                                                                                                                                                                                                                                                                                  |
| Quarry water                | Water that accumulates within active quarrying areas, overburden emplacement areas and infrastructure areas, synonymous with dirty water                                                                                                                                                                                                                                                                                                                                                                     |
| Secretary                   | Planning Secretary under the EP&A Act, or nominee                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

| Term                       | Definition                                                                                                                      |
|----------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| TfNSW                      | Transport for New South Wales                                                                                                   |
| VENM                       | Virgin Excavated Natural Material, as defined in clause 50 of Schedule 1 of the POEO Act                                        |
| Visual Impact Significance | How significant an impact is for a landscape or visual receptor                                                                 |
| Visual receptor            | A group or user experiencing views of the development from a particular location.                                               |
| Visual Sensitivity         | The degree to which a particular view can accommodate change arising from a particular development without detrimental effects. |
| WSA                        | Western Sydney Airport                                                                                                          |

## ACRONYMS

|          |                                                                                |
|----------|--------------------------------------------------------------------------------|
| AHD      | Australian Height Datum                                                        |
| EP&A Act | Environmental Planning & Assessment Act 1979                                   |
| DPHI     | Department of Planning, Housing and Infrastructure                             |
| CoC      | Conditions of Consent                                                          |
| EPL      | Environment Protection Licence                                                 |
| GLVIA    | Guidelines for Landscape and Visual Impact Assessment (UK Landscape Institute) |
| ha       | Hectares                                                                       |
| km       | Kilometre                                                                      |
| LGA      | Local Government Area                                                          |
| M        | metre                                                                          |
| SoC      | Statement of Commitments                                                       |
| VIA      | Visual Impact Assessment                                                       |
| VIMP     | Visual Impact Management Plan                                                  |

# 1. INTRODUCTION

## 1.1. Context

This Visual Impact Management Plan (**VIMP**) forms part of the Environmental Management Strategy (**EMS**) for the Goodman Property Services (Australia) Pty Ltd (**Goodman**) site at 225 – 245 Martin Road, Bradfield, New South Wales (**NSW**) (**the Site**). The site was formerly owned and operated by CSR Limited (**CSR**) however was acquired by Goodman on 19 December 2025.

This plan has been prepared by IEMA on behalf of Goodman following The Department of Planning, Housing and Infrastructure's (**DPHI**) determination of Project Approval (**MP10\_0014**) on 27 September 2011 and more recently Modification 6 on 19 December 2024.

A brief description of each modification is shown below:

- Modification 1: Mothballed the site and allowed minor maintenance requirement.
- Modification 2: Exportation of raw material and building products storage (this modification has not been enacted).
- Modification 3: Construction of a new brick manufacturing plant incorporating new equipment and a new pit (Pit No. 3).
- Modification 4: Rehabilitation of the site including dewatering of old pits and import of virgin excavated natural material (**VENM**) to fill the pits.
- Modification 5: Importation of excavated natural material (**ENM**).
- Modification 6: Importation and placement of tunnel spoil.

The current Project Approval allowed a series of phases (Phases 1 – 4) that included extraction, brick making and importing of material. **Section 1.4** outlines the key definitions of the different boundaries of the site.

Under the current Project Approval, Goodman proposes to undertake the following activities:

- There will be no brick making. The brick manufacturing building has been demolished.
- Importing of fill material will continue as per the Fill Management Plan.
- Onsite overburden will continue to be screened and sized.
- Pit 1 and 2 have recently been dewatered. Filling activities will continue in this pit, with this allowed under the current approval. Filling will occur via the onsite overburden or imported fill. There are small sediment dams within these pits which will change location as the pit is filled with engineered backfill.
- The former Pit 3 has been dewatered and filled with site materials. It should be noted that the footprint of the Pit 3 that was nominated within Figure 1 of MP10\_0014 has not been reached. Therefore, works will occur under this current Project Approval within the Quarry Operational Footprint - Pits and Stockpiles boundary. Works around the Pit 3 area will include stripping and landform set up.
- Water management of the existing quarry is being reviewed and there will be small changes to ensure the site continues to operate as per approvals.
- On-site sediment dams (within Quarry Operational Footprint - Pits and Stockpiles boundary) and other farm dams form part of the quarry's water management system and may be used for dust suppression.

Goodman have brought the site to create a fully engineered, stable landform suitable for future industrial and logistics development. Additional approvals would be required undertake these proposed activities.

This management plan covers only approved operations. If there was a change in the approval for the site, this management plan would be updated.

This VIMP has been prepared to address the requirements of:

- The Conditions of Consent (**CoC**) MP10\_0014; and
- The Statement of Commitments (**SoC**).

## 1.2. Background

The Badgerys Creek Site (the Site) is located at 225 - 245 Martin Road, Bradfield, 41 kilometres (kms) southwest of Sydney, within the Liverpool City Council Local Government Area (**LGA**). Primary access to the Site is provided through Martin Road at the north-eastern corner. This vehicle access currently terminates at the northern Site boundary, although the road reservation continues through the Site.

The Site was formerly owned and operated by CSR however was acquired by Goodman in 2025. The Site comprises of a previous mothballed brick manufacturing building which has now been demolished and exhausted quarry pits which have been filled with water over time. The former Pit 3 has been dewatered and filled with site materials. Pit 2 has also completed dewatering, and works are being undertaken for filling to commence.

The Site, as shown in **Figure 1**, is a consolidation of 5 lots which occupies an area of approximately 200 hectare (ha) located to the south of Elizabeth Drive. The Site is bound to the east by South Creek and to the west by Badgerys Creek. To the south the site adjoins Inghams Property Group site called Inghams & Co. Other commercial and rural residential properties are to the north. The old brickmaking facility was located towards the centre of the Site (the building has now been demolished with the concrete hardstand remaining in place) surrounded by excavated pits and stockpiles.

This management plan covers only approved operations. If there was a change in the approval for the site, this management plan would be updated.

## 1.3. Purpose and Scope

To achieve regulatory compliance, this VIMP identifies the relevant regulatory requirements and outlines strategies to manage visual impacts associated with the project and surrounding community.

This document has been restricted to 2025 to ensure consistency with other management plans for the Site. The structure of the VIMP is shown in **Table 1**.

