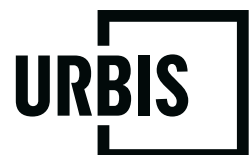


REQUEST FOR SECRETARY ENVIRONMENTAL ASSESSMENT REQUIREMENTS

GPT INDUSTRIAL ESTATE

Prepared for
THE GPT GROUP
21 October 2020



URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Director	Bruce Colman
Senior Consultant	Nazia Pokar
Assistant Planner	Natalie Yasmine
Project Code	P0013978
Report Number	Version 3 – For Submission

All information supplied to Urbis in order to conduct this research has been treated in the strictest confidence. It shall only be used in this context and shall not be made available to third parties without client authorisation. Confidential information has been stored securely and data provided by respondents, as well as their identity, has been treated in the strictest confidence and all assurance given to respondents have been and shall be fulfilled.

© Urbis Pty Ltd
50 105 256 228

All Rights Reserved. No material may be reproduced without prior permission.

You must read the important disclaimer appearing within the body of this report.

urbis.com.au

CONTENTS

Executive Summary.....	1
Site Description	1
Development Description	1
Planning Framework	2
Strategic Planning Policies	2
Commonwealth Legislation.....	2
State Policies and Other Legislation.....	2
Local Legislation	2
Contributions	2
Key Environmental issues.....	3
1. Introduction	1
2. Site and Surrounding Context	3
3. The Proposal.....	5
3.1. Project Objectives	5
3.2. Development Description.....	5
4. Strategic and Statutory Context	9
4.1. Strategic Plans and Policies	9
4.1.1. A Metropolis of Three Cities: Greater Sydney Region Plan	9
4.1.2. Western City District Plan.....	10
4.1.3. Penrith Local Strategic Planning Statement.....	10
4.1.4. Western Sydney Aerotropolis Plan.....	11
4.1.5. Mamre Road Structure Plan	12
4.2. Statutory Framework.....	13
4.2.1. Environmental Protection and Biodiversity Conservation Act 1999	13
4.2.2. Biodiversity Conservation Act 2016.....	13
4.2.3. Environmental Planning and Assessment Act 1979	14
4.2.4. State Environmental Planning Policy (Western Sydney Employment Area) 2009 Amendment	14
4.2.5. State Environmental Planning Policy (State and Regional Development) 2011.....	17
4.2.6. State Environmental Planning Policy (Infrastructure) 2007	18
4.2.7. State Environmental Planning Policy No. 33 – Hazardous and Offensive Development	18
4.2.8. State Environmental Planning Policy No. 55 – Remediation of Land	18
4.2.9. State Environmental Planning Policy (Western Sydney Aerotropolis)	19
4.2.10. Draft Cumberland Plain Conservation Plan	19
4.2.11. Penrith Local Environmental Plan 2010	19
5. Key Planning Considerations	20
5.1. Matters For Consideration In EIS	20
Key Issues.....	20
5.1.1. Amenity.....	20
5.1.2. Access	20
5.1.3. Built Environment	20
5.1.4. Heritage	20
5.1.5. Economic.....	21
5.1.6. Biodiversity	21
5.1.7. Land.....	21
5.1.8. Water	21
5.1.9. Other Issues	21
5.2. Cumulative Impacts	22
6. Community and Other Stakeholder Engagement	23

7. Expected Deliverables24

Disclaimer25

Appendix A CIV REPORT

Appendix B Concept Masterplan

FIGURES

Figure 1 Aerial Photograph..... 3

Figure 2 Indicative Concept Masterplan 6

Figure 3 Indicative staging..... 7

Figure 4 Region Plan’s Structure Plan 9

Figure 5 Structure Plan..... 11

Figure 6 Western Sydney Aerotropolis Structure Plan..... 12

Figure 7 Mamre Road Structure Plan..... 13

Figure 8 Proposed Land Zoning 15

TABLES

Table 1 WSEA SEPP Provisions..... 15

EXECUTIVE SUMMARY

This report has been prepared on behalf of *The GPT Group* (the applicant) and relates to the proposed development of an industrial estate and associated works at the land legally described as Lots 59-60 in DP 259135, Kemps Creek (the site), within the Western Sydney Employment Area (WSEA).

The site is located within the Mamre Road Precinct one of Sydney's major employment areas. On 11 June 2020, *State Environmental Planning Policy (Western Sydney Employment Area) 2009* (WSEA SEPP) was gazetted. The land on which the site is situated was rezoned under the WSEA SEPP (Mamre Road Precinct) to permit industrial land uses. The applicant seeks to commence a State Significant Development (SSD) planning approval pathway, preparation of Precinct Wide Development Control and finalisation of road network and access strategy.

The proposed industrial estate, to be known as GPT Industrial Estate, supports development of the Western Sydney region, by providing employment opportunities and responding to the shortfall of zoned industrial land identified in the Greater Sydney Commission's *A Metropolis of Three Cities: Greater Sydney Region Plan*, *Western City District Plan*, and draft Western Sydney Aerotropolis Plan.

This report has been prepared to request the Secretary issue the Environmental Assessment Requirements (SEARs) to inform the preparation of an Environmental Impact Statement (EIS). It includes a brief description of the site, its context and key features of the proposed development. It also provides an overview of the relevant planning framework and the key environmental assessment issues that will need to be addressed in detail during the preparation of the EIS.

SITE DESCRIPTION

Located within the Penrith local Government Area (LGA), the site is approximately 33.36 hectares (ha) in area and has 211 metres (m) frontage Mamre Road, which provides connection to the M4 Motorway in the north and Elizabeth Drive to the south. The site is legally described as Lots 59 and Lot 60 in DP 259135.

DEVELOPMENT DESCRIPTION

The SSD development application (SSDA) will seek a Concept consent in accordance with Section 4.22 of the EP&A Act. Development consent will be sought for a concept masterplan detailing development across the Estate as well as detailed development consent for the first stage of works on the site for the purpose of an industrial estate. The proposal will involve a concept masterplan comprising five (5) warehouses and Stage 1 works for construction and use of one (1) warehouse building for warehouse or distribution uses and other manufacturing industries pursuant to Part 11 of Schedule 1 of *State Environmental Planning Policy (State and Regional Development)* (SRD SEPP), bulk earthworks and retaining walls, stormwater and associated works, internal roads, associated carparking, signage, landscaping and a riparian zone. Specifically, the SSDA will seek consent for:

- Concept masterplan comprising five (5) industrial warehouses, internal road network, 25m riparian zone, building location, GFA, setbacks, car parking and built form parameters.
- Stage 1 consent for:
 - Construction and use of Warehouse 3 for the purposes of other manufacturing industries and/or warehouse and distribution centres which will operate 24 hours/day, seven days/week;
 - Provision of site servicing infrastructure to allow the operation of the industrial unit for warehouse and distribution and/or other manufacturing industries;
 - Bulk earth works;
 - Construction of retaining walls;
 - Internal road network (north-south);
 - Associated carparking;
 - Signage; and
 - Landscaping to the site and adjacent E2 Zone.

- Stage 2 of the Estate, including construction of warehouse buildings 1, 2, 4 and 5 will be subject to separate development applications.

PLANNING FRAMEWORK

The proposed development has an estimated capital investment value (CIV) of \$54,300,000 for the first stage of the Estate development. It is therefore considered SSD pursuant to Schedule 1, Clause 8(1b) of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP). The NSW Minister for Planning and Public Spaces is the consent authority for this proposal under Section 8A of the SRD SEPP.

The proposed development is fully aligned with strategic planning policy and addresses each of the State and local statutory planning controls that apply to the site. The following current and draft Commonwealth, State, Regional and Local planning controls and policies will be considered in preparation of this application.

Strategic Planning Policies

- *A Metropolis of Three Cities: Greater Sydney Region Plan*
- *Western City District Plan*
- *Penrith Local Strategic Planning Statement*
- *Draft Western Sydney Aerotropolis Plan (Stage 1 LUIIP)*
- *Western Sydney Employment Area*
- *Draft Mamre Road Structure Plan*

Commonwealth Legislation

- *Environmental Protection and Biodiversity Conservation Act 1999*

State Policies and Other Legislation

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2000*
- *State Environmental Planning Policy (Western Sydney Employment Area) 2009*
- *State Environmental Planning Policy (State and Regional Development 2011)*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development*
- *State Environmental Planning Policy No. 55 – Remediation of Land*
- *Draft State Environmental Planning Policy (Western Sydney Aerotropolis)*

Local Legislation

- *Penrith Local Environmental Plan 2010*

CONTRIBUTIONS

The GPT Group has had initial discussions with DPIE's Contribution Team in relation to the preparation of a Letter of Offer to enter into a Voluntary Planning Agreement using the draft WSEA contribution rate.

KEY ENVIRONMENTAL ISSUES

The following key environmental issues have been identified during the preparation of this scoping report and are considered likely to warrant detailed assessment in the preparation of the EIS.

- Transport and Access
- Mamre Road upgrade
- Soils and Water
- Infrastructure requirements
- Urban design and visual impact
- Building design
- Acoustic
- Aboriginal Heritage
- Non-Indigenous Heritage
- Riparian corridors
- Ecologically sustainable development
- Social and economic
- Air quality
- Bushfire
- Waste Management
- Stormwater and flooding
- Land capability
- Flora and Fauna
- Intermodal Terminal
- Consultation

The SEARs request also includes indicative details regarding the stakeholder consultation process that will be undertaken during the preparation of the EIS and the formal assessment of the SSDA.

1. INTRODUCTION

This report has been prepared on behalf of *The GPT Group* (the applicant) in association with the proposed development of an Industrial estate for warehouse or distribution purposes at the land legally described as Lots 59-60 in DP 259135, Kemps Creek (the site).

