

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN

**Lot 202 DP 106143
Horsley Logistics Park**

Prepared for:

ESR Developments (Australia) Pty Ltd
Level 29
20 Bond Street
Sydney NSW 2000

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BASIS OF REPORT

This report has been prepared by SLR Consulting Australia Pty Ltd (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with ESR Developments (Australia) Pty Ltd (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

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DOCUMENT CONTROL

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1 Introduction

1.1 Development Background

ESR Developments (Australia) Pty Ltd (ESR) obtained Development Consent (SSD-10436) for the construction, fit-out and operation of eight warehouse and distribution tenancies in four buildings comprising the Horsley Logistics Park in Western Sydney (**Figure 1** and **Figure 2**). Horsley Logistics Park is located within the 'CSR Estate', which historically was the location of extractive activities. Following planning approvals, the land has been subject to subdivision, earthworks, construction of public roads and associated drainage.

SSD-10436 incorporates the approval of the construction, fit-out and operation of eight warehouse and distribution tenancies in four buildings with a total gross floor area of 109,048m² including offices, loading docks, hardstand areas, truck and car parking areas, landscaping, associated infrastructure, and signage.

The site also has approval to operate 24 hours per day seven days a week.

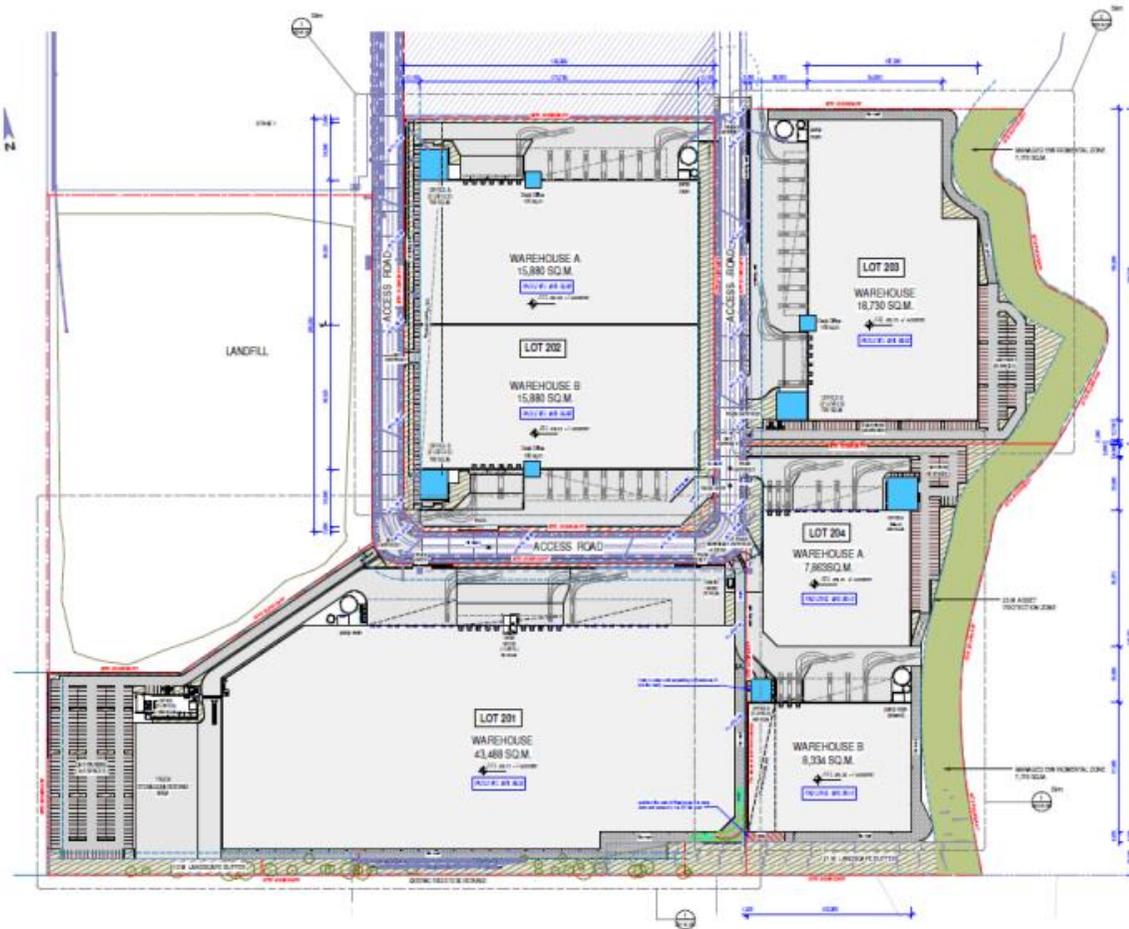
At the time of preparing this document, there have been two modifications to SSD-10436 determined., These modifications were:

