



Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility (Ardex)

**657-769 Mamre Road, Kemps Creek
Proposed Lot 10 (Approved under SSD 9522)**

Prepared by Willowtree Planning on behalf of Altis
Fraser's JV Pty Ltd

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility

657-769 Mamre Road, Kemps Creek

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Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

TABLE OF CONTENTS

PART A	PRELIMINARY	4
1.1	INTRODUCTION.....	4
PART B	SITE ANALYSIS	5
2.1	SITE LOCATION & EXISTING CHARACTERISTICS.....	5
2.2	LOCAL AND REGIONAL CONTEXT	7
PART C	PROJECT SUMMARY	11
3.1	AIMS AND OBJECTIVES OF THE PROPOSED DEVELOPMENT	11
3.2	DESCRIPTION OF THE PROPOSED DEVELOPMENT	11
3.3	OVERVIEW OF ARDEX OPERATIONS	15
3.4	CAPITAL INVESTMENT VALUE	21
3.5	CONSULTATION.....	21
3.6	STATE SIGNIFICANT DEVELOPMENT 9522	22
PART D	JUSTIFICATION	24
PART E	LEGISLATIVE AND POLICY FRAMEWORK	26
5.1	ENVIRONMENTAL PROTECTION AND BIODIVERSITY CONSERVATION ACT 1999	26
5.2	A METROPOLIS OF THREE CITIES – GREATER SYDNEY REGION PLAN.....	27
5.3	WESTERN CITY DISTRICT PLAN	28
5.4	WESTERN SYDNEY AEROTROPOLIS PLAN	29
5.5	MAMRE ROAD PRECINCT STRUCTURE PLAN.....	32
5.6	ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979	33
5.7	ENVIRONMENTAL PLANNING AND ASSESSMENT REGULATION 2000	33
5.8	PROTECTION OF THE ENVIRONMENT OPERATIONS ACT 1979.....	33
5.9	BIODIVERSITY CONSERVATION ACT 2016	33
5.10	STATE ENVIRONMENTAL PLANNING POLICY (STATE AND REGIONAL DEVELOPMENT) 2011.....	34
5.11	STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007.....	34
5.12	STATE ENVIRONMENTAL PLANNING POLICY NO. 33 – HAZARDOUS AND OFFENSIVE DEVELOPMENT	34
5.13	STATE ENVIRONMENTAL PLANNING POLICY NO. 55 – REMEDIATION OF LAND	34
5.14	STATE ENVIRONMENTAL PLANNING POLICY (WESTERN SYDNEY EMPLOYMENT AREA) 2009	35
5.15	PENRITH LOCAL ENVIRONMENTAL PLAN 2010	43
5.16	DRAFT ENVIRONMENTAL PLANNING INSTRUMENTS.....	43
5.17	DRAFT MAMRE ROAD PRECINCT DEVELOPMENT CONTROL PLAN.....	44
PART F	ENVIRONMENTAL ASSESSMENT	47
PART G	CONCLUSION	52

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

Figures

Figure 1: Estate Subdivision Plan	5
Figure 2: Site and Surrounds	7
Figure 3: Surrounding Development.....	10
Figure 4: Overall Estate Plan.....	14
Figure 5: Proposed Site Plan	14
Figure 6: Proposed Elevations.....	15
Figure 7: Powder Manufacturing Process Flow Chart	17
Figure 8: Process Description (Powders).....	18
Figure 9: Liquid Manufacturing Process Flow Chart.....	19
Figure 10: Process Description (Liquids)	19
Figure 11 Metropolis of 3 Cities A Vision to 2056	28
Figure 12 Western Sydney Aerotropolis: Structure Plan	30
Figure 13 Western Sydney Aerotropolis: Initial Precincts Plan	31
Figure 14 Mamre Road Precinct Structure Plan.....	32
Figure 15: Land Zoning Map WSEA	35

Tables

Table 1 State Significant Development Applications, Development Applications and Modification Applications in the vicinity of the Subject Site.....	8
Table 2: Building Areas	12
Table 3: Proposed Development as Approved	22
Table 4: SEPP WSEA Provisions	36
Table 5 Draft Mamre Road Precinct DCP	44
Table 6: Environmental Screening Analysis	47

Appendices

Appendix 1	Preliminary Architectural Plans
Appendix 2	Preliminary Cost Report
Appendix 3	Ecoplanning Letter

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

PART A PRELIMINARY

1.1 INTRODUCTION

This Scoping Report has been prepared by Willowtree Planning Pty Ltd (Willowtree Planning) on behalf of Altis Frasers JV Pty Ltd and is submitted to the NSW Department of Planning, Industry and Environment (DPIE) in support of a formal request for Secretary's Environmental Assessment Requirements (SEARs).

The Proponent is proposing to construct and operate a Warehouse / Industrial facility at the Site which will be occupied and operated by Ardex. Ardex is a manufacturer and supplier of products which include renders, screeds, floor levelling and adhesive products, decorative surface finishes, mortars used in repair applications, tile adhesives, grouts, silicone products, waterproofing membranes, primers, bonding agents and additives, sealants, sealers, sound proofing systems, a range of "natural stone" products, and a range of tools used for flooring and wall applications.

The Site is located within the Penrith Local Government Area (LGA) and is zoned IN1 General Industrial under the provisions of *State Environmental Planning Policy (Western Sydney Employment Area) 2009* (SEPP WSEA). Development for the purpose of warehousing and industry is permissible with consent within the IN1 General Industrial zone.

The proposed development satisfies the definition of State Significant Development (SSD) pursuant to Schedule 1, Part 9 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP) as the Capital Investment Value (CIV) exceeds more than \$30 Million.

This Scoping Report provides a brief overview of the proposed development and the relevant planning framework that applies to enable the issuance of the SEARs, which will guide the preparation of a formal Environmental Impact Statement (EIS) for future development of the land.

Environmental considerations relevant to the proposed development have been identified pertaining to the following parameters:

- Soil and Water;
- Noise and Vibration;
- Air Quality;
- Biodiversity;
- Waste;
- Traffic and Transport;
- Hazards and Risks;
- Energy Efficiency;
- Heritage, including Aboriginal Cultural Heritage and Non-Aboriginal (European) Heritage;
- Visual Amenity and Site Design;
- Infrastructure and Services;
- Social Impacts; and,
- Economic Impacts.

The proposed development would promote the enhanced development of the Sydney Metropolitan Region (primarily the Western Sydney Employment Area (WSEA)) by provision of modern-day Warehouse / Industrial facility that will generate employment opportunities as envisaged under the strategic directions of the WSEA.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

PART B SITE ANALYSIS

2.1 SITE LOCATION & EXISTING CHARACTERISTICS

The Site that is the subject of this Scoping Report is currently defined as 657-769 Mamre Road, Kemps Creek. The Site forms part of the broader estate (known as The Yards), that was approved under SSD 9522 in December 2020, for the purpose of Warehouse, Logistics and Industrial Facilities. Under SSD 9522, the proposed allotment is notated as Lot 10 in accordance with **Figure 1** below. It is noted that the subdivision plan shown below is pending approval under Modification 1.

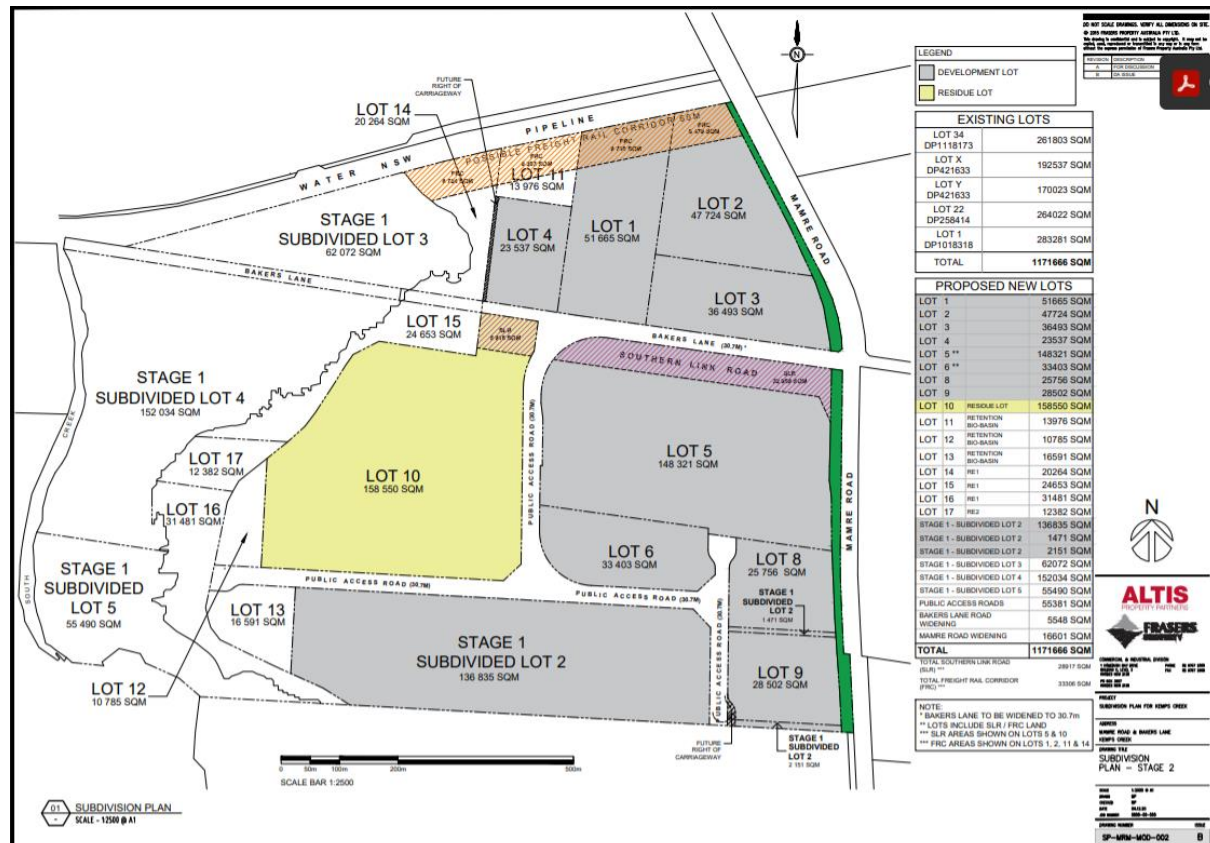


Figure 1: Estate Subdivision Plan

The entire area of proposed Lot 10 is 14.5ha and is subject to the applicable provisions outlined within SEPP WSEA. Lot 10 under this proposed SSD Application pertaining to this SEARs request will seek to only utilise 4.6 ha of land. Access to the Site is proposed via the estate access roads approved under SSD 9522, which are accessed from Mamre Road. Access into the overall estate is made possible via Mamre Road, which is subject to future road widening as part of the Mamre Road Widening Project.

The Site is situated approximately 40.26 km west of the Sydney CBD, 22.11 km west of Parramatta and 11.97 km southeast of Penrith. It is within proximity to transport infrastructure routes (predominantly the bus network), as well as sharing direct links with the wider regional road network, including Mamre Road and both the M4 & M7 Motorways, all of which provide enhanced connectivity to the Subject Site and immediate vicinity, as well as the wider locality. Additionally, the subject Site is located within close proximity to active transport links, such as bicycle routes, providing an additional mode of accessible transport available to the Subject Site.

In its existing state, the subject Site is undergoing bulk earthworks and infrastructure works as per SSD 9522.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

Land surrounding the Site comprises the following zoning categories, including:

- IN1 General Industrial;
- RE1 Public Recreation;
- RE2 Private Recreation;
- ENZ Environment and Recreation (under *State Environmental Planning Policy (Aerotropolis) 2020*).
- SP2 Infrastructure.

The Site is subject to the provisions outlined within SEPP WSEA, which is the primary Environmental Planning Instrument (EPI) and categorises the Site within the IN1 General Industrial zone.

The nearest land use zones are E2 Environmental Conservation, RE1 Public Recreation and RE2 Private Recreation located to the west of the subject Site, which are noted to be appropriately separated from the proposal. Accordingly, mitigation and protection measures would be required as part of the future development proposed for the purposes of the proposed facility, in order to preserve the amenity of the subject Site.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

2.2 LOCAL AND REGIONAL CONTEXT

The subject Site is located in the suburb of Kemps Creek, which forms part of the wider Penrith LGA. The immediate Site context (**Figure 2**) is undeveloped; however, is zoned for industrial-related purposes pursuant to the provisions of SEPP (WSEA) 2009 and forms part of the wider Kemps Creek Industrial Estate subject to SSD 9522.

Other land uses in the vicinity of the Site include:

- North – First Estate (Altis Property Partners), as well as the residential suburbs of St Clair and Erskine Park, comprising typical residential dwellings interspersed with pockets of open space – predominantly used for recreational purposes parks and sporting grounds. Additionally, the WaterNSW pipeline is located to the north running east to west.
- South – Rural-residential and industrial zoned landholdings within the Mamre Road Precinct.
- East – Industrial zoned land located within the Mamre Road Precinct, as well as Mamre Anglican School, Emmaus Catholic College and the Catholic Healthcare Retirement Living Community.
- Northeast – Erskine Business Park, comprising various warehouse / logistics and industrial facilities that operate on a 24-hours, 7-day basis, including CEVA Logistics, CSR, Woolworths and Alvaro Transport.
- West – rural-residential land holdings and Twin Creeks Golf and Country Club.