The SSDA seeks approval for a concept masterplan for the entire site and Stage 1 development of the estate, including:

- Site preparation works;
- Construction and use of one warehouse building (Warehouse 3) for warehouse or distribution uses and other manufacturing industries pursuant to Part 11 and 12 of Schedule 1 of the State and Regional Development SEPP;
- 25m realigned riparian zone;
- Retaining walls;
- Stormwater and associated works;
- Internal road network;
- Associated carparking;
- Signage; and
- Landscaping.

Future warehouse buildings will be subject to a separate development application. A staged consent in accordance with S4.22 of the Act is sought under this application.

This scoping report has been prepared to request the Secretary issue the Environmental Assessment Requirements (SEARs) to inform the preparation of an Environmental Impact Statement (EIS) for the proposed development.

The report provides the following information to assist with the Department of Planning, Industry and Environment's (DPIE) understanding of the proposal and the key issues to be addressed in the EIS:

- Identification of the site and locality;
- Description of the proposed development;
- Overview of the planning framework, including strategic planning policies and the current and proposed statutory controls; and
- Key environmental assessment issues to be considered during the preparation of the EIS.

A preliminary masterplan and stage 1 plan has been prepared to provide a general understanding of the proposal (**Appendix B**). Both plans will be refined during the preparation of the EIS as detailed investigations are undertaken and following assessment of key issues identified within the SEARs.

State and Regional Development

Pursuant to Schedule 1, Clause 8(1b) of the *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP), the proposed development is considered State Significant Development (SSD) as:

Clause 8(1b) of *State Environmental Planning Policy (State and Regional Development) 2011* relevantly states that:

- (1) *Development is declared to be State significant development for the purposes of the Act if—*
- (b) *the development is specified in Schedule 1 or 2.*

The proposed development for the site is specified under Part 11 and 12 of Schedule 1 of the SRD SEPP as follows:

(11) Other manufacturing industries

Development that has a capital investment value of more than \$30 million for any of the following purposes—

- (a) laboratory, research or development facilities,*
- (b) medical products manufacturing,*
- (c) printing or publishing,*
- (d) textile, clothing, footwear or leather manufacturing,*
- (e) furniture manufacturing,*
- (f) machinery or equipment manufacturing,*
- (g) the vehicle, defence or aerospace industry,*
- (h) vessel or boat building and repair facilities (not including marinas).*

(12) Warehouse or distribution centres

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

The proposed development satisfies the provisions of Schedule 1, Part 11 and Part 12 of the State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP), as the development will have a capital investment value greater than \$50 million for the purpose for other manufacturing industries and/or warehouse and distribution centres at one location and related to the same operation (**Appendix A**). The NSW Minister for Planning and Public Spaces is the consent authority for the proposal under Section 8A of the SRD SEPP.

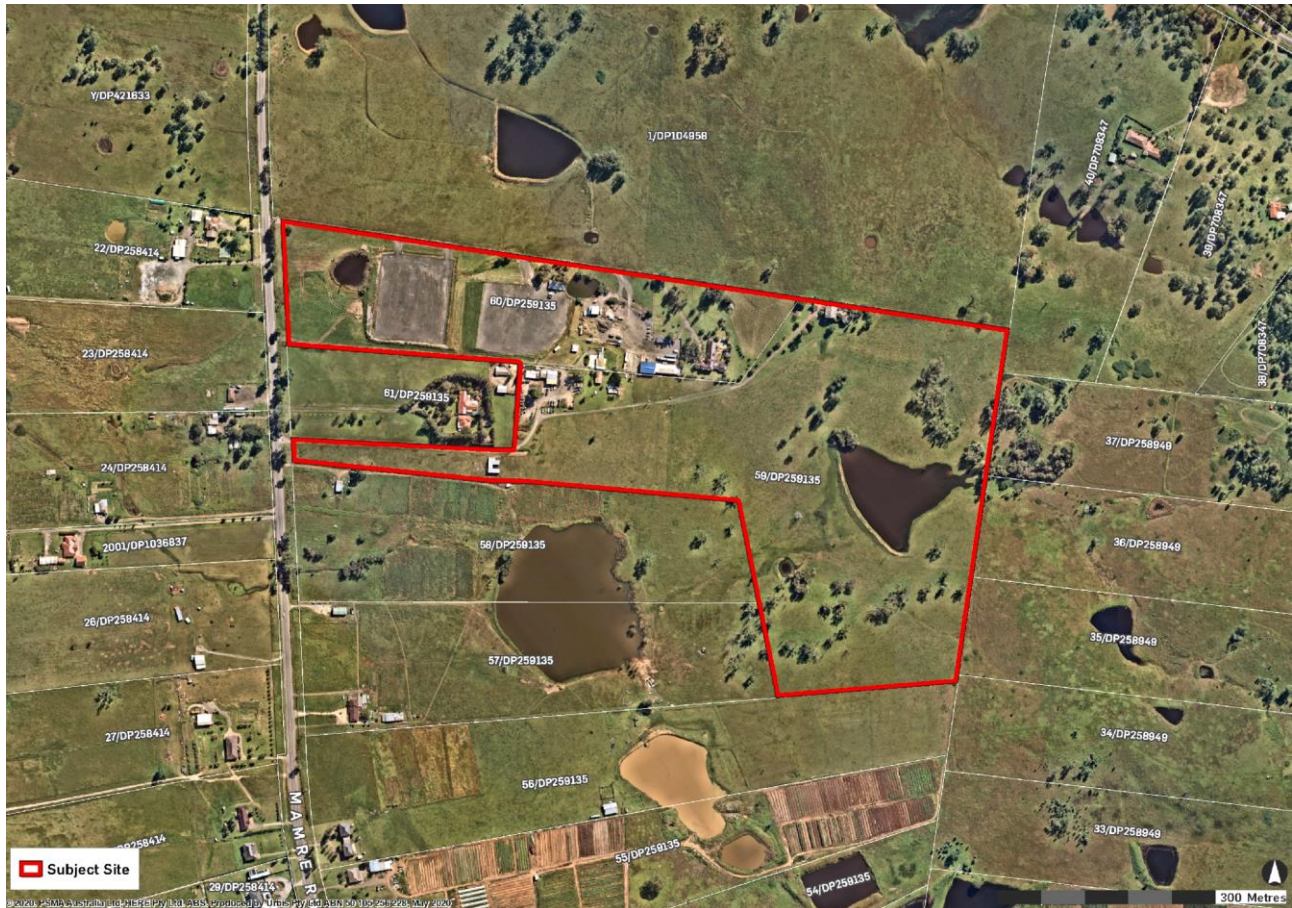
It is envisaged that the proposal will deliver economic benefits and employment generation for Western Sydney and the Greater Sydney region. Preliminary site investigations have indicated that the site is suitable for the proposed use and the potential environmental impacts can be appropriately mitigated, minimised or managed to avoid any unacceptable impact.

The applicant is committed to working with key stakeholders, including State government agencies and Penrith City Council to deliver a high-quality development.

2. SITE AND SURROUNDING CONTEXT

The site is legally described as Lots 59 and Lot 60 in DP 259135 and is owned by the applicant. The site has an area of approximately 33.36 ha and fronts to Mamre Road (refer to **Figure 1** below). Most of the site is cleared with scattered vegetation and three farm dams.

Figure 1 Aerial Photograph



Source: Nearmap

The site is located within the suburb of Kemps Creek, within the Penrith Local Government Area (LGA). The site falls within the Mamre Road Precinct within the broader Western Sydney Employment Area (WSEA) and is currently surrounded existing by rural and agricultural land uses.

The site is approximately 4 kilometres (km) north-east of the future Western Sydney International (Nancy-Bird Walton) Airport, 12 km south-east of Penrith CBD and 40 km west of the Sydney CBD.

The site has a broken 211m frontage to Mamre Road which is proposed to be upgraded and will provide vehicular access via Mamre Road to the M4 Motorway and Great Western Highway to the north and Elizabeth Drive to the south.

The site is bounded by Mamre Road to the west and agricultural uses to the north, south and east. It is assumed that historical land uses on the site include rural residential, grazing, dairy farming, poultry farming and horticulture. This land is identified for future employment land, as indicated by the recent rezoning of Mamre Road Precinct to from RU2 Rural Landscape zone to IN1 General Industrial zoning under the *State Environmental Planning Policy (Western Sydney Employment Area) 2009* (WSEA SEPP).

The Ministerial Local Planning Direction 3.5 precludes future residential development, as the site is affected by the Western Sydney International Airport's ANEF 20 noise contour. The NSW Government has identified an opportunity for land uses which are not sensitive land uses to locate in this precinct, such as a warehouse and logistics facilities.

The nearest residential receivers are located in Mount Vernon and Twin Creeks approximately 3 km east and west of the site respectively. Other nearby environmental living areas include Luddenham

(approximately 2 km west of the site), and Kemps Creek (approximately 4.2 km south of the site). Additionally, there is are two private education establishments and seniors living development approximately 2km north of the site. Both uses are within the Mamre Road Precinct and identified for future industrial land. In the interim, they will likely continue operating under their existing uses and are considered sensitive receivers for the purpose of this SSDA.

3. THE PROPOSAL

3.1. PROJECT OBJECTIVES

The project will facilitate the construction of the first stage of the proposed warehouse or distribution centre to be known as GPT Industrial Estate. The following objectives have been identified as forming the basis of the proposed development:

- Provide for an employment generating land use;
- Respond to the industrial land pipeline supply shortfall;
- Ensure minimal environmental and amenity impact;
- Integrate with existing and planned infrastructure;
- Enhance employment generating potential of a currently underutilised site; and
- Respond to the site context and key interfaces with surrounding lands including sensitive receivers to ensure an appropriate and sustainable development outcome.

The proposed development is consistent with the overarching aim for the WSEA, which is to create high quality industrial estates. The project maximises the employment generating potential of the land to create an efficient, attractive and high quality employment area for Western Sydney.