**Table 1: VIMP Structure**

| Section | Description                                    |
|---------|------------------------------------------------|
| 1       | Introduction and background                    |
| 2       | Statutory requirements relating visual impacts |
| 3       | Consultation relevant to this management plan  |
| 4       | Background and baseline environment            |
| 5       | Visual Impact Assessment                       |
| 6       | Visual mitigation measures                     |

| Section | Description                        |
|---------|------------------------------------|
| 7       | Landscape Management Strategy      |
| 8       | Complaints handling procedure      |
| 9       | Reporting and review               |
| 10      | Training and resource requirements |
| 11      | Roles and responsibilities         |
| 12      | References                         |

## 1.4. Key Approval / Area Definitions

**Table 2** summarises the key areas within the site.

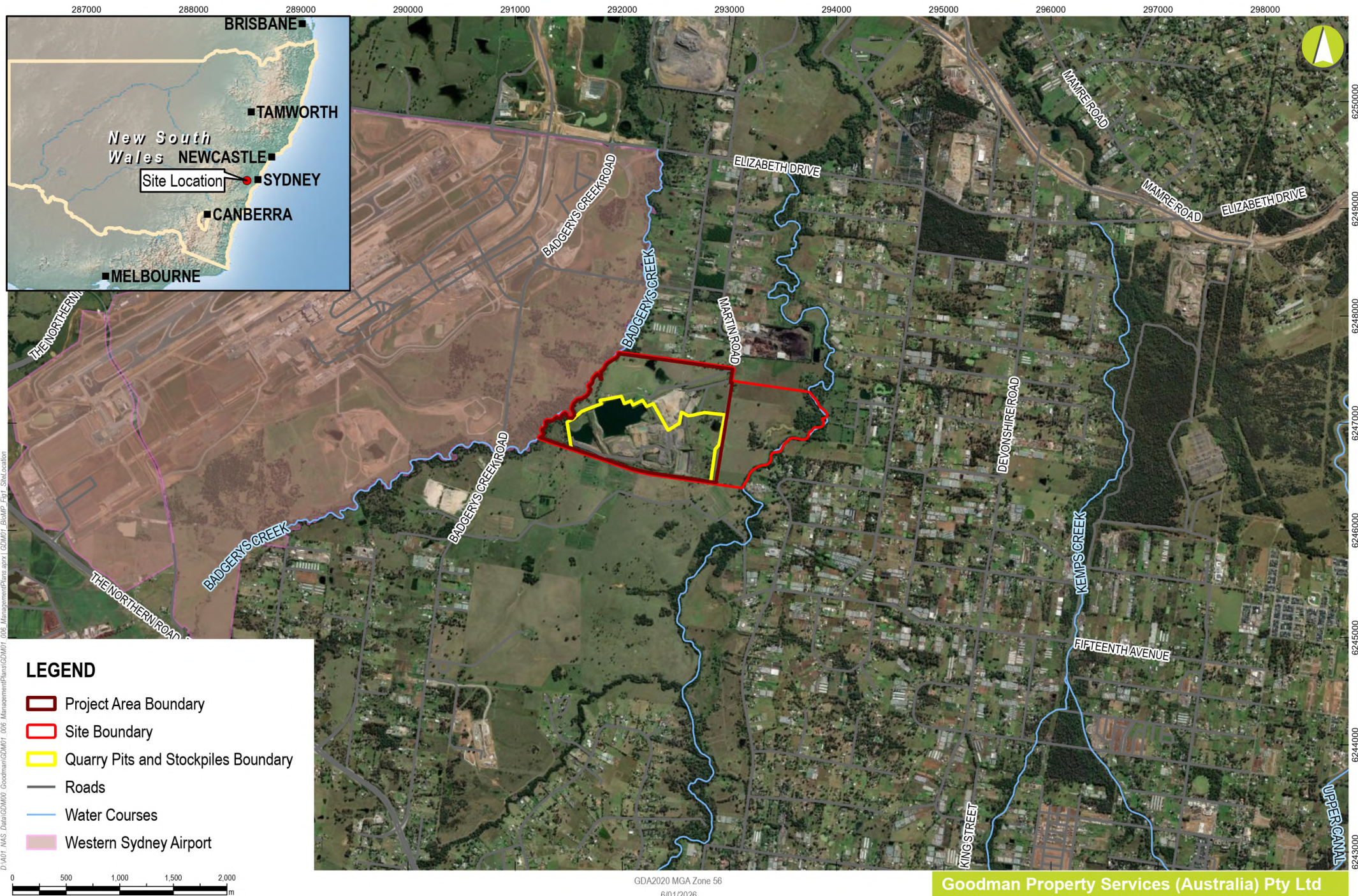
**Table 2: Key Approval / Area Definitions**

| Term                                | Definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Quarry Pits and Stockpiles Boundary | <ul style="list-style-type: none"> <li>Shown in <b>Figure 1</b> and <b>Figure 2</b>.</li> <li>This was provided by Goodman in consultation with consultant advice.</li> <li>It covers the approved mining limits of Pit 1, 2 and 3 (green areas under Appendix 3 Development Layout Figure from the Project Approval).</li> <li>It covers the previously disturbed areas such as the stockpile areas that connect the pits. It allows for additional work in the east of the site, within the footprint of the approved Pit 3 boundary.</li> </ul>                                                                                                                                                                                                                         |
| Site Boundary                       | <ul style="list-style-type: none"> <li>Shown in <b>Figure 1</b> and <b>Figure 2</b>.</li> <li>This illustrates the 'Site Boundary' from Appendix 1 of the Project Approval.</li> <li>The Site Boundary also includes some Lots to the East.</li> <li>It is a <b>boundary for guidance only</b> and all activities should be managed as per the Quarry Pits and Stockpiles Boundary and the Project Area Boundary.</li> </ul>                                                                                                                                                                                                                                                                                                                                               |
| Project Area Boundary               | <ul style="list-style-type: none"> <li>Shown in <b>Figure 1</b> and <b>Figure 2</b>.</li> <li>This covers the area defined as 'Project Area Boundary' from Appendix 1 of the Project Approval.</li> <li>The Quarry Pits and Stockpiles Boundary falls within the Project Area Boundary.</li> <li>There are areas within this boundary that don't fall within the Quarry Pits and Stockpiles Boundary, including the LDP, small tracks, farm dams, older brickworks area (currently flattened area used for storage).</li> <li>The site environmental management plans cover activities and site management within the entire Project Area Boundary. Except for the Rehabilitation Management Plan (<b>RMP</b>) which covers activities only in the mining Lease</li> </ul> |
| EPL                                 | Covers the same area as Project Area boundary, including all licensed discharge and monitoring points as per EPL648.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Mining Lease Area                   | The RMP covers activities within the Mining Lease Area. The Mining Lease Boundary is only shown in the RMP and not relevant to other site management plans.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