Figure 2: Site and Surrounds

As the Mamre Road Precinct is undergoing significant transformation following rezoning of the land to IN1 General Industrial, there are a variety of proposals (under assessment by Council and DPIE). The applications under assessment or determination are described below in **Table 1** and shown in **Figure 3**.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

Table 1 State Significant Development Applications, Development Applications and Modification Applications in the vicinity of the Subject Site

Application number	Address	Description	Status
SSD-9522	657-769 Mamre Road, Kemps Creek – Kemps Creek Warehouse, Logistics and Industrial Facilities Hub	SSDA for a warehouse, logistics and industrial facilities hub	Approval granted by Minister for Planning and Public Spaces on 21 December 2020
SSD-9522-Mod-1	657-769 Mamre Road, Kemps Creek – Kemps Creek Warehouse, Logistics and Industrial Facilities Hub	Section 4.55 (2) Modification to SSD 9522 to amend the Stage 1 and 2 Subdivision Plan and the Masterplan	Response to Submissions (RtS) request issued by DPIE on 14 May 2021
SSD-10101987	706-769 Mamre Road, Kemps Creek – Kemps Creek Data Centre	SSDA for a data centre	SEARs issued by DPIE on 1 March 2021. EIS currently under preparation by the Proponent
DA20/0564	772-782 Mamre Road	Construction of Industrial Warehouse including Ancillary Office & Associated Site Works	Under assessment by Council
SSD-10272349	754-770 and 784-786 Mamre Road, Kemps Creek – GPT Industrial Estate	SSDA for a Concept Masterplan comprising five industrial buildings and Stage 1 works including construction and use of one industrial building for warehouse and distribution or manufacturing purposes, site preparation works, realignment of a riparian corridor, stormwater and associated works, internal road network, signage and landscaping	SEARs issued by DPIE in November 2020. EIS currently under preparation by the Proponent
SSD-5211	788-804 Mamre Road, Kemps Creek	SSDA for a waste and resource management facility	Director General's Environmental Assessment Requirements issued by the former Department of Planning and Infrastructure in April 2012
SSD-10448	788-882 Mamre Road, Kemps Creek – Aspect Industrial Estate	SSDA for a Concept Masterplan comprising 11 industrial buildings and Stage 1 works for site preparation, construction and use of two warehouse and distribution buildings,	Request for Additional Information issued by DPIE on 29 March 2021.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

		stormwater and associated works, internal road network, signage and subdivision	
SSD-17647189	884-928 Mamre Road, Kemps Creek – Access Logistics Park	SSDA for one warehouse building, demolition and bulk earthworks, 13-lot Torrens Title subdivision, constriction and operation of internal roads, infrastructure and utilities	SEARs issued by DPIE on 14 May 2021. EIS currently under preparation by the Proponent
SSD-10479	106-228 Aldington Road, Kemps Creek – 200 Aldington Road Industrial Estate	SSDA for Concept plan comprising 13 development lots for 356,660m ² of warehouse floor space, 17,770m ² office and 200m ² café floor space, internal road layouts, parking and hardstand areas, landscaping, utilities and services and a Stage 1 development including site preparation, bulk earthworks, road works, infrastructure and utilities and a warehouse building with a total gross floor area of 52,500m ²	Request for additional information issued by DPIE on 28 April 2021
SSD-9138102	290-308 Aldington Road and 59-62 & 63 Abbotts Road, Kemps Creek – ESR Kemps Creek Logistic Park	SSDA for construction of seven warehouse and distribution buildings including offices, loading docks, parking and hardstand areas, landscaping, utilities and services. Associated works including demolition and bulk earthworks, vegetation removal and construction of internal roads	SEARs initially issued by DPIE in September 2020. A revised SEARs was issued by DPIE in December 2020 in response to the Proponent's request dated 10 December 2020
SSD-17552047	155-217 Aldington Road, Kemps Creek (Lot 33 DP258949 and Lots 25-28 DP 255560) – Frasers Property Industrial, Warehouse and Logistics Hub	Development Consent under this proposed development is sought for the construction and operational use of a Warehouse and Logistics Hub pertaining to the following scope of works:	SEARs issued 1 March 2021 and the application is undergoing adequacy review

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

		<ul style="list-style-type: none"> ▪ Bulk earthworks involving dam dewatering, cut and fill works and pad construction; ▪ Nine-lot Torrens title subdivision; ▪ Proposed construction of internal public access roads of 24m and 25.2m wide and connections to existing and future local roads; ▪ Construction of one warehouse and distribution centre with two portions on Proposed Lot 9 with a total building area of 65,327m². 	
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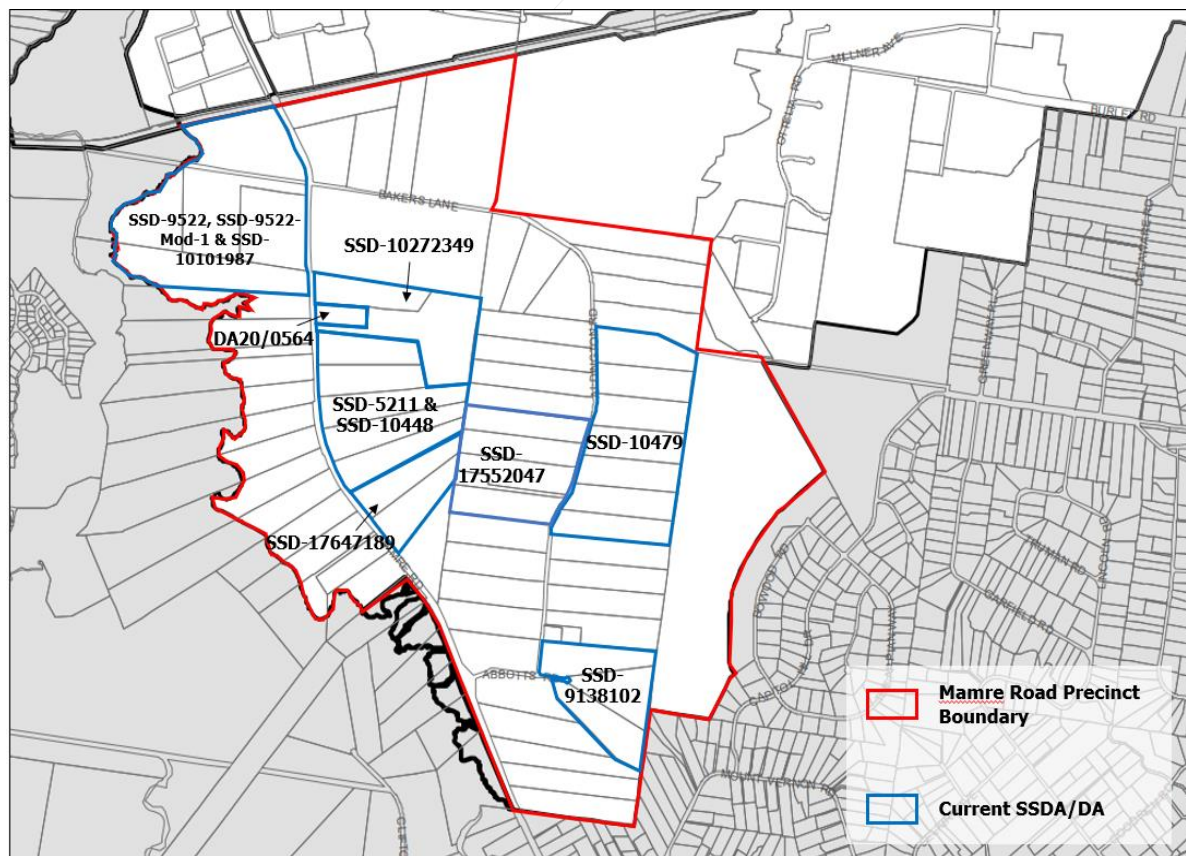


Figure 3: Surrounding Development

PART C PROJECT SUMMARY

3.1 AIMS AND OBJECTIVES OF THE PROPOSED DEVELOPMENT

The subject proposal seeks development consent for the construction and operational use of a proposed Warehouse / Industrial facility, as well as subdivision of the residual Lot 10 to form a separate lot for the proposed facility. The following objectives have been identified as forming the basis of the proposed development, as well as being consistent with the aims set out within SEPP WSEA, including:

- Design the Site to achieve a viable economic return;
- Ensure minimal environmental and amenity impact;
- Co-locate operations to provide improved efficiency;
- Implement contemporary processes and machinery that supersede outdated plant and equipment;
- Ensure ongoing compliance with all operational legislative requirements;
- Provide for an employment-generating land use; and
- Ensure development is compatible with surrounding development and both the local and regional context.

The Site and proposed design are considered to meet the objectives of the proposal, as it allows for development on a land portion that is currently undeveloped; would be suitably located; and is zoned accordingly for such permissible industrial-related purposes.

3.2 DESCRIPTION OF THE PROPOSED DEVELOPMENT

The Site forms part of the new Kemps Creek Warehouse, Logistics and Industrial Facilities Hub being developed as a joint venture between Frasers and Altis under SSD 9522, which was approved in December 2020. The Site subject to this proposal is approximately 15.8 ha and the area which will contain the proposal is 4.6 ha which will be subdivided under this application.

Consent is sought for the construction and operational use of Warehouse / Industrial facility, to be operated by Ardex. The proposed development is demonstrated in **Figures 4 - 6** below, whilst **Appendix 1** of this Scoping Report contains the detailed plans for the proposed development.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

3.2.1 Warehouse / Industrial Building

The Site is proposed to be developed to contain the following building components as shown in **Table 2**:

Table 2: Building Areas	
Component	Area
Warehouse	15,789m ²
Training area	500m ²
Test area	500m ²
Warehouse amenities 1	72m ²
Dock office and amenities	72m ²
Liquids manufacturing	3,828m ²
Warehouse amenities 2	40m ²
Manufacturing Office Level 1	40m ²
Powder manufacturing	2,500m ²
Powder silo tower	600m ²
Receiving and packaging store	1,666m ²
Compressor room	268m ²
DG store	63m ²
Wastewater treatment	145m ²
Liquid silo tower	200m ²
Main office	2,000m ²
Manufacturing office	500m ²
Car parking	157 spaces
TOTAL GFA	27,631m²

3.2.2 Building Height

The proposed building heights will vary with the tower elements reaching heights of 25m and 45m. The remainder of the building will be at a conventional warehouse height, being 13.7m. The tower elements are to be provided for tower and liquid manufacturing associated with production and are required to accommodate the necessary plant and equipment.

The main tower element at 45m in height affords dimensions of 41m x 14.85m while the 25m element will be 22.1m x 9.1m.

Located external to the building are some ancillary silos which are lower than the 13.7m component of the main building. Justification for the proposed building height is provided below in Section 3.3.1, however in essence these components are essential to contain plant and equipment for the manufacturing process. Additionally, the towers are to be enclosed so as to limit noise or dust emissions associated with the operations. The provision of the tower elements will provide for collocated manufacturing and distribution that results in operational efficiencies and delivery of product to market in a timely manner.

3.2.3 Subdivision

Torrens Title subdivision is proposed to create the subject allotment (Proposed Lot 12) that will be 46,682m² with the residual (Lot 11) being 101,657m².

3.2.4 Earthworks

All earthworks for the Site are to be provided in accordance with SSD 9522. Minor regrading will be required for this purpose-built facility; however, it is considered that there will be no

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

substantial change in level from what was previously approved with the building finished floor level to be located at RL38.50.

3.2.5 Access and Servicing

Access to the Site would be facilitated by the estate access roads under SSD 9522, which affords connectivity with Mamre Road to the east. Servicing pertaining to the subject Site has been considered under SSD 9522 with respect to the estate and it is considered that only minor further augmentation would be required.

The proposal includes provisions for internal hardstand and driveways providing safe ingress and egress throughout the Site, including appropriate directional access and vehicular movement. A total of two (2) vehicular cross over points are proposed along the respective local roads which the Site has a frontage to.

3.2.6 Landscaping

The landscape setting will be chosen comprising a mix of native and endemic plant species, shrubs, trees and grasses which will help to improve the aesthetic for workers and visitors, as well as exhibit an appropriate landscaping treatment for motorists traversing Mamre Road and the estate access roads. Landscaping will aid the proposal by virtue of landscape screening ultimately improving the visual amenity of the Site. The landscape strategy for the Site will be developed when preparing the plans to accompany the SSD Application.

Landscaping is intended to mitigate visual impacts at ground plane level. Species selection will comprise endemic species that are adaptable to the climatic conditions of Western Sydney and proven to thrive in industrial estate settings.

3.2.7 Car Parking

Car parking has been provided across the Site to facilitate both the construction and operational phases of the proposed development. A total of 156 spaces are proposed to cater for the 140 staff and incidental visitors.

3.2.8 Employment Generation

The proposal would positively impact on the social and economic conditions of the Penrith LGA and the wider WSEA, which are envisaged for employment-generation and economic growth and prosperity. Construction jobs are expected to be in the order of approximately 300, whilst operational jobs would be expected to exceed approximately 140 full time staff.

3.2.9 Staging

The approval strategy sought, seeks to obtain Development Consent to complete the construction with the multiple issue of Construction Certificates; however, any such staging does not constitute staged development as defined under Section 4.22 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The proposed phasing of construction will be detailed in the forthcoming SSD Application.