- MOD 1 – Amended layouts of Lots 201 and 204; and
- MOD 2 – Design amendments to Lot 202 (formally Lot 204), renumbering approved lots, updated signage strategy and administrative changes to conditions.

A copy of Development Consent (SSD-10436) is attached refer **Appendix A**.

This Operational Environmental Management Plan (OEMP) has been prepared to address the activities associated with the operation of Lot 202.

The OEMP has been prepared with consideration to the *Guideline for the Preparation of Environmental Management Plans* (Department of Infrastructure, Planning and Natural Resources 2004).



Source: Hla Architects

Figure 1 Lots 201 and 202 Masterplan

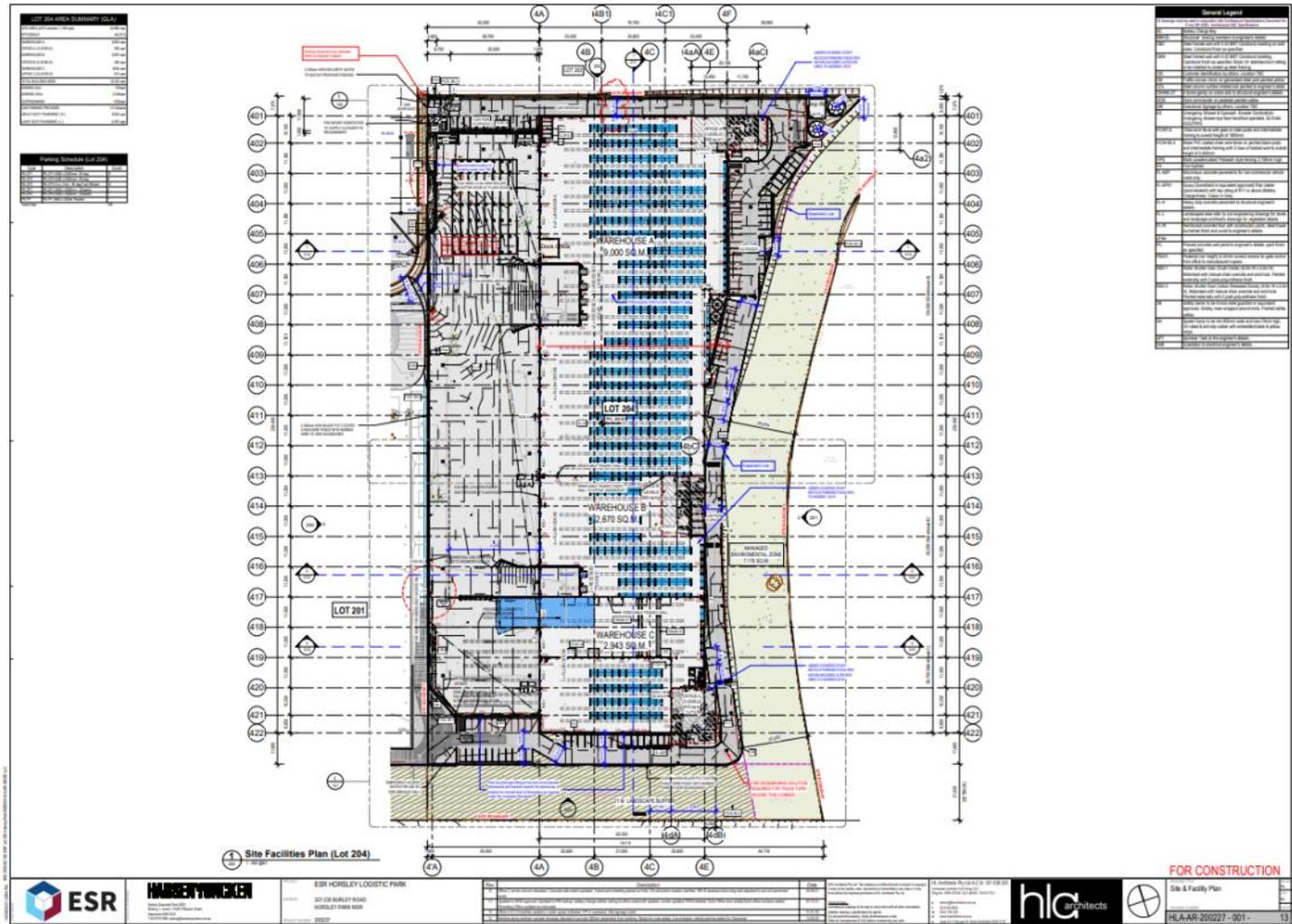


Figure 2 Lot 202 Layout

1.2 Operational Environmental Management Plan

1.2.1 Scope

This OEMP has been prepared to satisfy Conditions C1, C5 and C6 of Development Consent (SSD-10436) in relation to Lot 202 DP 106143 at Horsley Logistics Park. The specific requirements of this consent condition, along with where these requirements have been addressed within this document, are listed in **Table 1**.

Table 1 OEMP Scope

Condition	Section
C1. Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:	
(a) detailed baseline data;	Refer to specialist management plans.
(b) details of: <ul style="list-style-type: none"> i. The relevant statutory requirements (including any relevant approval, licence or lease conditions); ii. Any relevant limits or performance measures and criteria; and iii. The specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; 	<ul style="list-style-type: none"> i. Section 2.2 ii. Section 3 iii. Refer to specialist management plans
(c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	Section 3
(d) a program to monitor and report on the: <ul style="list-style-type: none"> i. Impacts and environmental performance of the development; and ii. Effectiveness of the management measures set out pursuant to paragraph (c) above; 	Section 4
(e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	Section 5
(f) a program to investigate and implement ways to improve the environmental performance of the development over time;	Section 6