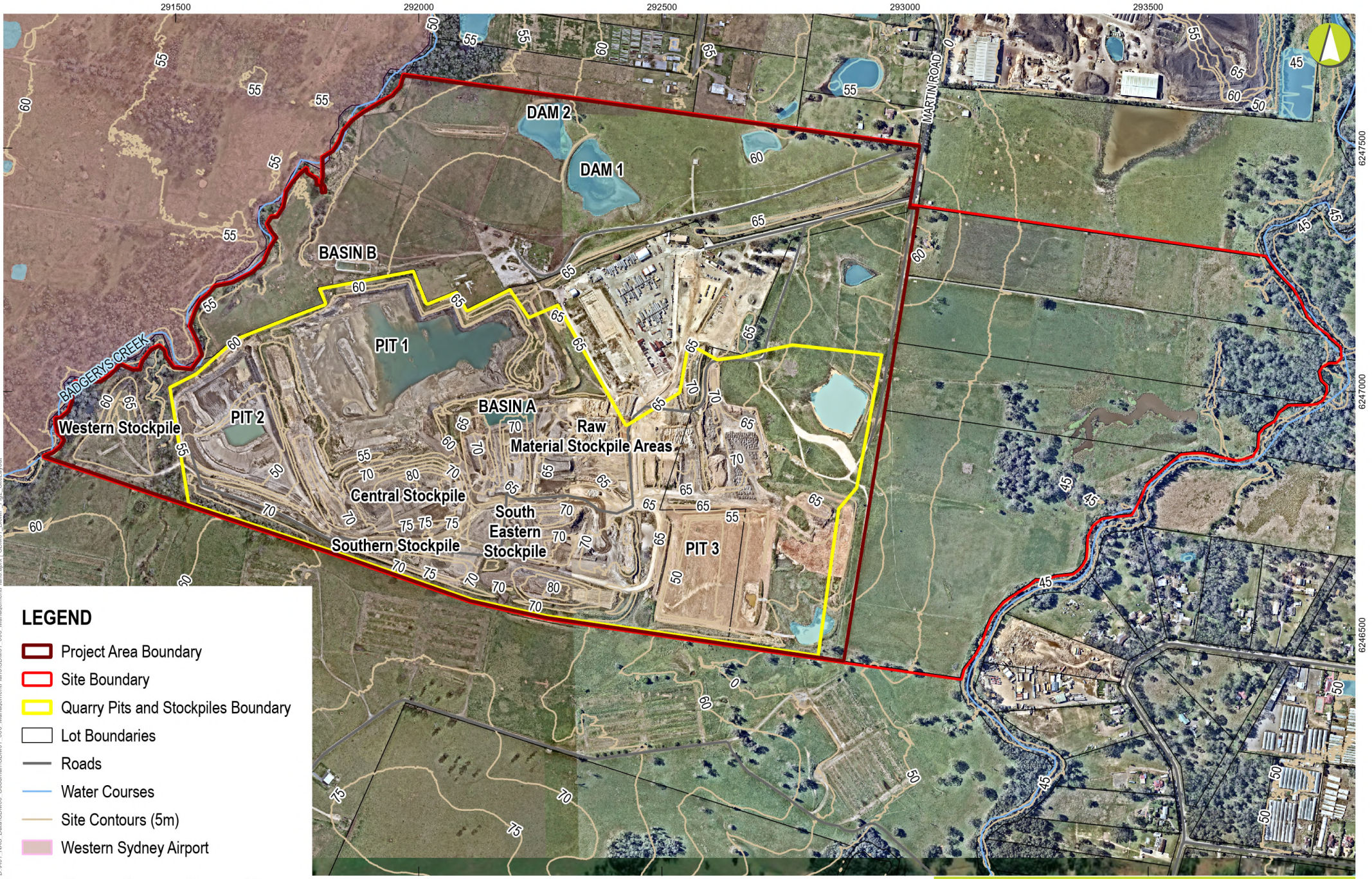
## **1.5. Updates in 2025 VIMP**

Updates for this VIMP included:

- Updated to be put into a Goodman template;
- Restructure of the document to meet Project Approval requirements and ensuring more consistency across all site management plans;
- Boundary definitions; and
- Updating the figures and Viewpoint photos. Since the 2022 VIMP the brickworks and the associated buildings have been removed. This has resulted in a reduced visual impact from the operations currently approved under Project Approval MP10\_0014.



D:\001\_NAS\_Data\GDM00\_Goodman\GDM01\_006\_ManagementPlans\GDM01\_006\_ManagementPlans.aprx | GDM01\_BComp\_Fig1\_SiteLocation



### LEGEND

- Project Area Boundary
- Site Boundary
- Quarry Pits and Stockpiles Boundary
- Lot Boundaries
- Roads
- Water Courses
- Site Contours (5m)
- Western Sydney Airport

0 125 250 375 500  
Scale: 1:10,000

GDA2020 MGA Zone 56  
6/01/2026

PA Boundary & LPI Data (SEED Map, 2025 NSW Spatial Services),  
ML1771 (MinView, 2025 Geoscience Australia), Imagery (Nearmap 10/10/2025)

Goodman Property Services (Australia) Pty Ltd

Site Layout  
FIGURE 2

## 2. STATUTORY REQUIREMENTS

### 2.1. Project Approval Conditions (MP10\_0014)

MP10\_0014 details the requirements for the VIMP. **Table 3** presents each requirement and outlines where they are addressed in this VIMP, including those detailed in the SoC.

**Table 3: MP10\_0014 Conditions Relevant to the VIMP**

| Condition                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Section/Comment                                                                                |
|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| Schedule 3<br>Condition<br>37  | The Applicant must implement all reasonable and feasible measures to minimise the visual and off-site lighting impacts of the development to the satisfaction of the Secretary.                                                                                                                                                                                                                                                                                                                      | <b>Section 5</b>                                                                               |
| Schedule 3<br>Condition<br>37A | Within 3 months of commencing quarrying operations in Pit 3, the Applicant must construct landscaped earthen bunds and plant vegetation screens (as shown conceptually in Appendix 3), to minimise the visual impacts of the development. The landscaped earthen bunds and plant vegetation screens must be maintained until Pit 3 area has been fully rehabilitated.                                                                                                                                | <b>Section 3</b>                                                                               |
| Schedule 3<br>Condition<br>37B | Within 6 months of the Secretary being advised of the confirmed Eastern Ring Road alignment, as required under condition 25C of this Schedule, the Applicant must construct landscaped earthen bunds and plant vegetation screens around the brickmaking facility and raw material stockpile (as shown conceptually in Appendix 3), to minimise the visual impacts of the development. The landscaped earthen bunds and plant vegetation screens must be maintained for the life of the development. | Not triggered. There are is however some screening of the site from closure to the front gate. |
| Schedule 3<br>Condition<br>37C | The Applicant must ensure that all outdoor and external lighting at the site:<br><br>(a) complies with AS4282 (INT) 1995 – Control of Obtrusive Effects of Outdoor Lighting; and                                                                                                                                                                                                                                                                                                                     | <b>Section 6.3</b>                                                                             |
|                                | (b) is designed in accordance with any Civil Aviation Safety Authority requirements for the WSA and is mounted, screened and directed in such a manner that it does not cause distraction or confusion to pilots due to light spill above the horizontal plane.                                                                                                                                                                                                                                      | <b>Section 6.3</b>                                                                             |
| Schedule 3<br>Condition<br>37D | <b>Visual Impact Management Plan</b><br><br>Within 6 months of approval of Modification 3 and 4, the Applicant must prepare a Visual Impact Management Plan for the development to the satisfaction of the Secretary. This plan must:<br><br>(a) be prepared by a suitably qualified and experienced person/s;                                                                                                                                                                                       | This plan has been updated by IEMA with the previous 2022 VIMP prepared by Geoscapes in 2022.  |
|                                | (b) be prepared in consultation with Council, TfNSW and relevant WSA authorities;                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Section 3</b>                                                                               |
|                                | (c) describe the measures to be implemented to minimise the visual, landscaping and off-site lighting impacts of the development to the WSA and surrounding community;                                                                                                                                                                                                                                                                                                                               | <b>Section 6</b>                                                                               |
|                                | (d) include a landscaping strategy to shield public views of the development (including views from the Eastern Airport Ring Road) that includes:<br><br>• the measures identified in the EA (Mod 3 and 4);                                                                                                                                                                                                                                                                                           | <b>Section 7</b>                                                                               |