Request for Secretary's Environmental Assessment Requirements
Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kamps Creek

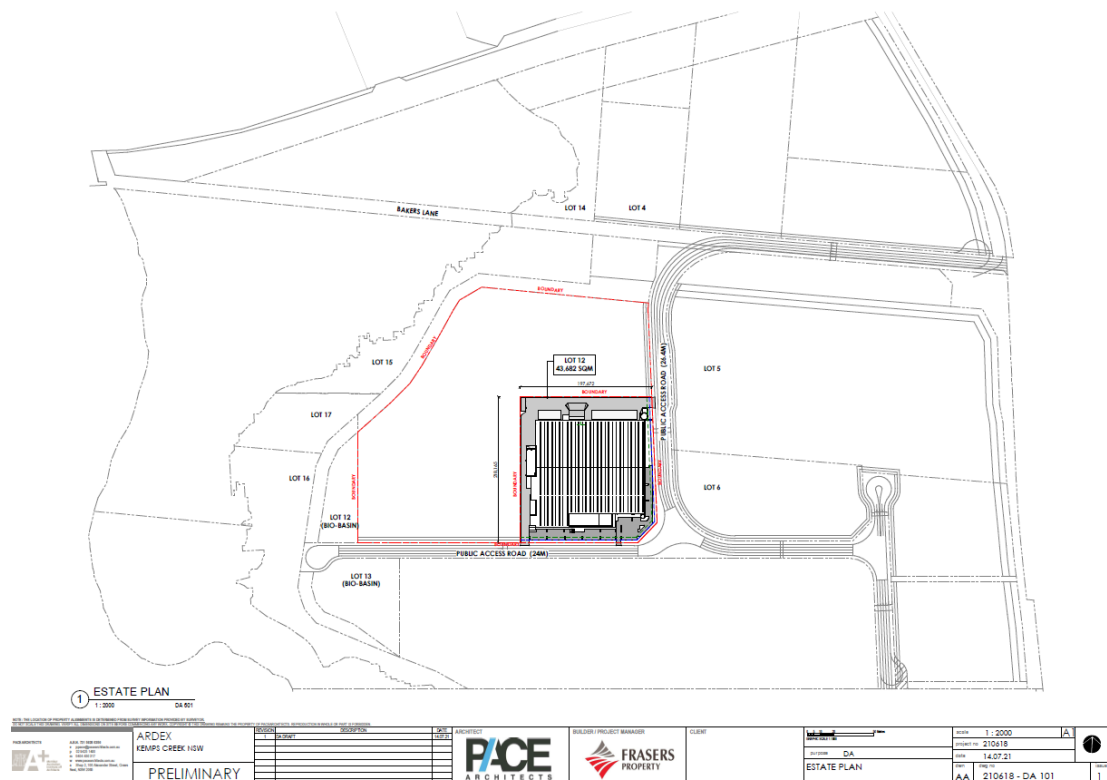


Figure 4: Overall Estate Plan

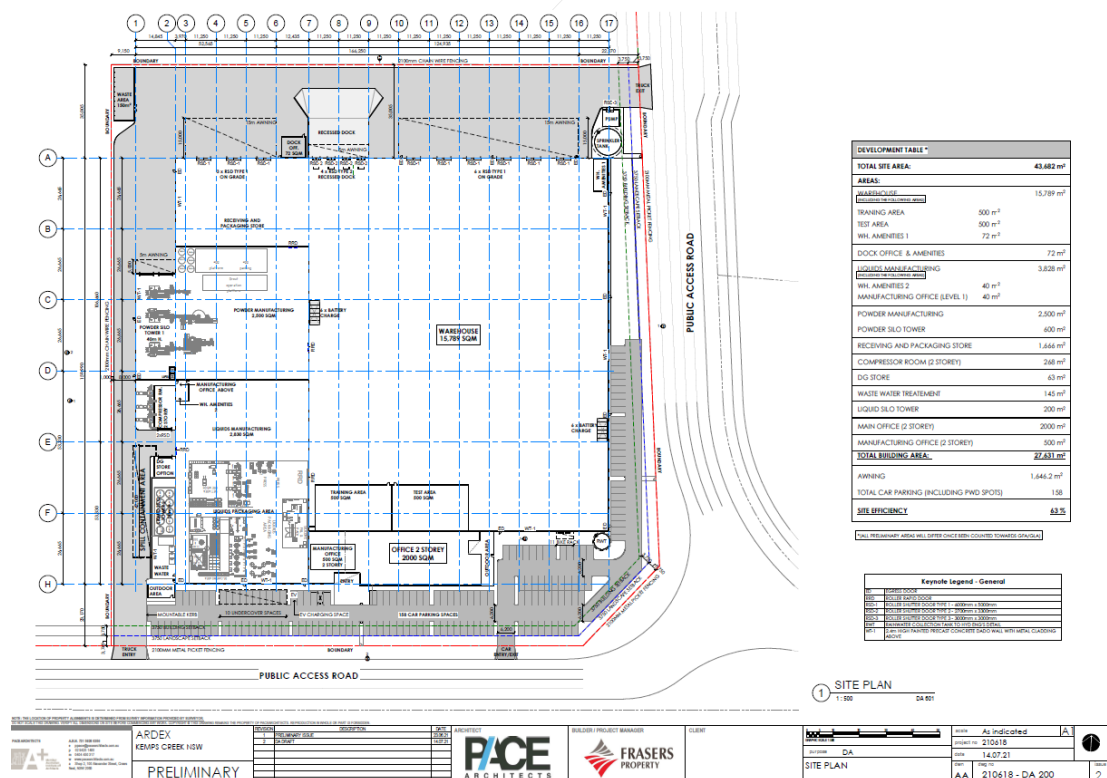


Figure 5: Proposed Site Plan

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek



Ardex is a manufacturer and supplier of products which include renders, screeds, floor levelling and adhesive products, decorative surface finishes, mortars used in repair applications, tile adhesives, grouts, silicone products, waterproofing membranes, primers, bonding agents and additives, sealants, sealers, sound proofing systems, a range of "natural stone" products, and a range of tools used for flooring and wall applications. Ardex sells to wholesalers, tilers and other building trades as well as into the retail market, in particular under the Dunlop brand. Ardex's brands are often specified by architects because of their quality, innovation and particular attraction to interior designers and architects. No sale of products is proposed from the subject Site.

Liquid manufacturing will involve the use of liquid batching, mixing and filling processes, where most batching is completed via a semi-automated process with manual dosing into various industrial mixers. The activities will primarily consist of mixing and filling water dispersed polymers (emulsion/latex) with or without non-combustible fillers, silicon packing, as well as water dispersion of epoxy resins to produce saleable products for the construction industry. There will be some limited batching of flammable goods under controlled conditions, including use and mixing of solvents which will be below SEPP 33 thresholds. All Australian Standards and fire engineering measures will be implemented per the BCA.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

The overall site will hold some dangerous goods (raw materials and finished goods), quantities of which, will be below the *State Environmental Planning Policy No.33 (Hazardous and Offensive Development)* (SEPP 33) threshold.

3.3.1 Operational Particulars

Powder Manufacturing

Powder manufacturing will involve the use of dry powder batching, mixing and bagging processes where most batching is completed via an automated process with some manual dosing into industrial mixers, then followed by semi-automatic bagging and palletising. The activities will primarily consist of mixing non-flammable and non-combustible powdered chemicals (including cement, limestone and sand) to produce saleable products for the construction industry. The design of the new powder manufacturing facility will include a state-of-the-art production process based on a uniquely designed vertical tower plant layout, that utilises the force of gravity in the production cycle. The proposed process incorporates an innovative design to improve quality, productivity, process reliability and energy efficiency. Maximum capacity of the plant will be 48,000 tonne per annum based on a 24/7 operation.

A tower height of 45m for the vertical powder plant has been proposed rather than the older, less efficient horizontal powder plants or "Split-tower" plants, which are around 12m - 25m in height. Vertical tower plants are now standard for Ardex's facilities across the world.

There are significant advantages in using the vertical powder plant as opposed to the horizontal powder plant, including:

- More energy efficient – the horizontal powder plant uses more than double the electricity for the same production output when compared to the vertical powder plant. This results in significant reductions in carbon emissions, and a significantly reduced load on local electrical transmission infrastructure.
- Reduced noise & dust emissions – the improved design of the vertical plant results in reduced noise & dust emissions from the powder plant line.
- The vertical powder plant also requires less cleaning and less maintenance than the horizontal powder plant, and overall is considered the superior plant option.
- Reduced manufacturing footprint by way of a consolidated footprint.

The internal elevation of the vertical powder tower is shown in **Figure 7** which demonstrates the internal arrangement that necessitates the overall building height while the powder plant process is illustrated in **Figure 8** and **9** below.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility

657-769 Mamre Road, Kemps Creek

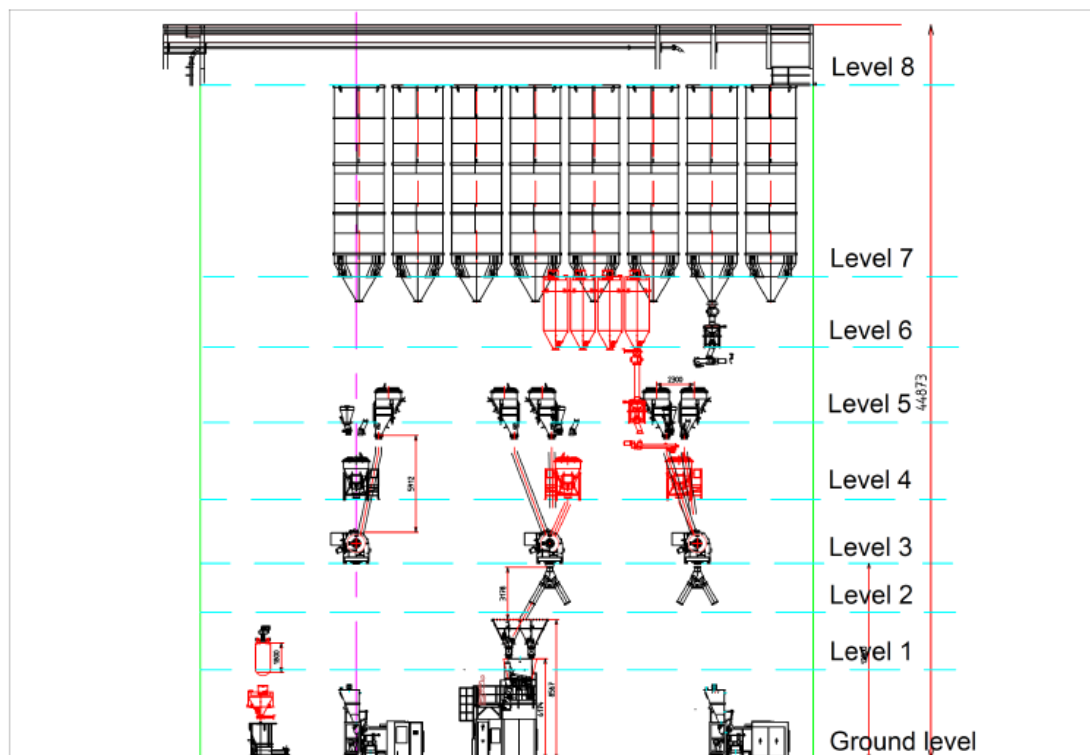


Figure 7: Internal Elevation of Powder Plant Tower

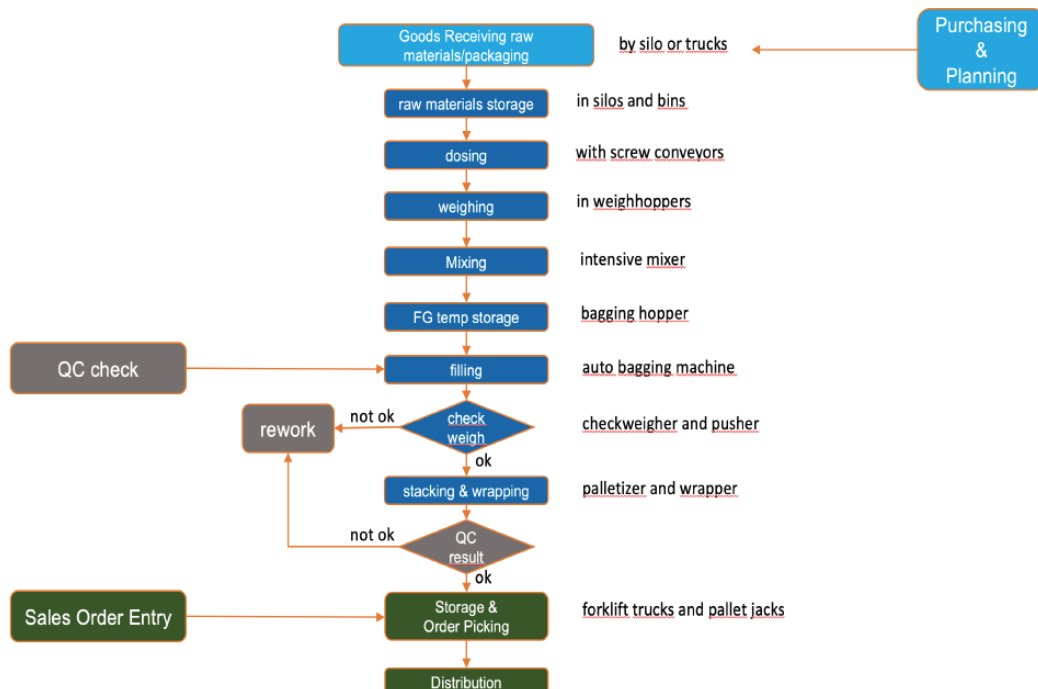


Figure 8: Powder Manufacturing Process Flow Chart

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

Aspect	Description		
Raw materials (refer raw material routes in Diagram 2)	Sands & Inert Materials: <ul style="list-style-type: none"> - Silica sand & Calcium Carbonates 	Cements <ul style="list-style-type: none"> - Portland & High Alumina cements 	Additives <ul style="list-style-type: none"> - Cellulosic thickeners - Vinyl co-polymer ethylene acetate - Retarders - Pigments - Hydrated lime
Raw material Receipt & Storage	Sands & Inert Materials: Pumped pneumatically into large silos from tankers or received in bulk bags (1000Kg) and decanted to Small silos	Cements Pumped pneumatically into large silos from tankers or received in bulk bags (1000Kg) and decanted to Small silos	Additives Received in bulk bags or 20Kg bags and decanted to small silos or received in 10Kg to 20Kg bags for manual addition (minor additives)
Material Dosing & Mixing	Screw conveyors transport raw materials and additives from the silos to the weighing hoppers. Computer controlled dosing occurs based on the formula recipe to a high level of accuracy. Materials are then transported by gravity into the mixer		
Product Packaging	Finished products are filled into 20Kg bags. Bags are then palletised and stored in the distribution warehouse for off-site distribution		
Finished products	Renders, screeds, floor levelling and adhesive products, mortars used in repair applications, tile adhesives, grouts.		

Figure 9: Process Description (Powders)

Liquids Manufacturing

A new liquid mixing and packing plant is proposed that will produce 25,000 tonne per annum, operating on a 24/7 basis.