3.2. DEVELOPMENT DESCRIPTION

The SSDA will seek approval in accordance with Section 4.22 of the EP&A Act for a concept masterplan for the Estate as well as the first stage of development on the site for the purpose of an industrial estate .

The detailed Stage 1 development application will seek consent for site preparation works, construction, fit out and operation of one (1) warehouse building for warehouse or distribution uses and other manufacturing industries pursuant to Part 11 of Schedule 1 of the SRD SEPP,, retaining walls, stormwater and associated works, internal roads, associated carparking, signage, landscaping and a riparian zone.

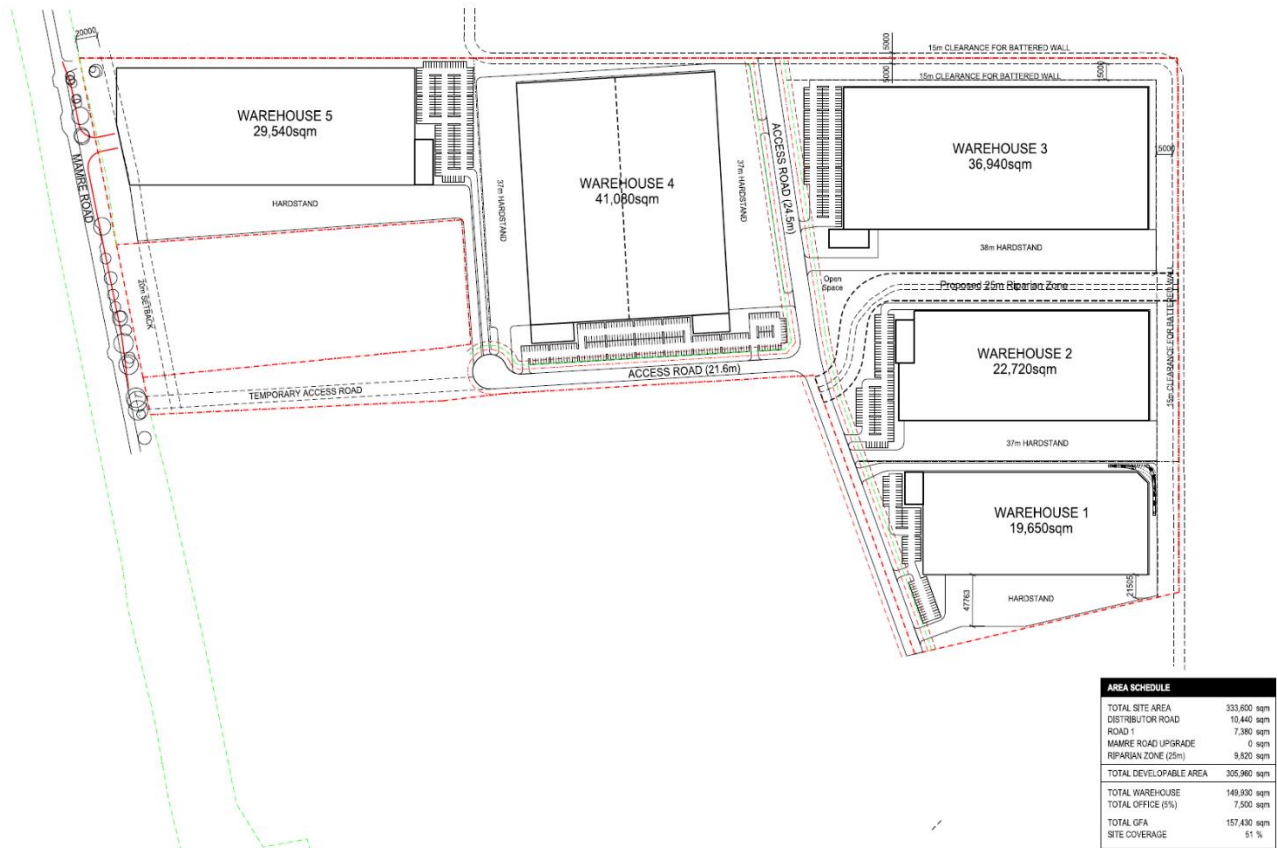
Specifically, the SSDA will seek consent for:

- Concept masterplan comprising five (5) industrial warehouses, internal road network, 25m riparian zone, building location, GFA, setbacks, car parking and built form parameters.
- Stage 1 consent for:
 - Construction and use of Warehouse 3 for the purposes of other manufacturing industries and/or warehouse and distribution centres which will operate 24 hours/day, seven days/week;
 - Provision of site servicing infrastructure to allow the operation of the industrial unit for warehouse and distribution and/or other manufacturing industries;
 - Bulk earth works;
 - Construction of retaining walls;
 - Internal road network (north-south);
 - Associated carparking;
 - Signage; and
 - Landscaping to the site and adjacent E2 Zone.

Stage 2 of the Estate, including construction of warehouse buildings 1, 2, 4 and 5 will be subject to separate development applications.

The indicative site plans (concept masterplan and Stage 1 plan) are shown at **Figure 2**. Plans will be refined and amended as required to incorporate the findings and recommendations of the detailed investigations during the preparation of the EIS in accordance with the SEARs.

Figure 2 Indicative Concept Masterplan



Source: SBA Architects

The key features of the Concept Masterplan are as follows:

- Estate layout
- Road locations and access arrangements
- Building locations
- Proposed riparian zones
- GFA
- Car Parking
- Building setbacks

Figure 3 Indicative staging



Source: The GPT Group

The key features of the Stage 1 proposal are as follows:

- **Bulk earthworks:** Cut and fill to part of the site identified as Stage 1.
- **Infrastructure:** Provision of a north-south access road, utility services and stormwater works required for the operation of warehouse 3.
- **Land use and built form:** Indicative building footprints are provided for the future construction of warehouse-style buildings, including:
 - One industrial warehouse buildings with ancillary offices, including building identification signage.
 - Concept plan identifying the future layout of the broader industrial estate and building footprints of future warehouse buildings not part of the Stage 1 development application.
- **Landscaping:** It is intended that a Landscape Masterplan will be prepared for the site which will complement and enhance the architectural design of the future warehouse estate and buildings. Visual screening will be provided to the surrounding street network and adjoining property through landscaping elements.
- **Transport, access and car parking:** Primary vehicle access will be provided from Mamre Road through a temporary access arrangement and will service the site until such time, formal access arrangements for the subject and adjoining site owned by Mirvac located south of the site have been determined. The proposed north-south road will be designed to address Penrith City Council's requirements.
- **Stormwater management and flooding:** A comprehensive stormwater management system will be provided to manage the quality and quantity of water flows across the site, including mitigation measures to address potential flooding risk and to avoid adverse impacts to the development potential of upstream and downstream properties.
- **Biodiversity:** Given the historic agricultural uses, the site has been extensively modified and disturbed. Most of the original vegetation has been cleared. A 25m riparian zone is proposed for the realignment of the E2 environmental conservation zone that transverses the site. Existing site vegetation will be assessed in further detail during the preparation of the SSDA.

- **Utility services:** The final siting and design will incorporate any required augmentation of existing utility services to the proposed development.
- **Signage:** Wayfinding signage and building identification signage will be proposed and detailed in the EIS.