| Condition                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Section/Comment                                                            |
|---------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|
|                           | <ul style="list-style-type: none"> <li>• a vegetation strategy utilising a diversity of local provenance tree species from the native vegetation community (or communities) that occur, or once occurred on the site, and would minimise wildlife attraction;</li> <li>• a bund vegetation and maintenance schedule; and</li> <li>• procedures to notify, consult with and implement site-specific mitigation measures at affected privately-owned residences; and</li> </ul> |                                                                            |
|                           | (e) include a program to monitor and report on the implementation and effectiveness of the mitigation measures; and                                                                                                                                                                                                                                                                                                                                                           | <b>Section 10</b>                                                          |
|                           | (f) include a protocol to update the plan to include the requirements of condition 37A and 37B of this Schedule, once the Secretary has been advised of the confirmed Eastern Ring Road alignment, as required under condition 25C of this Schedule.                                                                                                                                                                                                                          | <b>Section 10</b>                                                          |
|                           | The Applicant must implement the Visual Impact Management Plan as approved by the Secretary.                                                                                                                                                                                                                                                                                                                                                                                  | Noted.                                                                     |
| Schedule 5<br>Condition 3 | <b>Management Plan Requirements</b><br>The Applicant must ensure that the management plans required under this consent are prepared in accordance with any relevant guidelines, and include:                                                                                                                                                                                                                                                                                  |                                                                            |
|                           | (a) a summary of relevant background or baseline data;                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Section 4</b>                                                           |
|                           | (b) a description of: <ul style="list-style-type: none"> <li>• the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>• any relevant limits or performance measures/criteria; and</li> <li>• the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;</li> </ul>                                       | <b>Section 2</b>                                                           |
|                           | (c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;                                                                                                                                                                                                                                                                                                                             | <b>Section 6</b>                                                           |
|                           | (d) a program to monitor and report on the: <ul style="list-style-type: none"> <li>• impacts and environmental performance of the development; and</li> <li>• effectiveness of any management measures (see (c) above);</li> </ul>                                                                                                                                                                                                                                            | <b>Section</b>                                                             |
|                           | (e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;                                                                                                                                                                                                                                                                         | Unpredicted impacts are unlikely to occur under the current Goodman works. |
|                           | (f) a program to investigate and implement ways to improve the environmental performance of the development over time;                                                                                                                                                                                                                                                                                                                                                        | <b>Section 10</b>                                                          |
|                           | (g) a protocol for managing and reporting any: <ul style="list-style-type: none"> <li>• incidents;</li> <li>• complaints; and</li> <li>• non-compliances with statutory requirements;</li> </ul>                                                                                                                                                                                                                                                                              | <b>Section 10</b>                                                          |

| Condition                          |                                                                                                                                                                                                                                                                                        | Section/Comment      |
|------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
|                                    | (h) a protocol for periodic review of the plan; and                                                                                                                                                                                                                                    | <b>Section 10</b>    |
|                                    | (i) a document control table that includes version numbers, dates when the management plan was prepared and reviewed, names and positions of the person/s who prepared and reviewed the management plan, a description of any revisions made and the date of the Secretary's approval. | See document control |
|                                    | Note: The Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.                                                                                                                                                       | Noted                |
| MP10_0014 Statement of Commitments |                                                                                                                                                                                                                                                                                        |                      |
| Appendix 6, SoC 71                 | Proposed lighting at the site will still comply with Australian Standard AS4282 (INT) 1995 - Control of Obtrusive Effects of Outdoor Lighting                                                                                                                                          | <b>Section 6.3</b>   |

## 2.2. Environment Protection Licence (EPL) 648 Conditions

The Site has been granted EPL 648 under Section 58(5) of the *Protection of the Environment Operations Act 1997* (POEO Act). There are no EPL conditions related to visual management.

## 2.3. Other Relevant Legislation

The following legislation is relevant to VIMP:

- *Environmental Planning and Assessment Act 1979* (EP&A Act);
- *NSW Protection of the Environment (General) Regulation 2022* (POEO General Regulation);
- *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation);
- *State Environmental Planning Policy (Western Sydney Aerotropolis) (2020)*; and
- AS4282 (INT) 1995 – *Control of Obtrusive Effects of Outdoor Lighting*

### 3. CONSULTATION

Consultation was undertaken with the Liverpool Council, Traffic for New South Wales (**TfNSW**) and the relevant Western Sydney Airport (**WSA**) authorities in alignment with MP10\_0014 Schedule 3, Condition 37D(b) for the development of this VIMP.

#### 3.1. Pre-2025 Consultation

Consultation was completed by CSR as part of the previous VIMP with the outcomes summarised in **Table 4**. No letters or dates of this consultation are available, however it is provided in the Appendix of the 2022 VIMP.

**Table 4: Pre 2025 Consultation**

| Organisation      | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | CSR Response                                                                                                                                                                                                                                                                                                                                   |
|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Liverpool Council | No objections from Council                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | No further action.                                                                                                                                                                                                                                                                                                                             |
| TfNSW             | The VIMP prepared by Geoscapes Landscape Architecture and submitted (as outlined below) has been reviewed and it is advised that Condition 37D in the Consent has been satisfied.                                                                                                                                                                                                                                                                                                                                                      | No further action.                                                                                                                                                                                                                                                                                                                             |
| WSA Authority     | Lighting Impacts management to WSA                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Those requirements form part of Phase 1b works, the VIMP will be updated once Phase 1b works timing is known. Once CSR moves with the redevelopment of the Brick Factory all lighting design requirements and impacts will be issued to WSA for review.                                                                                        |
|                   | Landscaping management measures to manage wildlife impact on WSA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Works are associated with Phase 1b of the project and detailed landscape management plans and wildlife management plan will be prepared for Phase 1b works. Once the Eastern Ring Road has been approved and CSR commences quarrying of Pit 3, the Wildlife Management Plan will be prepared and issued to WSA for comments and consideration. |
|                   | As discussed, WSA's comments on the VIMP at this time are limited to the proposed landscaping. WSA would welcome the opportunity to further discuss the proposed landscaping species as some of the proposed species will likely be bird attracting. In addition, WSA requests that a Wildlife Management Plan be prepared for the site. We note your advice that the timing of Phase 1b works is not yet known and request that WSA be further consulted in relation to landscaping and lighting prior to Phase 1 b works commencing. | CSR will consult with WSA as part of the up-dating of the VIMP for Phase 1b works. Once the Eastern Ring Road alignment and construction timeline has been approved, CSR will consult with WSA with the detail plans including the wildlife management plan.                                                                                   |

### **3.2. 2025 Consultation**

The 2025 management plans have been sent to DPHI for review and approval. The changes mostly align with Goodman taking ownership of the site. There has been no further agency consultation in the update to the 2025 VIMP.