Liquid manufacturing will involve the use of liquid batching, mixing and filling processes, where most batching is completed via a semi-automated process with manual dosing into various industrial mixers. The activities will primarily consist of mixing and filling water dispersed polymers (emulsion/latex) with or without non-combustible fillers, silicon packing, as well as water dispersion of epoxy resins to produce saleable products for the construction industry. The new manufacturing facility is designed to achieve high efficiency, increased production volumes, high quality standards, and the ability to manufacture more complex product formulations.

A process flow diagram of Liquids plant is shown in **Figure 10** and process description in **Figure 11**. The dosing according to the formula is semi-automatically controlled via a central computer and an operator panel.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility

657-769 Mamre Road, Kemps Creek

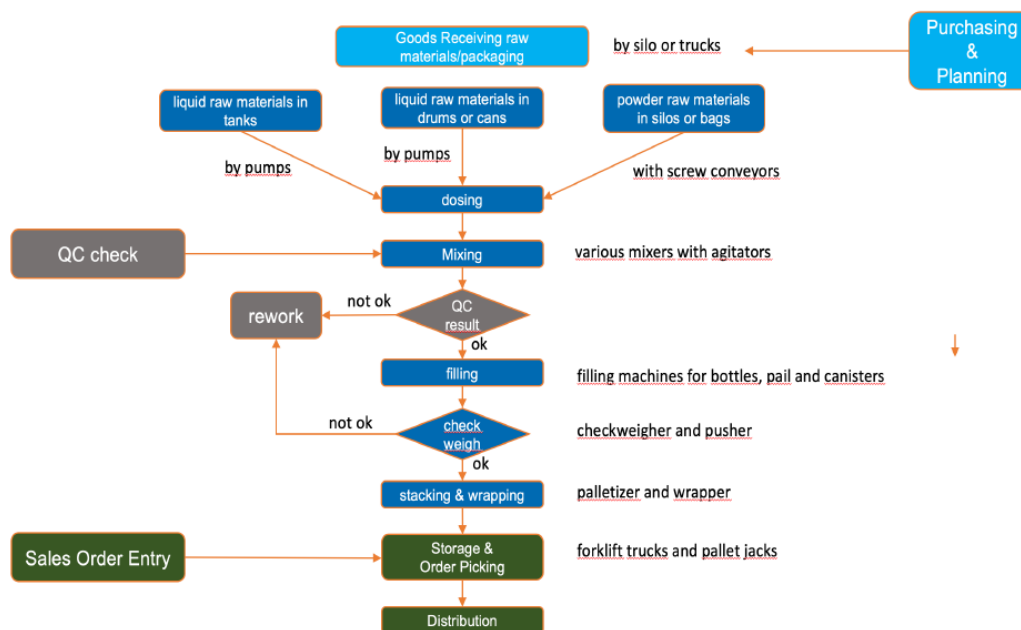


Figure 10: Liquid Manufacturing Process Flow Chart

Aspect	Description		
Raw materials	Water Dispersion Polymers <ul style="list-style-type: none"> - Acrylic and Vinyl acetate copolymers - Modified Acrylics - Polyurethane dispersion - SBR dispersions 	Fillers <ul style="list-style-type: none"> - Silica Sand - Calcium carbonate - Rubber crumb 	Additives <ul style="list-style-type: none"> - Surfactants - Pigments - Epoxy resin - Biocides - Solvent Butyl DiGlycol Carbitol 200 Kg
Raw material Receipt & Storage	Water Dispersion Polymers Pumped pneumatically into silos from tankers or received in 1000Kg IBCs or 200L drums. Pumped into specific mixers	Fillers Bulk Silica sand and Calcium Carbonate transferred pneumatically into silos from tankers. Rubber crumb received in 1000 Kg bags. Other fillers received in 20 Kg bags	Additives Received in IBC, 200L drums or 20Kg bags. Stored in raw material/receiving store before transferring to Liquids manufacturing area. Dangerous goods (Class 3, 8 & 9) stored in designated areas
Material Dosing & Mixing	Screw conveyors transport fillers (silica sand and calcium carbonate) from silos to weighing hoppers. Water dispersion polymers are pumped from silos tanks or drums to mixers. Most Liquid additives are pumped from drums to mixers. Some manual additions of raw materials are required. Computer controlled dosing occurs based on the formula recipe to a high level of accuracy. After mixing and QA testing, products are pumped or pressed to filling equipment at ground level.		
Product Packaging	Finished products are filled into bottles and pails ranging in size from 0.5Kg to 20Kg. Products are then palletised and stored in the distribution warehouse for off-site distribution		
Finished products	Liquid grouts, waterproofing membranes, roof pointing repair products, mastics for tiling applications, Silicone tubes for tiling and waterproofing applications		

Figure 11: Process Description (Liquids)

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

Equipment (Internal)

Internal equipment is generally described as follows:

- Packaging machinery: products are packed in 20kg bags and then transported by conveyor through checkweigher and auto-palletiser and auto-stretch hood. Some products are packed into 1000Kg bulk bags.
- Mixers, diverter valves and transfer pipes. Only accessed for clean-up and maintenance.
- Manual dosing equipment for minor additives and operator controlled computer screen.
- Weighing and dosing hoppers. Only accessed for clean-up and maintenance.
- Silos located at higher tower levels. Only accessed for maintenance.

Equipment (External)

External equipment is generally described as follows:

- Fill pipes for each large silo pneumatically transferred by tanker.
- Dust Collectors.
- Compressed air equipment.

Trade Waste Plant

All trade waste is water-based washouts from mixing plants. Treatment process is based on flocculation of solids from wastewater and filtering of sludge. Treated water is discharged to the sewer. A Trade Waste Agreement will be obtained prior to commencement of operation of the subject proposal.

Associated Warehouse Area

The warehouse area being 15,789m² associated with the manufacturing area will be used for storing of goods manufactured, pending their distribution to retailers in the market. Typical retailers that will receive the goods include Bunnings and hardware. Goods will be palletised internal to the warehouse and packaged for distribution as required.

Ancillary Office

Ancillary office areas are proposed that will accommodate administration / research and development staff associated with the Ardex operation. These spaces will be directly linked to the main building area and also comprise meeting rooms.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

3.4 CAPITAL INVESTMENT VALUE

While costs have not yet been finalised, the CIV of this Project is expected to be approximately \$65 Million. The costs will be finalised once the final design is confirmed.

As this exceeds the \$30 Million threshold under Schedule 1, Part 9 of the SRD SEPP, the proposed development is considered SSD. A Preliminary Cost Report is attached to verify the CIV (refer to **Appendix 2**).

3.5 CONSULTATION

Consultation will be undertaken with the following stakeholders:

- Penrith City Council;
- NSW DPI Water;
- Aboriginal Land Council;
- NSW Environment Protection Authority;
- Transport for NSW;
- Endeavour Energy;
- WaterNSW;
- NSW Rural Fire Service;
- Fire and Rescue NSW;
- Office of Environment and Heritage (now Environment, Energy and Science Group);
- and
- Surrounding landowners.

Consultation with relevant stakeholders will be undertaken whilst preparing a detailed Environmental Impact Statement in keeping with the Department's Major Project Community Consultation Guidelines and documented within the EIS.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

3.6 STATE SIGNIFICANT DEVELOPMENT 9522

Approval was granted in December 2020 to SSD 9522, with works currently being undertaken within the overall estate. The particulars as approved are outlined as follows in **Table 3**:

Table 3: Proposed Development as Approved	
Project Element	Development Particular
Site Area	- 118 ha
Developable Area	- 89.495 ha (construction of all roads and buildings).
Development Gross Floor Area	- 166,225 m ²
Subdivision	17 lot Torrens Title Subdivision comprising two (2) stages: Stage 1: <ul style="list-style-type: none">Five (5) residual allotments proposed. Stage 2: <ul style="list-style-type: none">17 development allotments proposed Note: The subject proposal would be located on Lot 10 Stage 2 Subdivision.
Built Form	Eight (8) Warehouse buildings (comprising 10 tenancies), including ancillary offices, hardstand, car parking area and associated landscaping.
Primary Land Use	Lots 1-13 (including Stage 1 Subdivided Lot 2): <ul style="list-style-type: none">Warehousing and DistributionNote: Lots 11-13 comprise the proposed OSD basins Lots 14-17: <ul style="list-style-type: none">Public Recreation and Private Recreation
Bulk Earthworks	<ul style="list-style-type: none">Cut: -60,350 m³Detailed Excavation: -109,600 m³Fill: +2,072,750 m³Balance: +1,902,800 m³ (Import required)
Landscaping	<ul style="list-style-type: none">New Vegetation Area: 91,700 m²Number of New Trees: 1,250Approximate Canopy Cover (average): 141,250 m²
Site Access	<ul style="list-style-type: none">Access from Mamre Road and the Estate access roads
Biodiversity and Vegetation Clearing	14.41 ha of Native Vegetation identified on-site: <ul style="list-style-type: none">9.29 ha proposed to be cleared
Employment Generation	1,650 full time jobs, comprising: <ul style="list-style-type: none">950 operational jobs700 construction jobs

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

Modification 1 to SSD 9522 is still pending determination. The key material changes to the approved Site Plan sought under this application are:

- Stage 1 Subdivision Plan:
 - Amendment to Lot 1, comprising an increase in Site Area from 680,972 m² to 684,083 m²;
 - Increase in the size of the easements from 5,548 m² to 5,550 m²; and
 - Construction of a slip lane to facilitate access into Lot 5.
- Stage 2 Subdivision Plan:
 - Amendment to Lot 5, comprising an increase in Site Area from 40,726 m² to 148,321 m²;
 - Amendment to Lot 6, comprising a decrease in Site Area from 37,947 m² to 33,403 m²;
 - Removal of Lot 7;
 - Amendment to Lot 8, comprising a decrease in Site Area from 44,315 m² to 25,756 m²;
 - Amendment to Lot 10 (part lot), which will now become part of Lots 5 & 6.
 - Amendment to Lot 10 (part lot), comprising an increase in Site Area from 144,988 m² to 158,550 m²;
 - Amendment to the site area of the Public Access Roads comprising an increase from 58,490 m² to 55,381 m²; and
 - Amendment to the site area of the Southern Link Road intersecting the Site from 29,375 m² to 28,917 m².
- Masterplan:
 - Increase in overall GFA across the Site from 162,355 m² to 186,123 m² – this includes an amendment to Condition A6 of SSD 9522;
 - Increase in overall car parking from 744 spaces to 772 spaces; and
 - Decrease in the site area of the public access roads from 58,490 m² to 55,381 m².
 - Realignment of NS Road east.
 - Access to the allotments to the north of Bakers Lane is being dealt with separately to satisfy B18 of SSD 9522.
 - Amend landscape setbacks to 3.75 m in accordance with the Instrument of Approval and consistent with Mamre Road Precinct DCP.

PART D JUSTIFICATION

4.1 PROJECT NEED

The proposed development would assist in providing new employment opportunities through the provision of a manufacturing facility to facilitate employment-generating development and economic growth of the Mamre Road Precinct. The proposal will also contribute to greater productivity and a significant increase in jobs for the Western Sydney Aerotropolis (WSA) in the industrial and logistics sector.

The proposed development, for the purposes of a manufacturing facility is considered consistent with the strategic direction of both the Western City District Plan published by the Greater Sydney Commission and the WSA Plan published by the Western Sydney Planning Partnership and the NSW Government.

It is considered that the proposed development could support the growth of the existing sectors in the Western City District, such as logistics and freight, whilst promoting industry diversification; and would attract investment opportunities, ultimately fostering the growth of the wider Mamre Road area within the WSA as the economic catalyst of the Western Parkland City.

The construction and operation of the proposal seeks to promote operational efficiencies and improved environmental outcomes by implementing technology and plant/equipment in line with best industry practice. The proposal ensures product to market for the building and construction industry which is in demand nationwide.

4.2 CONSIDERATION OF ALTERNATIVES

The purpose of the proposed development is to increase the efficiency of Ardex operations, whilst contributing towards the intended industrial character and nature of the IN1 General Industrial zone; providing a manufacturing and warehouse facility which encourages employment opportunities and promotes the economic development of the WSEA and WSA. The proposed development seeks to ensure:

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

Overall, the scale of the proposed development is considered suitable, and the built form proposed would enhance and renew an undeveloped land portion into a modernised, state-of-the-art manufacturing facility, which will be consistent with surrounding industrial-related uses in close proximity to the site and the wider WSEA. The Site design and layout of the built form proposed, seeks to maintain consistency with the zone objectives under WSEA SEPP and enhance the underlying industrial character intended for the identified land portion, which is zoned for such permissible land uses

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

(a) 'Do Nothing' Scenario

This option was dismissed as the objectives of the proposal would not be met, including the objective of facilitating an employment-generating development. If the proposed development

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

was not to proceed, the site would continue to remain vacant, or be developed for another industrial-related development.

(b) Development on an Alternative Site

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

- It is located subject to the provisions of the IN1 General Industrial zone pursuant to the provisions of SEPP WSEA, which seeks to provide employment-generating land uses;
- The Site is suitably located with respect to sensitive land activities, including residential development;
- All potential environmental impacts concerning the proposed development are able to be suitably mitigated within the Site;
- The proximity to the regional road network provides accessibility and linkages to the broader Sydney Metropolitan Region and regional areas of NSW;
- The proposed development demonstrates the capability for continued employment-generating opportunities, during both the construction and operational phases;
- Sufficient separation is maintained towards the interfaces of surrounding industrial zoned land and existing industrial development in close proximity to the subject Site;
- The proposed development could be developed with appropriate visual amenity achieved given its surrounding context.

(c) Different Site Configuration

The configuration of the proposed development was chosen based on the Site's topography; street access; as well as the need to respond to the character of the surrounding IN1 General Industrial zone. It is noted that a different site configuration would not have been able to respond to the abovementioned site opportunities and constraints given the specific operational requirements of Ardex and the need to ensure a building envelope that encapsulates all plant and equipment. This option was therefore not considered appropriate.