(g) a protocol for managing and reporting any: <ul style="list-style-type: none"> i. Incident and any non-compliance (specifically including any exceedance of the impacts assessment criteria and performance criteria); ii. Complaint; iii. Failure to comply with statutory requirements; and 	<ul style="list-style-type: none"> i. Section 2.5 ii. Section 2.6 iii. Section 2.5
(h) a protocol for periodic review of the plan.	Section 6
C5. The Applicant must prepare an Operational Environmental Management Plan (OEMP) in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.	This Plan.
C6. As part of the OEMP required under condition C5 of this consent, the Applicant must include the following:	

Condition	Section
(a) describe the role, responsibility, authority and accountability of all key personnel involved in environmental management of the development;	Section 2.1
(b) describe the procedures that would be implemented to: <ul style="list-style-type: none"> i. Keep the local community and relevant agencies informed about the operation and environmental performance of the development; ii. Receive, handle, respond to, and record complaints; iii. Resolve any disputes that may arise; iv. Respond to any non-compliance; v. Respond to emergencies; and 	<ul style="list-style-type: none"> i. Section 4.2 ii. Section 2.6 iii. Section 2.7 iv. Section 2.5 v. Section 2.5
(c) include the following environmental management plans: <ul style="list-style-type: none"> i. Landscape Management Plan (see condition B1); ii. Loading Area Management Plan (see condition B18); iii. Operational Traffic Management Plan (see condition B27A); iv. Green Travel Plan (see condition B28) v. Stormwater Management Plan (see condition B32); and vi. Community Consultation Plan (see condition B57). 	<ul style="list-style-type: none"> i. Section 3.7 ii. Section 3.2 iii. Section 3.3 iv. Section 3.3 v. Section 3.6 vi. Section 2
C7. The Applicant must: <ul style="list-style-type: none"> (a) not commence operation until the OEMP is approved by the Planning Secretary; and (b) operate the development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time). 	Noted.