## 4. BASELINE ENVIRONMENT

The visual setting of Badgerys Creek was originally assessed in the Environmental Assessment (EA) prepared by AECOM (2009). The topography of the surrounding land is gently undulating, and parts of the Site and vicinity have modest elevation changes ranging from 50 to 110 metres (m) AHD.

The Site is visible from several directions for residences at the north, west, south and southeast, and from Martin Road and Lawson Road. Partial screening exists via riparian vegetation along Badgerys Creek. The surrounding landscape is already influenced by human activity (quarrying, agriculture and built forms) and the construction of the WSA.

The existing Site contains quarry pits (Pit 1, 2 and 3), stockpiles, sedimentation basins, internal roads, storage yards and Site infrastructure. Vegetation within the Site is sparse and largely confined to creek corridors and isolated tree patches (Element Environment, 2019).

The overall visual baseline environment is described as a working rural landscape with a strong industrial influence. The combination of cleared agricultural land scattered rural dwellings, the construction of the WSA and the highly modified quarry creates a setting that is disturbed and functional.

## 5. VISUAL IMPACT ASSESSMENT

### 5.1. Previous Visual Impact Assessments

The Site has previously been the subject of three visual impact assessments (**VIAs**):

- The first undertaken as part of the original EA (AECOM, 2009);
- The second a part of the Modification 3 application (Envisage Consulting, 2019); and
- The third completed by Geoscapes in 2022. The current VIMP states to MOD 3 and 4.

### 5.2. 2025 Visual Impact Assessment

In 2025, IEMA conducted a visual review at three identified visual receptor locations, recognising that the degree of visual impact sensitivity has changed as Goodman will now undertake fewer activities than originally assessed.

Visual impacts were reassessed in 2025 at the following viewpoint (**VP**) locations and shown in **Figure 3**:

- VP1 – Martin Road: This location was selected as it is representative of several rural properties in proximity to the north east corner of the Site, including 217 Martin Road;
- VP2 – Front gate to current Badgerys Creek Quarry: This location was selected to assess potential visual impacts to motorists passing by Site entrance; and
- VP3 – 255 Lawson Road: This location was selected as it is representative of rural properties close to the northern boundary of the Site that experience open views towards the development. The photograph was taken at the front access of 255 Lawson Road, which is one of the closest sensitive receivers.

### 5.3. Methodology

The proposed approach for the previous 2022 update and this 2025 update have included:

- *Guidelines for Landscape and Visual Impact Assessment (GLVIA)*; and
- The Landscape Institute Advice Note 01 (2011) Photography and Photomontage in Landscape and Visual Assessment.

The following sections outline how visual impact significance at each viewpoint is determined. The categories and definitions have been taken from the 2022 VIMP.

#### 5.3.1. Visual Receptor Sensitivity

Visual receptor sensitivity refers to the degree to which a viewer, or group of viewers, is likely to be affected by a change in the visual environment resulting from a proposed development. It represents how susceptible or responsive a particular viewing location or population is to alterations in the landscape's visual character or amenity.

Sensitivity is determined by considering the following:

- Type of receptor (e.g. resident, worker, road user, etc.);
- Time of exposure to development as receptors with regular, long-duration views are more sensitive;
- Context and expectations as areas with scenic or recreational value are more sensitive than industrial or urban areas; and

- Existing visual quality as areas with high visual or landscape value increase sensitivity to change.

Visual receptor sensitivity has been classed from Very High, High, Medium, Low and Very Low with a brief summary of each provided in **Table 5**.

**Table 5: Visual Receptor Sensitivity**

| Category  | Definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Very High | <ul style="list-style-type: none"> <li>Designed view to or from a heritage/ protected asset.</li> <li>Key-protected viewpoint (e.g. interpretive signs. References in literature and art / guidebooks and tourist maps.</li> <li>Protected view recognised in planning policy designation.</li> <li>Views from the main living space of residential properties, state, public rights of way (e.g. bush trails and state designated landscape feature with public access.</li> <li>Visitors to heritage assets of state importance.</li> </ul>                                      |
| High      | <ul style="list-style-type: none"> <li>View of clear value but may not be recognised (e.g. framed view of high scenic value from an individual private dwelling or garden). It also may be inferred that the view is likely to have value (e.g. to locals). Views from the secondary living space of residential properties and recreational receptors where there is some appreciation of the landscape (e.g. golf and fishing).</li> <li>Local public rights of way and access land.</li> <li>Road and rail routes promoted in tourist guides for their scenic value.</li> </ul> |
| Medium    | <ul style="list-style-type: none"> <li>View is not promoted or recorded in any published sources and may be typical of the views experienced from a given receptor.</li> <li>People engaged in outdoor sport where an appreciation of the landscape has little or no importance (e.g. football and soccer).</li> <li>Road users on main routes (Motorway / Freeway / Highway) and passengers on trains.</li> </ul>                                                                                                                                                                 |
| Low       | <ul style="list-style-type: none"> <li>View of clearly lesser value.</li> <li>Road users on minor roads.</li> <li>People at their place of work or views from commercial buildings where views of the surrounding landscape may have some importance.</li> </ul>                                                                                                                                                                                                                                                                                                                   |
| Very Low  | <ul style="list-style-type: none"> <li>View affected by many landscape detractors and unlikely to be valued.</li> <li>People at their place of work or other locations where the views of the wider landscape have little or no importance.</li> </ul>                                                                                                                                                                                                                                                                                                                             |

### 5.3.2. Magnitude of Change

The magnitude of change is the scale to the extent or degree of visual alteration a development will have on an existing view or landscape. It determines how much the visual environment will change resulting from the development.

The magnitude of change is ranked from Very High, High, Medium, Low and Very Low. A brief summary of the rankings is provided in **Table 6**.