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

PART E LEGISLATIVE AND POLICY FRAMEWORK

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

Commonwealth Planning Context

- *Environment Protection and Biodiversity Conservation Act 1999*

State & Regional Planning Context

- *A Metropolis of Three Cities – Greater Sydney Regional Plan*
- *Western City District Plan*
- *Draft Western Sydney Aerotropolis Plan*
- *Western Sydney Employment Area*
- *Mamre Road Precinct Structure Plan*
- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning & Assessment Regulation 2000*
- *Protection of the Environment Operations Act 1997*
- *Biodiversity Conservation Act 2016*
- *State Environmental Planning Policy (State and Regional Development) 2011*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *State Environmental Planning Policy No 33 – Hazardous and Offensive Development*
- *State Environmental Planning Policy No 55 – Remediation of Land*
- *State Environmental Planning Policy (Western Sydney Employment Area) 2009*

Local Planning Context

- *Penrith Local Environmental Plan 2010*
- *Penrith Development Control Plan 2014*
- *SSD 9522 Development Control Plan 2020*

This planning framework is considered in detail in the following sections.

5.1 ENVIRONMENTAL PROTECTION AND BIODIVERSITY CONSERVATION ACT 1999

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

Based on recent investigations carried out, the proposal has been referred to the Commonwealth Minister for Environment. The initial investigations undertaken for SSD 9522 confirmed that there were no MNES identified on the subject Site, however a December 2020 updated species list issued resulted in a referral, that is currently being assessed by the Commonwealth.

5.2 A METROPOLIS OF THREE CITIES – GREATER SYDNEY REGION PLAN

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

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

The division into three cities puts workers and the wider community closer to an array of characteristics such as, intensive jobs, 'city-scale' infrastructure and services, entertainment and cultural facilities. By managing and retaining industrial land close to city centres and transport, this will ensure critical and essential services are readily available to support local businesses and community members and residents. Once constructed and operational, the subject site would achieve economic growth and prosperity, as well as encourage employment-generating opportunities within an area zoned for such permissible purposes, that is considered relatively close in conjunction to residential communities, providing an ease of commute. The proposed development across the site considers the employment-generating outcomes that can be achieved for the immediate and wider localities.

The proposed development also contributes to the four (4) standardised elements communicated across for all three (3) cities, including:

- Infrastructure and collaboration – the proposed development of the site for the purposes of a manufacturing facility, would facilitate the manufacturing of product directly related to the construction industry in metropolitan Sydney;
- Liveability – the proposed development encourages employment-generating opportunities and economic prosperity, which has positive influences on the wider locality;
- Productivity – the proposed development is situated within the *Western City District Plan*; and,
- Sustainability – the proposed development would not exhibit or emit any detrimental impacts to its wider ecological surroundings.

In summary, the subject site contributes to the objectives set out in the *Greater Sydney Region Plan – A Metropolis of Three Cities* by promoting minor environmental impacts and the further promotion of employment-generating opportunities to the wider locality and community, positioned within the Penrith LGA.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

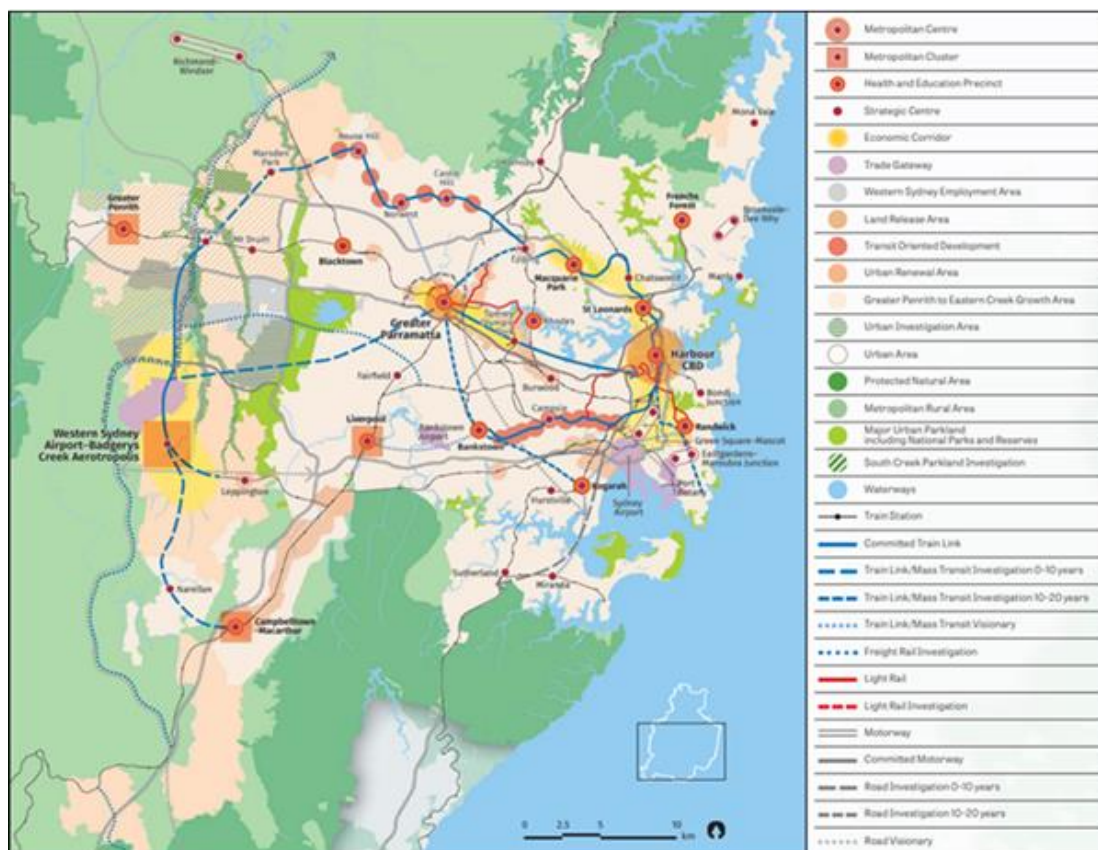


Figure 12 Metropolis of 3 Cities A Vision to 2056

5.3 WESTERN CITY DISTRICT PLAN

The *Western City District Plan* covers the Western Parkland City area, including the Penrith LGA in which the subject site is located. The Plan sets out a twenty-year vision to help achieve the goals contained in *A Metropolis of Three Cities* – the GSC vision for developing Sydney as a world-class future city. The Plan agglomerates City, Regional and Local planning. The site is situated within the Western City District, which falls within the Western Parkland City.

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

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

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

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

The proposed development, would contribute to the objectives set out in the *Western City District Plan* (of which the site forms a part), by promoting a greater range of land uses of benefit to the community, including the proposed development (manufacturing) and other associated land uses; facilitating the provision of greater and improved infrastructure; and promoting additional employment-generating opportunities, to the wider locality and community closer to home, whilst supporting economically and environmentally-sustainable development. These aims are specifically relevant to the proposed development.

5.4 WESTERN SYDNEY AEROTROPOLIS PLAN

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

The Site is located within the Mamre Road Precinct (**Figures 13 and 14**) which is identified as one of the initial precincts under the Western Sydney Aerotropolis Plan.

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

Importantly, the proposal is consistent with the themes and objectives identified in the Western Sydney Aerotropolis Plan. The proposed development will create employment opportunities during both construction and operational phases, which support high-value jobs growth in the industrial sector.

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

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

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility

657-769 Mamre Road, Kemps Creek

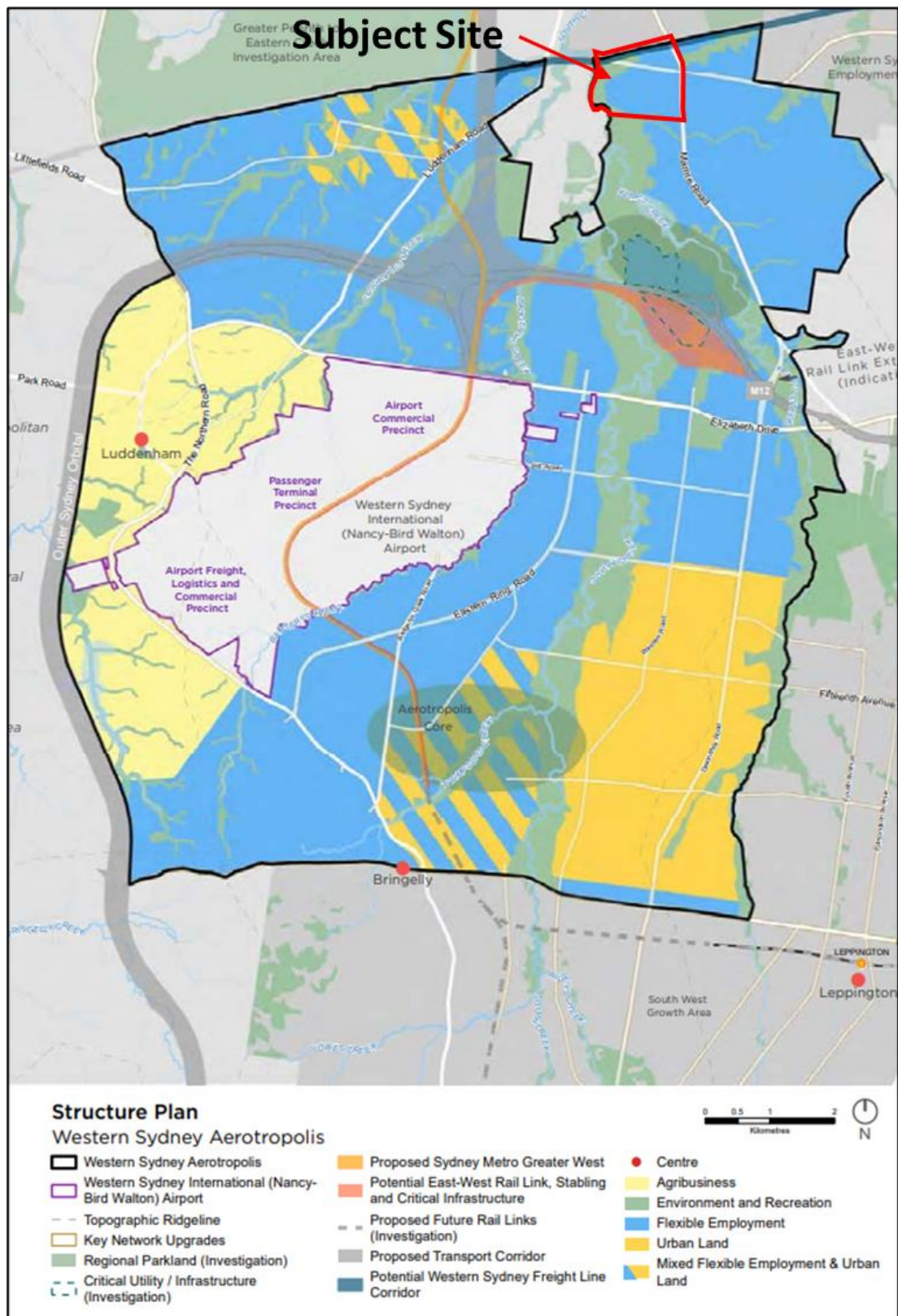


Figure 13 Western Sydney Aerotropolis: Structure Plan

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility

657-769 Mamre Road, Kemps Creek

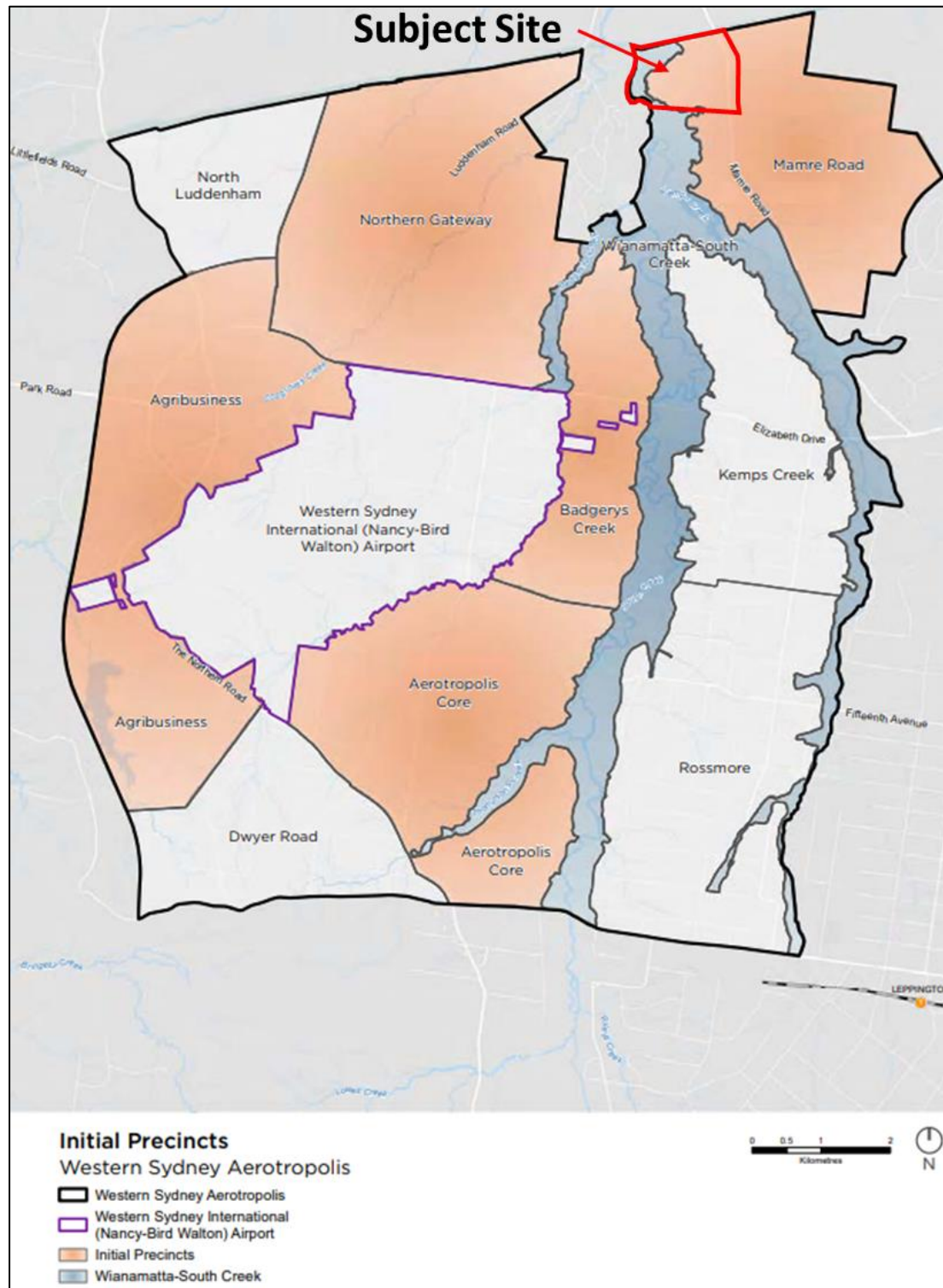


Figure 14 Western Sydney Aerotropolis: Initial Precincts Plan

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

5.5 MAMRE ROAD PRECINCT STRUCTURE PLAN

The subject Site (being proposed Lot 10) is located wholly within the Mamre Road Precinct Structure Plan. This Plan clearly seeks to provide the framework to amend SEPP WSEA, so as to include an additional 800 ha of land for employment and open space development. This is entirely consistent with the intentions for the subject Site, aiming to deliver some 950 operational jobs, once fully constructed.