4. STRATEGIC AND STATUTORY CONTEXT

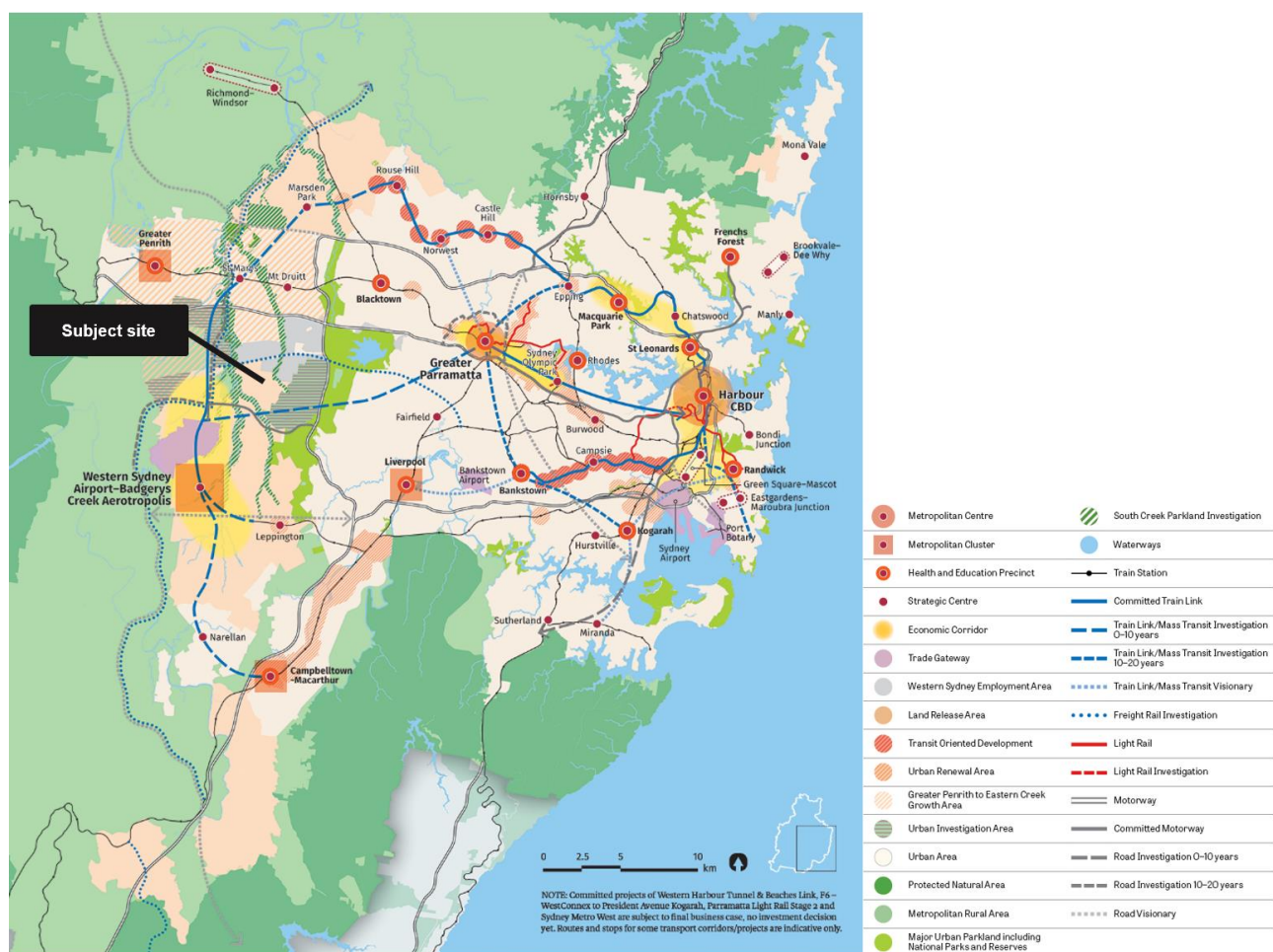
4.1. STRATEGIC PLANS AND POLICIES

4.1.1. A Metropolis of Three Cities: Greater Sydney Region Plan

A Metropolis of Three Cities: Greater Sydney Region Plan (Region Plan) was finalised in March 2018. The Region Plan has been prepared in accordance with Section 3.3 of the Environmental Planning and Assessment Act 1979 (EP&A Act). The Region Plan is built on a vision of three cities, where most residents live within 30 minutes of their jobs, education and health facilities, services and great places. It identifies four themes: infrastructure and collaboration, liveability, productivity, and sustainability. Within these four themes, a set of planning priorities and actions are identified to achieve the Region Plan's vision.

The Region Plan includes a high-level structure plan identifying key centres, employment areas, and important infrastructure contributions. The site is identified as a land release area.

Figure 4 Region Plan's Structure Plan



Source: Greater Sydney Commission

The proposed development complies with the provisions of the Region Plan as summarised below:

- **Infrastructure and collaboration:** The site has access to existing road infrastructure. It fronts Mamre Road which provides direct access to the M4 Motorway, Great Western Highway and Elizabeth Drive. Mamre Road is undergoing detailed design for an upgrade by Transport for NSW (TfNSW) (formerly known as RMS). In addition, the proposal seeks to provide essential infrastructure, e.g. sewer, water, electricity, to the site.

Through the Western Sydney City Deal, there are significant infrastructure commitments proposed to service the Western Sydney International Airport and significant road upgrades and public transport projects to support the future employment of the site and surrounding area.

- **Liveability:** The proposed development will support the 30-minute city by providing employment to nearby residential suburbs. It is surrounded by land identified for future employment and the proposed future uses on the site will not negatively impact on nearby residential land.
- **Productivity:** The proposed development responds to the industrial land shortfall identified in the Region Plan. The site is well-located to the M4 and M7 Motorways and supports the vision of the Western Sydney Aerotropolis.

4.1.2. Western City District Plan

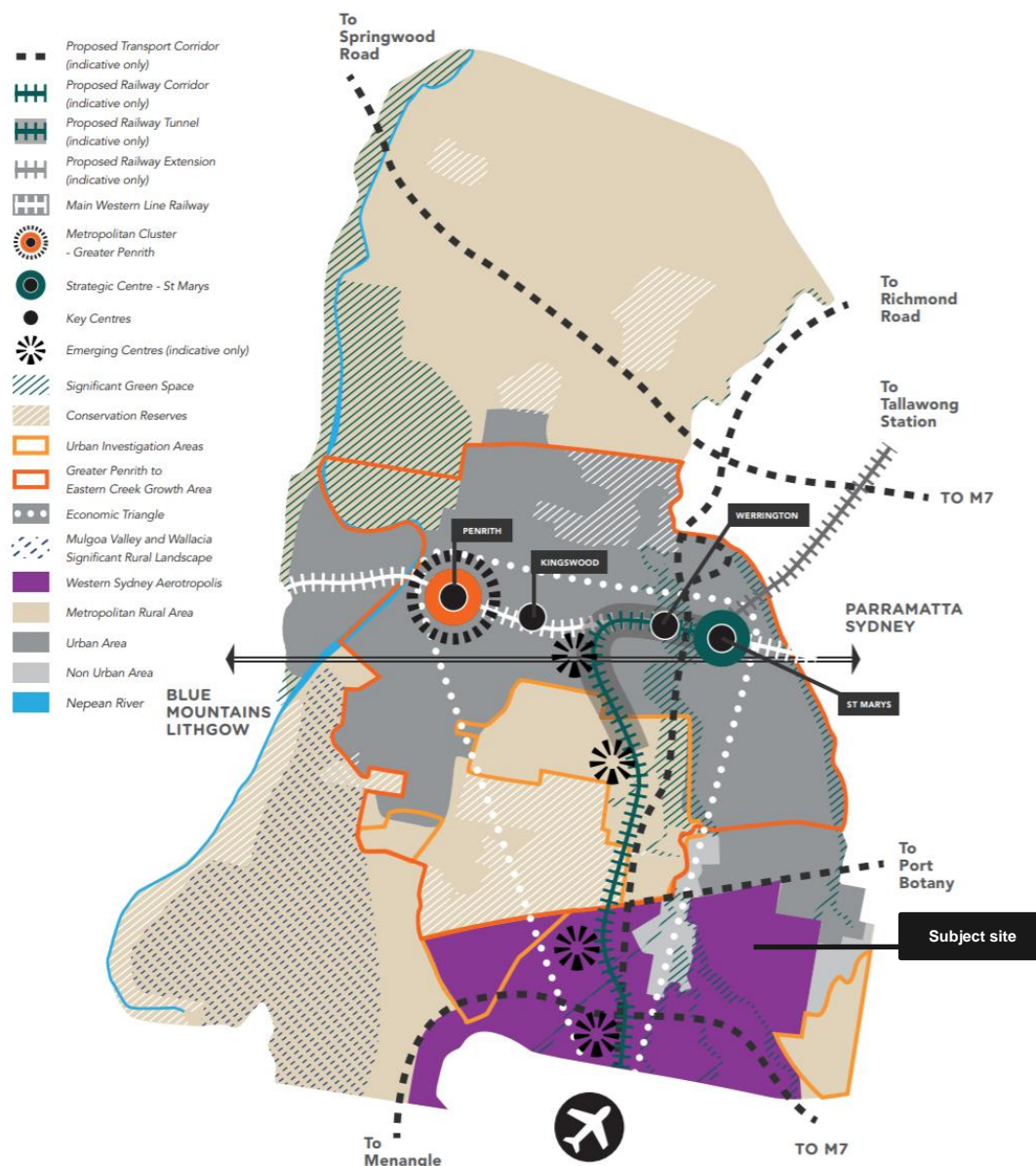
The Western City District Plan (District Plan) was finalised by the Greater Sydney Commission in conjunction with the Region Plan in March 2018. The District Plan has been prepared in accordance with Section 3.4 of the EP&A Act. The proposed development aligns with the vision of the District Plan, as summarised below:

- **Infrastructure and Collaboration:** The proposed development will assist in the delivery of essential infrastructure needed to support the Western Parkland City.
- **Liveability:** The proposed development will deliver employment opportunities accessible to nearby residents, thus contributing to the 30-minute city vision.
- **Productivity:** The site is within the Western Sydney Aerotropolis and surrounded by land identified for future employment. The proposed development will supply industrial lands within a land release area in response to long-term projected population and development growth.
- **Sustainability:** The proposal includes a range of measures to mitigate, minimise or manage the potential environmental impact of the proposal. The EIS will detail stormwater management measures to protect and manage the existing natural systems and ecologically sustainable development initiatives to minimise demand on infrastructure systems, such as sewer, water and electricity.

4.1.3. Penrith Local Strategic Planning Statement

The Penrith Local Strategic Planning Statement (LSPS) was finalised on 31 March 2020. The LSPS describes the vision and priorities for land use across the LGA, as well as outline the special character and values of the place and how they will be managed into the future. The Structure Plan identifies land within Mamre Road Precinct within the Western Sydney Aerotropolis. The LSPS identifies the Western Sydney Aerotropolis as a key employment generator for the LGA and seeks to create an economic triangle with Penrith CBD and St Marys (refer to **Figure 5** below). The LSPS defers the details on the types of employment within the Western Sydney Aerotropolis to the Western Sydney Aerotropolis Plan, the main strategic planning document guiding this growth area.