**Table 6: Magnitude of Change Criteria**

| Category  | Definition                                                                                                                                                                                                                                            |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Very High | There will be a substantial change to the baseline, with the proposed development creating a new focus and having a defining influence on the view. Direct views at close range with changes over a wide horizontal and vertical extent.              |
| High      | The proposed development will be clearly noticeable, and the view will be fundamentally altered by its presence. Direct or oblique views at close range with changes over a noticeable horizontal and / or vertical extent.                           |
| Medium    | The proposed development will form a new and recognizable element within the view which is likely to be recognized by the receptor. Direct or oblique views at medium range with a moderate horizontal and / or vertical extent of the view affected. |
| Low       | The proposed development will form a minor constituent of the view being partially visible or at sufficient distance to be a small component. Oblique views at medium or long range with a small horizontal / vertical extent of the view affected.   |
| Very Low  | The proposed development will form a barely noticeable component of the view, and the view whilst slightly altered will be similar to the baseline situation. Long range views with a negligible part of the view affected.                           |

### 5.3.3. Visual Impact Significance

Visual impact significance is determined by using the visual sensitivity and magnitude of change. **Table 7** provides a matrix of the visual impact significance rankings.

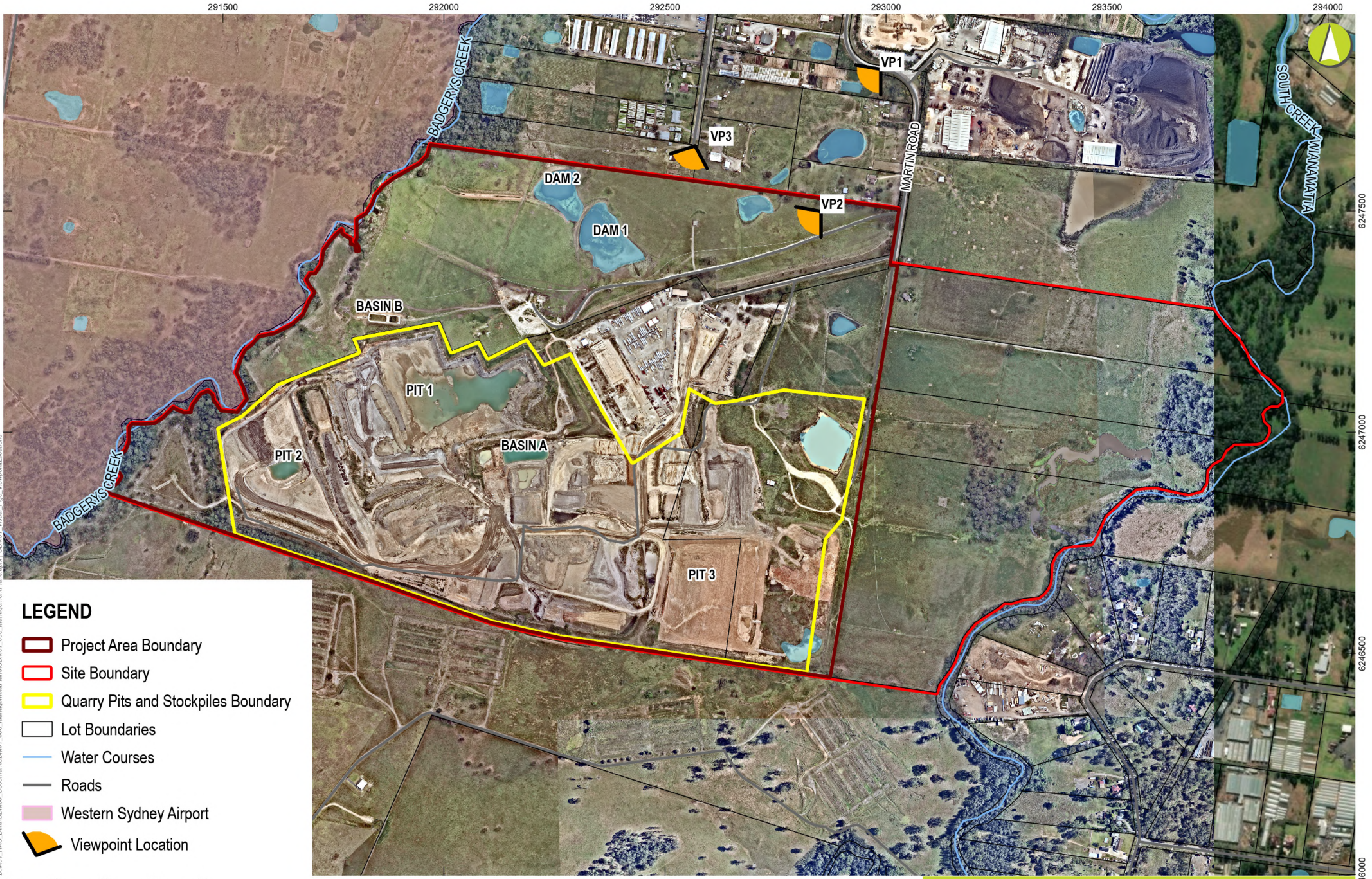
**Table 7: Visual Impact Significance**

| Receptor Sensitivity | Magnitude of Change |                  |                  |                  |                  |                   |
|----------------------|---------------------|------------------|------------------|------------------|------------------|-------------------|
|                      |                     | Very high        | High             | Medium           | Low              | Very Low          |
|                      | Very High           | Substantial      | Major            | Major / Moderate | Moderate         | Moderate / Minor  |
|                      | High                | Major            | Major / Moderate | Moderate         | Moderate / Minor | Minor             |
|                      | Medium              | Major / Moderate | Moderate         | Moderate / Minor | Minor            | Minor Negligible  |
|                      | Low                 | Moderate         | Moderate / Minor | Minor            | Minor Negligible | Negligible        |
|                      | Very Low            | Moderate / Minor | Minor            | Minor Negligible | Negligible       | Negligible / None |

### 5.4. Visual Impact Significance at Sensitive Receptors

Using the methodology outlined in the previous sections, a VIA was undertaken for each identified viewpoint to determine the level of visual significance associated with the development as of December 2025. This VIA only covers activities under the approved operations. Locations of the viewpoints are shown in **Figure 3**.

The outcomes of these rankings are provided in **Table 8**.