As the Site is zoned IN1 General Industrial under SEPP WSEA (refer to **Figure 15** below), the Site is clearly suited for its proposed development.

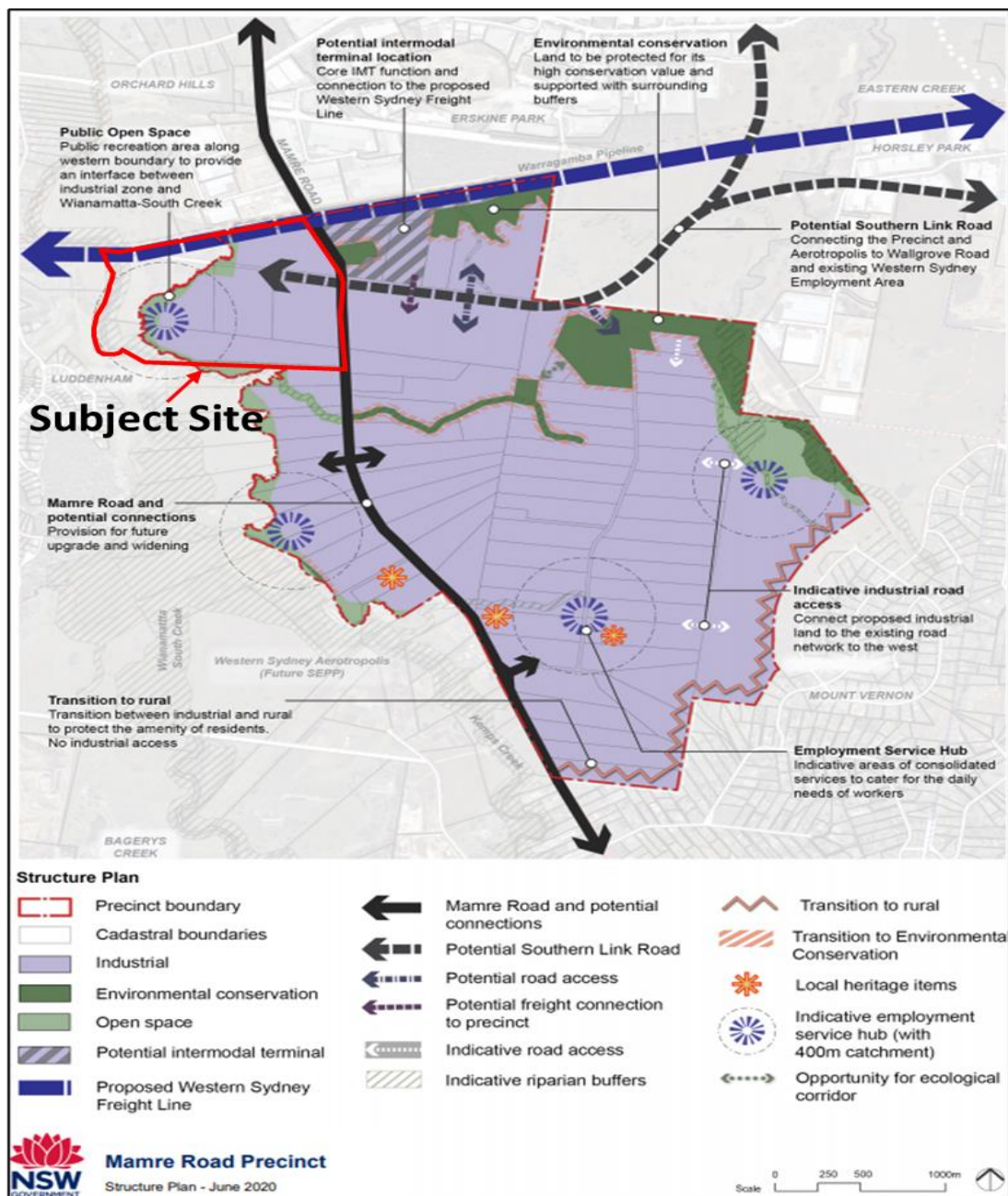


Figure 15 Mamre Road Precinct Structure Plan

As seen in **Figure 15** above, the proposed development is consistent with both the aims and provisions of the Mamre Road Precinct Structure Plan, which contains areas allocated for both industrial-related as well as open-space land uses. The proposed development, in

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

demonstrating clear consistency with the Mamre Road Precinct Structure Plan, also caters for all planned State and Federal future infrastructure assets including the widening of Mamre Road and the Southern Link Road. By delivering 140 operational jobs and 300 construction jobs, the proposal for the Site, provides the envisaged outcomes in this respect.

5.6 ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

The EP&A Act is the overarching governing statute for all development in NSW and pursuant to Section 4.36(2) provides that:

"A State environmental planning policy may declare any development, or any class or description of development, to be State significant development."

The proposed development has been identified as SSD under the SRD SEPP. The Application will be prepared in accordance with SEARs provided.

5.7 ENVIRONMENTAL PLANNING AND ASSESSMENT REGULATION 2000

Section 4(1) of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) states that:

"Development described in Part 1 of Schedule 3 is declared to be designated development for the purposes of the Act unless it is declared not to be designated development by a provision of Part 2 or 3 of that Schedule."

The Proposal being does not trigger the Designated Development thresholds. The future SSD Application will be prepared in accordance with Schedule 2 of the EP&A Regulation.

5.8 PROTECTION OF THE ENVIRONMENT OPERATIONS ACT 1979

Schedule 1 of the *Protection of the Environment Operations Act 1979* (POEO Act) contains a core list of activities that require a licence before they may be undertaken or carried out. The definition of an 'activity' for the purposes of the POEO Act is:

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

Schedule 1 of the POEO Act identifies scheduled activities that require an Environment Protection License (EPL). The proposal does not trigger any thresholds identified in Schedule 1 as less than 150 tonne per day or 30,000 tonne per annum of cement will be handled.

It is anticipated that cement handled will represent 15% of production capacity, being 7,200 tonnes annually, with the daily capacity not exceeding 150 tonnes.

5.9 BIODIVERSITY CONSERVATION ACT 2016

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

The BC Act requires consideration of whether a development or an activity is likely to significantly affect threatened species. SSD 9522 included provision for native vegetation clearing on some 9.15 ha of native estate wide. Accordingly, there would be no such vegetation

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

clearing required as a result of the proposal and a BDAR Waiver will be sought accordingly. Confirmation of the proposed approach in this respect is outlined in the letter prepared by Ecoplaning (**Appendix 3**).

5.10 STATE ENVIRONMENTAL PLANNING POLICY (STATE AND REGIONAL DEVELOPMENT) 2011

Proposals involving activities that are listed in Schedule 1 of the SRD SEPP are identified as being State Significant Development (SSD). Schedule 1, Part 9 of the SRD SEPP includes provisions for developments comprising industries to be undertaken as SSD:

9 Metal, mineral and extractive material processing

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

- (a) metal or mineral refining or smelting, metal founding, rolling, drawing, extruding, coating, fabricating or manufacturing works or metal or mineral recycling or recovery,*
- (b) brickworks, ceramic works, silicon or glassworks or tile manufacture,*
- (c) cement works, concrete or bitumen pre-mix industries or related products,*
- (d) building or construction materials recycling or recovery.*

The proposal involves the mixing of cement and related products and the CIV of the entire project is \$65 Million, thus the SSD provisions apply to the proposal.

5.11 STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007

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

- *20,000 m² in area with site access to any road; or,*
- *5,000 m² in area where the site has access to a classified road or to a road that connects to a classified road (if access is within 90 metres of connection, measured along the alignment of the connecting road).*

The subject Site attains an area greater than 20,000 m². Therefore, any such future development would require referral to the NSW RMS (now TfNSW). It is noted that extensive consultation has been undertaken through SSD 9522 and Modification 1. The outcomes of this consultation would not be materially affected by the proposal.

5.12 STATE ENVIRONMENTAL PLANNING POLICY NO. 33 – HAZARDOUS AND OFFENSIVE DEVELOPMENT

A review of the quantities of Dangerous Goods (DGs) stored at the proposed facility and the associated vehicle movements has been conducted and compared to the threshold quantities outlined in *Applying State Environmental Planning Policy (Hazardous and Offensive Development) No.33* (SEPP 33). It is concluded that the threshold quantities for the DGs to be stored and transported are not exceeded; hence, SEPP 33 does not apply to the project.

As the facility is not classified as potentially hazardous, it is not necessary to prepare a Preliminary Hazard Analysis for the facility as SEPP 33 does not apply.

An independent assessment will be provided to support the EIS.

5.13 STATE ENVIRONMENTAL PLANNING POLICY NO. 55 – REMEDIATION OF LAND

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

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

5.14 STATE ENVIRONMENTAL PLANNING POLICY (WESTERN SYDNEY EMPLOYMENT AREA) 2009

5.14.1 Permissibility under the SEPP

Table 4 provides a summary of all SEPP WSEA provisions, as they apply to the proposed development.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

Table 4: SEPP WSEA Provisions	
Clause	Comment
Clause 11: Zone objectives and land use table	<p>(2) <i>The consent authority must have regard to the objectives for development in a zone when determining a development application in respect of land within the zone.</i></p> <p>Zone IN1 General Industrial</p> <p>1 Objectives of Zone</p> <ul style="list-style-type: none"> <i>To facilitate a wide range of employment-generating development including industrial, manufacturing, warehousing, storage and research uses and ancillary office space.</i> <p>Response: The proposal includes provisions for the construction and operational use of Warehouse and Industrial facility within a zone designated for employment generation.</p> <ul style="list-style-type: none"> <i>To encourage employment opportunities along motorway corridors, including the M7 and M4.</i> <p>Response: The subject Site is suitably located in close proximity to key infrastructure corridors including the M4 and M7 Motorways, as well as being located alongside Mamre Road, which is due to be upgraded as part of the TfNSW Mamre Road Widening project. Additional infrastructure such as of the Southern Link Road will better service the subject Site encouraging improved access for employees.</p> <ul style="list-style-type: none"> <i>To minimise any adverse effect of industry on other land uses.</i> <i>To facilitate road network links to the M7 and M4 Motorways.</i> <p>Response: The proposal would minimise adverse effects on other land through mitigation in design and operation. There would be no material change to any planned road networks.</p> <ul style="list-style-type: none"> <i>To encourage a high standard of development that does not prejudice the sustainability of other enterprises or the environment.</i> <p>Response: There would be no adverse impacts on adjoining land uses or the environment as a result of the proposed development. The proposal includes provisions for the construction and operational use of a Warehouse / Industrial facility is considered commensurate with surrounding industrial development within the estate (SSD 9522) and the wider WSEA.</p> <ul style="list-style-type: none"> <i>To provide for small-scale local services such as commercial, retail and community facilities (including</i>

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

	<p><i>child care facilities) that service or support the needs of employment-generating uses in the zone.</i></p> <p>Response: The proposal includes provisions for the construction and operational use of a Warehouse / Industrial Facility within a zone designated for employment generation. The proposal would be appropriately co-located in close proximity to existing industrial developments which generate significant employment outcomes throughout the WSEA.</p>
Clause 18: Requirements for Development Control Plans	<p>A site-specific Development Control Plan (DCP) has been prepared for this Site under SSD 9522. The proposed development has been designed to comply with Mamre Road Precinct DCP notwithstanding.</p>
Clause 20: Ecologically Sustainable Development	<p>Future development on the Subject Site, for the purposes proposed would incorporate a number of Ecologically Sustainable Development (ESD) initiatives to reduce the consumption of potable water and greenhouse gas emissions of future built form. Initiatives relate to:</p> <ul style="list-style-type: none"> ▪ Energy & Greenhouse Gas Emissions ▪ Potable water reduction ▪ Minimising waste to landfill ▪ The Indoor Environment ▪ Occupant amenity and comfort ▪ Land Use & Ecology ▪ Emissions ▪ Building Management
Clause 21: Height of Buildings	<p>No maximum building height has been adopted under SEPP WSEA.</p> <p>However, the consent authority must be satisfied that:</p> <p><i>(a) Building heights will not adversely impact on the amenity of adjacent residential areas, and,</i> <i>(b) Site topography has been taken into consideration.</i></p> <p>Notwithstanding, the building height with respect to the proposed development will be generally 13m with the exception of the tower elements which are 25m and 45m respectively. For consistency and completeness, a Landscape and Visual Impact Assessment will be prepared to justify the proposed building height in the Site context.</p>
Clause 22: Rainwater Harvesting	<p><i>"the consent authority must not grant consent to development on land to which this Policy applies unless it is satisfied that adequate arrangements will be made to connect the roof areas of buildings to such rainwater harvesting scheme (if any) as may be approved by the Director-General."</i></p> <p>Rainwater harvesting will be provided for any future built form proposed, with re-use for non-potable applications incorporated into the overall design for built form characteristics. Internal uses</p>