Figure 5 Structure Plan



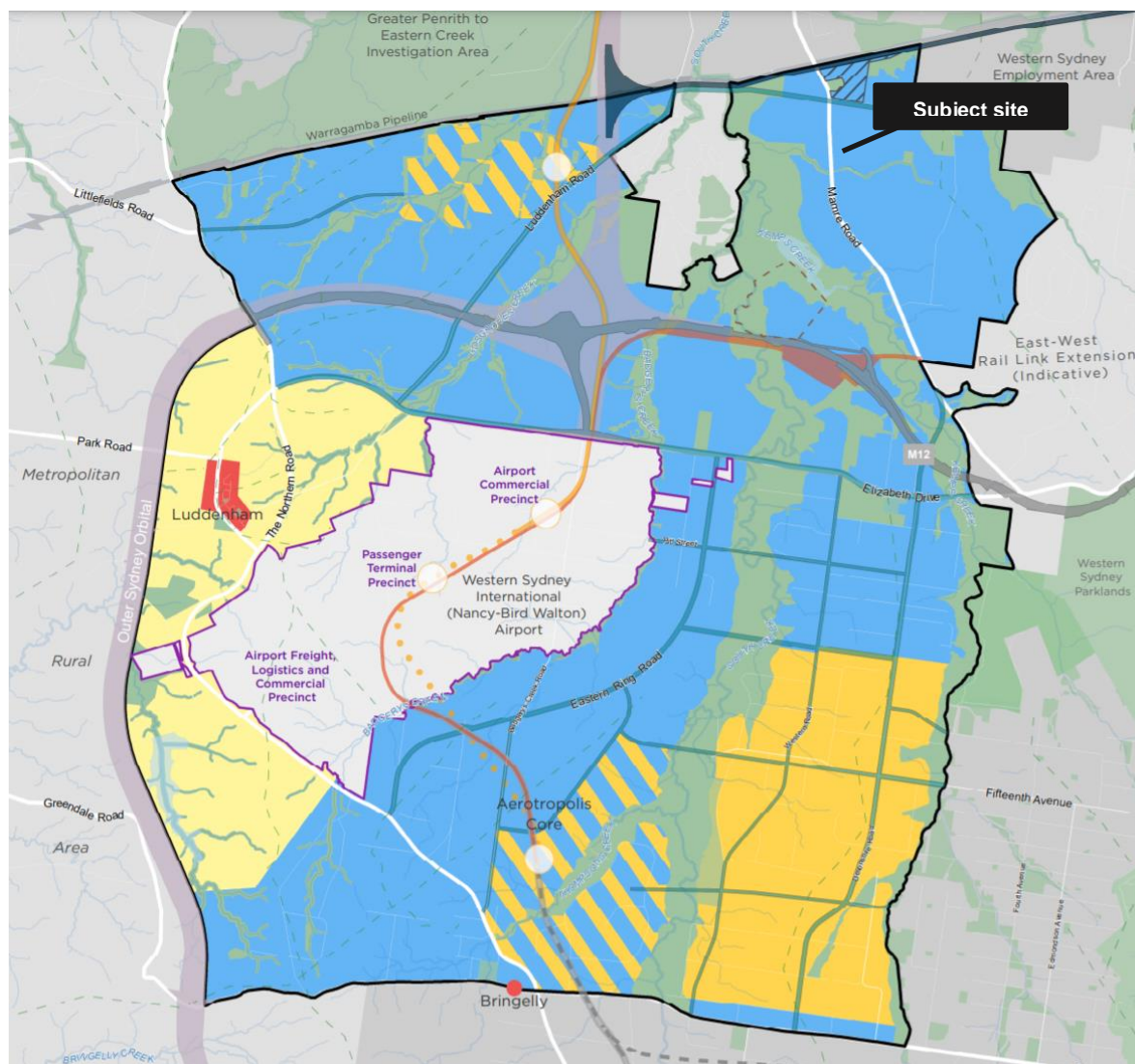
Source: Penrith City Council

4.1.4. Western Sydney Aerotropolis Plan

The *Western Sydney Aerotropolis Plan*, was finalised on 13 September 2020 and sets the planning framework for the Aerotropolis. Mamre Road Precinct is identified as one of ten precincts within the growth area. Mamre Road Precinct is an initial precinct to be brought forward to create early employment opportunities and better coordinate infrastructure planning.

The Structure Plan identifies land within Mamre Road Precinct to be zoned under the WSEA SEPP for flexible employment (**Figure 7**), with intended land uses being industrial warehousing and logistics. The statutory planning pathway is separate from the remaining Aerotropolis precincts and the Mamre Road Precinct will have its own Development Control Plan.

Figure 6 Western Sydney Aerotropolis Structure Plan



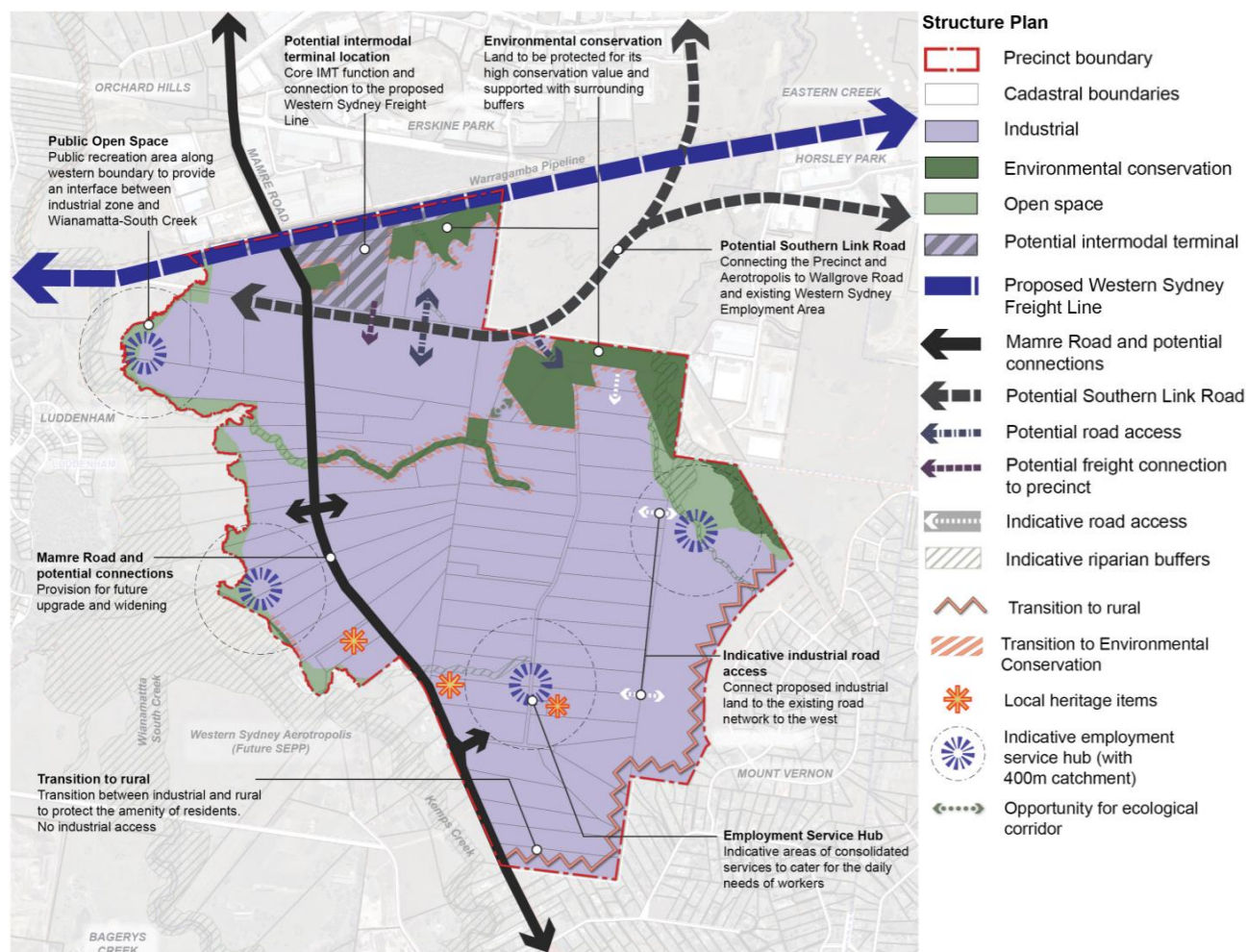
Source: Western Sydney Planning Partnership

4.1.5. Mamre Road Structure Plan

On 11 June 2020, the draft Mamre Road Structure Plan which was exhibited along with the WSEA SEPP Amendment. The structure plan has since come into effect and is reflected in the WSEA SEPP zoning maps. The structure plan identifies the intent of the precinct, highlighting future industrial, environment and drainage areas, as well as identifying key infrastructure required to support the precinct.

The site is identified for industrial land within the structure plan. It includes a riparian zone that traverses the site. It is proposed that the technical studies used to inform the future development will ground truth and support the proposed 25m wide realigned riparian corridor.

Figure 7 Mamre Road Structure Plan



Source: Department of Planning, Industry and Environment

4.2. STATUTORY FRAMEWORK

4.2.1. Environmental Protection and Biodiversity Conservation Act 1999

The Commonwealth's *Environmental Protection and Biodiversity Act 1999* (EPBC Act) aims to protect the environment and matters of national environmental significance, including flora, fauna, ecological communities and heritage.

As discussed in **Section 2**, the land has been historically used for agricultural uses and farming. The site has gradually been cleared of vegetation and has been subject to the construction of farms dams. To inform the EIS, a Biodiversity Assessment will be undertaken in accordance with the NSW Framework and with consultation with Natural Resources Access Regulator (NRAR), to investigate the extent of potential native vegetation present and to inform an assessment of impacts to potential threatened species, their habitats and ecological communities.

4.2.2. Biodiversity Conservation Act 2016

The *Biodiversity Conservation Act 2016* (BC Act) aims to maintain a healthy, productive and resilient environment in accordance with Ecologically Sensitive Development (ESD) principles, including an assessment framework for determining the likely impacts of development on biodiversity and threatened species and a consistent methodology for calculating measure to off-set those impacts.

The EIS and supporting documentation will demonstrate the way in which the proposal will avoid or minimise impacts to any retained biodiversity.

4.2.3. Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) outlines the strategic and statutory planning framework for the State, including the assessment requirements for development applications.

The proposal is classified as SSD in accordance with the SRD SEPP as outlined in **Section 4.2.5**. Accordingly, the Division 4.7 provisions apply to the proposal as outlined below:

- The proposed development is permitted with consent in accordance with the WSEA SEPP (refer to **Section 4.2.4**).
- An EIS will be prepared in accordance with the relevant legislation and requirements as outlined within the SEARs.