**LEGEND**

- Project Area Boundary
- Site Boundary
- Quarry Pits and Stockpiles Boundary
- Lot Boundaries
- Water Courses
- Roads
- Western Sydney Airport
- Viewpoint Location



GDA2020 MGA Zone 56  
5/01/2026

**Table 8: Visual Impact Significance at Sensitive Receptors**

| Viewpoint Number    | Significance Rankings                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                      |
|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
| VP 1<br>Martin Road | <p><u>Visual Sensitivity: <b>Medium</b></u></p> <p>The view is predominately pastoral, although existing stockpiles are visible within the landscape. This viewpoint is representative of residential receptors in the surrounding area. The site is also briefly visible to motorists and other public road users where vegetation or screening is sparse or absent.</p>                                                                  |                                                                                      |
|                     | <p><u>Magnitude of Change: <b>Very Low</b></u></p> <p>There are minimal long-range views of the Site. As fewer activities are planned under Goodman's ownership, there is no expected increase in visual impacts.</p> <p>The impacts are lower than those noted in the 2022 VIMP as the existing brickworks and stacks have been removed. There are also no plans to replace these features which were also assessed in the 2022 VIMP.</p> |  |
|                     | <p>Visual Impact Significance: <b>Minor / Negligible</b></p>                                                                                                                                                                                                                                                                                                                                                                               |                                                                                      |

| Viewpoint Number  | Significance Rankings                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                               |
|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| VP2<br>Front Gate | <p>Visual Sensitivity: <b>Low</b></p> <p>Although motorists and other road users experience brief views of the Site, the road passes through land zoned as Enterprise under the SEPP (Western Sydney Aerotropolis) 2020. Majority of road users in this area are therefore likely to be associated with industrial or commercial activities.</p> |  <p>Fence near front gate looking towards the site. Noting bunding for internal road.</p> |
|                   | <p>Magnitude of Change: <b>Low</b></p> <p>There are minimal long-range views of the Site. As fewer activities are planned under Goodman's ownership, there is no expected increase of visual impacts.</p>                                                                                                                                        |                                                                                                                                                                               |
|                   | <p>Visual Impact Significance: <b>Minor / Negligible</b></p>                                                                                                                                                                                                                                                                                     |                                                                                                                                                                               |

| Viewpoint Number | Significance Rankings |                                                                                                                                                                  |
|------------------|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                  |                       |  <p data-bbox="1086 1066 1505 1098">Front gate looking towards the site.</p> |

| Viewpoint Number              | Significance Rankings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                      |
|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
| VP 3<br>255<br>Lawson<br>Road | <p>Visual Sensitivity: <b>High</b></p> <p>This viewpoint is located on private residential property and presents the nearest sensitive receptor along the northern Project Approval boundary. Stockpiles are always visible, resulting in high level of visual exposure and long-term duration of effect.</p>                                                                                                                                                                                                                                                                                                          |  |
|                               | <p>Magnitude of Change: <b>Low</b></p> <p>Stockpiles already exist as part of the current view and are only partially visible from this viewpoint. There may be some additional disturbance and stockpiles under the current approval, however this will take place within the Quarry Pits and Stockpiles Boundary and not located near any sensitive receivers, as shown in <b>Figure 3</b>.</p> <p>The impacts are lower than those noted in the 2022 VIMP as the existing brickworks and stacks have been removed. There are also no plans to replace these features which were also assessed in the 2022 VIMP.</p> |                                                                                      |
|                               | <p>Visual Impact Significance: <b>Moderate / Minor</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                      |

## **6. VISUAL MITIGATION MEASURES**

### **6.1. Strategic Framework for Environmental Management**

In addition to meeting the specific criteria established under the Project Approval, Goodman will implement all reasonable and feasible measures to prevent, and if prevent is not reason or feasible, minimise any visual impacts that may result from construction or operation of the project and any rehabilitation required under the approval.

### **6.2. Visual Mitigation Measures**

VP3 has the highest visual view of the site. Stockpiles already exist as part of the current view and are only partially visible from this viewpoint. There may be some additional disturbance and stockpiles under the current approval. Visual impacts will be reviewed when placing material onsite. Noting all works under the current approval need to occur within the approved Quarry Pit and Stockpiles footprint.

### **6.3. Lighting**

In accordance with Schedule 3, Condition 37C of MP10\_0014, Goodman will ensure that all outdoor and external lighting associated with the Site comply with AS4282 (INT) 1995 – *Control of Obtrusive Effects of Outdoor Lighting* and in accordance with any Civil Aviation Safety Authority (CASA) requirements. All lighting design requirements and impacts will be issued to WSA for review.

The site operates with minimal lighting requirements noting the strict operational hours.

Bunding along the entrance road assists to reduce lighting impacts from the development.

## 7. LANDSCAPE MANAGEMENT STRATEGY

### 7.1. Landscaping Management Measures

Under MP10\_0014, Schedule 3, Condition 37D(d), Goodman must include a landscaping strategy that includes the measures identified in the MOD 3 and 4 EA. This will involve the implementation of:

- Actively remove weeds during operations and maintain landscaping and grounds within the Site to a high standard;
- Reduce potential dust impacts through appropriate environmental controls.

### 7.2. Earth Mound Planting

There have been some trees planted on the earthen bund on the north eastern boundary and along the entrance road into the site. The bund area is reviewed as part of inspections.

Weed management is a key consideration for newly established landscaped and disturbed areas. Effective control is required to prevent the spread of environmental weeds, protect native vegetation and maintain the visual and environmental quality of the site.

Weeds are managed under *the NSW Biosecurity Act 2015* and *Biosecurity Regulation 2017*, which assess all plant species based on their biosecurity risk and the likelihood that their introduction, presence or spread may have an adverse impact on the environment or community. The *Biosecurity Act 2015* also places general biosecurity duties on all persons to prevent, eliminate or minimise biosecurity risks posed by weeds.

Weed control will be undertaken in accordance with the Weed Maintenance Schedule shown in **Table 9** and in accordance with the relevant statutory guidance and management plans including:

- Appendix 1 of the *Greater Sydney Regional Strategic Weed Management Plan 2023-2027* (Local Land Services, 2022);
- NSW WeedWise;
- NSW Weed Control Handbook – *A Guide to Weed Control in Non-Crop, Aquatic and Bushland Situations* (DPI, 2025).

**Table 9: Weed Maintenance Schedule**

| Maintenance Action Required                                                                                                                                                                                                                                                          | Frequency                                                                          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|
| Prevent reproduction of weeds by destroying seedlings and established weeds before seed set or other propagules form. Remove by hand in the first instance (where infestations are low). Ensure that the entire weed, including all roots is removed. Dispose of the weeds off site. | Assessed monthly and weed management as required based on assessment of the weeds. |
| Remove by herbicide application any weeds which cannot be controlled by hand removal. Herbicide application must occur before weed seed set. Non-target species and areas must be reinstated if damaged by herbicide application.                                                    |                                                                                    |
| Herbicide use to be in accordance with regulation rates and manufacturers recommendations. Herbicide use must comply with the requirements of the Noxious and environmental weed control handbook. A guide to weed control in non-corp,                                              |                                                                                    |

| Maintenance Action Required                                                                            | Frequency |
|--------------------------------------------------------------------------------------------------------|-----------|
| aquatic and bushland situation (NSW Department of Primary Industry Management Guide, Seventh edition). |           |
| After spraying, lop any dead weeds flush with the ground surface and dispose of the cuttings.          |           |
| Use of biodegradable herbicide is mandatory.                                                           |           |

## **8. COMPLAINTS HANDLING PROCEDURE**

In the event of a third-party environmental complaint the Goodman policy within in the Environmental Management Strategy will be followed which involves:

- Assessing whether it threatens the environment;
- Commence verbal notifications to relevant external authorities;
- Investigates and verifies complaints, and assesses if excessive off-site impacts have occurred;
- Implements corrective measures including modification of execution methods and operational techniques to avoid recurrence or minimise ongoing adverse impacts;
- Completes monitoring/ additional investigations to verify the adequacy of the recommendations, as required;
- Notifies the complainant of actions taken; and
- Continues to monitor activity, if required.