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

	will include such potable applications as toilet flushing, while external applications would be used for irrigation.
Clause 23: Development Adjoining Residential Land	<p>In consideration of Clause 23 of SEPP WSEA, the potential visual impact of any built form would be considered in accordance with the provisions outlined under Clause 23, which state:</p> <ul style="list-style-type: none"> <i>(a) wherever appropriate, proposed buildings are compatible with the height, scale, siting and character of existing residential buildings in the vicinity, and</i> <i>(b) goods, plant, equipment and other material resulting from the development are to be stored within a building or will be suitably screened from view from residential buildings and associated land, and</i> <i>(c) the elevation of any building facing, or significantly exposed to view from, land on which a dwelling house is situated has been designed to present an attractive appearance, and</i> <i>(d) noise generation from fixed sources or motor vehicles associated with the development will be effectively insulated or otherwise minimised, and</i> <i>(e) the development will not otherwise cause nuisance to residents, by way of hours of operation, traffic movement, parking, headlight glare, security lighting or the like, and</i> <i>(f) the development will provide adequate off-street parking, relative to the demand for parking likely to be generated, and</i> <i>(g) the site of the proposed development will be suitably landscaped, particularly between any building and the street alignment.</i> <p>It is noted, that the potential visual amenity impacts as a result of the proposed development were generally modelled under SSD 9522, however a new assessment will be provided considering the specific built form.</p>
Clause 24: Development involving Subdivision	SSD 9522 included provisions for subdivision to create the subject allotment. This application involves a further subdivision to create a lot for the subject facility. Any further subdivision would accord with the requirements to create a suitable platform for development.
Clause 25: Public Utility Infrastructure	<p>All essential services would be required to be successfully augmented to the Subject Site for any future development, which include:</p> <ul style="list-style-type: none"> ▪ Potable water ▪ Wastewater ▪ Gas ▪ Electricity ▪ Telecommunications
Clause 26: Development on or in the Vicinity of Proposed	The Site is within proximity of a proposed transport infrastructure route (being the Southern Link Road).

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

Transport Infrastructure Routes	SSD 9522 allows for the Southern Link Road and has based its alignment on the designs prepared for the NSW DPIE by AECOM. The alignment shown, demonstrates sound planning, combining three (3) infrastructure corridors (Southern Link Road, Sydney Water Pipeline, Western Sydney Freight Rail Corridor). This alignment is consistent with the Mamre Road Precinct Structure Plan.
Clause 27: Exceptions to development standards	There are no exceptions to Development Standards proposed under this SSD Application.
Clause 28: Relevant acquisition authority	The subject Site is separated from Mamre Road and will not have any impact in this respect.
Clause 29: Industrial Release Area satisfactory arrangements for the provision of regional transport infrastructure facilities	<p>The Site is identified within an Industrial Release Area pursuant to Clause 29 of SEPP WSEA.</p> <p>Satisfactory arrangements were issued under SSD 9522 which relate to the subject development Site.</p>
Clause 31: Design Principles	<p>The Proposed development will consider the following design principles, as they apply to Clause 31 of SEPP WSEA, including:</p> <ul style="list-style-type: none"><i>(a) the development is of a high quality design, and</i><i>(b) a variety of materials and external finishes for the external facades are incorporated, and</i><i>(c) high quality landscaping is provided, and</i><i>(d) the scale and character of the development is compatible with other employment-generating development in the precinct concerned.</i> <p>Given the proposed tower elements, a high degree of articulation is proposed by way of materials and colours to reduce the visual impact and set a desirable precedent for such future development. The ESI will be accompanied by a design report which addresses the criterion.</p>
Clause 32: Preservation of Trees or Vegetation	SSD 9522 included provision for native vegetation clearing on some 9.15 ha of native. Accordingly, there would be no such vegetation clearing required as a result of the proposal.
Clause 33A: Development Near Zone Boundaries	The proposed development would not rely on Clause 33A of SEPP WSEA.
Clause 33B: Development of land within or adjacent to transport investigation area	Concurrence has been granted with TfNSW under SSD 9522. Further concurrence would be required under the subject proposal.
Clause 33C: Development within the Mamre Road Precinct	Due to the CIV for the proposed development being for more than \$200,000, concurrence with Transport for NSW would be required.
Clause 33D: Development in areas subject to aircraft noise	The subject Site is located outside of the Western Sydney Airport Aircraft Noise Exposure Forecast (ANEF) 2030 contours.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

	Notwithstanding, a Noise Impact Assessment will consider Clause 33D in further detail.
Clause 33E: Airspace operations	It is noted, that Table 3.3 of AS 2021:2015 sets limits for noise intrusion when a new development is located in an area within the ANEF contour 20 and 25. Accordingly, the Site is located outside of the 20-25 ANEF contour with respect to Western Sydney Airport; therefore, satisfying Clause 33D of SEPP WSEA.
Clause 33F: Development of land adjacent to Airport	The proposed development is not likely to attract birds or animals in numbers that are likely to increase hazards of operating an aircraft. Therefore, further consideration with regard to Clause 33F is not considered to be required.
Clause 33G: Water Recycling and Conservation	The proposed development does not comprise a water recycling facility, nor are there provisions for a water recycling facility to service the Site requiring further consideration.
Clause 33H: Earthworks	<p>(1) <i>The objectives of this clause are as follows—</i></p> <ul style="list-style-type: none"> (a) <i>to ensure that earthworks for which development consent is required will not have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land,</i> (b) <i>to allow earthworks of a minor nature without separate development consent.</i> <p>(2) <i>Development consent is required for earthworks unless—</i></p> <ul style="list-style-type: none"> (a) <i>the work is exempt development under this Policy or another applicable environmental planning instrument, or the work is ancillary to other development for which development consent has been given.</i> <p>(3) <i>Before granting development consent for earthworks, the consent authority must consider the following matters—</i></p> <ul style="list-style-type: none"> (a) <i>The likely disruption of, or detrimental effect on, existing drainage patterns and soil stability in the locality,</i> (b) <i>The effect of the proposed development on the likely future use or redevelopment of the land,</i> (c) <i>The quality of the fill or the soil to be excavated, or both,</i> (d) <i>The effect of the proposed development on the existing and likely amenity of adjoining properties,</i> (e) <i>The source of fill material and the destination of excavated material,</i> (f) <i>The likelihood of disturbing relics.</i> (g) <i>The proximity to and potential for adverse impacts on a waterway, drinking water catchment or environmentally sensitive area,</i> (h) <i>Appropriate measures proposed to avoid, minimise or mitigate the impacts of the development,</i> (i) <i>The proximity to and potential for adverse impacts on a heritage item, an archaeological site, or a heritage conservation area,</i> (j) <i>The visual impact of earthworks as viewed from the waterways.</i> <p>SSD 9522 has considered earthworks across the subject Site; however, the proposed development will consider any minor</p>

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

	<p>earthworks required to facilitate an appropriate pad level for future development. The finished floor level of the building is proposed at RL38.50 which is generally consistent with the previous approval.</p>
<p>Clause 33I: Development on flood prone land</p>	<p>(1) <i>This clause applies to development requiring consent that is carried out on flood prone land.</i></p> <p>(2) <i>Consent is not to be granted to the carrying out of development to which this clause applies unless the consent authority has taken into consideration whether or not—</i></p> <ul style="list-style-type: none"> <i>(a) the development will adversely affect flood behaviour resulting in detrimental increases in the potential flood affectation of other development or properties, and</i> <i>(b) the development will alter flow distributions and velocities to the detriment of other properties or the environment of the floodplain, and</i> <i>(c) the development will enable safe occupation of the flood prone land, and</i> <i>(d) the development will detrimentally affect the floodplain environment or cause avoidable erosion, siltation, salinity, destruction of riparian vegetation or a reduction in the stability of the riverbank/watercourse, and</i> <i>(e) the development will be likely to result in unsustainable social and economic costs to the flood affected community or general community, as a consequence of flooding, and</i> <i>(f) the development is compatible with the flow conveyance function of the floodway, and</i> <i>(g) the development is compatible with the flood hazard, and</i> <i>(h) in the case of development consisting of the excavation or filling of land, the development—</i> <ul style="list-style-type: none"> <i>i. will detrimentally affect the existing drainage patterns and soil stability in the locality, and</i> <i>ii. will adversely impact or alter flood behaviour.</i> <p>SSD 9522 considered the potential flooding impacts and behaviours as a result of the post-development flows. There would be no further changes to the outcomes in this respect. It is noted that the Site is located outside the 1% AEP flood extent and above the PMF. The bulk earthworks previously approved establish a general level at which the building will be constructed. There would be no adverse flood impacts (upstream or downstream) as a result of this proposal.</p>
<p>Clause 33J: Heritage conservation</p>	<p>(1) <i>The objectives of this clause are as follows –</i></p> <ul style="list-style-type: none"> <i>(a) To conserve the environmental heritage of the Western Sydney Employment Area,</i> <i>(b) To conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,</i> <i>(c) To conserve archaeological sites,</i> <i>(d) To conserve Aboriginal objects and Aboriginal places of heritage significance.</i> <p>SSD 9522 considered potential Historic (European) Heritage and Aboriginal Cultural Heritage affectations attributed to the Subject</p>

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

	Site. Accordingly, the proposed development would not impact any identified Aboriginal Cultural Heritage in close proximity to the Site. Where required, existing recommendations and mitigations measures would be continued to apply to the Site. It is not proposed to prepare a new Aboriginal Cultural Heritage Assessment Report (ACHAR) given that the Site has been approved for bulk earthworks and all necessary requirements are to be complied with under that consent.
Clause 33K: Consent for clearing native vegetation	SSD 9522 included provisions for native vegetation clearing on some 9.15 ha of native. Accordingly, there would be no such vegetation clearing required as a result of this proposal.
Clause 33L: Stormwater, water quality and water sensitive design	<p><i>(1) The objective of this clause is to avoid or minimise the adverse impacts of stormwater on the land on which development is to be carried out, adjoining properties, riparian land, native bushland, waterways, groundwater dependent ecosystems and groundwater systems.</i></p> <p>Response: The proposed development would include a satisfactory stormwater management cycle which would include provisions for a Water Sensitive Urban Design (WSUD) strategy which achieves stormwater and pollution reduction targets across the Site and consistent with the WSUD strategy approved under SSD 9522.</p> <p><i>(2) Before granting development consent to development on land to which this Policy applies, the consent authority must take into consideration whether—</i></p> <p><i>(a) water sensitive design principles are incorporated into the design of the development, and</i></p> <p>Response: The proposed development would include a satisfactory stormwater management cycle which would include provisions for a Water Sensitive Urban Design (WSUD) strategy which achieves Council's stormwater and pollution reduction targets across the Site and is consistent with the WSUD strategy approved under SSD 9522.</p> <p><i>(b) riparian, stormwater and flooding measures are integrated, and</i></p> <p>Response: The Site would be implemented with appropriate drainage and landscaping measures to satisfactorily capture runoff and any adverse flooding affectations. The on-site stormwater detention basin(s) would act as an appropriate Stormwater Treatment Measure for the Site.</p> <p><i>(c) the stormwater management system includes all reasonable management actions to avoid adverse impacts on the land to which the development is to be carried out, adjoining properties, riparian land, native bushland, waterways, groundwater dependent ecosystems and groundwater systems, and</i></p>

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

	<p>Response: All reasonable and feasible recommendations and mitigation measures including landscaping provisions; and incorporation of erosion and sediment controls would satisfactorily avoid adverse impacts on adjoining properties and demonstrate an environmentally sustainable development.</p> <p><i>(d) if a potential adverse environmental impact cannot be feasibly avoided, the development minimises and mitigates the adverse impacts of stormwater runoff on adjoining properties, riparian land, native bushland, waterways, groundwater dependent ecosystems and groundwater systems, and</i></p> <p>Response: There are no environmental impacts anticipated as a result of the proposed development, for which the EIS to be prepared would satisfactorily demonstrate.</p> <p><i>(e) the development will have an adverse impact on—</i></p> <ol style="list-style-type: none"><i>the water quality or quantity in a waterway, including the water entering the waterway, and</i><i>the natural flow regime, including groundwater flows to a waterway, and</i><i>the aquatic environment and riparian land (including aquatic and riparian species, communities, populations and habitats), and</i><i>the stability of the bed, banks and shore of a waterway, and</i> <p>Response: As mentioned above, the proposed development includes a satisfactory stormwater management cycle which includes a Water Sensitive Urban Design (WSUD) strategy which achieves Council's stormwater and pollution reduction targets across the Site and is consistent with the WSUD strategy proposed under SSD 9522. There are no adverse impacts anticipated to the water quality or downstream flows as a result of the proposed development.</p> <p><i>(f) the development includes measures to retain, rehabilitate and restore riparian land.</i></p> <p>Response: The subject Site does not adjoin a riparian corridor. Notwithstanding, landscaping provisions have been included across the Site to contribute to the management of the heat island effect.</p>
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5.15 PENRITH LOCAL ENVIRONMENTAL PLAN 2010

Penrith Local Environmental Plan 2010 (PLEP2010) is not applicable to the land as the provisions of SEPP WSEA apply.

5.16 DRAFT ENVIRONMENTAL PLANNING INSTRUMENTS

No draft EPIs apply relevant to the proposal.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

5.17 DRAFT MAMRE ROAD PRECINCT DEVELOPMENT CONTROL PLAN

The following key controls have been considered with respect to the proposal. A comprehensive DCP assessment table will be included with the final EIS.