4.2.4. State Environmental Planning Policy (Western Sydney Employment Area) 2009 Amendment

State Environmental Planning Policy (Western Sydney Employment Area) 2009 (WSEA SEPP) was gazetted on 11 June 2020 and rezoned the Mamre Road Precinct and brought the Mamre Road Structure Plan into effect.

The SEPP amendment and introduction of the Mamre Road Precinct Structure Plan ensured that the precinct would become an employment area, provide industrial lands and increase employment opportunities within Western Sydney.

The Mamre Road Structure Plan identifies a majority of Mamre Road Precinct for future industrial land uses. As a result of the Mamre Road Precinct rezoning, the WSEA SEPP has become the primary environmental planning instrument governing development on the site. The site zoned IN1 General Industrial and industrial uses and warehouse or distribution centres are permitted with consent (refer to **Figure 8** below).

The WSEA SEPP zoning maps identify a portion of E2 Environmental Conservation land that transverses the eastern part of the subject site. It is understood that clause 33A *Development near zone boundaries, State Environmental Planning Policy (Western Sydney Employment Area) 2009 (WSEA SEPP)*, which allows a 20 metre flexibility for land zoned adjacent to E2 Environmental Conservation zone, was specifically included in the Mamre Road rezoning package to provide flexibility in the location of the E2 zone across the precinct.

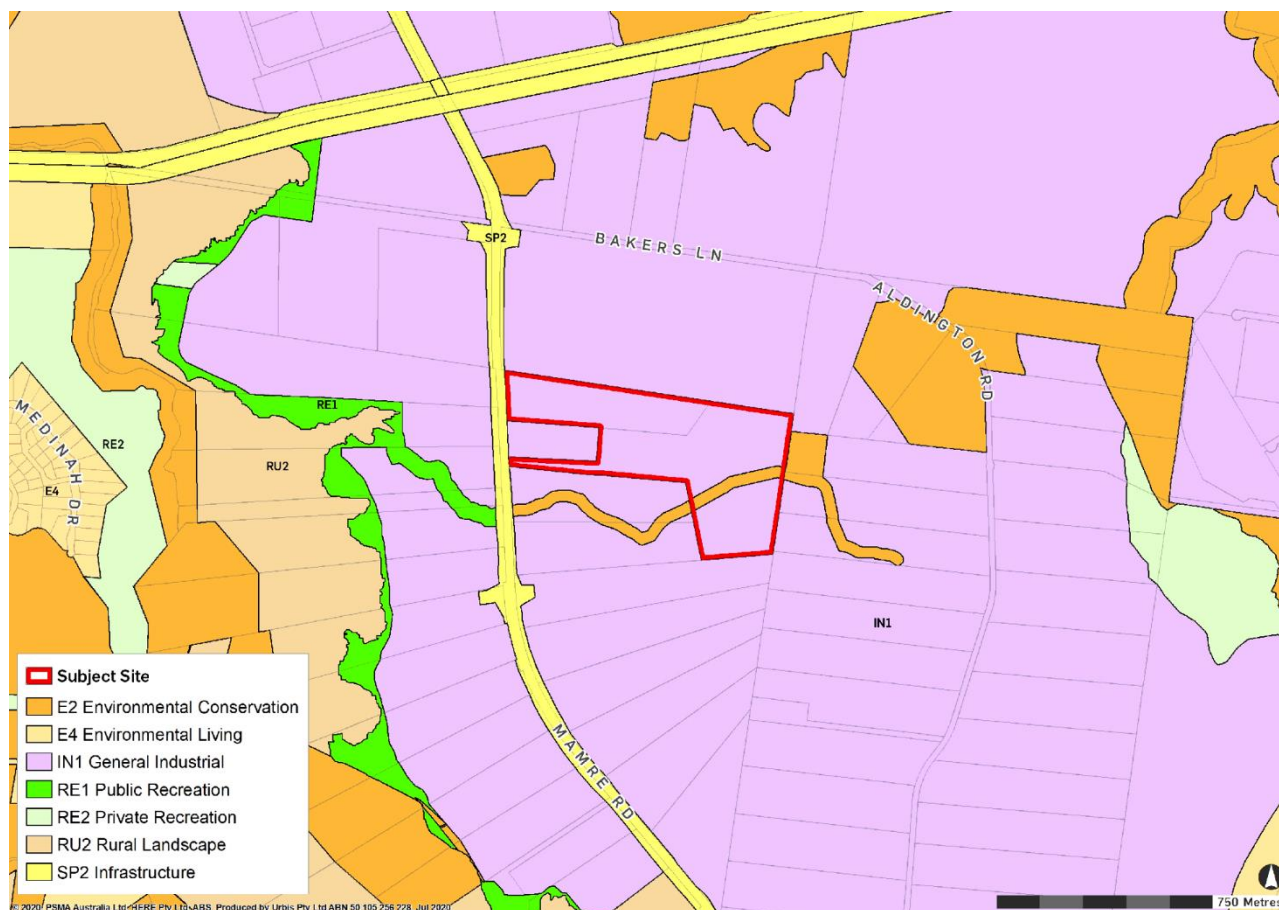
It is GPT's intention to:

- Rely on clause 33A to seek consent for industrial purposes across the majority of the E2 Environmental Conservation zoned land on its site, being a corridor 40m wide running east-west (i.e. applying the 20m distance from both the eastern and western sides of the E2 Environmental Conservation zone), and simultaneously
- Seek consent to construct a new, realigned, corridor connecting the ground-truthed 25m wide ecological corridor which will connect with the wider E2 Environmental zone corridor.

It is recognised that, in addressing clause 33A, the application must demonstrate compliance with the objectives of each zone and result in a better outcome than what current exists on site.

The masterplan has been the subject of significant consultation with respective environmental agencies and DPIE to ensure the revised E2 corridor alignment provides a significant environmental benefit compared with the current situation. As part of the application package, we will ensure appropriate letters of support are documented to provide assurance to the DPIE that the final masterplan meets each zone's objectives and strategically aligns with the Aerotropolis and WSEA strategic planning documents.

Figure 8 Proposed Land Zoning



Source: Urbis

The proposed development is consistent with the aims of the WSEA SEPP and the Mamre Road Structure Plan as summarised below:

- The proposal seeks to develop the site for employment-generating uses consistent with the Region and District Plans and deliver social and economic outcomes for Western Sydney.
- The careful siting and design of the proposed development, including the location of warehouse buildings and landscaping, will respect the natural features of the site and surrounding locality.
- The proposed development will be undertaken in an ecologically sensitive manner.

Table 1 WSEA SEPP Provisions

Clause	Comment
Clause 3 – Aims	The proposal seeks consent to plan and develop the land for employment generating uses consistent with the overarching aim of the WSEA SEPP.
Clause 10 – Land Use Zoning	Subject to the SEPP amendment, the site will be zoned IN1 General Industrial. All works proposed under the SSD are permissible in the IN1 zone, including construction and use of the buildings as a warehouse or distribution centre and other manufacturing industries as identified under Schedule 1 of the SRD SEPP. A small portion of the site includes a strip of E2 Environmental Conservation zone. As such, the proposal will be amended to respond and mitigate impacts on the area zoned E2 Environmental Conservation. It is intended that the alignment of the E2 zone will be adjusted as part of an amendment to the WSEA SEPP.

Clause	Comment
Clause 18 – Development Control Plans	A Development Control Plan will be prepared in accordance with Division 3.6 in the EP&A Act and Clause 18 of the WSEA SEPP, to facilitate the proposed SSDA. DPIE is currently preparing a draft Precinct wide Development Control Plan, which will soon be on exhibition.
Clause 20 – Ecologically Sustainable Development	Energy efficiency of the proposal will be assessed and addressed in the EIS, including an assessment of likely emissions during construction and operation.
Clause 21 – Height of Buildings	<p>Building heights proposed for the warehouse or distribution centres have been established in consideration of the needs of current and emerging industrial or warehousing development typologies and the potential visual impacts.</p> <p>A maximum building height will be established for the proposed warehouses.</p> <p>In relation to the provisions of Clause 21, a detailed analysis of the proposed built form in the context of existing topography and potential for impact on surrounding residential development will be undertaken as part of the visual impact assessment (VIA) as part of the EIS.</p>
Clause 22 – Rainwater Harvesting	<p>Rainwater tanks would be provided as part of the development and a detailed Stormwater Management Plan will be provided in the EIS.</p> <p>Details of the proposed rainwater tanks will be provided in the Civil Report.</p>
Clause 25 – Public Utility Infrastructure	All necessary public utility infrastructure and services would be discussed and assessed as part of the EIS, including any potential upgrades of existing services.
Clause 26 – Development on or in the vicinity of proposed transport routes	The EIS and accompanying Traffic and Transport Assessment will consider the compatibility of the development with the proposed Mamre Road Upgrade.
Clause 29 – Industrial Release Area	<p>The requirement for regional infrastructure contributions will be satisfied via a monetary contribution in accordance with the satisfactory arrangement requirement for the WSEA and contribution to Penrith Section 7.11 Contribution Plan for the provision of infrastructure and services.</p> <p>The proposed internal road, stormwater infrastructure work, utilities and services (including sewer, water, electricity, gas and telecommunications) will be delivered by the proponent to service the estate.</p>
Clause 31 – Design Principles	The proposal is being developed based on robust principles and an iterative design process, underpinned by carefully considered design principles related to bulk and scale, accessibility and permeability, landscaping and public domain, materials and finishes. Integration with the surrounding land use character and context remains at the forefront of design principles which has guided the proposed development. The guiding principles and design will be detailed in the EIS and further articulated in the final architectural package.