### **8.1. Procedure**

Refer to the EMS for the correct procedure to follow in the case of a complaint.

## **9. REPORTING AND REVIEW**

### **9.1. Regular Reporting**

#### **9.1.1. Information Required on the Website**

In alignment with Schedule 5, Condition 11 of MP10\_0014 Goodman will provide regular reporting on the environmental performance of the development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.

### **9.2. Annual Review**

Goodman is required to prepare an Annual Review each year in accordance with Schedule 5, Condition 12 of MP10\_0014 which states:

*Prior to recommencing quarrying operations or Fill import, and annually thereafter, the Applicant must submit a review to the Department reviewing the environmental performance of the development to the satisfaction of the Secretary. This review must:*

- (a) describe the development (including any progressive rehabilitation) that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year;*
- (b) include a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, which includes a comparison of these results against the:*
  - relevant statutory requirements, limits or performance measures/criteria;*
  - requirements of any plan or program required under this consent;*
  - monitoring results of previous years; and*
  - relevant predictions in the documents listed in condition 3 of Schedule 2;*
- (c) evaluate and report on:*
  - the effectiveness of the air quality and noise management systems; and*
  - compliance with the performance measures, criteria and operating conditions in this consent.*
- (d) identify any non-compliance over the past calendar year, and describe what actions were (or are being) taken to rectify the non-compliance and avoid reoccurrence;*
- (e) identify any trends in the monitoring data over the life of the development;*
- (f) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and*
- (g) describe what measures will be implemented over the current calendar year to improve the environmental performance of the development.*

*The Applicant must ensure that copies of the Annual Review are submitted to Council and are available to the Community Consultative Committee (see condition 8 of Schedule 5) and any interested person upon request.*

### 9.3. Incident Notification and Reporting

An incident is defined in MP10\_0014 as:

*Incident*

*An occurrence or set of circumstances that:*

- causes or threatens to cause material harm to the environment; and/or*
- breaches or exceeds the limits or performance measures/criteria in this*

Material harm is defined in MP10\_0014 as:

*Material harm is unauthorised harm that:*

- involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or*
- results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment)*

In the event of an incident occurring on site, Goodman will in compliance with MP10\_0014 Condition 9:

*Incident Notification*

*9. The Applicant must immediately notify the Department and any other relevant agencies immediately after it becomes aware of an incident. The notification must be made in writing through the Department's Major Projects Website and identify the development (including the development application number and name) and set out the location and nature of the incident.*

### 9.4. Non-Compliance Notification and Reporting

MP10\_0014 does not provide a specific definition of 'non-compliance'. In the event of an incident occurring on site, it will be managed in accordance with **Section 9.3**. Other instances of non-compliance (e.g. exceedances of the 24-hour criteria) will be addressed in line with Schedule 5, Condition 10, which states:

*Non-Compliance Notification*

*10. Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance. The notification must be made in writing through the Department's Major Projects website and identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, why it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the noncompliance.*

*Note: A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.*

## 9.5. Independent Environmental Audits

An Independent Environmental Audit (IEA) will be conducted at Site in accordance with Schedule 5, Condition 13 of MP10\_0014 which states:

*Within 12 months of the commencement of Phase 1, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant must commission, commence and pay the full cost of an Independent Environmental Audit of the development. This audit must:*

- (a) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- (b) include consultation with the relevant agencies and the CCC;*
- (c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL or necessary water licences for the development (including any assessment, strategy, plan or program required under these approvals);*
- (d) review the adequacy of strategies, plans or programs required under the abovementioned approvals;*
- (e) recommend appropriate measures or actions to improve the environmental performance of the development, and/or any assessment, strategy, plan or program required under the abovementioned approvals;*
- (f) and be conducted and reported to the satisfaction of the Secretary.*

## 9.6. Plan and Program Revision

Revisions of plans and programs will be completed in alignment with Schedule 5, Condition 5 of MP10\_0014 which states:

*Within 3 months of:*

- (a) the submission of an incident report under condition 10 below;*
- (b) the submission of an Annual Review under condition 12 below;*
- (c) the submission of an Independent Environmental Audit report under condition 14 below; and*
- (d) the approval any modifications to this consent,*

*the Applicant must review the suitability of all strategies, plans and programs required under this consent, to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 6 weeks of the review the revised document must be submitted for the approval of the Secretary.*

Notes:

- *The purpose of this condition is to ensure that strategies, plans and programs are regularly updated to incorporate any measures recommended to improve environmental performance of the development.*
- *In the event of an inconsistency between condition 5(d) above and any condition in Schedule 3 of this consent, the latter prevails.*

## **10. TRAINING AND RESOURCE REQUIREMENTS**

All Goodman staff and contractors will undertake general inductions and awareness training prior to commencing work at the Site. If any complaints related to visual or lighting are made, further awareness training will be completed.

## 11. ROLES AND RESPONSIBILITIES

This section was added in 2025 to avoid any confusion between the roles of Goodman and the onsite contractor regarding compliance. The roles and responsibilities in relation to this VIMP are listed in **Table 10**.

**Table 10: Roles and Responsibilities**

| Position      | Accountable Tasks                                                                                                                                                                                                                                                                                 |
|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Goodman       | <ul style="list-style-type: none"><li>• Oversee overall compliance and performance of activities</li><li>• Conduct regular inspections to ensure standards are met</li><li>• Assist contractor in managing complaints</li><li>• Provide support in responding to and managing incidents</li></ul> |
| Contractor    | <ul style="list-style-type: none"><li>• Manage day-to-day site operations</li><li>• Authorised to make operational changes (e.g., plant, water trucks, equipment)</li></ul>                                                                                                                       |
| All Personnel | <ul style="list-style-type: none"><li>• All personnel shall undergo visual impact management awareness training through the induction and re-induction process.</li></ul>                                                                                                                         |

## **12. REFERENCES**

AECOM (2009) *Preliminary Environmental Assessment Proposed Continuation of Operations Quarry and Brickworks – Boral Badgerys Creek*

Element Environment (2019) *Modification 3 Environmental Assessment*

Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment*.

The Landscape Institute Advice Note 01 (2011) *Photography and Photomontage in Landscape and Visual Assessment*.