1.2.2 Objectives

The objectives of this OEMP are to guide and assist in ensuring:

- The Operational Environmental Management requirements under SSD-10436 are undertaken and adhered to in line with the relevant consent conditions;
- Establish the framework for managing and mitigating the potential for adverse environmental impacts as a result of the operation of Lot 202 at Horsley Logistics Park;
- Clearly and concisely document the mitigation measures made in the EIS (Urbis 2020) and Response to Submissions (RTS) and SSD-10436 Modification Reports (as listed in **Section 1.1**), including relevant management plans, that are required to be implemented during operation;
- Demonstrate to DPIE how the applicant proposes to meet all its regulatory obligations including those outlined in the Conditions of Consent; and
- Clearly and concisely document the conditions imposed by SSD-10436 that are required to be implemented and/or complied with during operation.

2 Environmental Management Framework

2.1 Roles and Responsibilities

The key personnel responsible for environmental management at Lot 202 at Horsley Logistics Park are listed in **Table 2**.

Table 2 Personnel Responsible for Environmental Management

Company and Role	Responsibilities
ESR's Representative	<ul style="list-style-type: none"> Ensure the tenant's representative is made aware of their obligations of the OEMP are appropriately implemented and maintained. Advise and assist the tenant in the implementation of the OEMP, as required.
Tenant's Representative	<ul style="list-style-type: none"> Ensure that the obligations of this OEMP are implemented and communicated to all relevant parties. Implement the Complaints and Incident Handling Procedures, as required.
Tenants/employees/contractors	<ul style="list-style-type: none"> Ensure familiarity, implementation and compliance with this OEMP and appended management plans. Support the company's commitment to environmental management and compliance. Work in a manner that will not harm the environment or impact on surrounding receptors. Report all environmental incidents and complaints to the ESR's Representative without delay. Report any inappropriate operational and/or environmental management practices to the ESR's Representative without delay.

The contact details of the key personnel responsible for the environmental management of Lot 202 are as follows:

Role	Name/ Position	Contact Details
ESR's Representative	Fergus Adamson – Portfolio Manger	Fergus.Adamson@esr.com M: 0431 063 866
Tenant's Representative	Unit 1: Ray Toscano Unit 2: Gary Nulty Unit 3: Grace Corbett	ray.toscano@holmanindustries.com.au M: 0417 584 716 Gary.Nulty@tenantco.com M: 0488 488 661 grace.corbett@rsrg.com M: 0477 110 320

2.2 Statutory Requirements

The development will be constructed in accordance with SSD-10436 and in accordance with the documents referenced under Condition A2 of the Consent:

- The EIS (Urbis 2020) and RTS, Supplementary RTS, and Supplementary Information;
- The development layout plans attached to the Development Consent as Appendix 1, which have been sourced from the EIS (Urbis 2020); and
- The management and mitigation measures (attached to the Development Consent as Appendix 2).

If there is any inconsistency between the plans and documentation referred to in Condition A2, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of SSD-10436 prevail to the extent of any inconsistency.

The consent conditions applicable to the operation of Lots 201 and 202 at Horsley Logistics Park are listed in **Appendix A**.

2.3 Community Enquiries

Relevant contact details, including a phone number for community enquiries, will be included on ESR's website. All community enquiries should be forwarded to ESR's Representative.

2.4 Environmental Training

It is the responsibility of ESR's Representative to ensure all Tenant Representatives and maintenance contractors engaged by ESR are appropriately inducted and aware of their general obligations under this OEMP. It is then the responsibility of the respective Tenant Representatives to ensure all other employees and contractors are appropriately inducted and aware of their obligations under the OEMP. It is also the responsibility of the Tenant Representatives to conduct regular "toolbox talks" to ensure continuing awareness of environmental management expectations and responsibilities as applicable to their operations.

The topics to be covered during the induction and toolbox talks include:

- General site maintenance and management expectations and requirements;
- Familiarisation with site environmental controls;
- The environmental management commitments and responsibilities in this OEMP (including appended management plans);
- Appropriate response and management of environmental incidents (for example, a chemical spill) in accordance with the incidents protocol in **Section 1.1**;
- Appropriate response and management of complaints received from the public, government agencies or other stakeholders in accordance with the complaints protocol in **Section 1.1**; and
- Waste minimisation principles (see **Section 3.5**).