Clause	Comment
Clause 32 – Preservation of Trees	A biodiversity and arboriculture report will be prepared to investigate the removal of trees and outline the tree protection specifications for retained and potentially impacted trees.
Clause 33B – Development of land within or adjacent to transport corridor	This clause requires the consent authority to obtain concurrence with TfNSW in relation to the proposed intermodal terminal. The site is not located on or adjacent to the potential intermodal corridor, therefore this clause does not apply.
Clause 33C – Development within the Mamre Road Precinct	This clause requires the consent authority to obtain concurrence with TfNSW for development of land within Precinct 12 (Mamre Road) that has a CIV of greater than \$200,000.
Clause 33D – Development in areas subject to aircraft noise	This clause sets out additional matters for a consent authority to consider before it grants development consent. The proposed development is complimentary to the 24-hour airport operations and is not a sensitive land use.
Clause 33G – Water recycling and conservation	A Water Cycle Management Report will address stormwater and water management requirements in relation to the proposed development. Water recycling plant will be investigated as part of the development and a detailed Stormwater Management Plan will be provided in the EIS.
Clause 33H – Earthworks	The proposed earthworks will be designed to prevent detrimental impact on the environmental function and processes, neighbouring uses, cultural or heritage items of the surrounding land. The Civil Plans and Report will detail how this is proposed to be mitigated.
Clause 33I – Development on flood prone land	A Water Cycle Management Report will be prepared to consider the cumulative and local impact of the proposed development on the whole floodplain within the PMF and 1:100 chance per year flood level.
Clause 33J – Heritage Conservation	An assessment of Non-Indigenous heritage and Indigenous heritage will be undertaken to support the SSDA and ensure proper management and mitigation of heritage impacts.

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

The State and Regional Development State Environmental Planning Policy (SRD SEPP) identifies certain types of development as State Significant Development under Clause 8 of the SEPP.

Specifically, Clause 8(1b) of *State Environmental Planning Policy (State and Regional Development) 2011* relevantly states that:

- (1) *Development is declared to be State significant development for the purposes of the Act if—*
- (b) *the development is specified in Schedule 1 or 2.*

The proposed development for the site is specified under Part 11 and 12 of Schedule 1 of the SRD SEPP as follows:

- (11) *Other manufacturing industries*

Development that has a **capital investment value of more than \$30 million** for any of the following purposes—

- (a) laboratory, research or development facilities,
- (b) medical products manufacturing,
- (c) printing or publishing,
- (d) textile, clothing, footwear or leather manufacturing,
- (e) furniture manufacturing,
- (f) machinery or equipment manufacturing,
- (g) the vehicle, defence or aerospace industry,
- (h) vessel or boat building and repair facilities (not including marinas).

(12) Warehouse or distribution centres

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

The proposed development satisfies the provisions of Clause 8 and Schedule 1, Part 11 and Part 12 of the State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP), as the development will have a capital investment value greater than \$50 million for the purpose for *other manufacturing industries and/or warehouse and distribution centres* at one location and related to the same operation to be classified as State Significant Development.

4.2.6. State Environmental Planning Policy (Infrastructure) 2007

State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) aims to facilitate the effective delivery of infrastructure by providing a consistent planning framework that applies across NSW.

The SSDA may be referred to relevant utility service providers to confirm that the siting and layout of the proposed development will not impact on relevant easements and/ or infrastructure corridors. Schedule 3 of the ISEPP identifies *'traffic generating development'* that must be referred to the RMS for concurrence. Give, the site exceeds the minimum gross floor area of 20,000m² RMS concurrence will be required.

4.2.7. State Environmental Planning Policy No. 33 – Hazardous and Offensive Development

State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33) ensures appropriate mitigation measures are employed to reduce the impact of development with hazardous or offensive industries.

No dangerous goods are to be stored within the proposed facility. Any future proposal to store such goods will be subject to assessment under SEPP 33.

4.2.8. State Environmental Planning Policy No. 55 – Remediation of Land

State Environmental Planning Policy No 55 – Remediation of Land (SEPP 55) provides a State-wide approach to the remediation of contaminated land, including the requirements to be addressed prior to determining a development application.

The SSDA will be supported by detailed technical reports which satisfactorily address the provision of SEPP 55, including any remediation works required to ensure the site is suitable for the proposed use.

4.2.9. State Environmental Planning Policy (Western Sydney Aerotropolis)

The State Environmental Planning Policy (Western Sydney Aerotropolis) is the new planning framework to achieve the State planning objectives for the Aerotropolis. The proposed SEPP applies to the whole growth area and:

- Implements the Western Sydney Aerotropolis Plan
- Sets the boundary for the Aerotropolis and the area to which the SEPP applies;
- Defines the precincts within the Aerotropolis;
- Applies land use zones throughout the Aerotropolis, with the airport site remaining subject to the Airports Act 1996 (Cth);
- Sets strategic objectives for future planning within the area;
- Outlines planning controls including mapping (Mamre Road Precinct is excluded from this as it has been rezoned under the WSEA SEPP);
- Identifies transport corridors and utility sites required to service the Aerotropolis; and
- Outlines relevant approval pathways.

The SEPP applies to the site for the purpose of aligning the strategic objectives and Western Sydney Aerotropolis Plan to the site. All planning controls related to future development are outlined in the WSEA SEPP. Consistency with the Aerotropolis SEPP will be addressed as part of the EIS.

4.2.10. Draft Cumberland Plain Conservation Plan

The Draft Cumberland Plain Conservation Plan (CPCP) seeks to biodiversity certified land across Western Sydney to offset the impacts of urban development. It is noted that majority of the site has been identified as biodiversity certified land that is capable of urban development, with the exception of the E2 zone that transverses the site.

GPT intend on making a submission on the Draft CPCP to have land within the E2 zone biodiversity certified and supported by ground truthing across the site. The biodiversity certification outcomes will be addressed as part of the EIS.

4.2.11. Penrith Local Environmental Plan 2010

The WSEA SEPP amendment came into effect on 11 June 2020, therefore The *Penrith Local Environmental Plan 2010* (PLEP 2010) has been superseded. Therefore, this LEP does not apply to strategic and statutory assessment of the surrounding area.

5. KEY PLANNING CONSIDERATIONS

5.1. MATTERS FOR CONSIDERATION IN EIS

KEY ISSUES

The key environmental issues associated with the proposed development have been identified as follows.

5.1.1. Amenity

Noise, vibration, visual and air quality impacts

The site is located along Mamre Road, Kemps Creek and is within proximity to the M4 Motorway and Great Western Highway to the north and Elizabeth Drive to the south. It is situated north-east of the future Western Sydney International Airport and falls within the Australian Noise Exposure Forecast (ANEF) 20 contour. The proposed development supports the Airport's 24 hour operation and is considered an appropriate land use.

The proposal will need to be assessed having regard to its potential impacts on the surrounding locality including the potential noise generating sources associated with the future site operations and traffic generated by future industrial tenants. The visual impact of the proposed buildings will be assessed from vantage points outside the site. In addition, the construction and operation of the proposed development will be assessed against noise and air quality impacts.

5.1.2. Access

Transport, access and parking

The EIS will provide a comprehensive assessment of the likely transport and traffic impacts of the proposed development, including the future traffic generation and required infrastructure improvements to mitigate, minimise or manage the potential impacts. This will include the construction of a new internal road, a north-south road as part of Stage 1 and interim access arrangement prior to the finalisation of the road layout for the Precinct.

Car parking associated with the future warehouse will be provided in accordance with the relevant rates prescribed within the WSEA. Existing and likely future sustainable transport modes, including public transport, cycling and walking will be addressed as part of the Transport and Accessibility Assessment.

5.1.3. Built Environment

Built form and urban design

The EIS will outline the proposed development in detail, including site preparation works and the proposed construction works. The final architectural package and urban design report will detail the rationale for the siting and layout of the proposed development, including vehicular access arrangements.

Consideration will be given to the proposed buildings and their potential visual impacts when viewed from the surrounding area, including Mamre Road and adjoining properties. The overall design will consider architectural appearance and landscape treatment to provide an attractive street presentation.

The proposed early works to facilitate future development on the site, including bulk earthworks and infrastructure delivery will be addressed in detail, including consideration on the proposed levels and future building envelopes.

5.1.4. Heritage

Indigenous and non-Indigenous

A non-Aboriginal Statement of Heritage Impact, an Aboriginal Archaeological Survey Report and an Aboriginal Cultural Heritage Assessment Report will be prepared to assess the site for Aboriginal and non-Aboriginal archaeological potential or heritage significance. The outcomes of the assessment will be detailed in the EIS. An associated management and mitigation protocol will ensure that any findings can be properly managed during the construction phases of the development.

5.1.5. Economic

Social and economic impacts

The proposed Warehouse and Logistic Hub will deliver significant social and economic benefits associated with the delivery of zoned, serviced industrial land and creation of jobs within a future employment precinct.

The EIS will include detailed analysis and assessment of the potential social and economic impacts of the proposed development, including increased local spending and job creation associated with the construction and operational phases.

5.1.6. Biodiversity

Riparian Corridor

The WSEA SEPP maps a riparian corridor through the site which connects to the broader landscape to the east and west. The integrity of the riparian corridor has been altered through a series of farm dams within the site. In addition, the vegetation on the eastern boundary is generally isolated from the broader landscape. As such, a realigned 25m wide riparian corridor is proposed as part of the Stage 1 works.

A Riparian Lands Assessment will be prepared to ground truth to the condition of the existing riparian corridor, potential impacts of the proposed realignment and mitigation measure to ensure any impacts are minimised.

Flora and Fauna

The EIS will investigate existing flora and fauna within the site, including any potential threatened species. A Biodiversity Development Assessment Report will be prepared to detail existing species found on the site and identify appropriate mitigation measures.

5.1.7. Land

Soil

The EIS will detail the underlying geology of the site and geotechnical investigations will identify any acid sulfate soils, salinity, erosions or other forms of land degradation present on the site.