Table 5 Draft Mamre Road Precinct DCP		
Clause	Compliance	Response
3. Precinct and Subdivision Design		
3.1 Subdivision Minimum Allotment Size: <ul style="list-style-type: none">IN1 General Industrial: 1,000m² Minimum Frontage: <ul style="list-style-type: none">40m (excluding cul-de-sacs) and 35m minimum lot width at building line (for lots > 5,000m²)60m (for lot >10,000m²)	YES	The proposed allotment is greater than 1,000m ² with a frontage greater than 60m.
3.4.1 Road Network, Hierarchy and Design The Mamre Road Precinct should be developed generally in accordance with the road network map. Road reserve width (total): <ul style="list-style-type: none">Local Industrial Road (Type 1): 24.0m (mid-block)Distributor/Collector Road (Type 2): 26.4m (mid-block), 30.6m (intersections) No direct vehicle access to Mamre Road or Southern Link or distributor roads are permitted.	YES	The proposal is consistent with the Mamre Road Precinct Road Network Map. The internal road network was approved under SSD 9522. The proposal has no material impact on the widths or alignment of this road network.
4. General Requirements for Industrial Development		
3.6.1 Building Height Maximum height: <ul style="list-style-type: none">16m from the existing ground level within 250m of a rural-residential zone20m from the existing ground level for all other sites A Visual Impact Assessment is to be provided for built form above 20m	YES	The proposal will provide tower elements reaching 25m and 45m respectively, while the remainder of the building will be at a conventional 13.7m height. The variation to the control is justified based on the plant, equipment and processes as part of the operation. The tower elements provide an improved environmental outcome to

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

to demonstrate mitigation of solar and visual impacts to the surrounding uses and public amenity.		contain dust and noise, whilst achieving an efficient collocated operation. Regardless, a Visual Impact Assessment will be prepared as part of the EIS which considers key viewpoints and the impacts from the RE1 land to the rear.
3.6.2 Building Setbacks Building setback requirements: <ul style="list-style-type: none">▪ Lots fronting designated roads (Mamre Road and Potential Southern Link Road): 20m▪ Lots fronting key access roads (distributor and collector roads): 12m▪ Lots fronting all other roads (local estate roads): 7.5m▪ Secondary road frontages (corner lots): 5m▪ Rear and side boundaries: 5m▪ Lots adjoining the proposed WSFL corridor: 5m Notwithstanding the above, no development other than the following development is permitted within the defined setback for any road, other than Mamre Road and potential Southern Link Road: <ul style="list-style-type: none">▪ Landscaping;▪ Maintenance/rehabilitation of biodiversity corridors or areas;▪ Utility services installation;▪ Accessways and driveways (not permitted in setbacks to designated roads);▪ Fire access roads;▪ Approved signage;▪ Street furniture; or▪ Drainage works.	YES	It is understood the final DCP will have 7.5m setback requirements from collector and distributor roads which will be complied with.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

3.6.3 Landscaping Minimum landscape requirements: <ul style="list-style-type: none">▪ Lots fronting designated roads (Mamre Road and Potential Southern Link Road): 10m landscape setback to the road frontage▪ Lots fronting key access roads (distributor and collector roads): 6m or average 50% of the setback along the road frontage▪ Lots fronting all other roads (local estate roads): Average of 50% of setback along the road frontage▪ Rear boundary: 2.5m from the rear boundary▪ Side boundary: No minimum requirement	YES	Based on the strategic DPIE briefing, it is understood that the final DCP will have a landscaping setback control of 50% of the building setback which is complied with.
4.7 Access and Parking Minimum parking rates: <ul style="list-style-type: none">▪ Warehouse or distribution centres: 1 space per 300m² of gross floor area or 1 space per 4 employees, whichever is the greater▪ Ancillary office space: 1 space per 40m² of gross floor area	YES	Applying the rates relevant to industry, warehousing and ancillary office, car parking is required as follows: <ul style="list-style-type: none">▪ Industry (1/200m²) - 40 spaces▪ Warehouse (1/300m²) - 53 spaces▪ Ancillary office (1/40m²) - 63 spaces Total = 156 spaces 156 spaces are provided and therefore compliant.

PART F ENVIRONMENTAL ASSESSMENT

A screening analysis of the environmental issues applicable to the proposal is presented in **Table 6** below. This risk-based analysis has been used to identify the key environmental issues for further assessment and assist the preparation of the SEARs with respect to the proposed development.

The analysis is based on preliminary environmental assessment of the subject site only. The EIS for the proposal will fully address these items and other key environmental issues relevant to the proposal.

Table 6: Environmental Screening Analysis

Issue	Analysis
Soil and Water	<ul style="list-style-type: none">▪ Site benching is being undertaken as part of SSD 9522.▪ During construction, an Erosion and Sediment Control Plan would be implemented to protect the downstream drainage system and receiving waters from sediment-laden runoff.▪ Minimal earthworks would be required and designed to minimise the extent of cut and fill, aiming for a balance of soil to be re-used on-site. Topsoil would be stockpiled for re-use within landscaped areas where possible.▪ Minor regrading would be required to facilitate the building pad for construction purposes. No extensive filling is proposed. The building pad will be set at RL 38.50 which is generally consistent with the levels established under SSD 9522.▪ The proposed development will include a satisfactory stormwater management cycle which includes a Water Sensitive Urban Design (WSUD) strategy which achieves the relevant stormwater and pollution reduction targets across the site. It is anticipated that ongoing consultation with the NSW DPIE, Council, NSW EPA and TfNSW will occur throughout the SSD Application.▪ Rainwater harvesting would also be applied across the site (where considered practical), which will incorporate re-use in irrigation methods and recycled potable water components, i.e. toilet flushing.
Noise	<ul style="list-style-type: none">▪ The site is capable of mitigating acoustic impacts to sensitive receivers.▪ The SSD Application would consider both construction and operational acoustic impacts (noise and vibration) having regard to the NSW Environment Protection Authority (EPA) Industrial Noise Criteria, including the Noise Policy for Industry (NPI) document, the Interim Construction Noise Guideline, as well as the relevant controls in the Mamre West DCP.▪ Potential noise impacts generated during the construction phase of the proposed development would be localised through construction traffic and construction equipment, for which a Construction Noise and Vibration Management Plan (CNVMP) would be implemented to address any potential noise and vibration impacts anticipated during the construction phase.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

Table 6: Environmental Screening Analysis

Issue	Analysis
	<ul style="list-style-type: none">Operational noise would be attributed to proposed plant and equipment. It is noted that a complete Noise Impact Assessment would be undertaken by a suitably qualified Acoustic Engineer to confirm the proposed development does not exceed the relevant acoustic emissions criteria. Where potential impacts are identified suitable acoustic attenuation and mitigation measures would be recommended and implemented where required.
Biodiversity	<ul style="list-style-type: none">The subject Site is not considered to contain biodiversity values given clearing was approved under SSD 9522, therefore a BDAR wavier will be sought.
Air Quality and Odour	<ul style="list-style-type: none">Given the nature of the proposed development being for a warehouse and manufacturing facility, air quality impacts would be considered accordingly.Potential sources of odour include:<ul style="list-style-type: none">Rooftop ventilation units, which draw air from within the facilityexhaust stacksThe POEO Act requires that no occupier of any premises causes air pollution (including odour) through a failure to maintain or operate equipment or deal with materials in a proper and efficient manner. The operator must also take all practicable means to minimise and prevent air pollution. The POEO Act includes the concept of 'offensive odour' and states it is an offence for scheduled activities to emit 'offensive odour'. It will be demonstrated in the EIS that the POEO Act is not triggered by the proposal.An Air Quality Impact Assessment Report prepared by a suitably qualified expert would accompany the EIS in accordance with the NSW EPA requirements, detailing:<ul style="list-style-type: none">A background and description of the proposalA review of the existing meteorology and air quality environment of the subject siteA description of the dispersion modelling approach used to assess potential air quality impacts of the proposalThe predicted results and a discussion of the potential air quality impactsAny recommendation mitigation measures, if necessaryThe proposed operations will apply a range of mitigation measures to achieve a standard of operation consistent with current best practice for the control of emissions from such an operation.During construction, air quality would be managed through appropriate dust mitigation measures.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

Table 6: Environmental Screening Analysis

Issue	Analysis
Aboriginal Cultural Heritage and Non-Aboriginal Heritage	<ul style="list-style-type: none">Given the extensively disturbed nature of the subject site, and the fact earthworks were approved under SSD 9522, it is considered that a full ACHAR is not warranted. The salvage works under this consent have been completed and a copy of the salvage report will be provided in the SSD submission.Appropriate mitigation and management measures have been undertaken where Aboriginal heritage items or artefacts were identified at the site.
Waste	<ul style="list-style-type: none">Operational waste would be managed in accordance with a Plan of Management for the site.Waste generated throughout the construction phase would be disposed of in accordance with a Waste Management Plan, which would include provisions for recyclables and suitable off-site disposal.
Traffic and Transport	<ul style="list-style-type: none">Suitable provision is made to accommodate and service the proposed development in terms of traffic and transport.A Traffic Impact Assessment would be prepared by a suitably qualified Traffic Engineer, which would consider the potential traffic related impacts as a result of the proposal on the surrounding road network; access and design; car parking; and trip generation (including relevant swept path analysis).Therefore, the proposal is expected to have no material adverse impact on the surrounding road network operation and the key intersection of Mamre Road and Bakers Lane is anticipated to operate as intended under SSD 9522.The operational trip generation assessment has fewer trips than what was previously approved as part of the SSD-9522 approval (which included detailed traffic modelling for the entire Kemps Creek in sequences 1B, 2 and 3). Therefore, the proposed Site will not have any additional traffic impact beyond what has been approved as part of the SSD-9522 approval.Furthermore, proposed Modified Sequence 1A (has also captured the additional traffic impacts for the proposed Site. Even with the Modified Sequence 1A, the Site will still not have any additional traffic impacts beyond what has been modelled for this assessment.Additionally, SIDRA modelling has been undertaken for the potential future SLR / Bakers Lane / North-South 01 Access Road intersection for an assumed year 2036. This assessment has been undertaken noting that the SLR / Bakers Lane / North-South Road 01 intersection is likely to operate as a signalised intersection when a Sequence 3 upgrade plan is delivered by TfNSW.In relation to multi-directional access along the north/south road, it is understood from discussions in the Land Owners Group (LOG) that this will be permitted.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility
657-769 Mamre Road, Kemps Creek

Table 6: Environmental Screening Analysis

Issue	Analysis
Other Infrastructure and Services	<ul style="list-style-type: none"> All essential infrastructure services would be augmented accordingly for the proposed development, including water, sewer, electricity and communications.
Visual Amenity / Urban Design	<ul style="list-style-type: none"> The built form would be designed to incorporate architectural elements that articulate the facades and provide a sufficient level of visual amenity within the public domain. Clause 31 of SEPP WSEA is to be addressed within the EIS and accompanied by a design statement responding to the provisions. The material and colour scheme will seek to mitigate any visual impacts. Consideration would be given towards public recreation land and ENZ zone in the vicinity of the site by way of increased landscaping provisions. Potential visual impacts as a result of the proposed development would be assessed via means of a Visual Impact Assessment, which would include an assessment of the proposed layout and design in accordance with the following principles and best-practice approaches identified within the following documents (but not limited to): <ul style="list-style-type: none"> <i>Guidelines for Landscape and Visual Impact Assessment (GLVIA) – Third Edition</i> (LI/IEMA, 2013); and <i>The Landscape Institute Advice Note 01</i> (2011) – <i>Photography and Photomontage in Landscape and Visual Assessment</i>. <p>It is noted that due consideration was given to the overall visual impacts under SSD 9522 however this will be addressed as required under this SSD. Particular analysis is to be given to the potential impacts from the RE1 zoned land to the rear.</p>
Hazards and Risks	<ul style="list-style-type: none"> A Preliminary Hazard Analysis will be undertaken in accordance with the relevant SEPP 33 thresholds to establish the storing of Dangerous Goods on-site does not trigger further consideration.
Site Layout and Design	<ul style="list-style-type: none"> The proposed Site layout and design (including landscaping) respond to the site constraints and surrounding characteristics, thus providing a highly functional development which enhances the visual amenity of the locality. Suitable provision is made for service vehicles within the subject site. Detailed swept paths would be provided within the EIS and Traffic Impact Assessment.
Socio / Economic	<ul style="list-style-type: none"> The proposed development would positively impact on the social and economic conditions of the WSEA and WSA, which are envisaged for employment-generation and economic growth and prosperity.

Request for Secretary's Environmental Assessment Requirements

Proposed Warehouse / Industrial Facility

657-769 Mamre Road, Kemps Creek

Table 6: Environmental Screening Analysis

Issue	Analysis
	<ul style="list-style-type: none">Construction jobs are expected to be in the order of approximately 300 (full time equivalent (FTE)) jobs and approximately 140 operational jobs.

PART G CONCLUSION

The proposed development would equate to a CIV of more than \$30 Million, thus it is defined as SSD pursuant to Schedule 1, Part 9 of the SRD SEPP.

The Site is situated within the Penrith LGA and is complimented by surrounding developments of similar contextual importance; therefore, the it is considered highly suitable for proposal, given the industrial-related uses proposed.

The proposed development is considered to align with the strategic objectives of SEPP WSEA and continues to support employment-generating opportunities within the wider Sydney Metropolitan Region. Furthermore, the Site is located within close proximity to housing and key infrastructure. In this respect, the proposed development would provide for economic growth and prosperity for the Penrith LGA.

As noted throughout this Report, the proposed development can be carried out in an environmentally and ecologically sustainable manner and would further implement suitable mitigation measures to ensure that the amenity and function of surrounding land uses would not be compromised.

It is requested that NSW DPIE issue formal SEARs for the preparation of an EIS for the proposed development as SSD.

APPENDIX 1

Preliminary Architectural Plans

APPENDIX 2

Preliminary Cost Report

APPENDIX 3

Ecoplanning Letter