An Erosion and Sediment Control Plan will be prepared to detail measures and procedure to minimise and manage the generation of off-site sediment and dust transmission.

Geotechnical and contamination

Historic records indicate that the site was not subject to extensive landform modification or disturbance through construction or built structures. The site currently comprises farm dams which were constructed to facilitate agricultural production. Based on historic land uses, it is unlikely that land disturbance and land contamination will be present on the site.

The Targeted Environmental Investigation identified that the land is appropriate for industrial use. The EIS will detail any required works to be incorporated in the proposed development.

5.1.8. Water

Stormwater and Flood Management

The site is unaffected by the 1% Annual Exceedance Probability (AEP) and Probable Maximum Flood (PMF) flood events defined within the Worley Parsons 2015 South Creek Flood Study.

A Stormwater Management Plan will be prepared to outline how the water quality and quantity will be managed across the site, including mitigation measures for upstream runoff such as rainwater tanks to capture water for potential re-use.

5.1.9. Other Issues

Additional relevant issues to be addressed in the EIS includes the following:

Future Mamre Road upgrade

The Mamre Road Upgrade Community Consultation Report details the proposed Mamre Road Upgrade between the M4 Motorway and Kerrs Road (south of the site). A Traffic Impact Assessment Report will be prepared to determine the impact of the expected future traffic flows from the proposed development and its impacts on the timing on the future Mamre Road upgrade. The proposed development has been designed to accommodate the Mamre Road upgrade and in consultation with RMS.

Utility and infrastructure delivery

The EIS will outline the adequacy of the existing potable water, sewer, electricity and telecommunications infrastructure to accommodate the proposed development, including any necessary upgrades to meet forecasted demand.

Ecologically sustainable development

The EIS will demonstrate the way in which Ecologically Sustainable Development (ESD) principles have been incorporated into the siting and design of the proposed development.

It will identify potential measures to be implemented into the building design and construction to minimise the environmental footprint of the development, including opportunities to avoid or minimise the demand for water, power, etc.

Waste management

The EIS will provide detailed measures to avoid, minimise or manage waste generated during the site preparation, construction and operation phases.

5.2. CUMULATIVE IMPACTS

Cumulative impacts on the site to surrounding areas will be addressed through the EIS in respect to the following key issues:

- Noise and vibration
- Odour
- Traffic and transport
- Riparian corridors
- Water cycle management
- Geotechnical

6. COMMUNITY AND OTHER STAKEHOLDER ENGAGEMENT

The proponent has engaged with State and local planning authorities during the preliminary investigations phase for the GPT Industrial Estate SSDA process, including:

- Department of Planning, Industry and Environment
- Transport for NSW
- Penrith City Council
- Natural Resource Access Regulator
- Western Sydney Planning Partnership
- Sydney Water
- Endeavour Energy
- Jemena
- NBN

Further consultation will be undertaken with the above stakeholders and additional stakeholders, including neighbouring landowners, during the preparation of the EIS and in accordance with the SEARs. The outcome of consultation activities will be documented in the EIS.

7. EXPECTED DELIVERABLES

To assist in confirming the SEARs, we have conducted an examination of what the expected deliverables will be to accompany the EIS. These include:

- Landowner's consent
- Environmental Assessment
- Flood Impact Assessment
- Energy Efficiency Report
- Geotechnical Report
- Contamination Assessment Report
- Remediation Action Plan (if required)
- Flood Risk Assessment
- Groundwater Management Plan
- Waste Management Plan
- Dam Dewatering Report
- Unexpected Finds Protocol
- Bushfire Risk Assessment
- Site Survey
- Noise and Vibration Impact Assessment
- Vegetation Management Plan
- BCA Compliance Report
- Fire Safety Statement
- Air Quality and Odour Impact Assessment
- Aboriginal Archaeological Survey Report
- Urban Design Report
- Landscape and Visual Impact Assessment
- Civil Plans and Report
- Traffic Impact Assessment
- Landscape Plans
- Architectural Concept Masterplan
- Architectural Stage 1 Package
- Heritage Impact Assessment
- Biodiversity Development Assessment Report
- Riparian Lands Assessment Report
- CIV Estimate

DISCLAIMER

This report is dated 2 October 2020 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of The GPT Group (**Instructing Party**) for the purpose of DRAFT (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A

CIV REPORT

29 September 2020

The Secretary
NSW Department of Planning, Industry and Environment
320 Pitt Street
Sydney, NSW 2000

Re: Capital Investment Value for Stage 1 of the Industrial Estate at Lots 59-60 in DP 259135, Kemps Creek

To support the SEARS request and supporting scoping report for the above Development, the estimated Capital Investment Value ('CIV') of Stage 1 State Significant Development Application is as follows:

Stage 1 Works	\$ million
Onsite Civil	8.2
Infrastructure Services Reticulation	14.8
Access Roads	1.2
Base Building	25.5
E2 Zone	1.5
Fees	3.1
CIV	54.3

Stage 1 works include the construction and use of Warehouse 3 and the required infrastructure to allow the operation of the Warehouse including bulk earthworks and retaining walls, internal road network, associated carparking, signage and landscaping and the adjacent E2 Zone.

A quantity surveyors report will be provided with the State Significant Development Application as required.

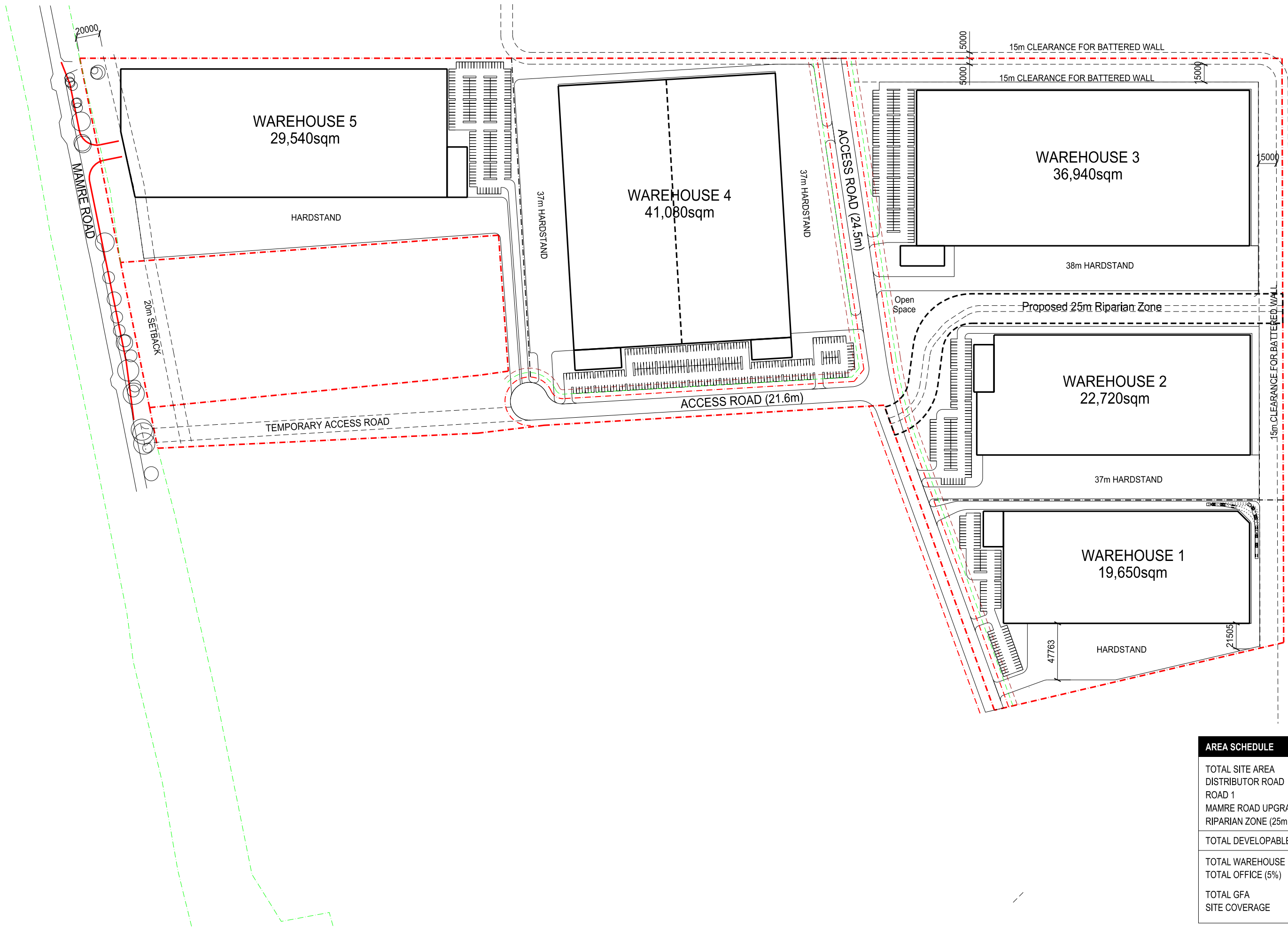
Yours sincerely



Matt Jordan
Development Manager, Logistics Development

APPENDIX B

CONCEPT MASTERPLAN



AREA SCHEDULE	
TOTAL SITE AREA	333,600 sqm
DISTRIBUTOR ROAD	10,440 sqm
ROAD 1	7,380 sqm
MAMRE ROAD UPGRADE	0 sqm
RIPARIAN ZONE (25m)	9,820 sqm
TOTAL DEVELOPABLE AREA	305,960 sqm
TOTAL WAREHOUSE	149,930 sqm
TOTAL OFFICE (5%)	7,500 sqm
TOTAL GFA	157,430 sqm
SITE COVERAGE	51 %