Records of all training undertaken should be maintained in an Environmental Training Register to maintain consistency and for audit purposes.

2.5 Incident and Non-Compliance Response Handling and Procedure

For the purposes of this OEMP, SSD-10436 describes an 'incident' as an occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance. SSD-10436 describes a 'non-compliance' as an occurrence, set of circumstances or development that is a breach of the consent.

As per Section 147 of the *Protection of the Environment Operations Act 1997* (POEO Act), SSD-10436 defines material harm as:

...harm that:

a) involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or

b) results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment).

It is noted that incidents relating to workplace health and safety (WHS) are not addressed by this OEMP. WHS incidents are managed in accordance with ESR's Current Work, Health & Safety Policy.

2.5.1 Objective

To ensure that any environmental incident caused by or relating to the operation of Lots 201 and 202 is effectively responded to, and any resulting adverse environmental impact is promptly prevented or effectively managed.

2.5.2 Responsibility

ESR's Representative is responsible for ensuring that the appropriate management response and handling procedures are instigated and carried through in the event of an environmental incident and SSD-10436 non-compliance. The induction is outlined in **Section 2.4** and should be used to ensure all tenant's representatives are aware of and understand their obligations for incident response. It is the responsibility of the respective Tenant Representatives to ensure all other employees and contractors are aware of the incident management response and handling procedures.

All tenant employees and contractors are to:

- Notify Tenant Representative once aware of any hazard or potential hazard that may result in an environmental incident, regardless of the nature or scale;
- Take immediate action to notify the ESR Representative of any environmental incident; and
- Take immediate action (where it is safe to do so) to prevent, stop, contain and/or minimise any adverse impact associated with an incident.

2.5.3 Notification Requirements

2.5.3.1 Incidents

Section 147 of the *Protection of the Environment Operations Act 1997* (POEO Act) defines material harm as:

- a) *harm to the environment is material if:*
 - i. *it involves actual or potential harm' to the health or safety of human beings or to ecosystems that is not trivial, or*
 - ii. *it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and*
- b) *loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.*

Notification responsibilities for incidents that have caused or threatened to cause material harm to the environment are detailed in Section 148 of the POEO Act. In summary, these are broadly categorised as:

Duty of an employee or any person undertaking an activity:

Any person engaged as an employee or undertaking an activity at Lots 201 and 202 will, immediately after becoming aware of any potential incident (even if outside of normal business hours), notify their respective tenant representative of the incident and all relevant information about it. If the Tenant Representative is unavailable, the ESR's Representative must be contacted. Tenant Representative and the ESR Representative will be available 24 hours a day, seven days a week and have the authority to stop or direct works.

Duty of an employer or occupier of the premises to notify:

The employer or occupier of the premises on which the incident occurred, who is notified (or otherwise becomes aware of) of the incident, must immediately notify the relevant authorities about the incident and all relevant information.

Under the POEO Act, "relevant authority" means any of the following:

- The appropriate regulatory authority – the Environment Protection Authority (EPA);
- If the EPA is not the appropriate regulatory authority – the local authority for the area in which the pollution incident occurs (i.e. Council);
- NSW Public Health Unit;
- SafeWork NSW; and
- Fire and Rescue NSW.

Table 3 lists the contact details for these authorities. The person reporting the pollution incident will provide the following key details:

- Location of the pollution incident/emergency;
- Nature of the pollution incident/emergency;
- Their name and contact details; and

- Details of any required assistance.

Table 3 Regulatory Authority Contact List

Regulatory Authority / Stakeholder	Key Contact	Contact Details	
Department of Planning, Industry and Environment (DPIE)	Main switchboard	Email: information@planning.nsw.gov.au	
Environment Protection Authority (EPA)	Environment Line	131 555 info@environment.nsw.gov.au	
	Head office (Sydney)	02 9995 5000	
Fairfield City Council	Main switchboard	02 9725 0222 mail@fairfield.city.nsw.gov.au	
Water NSW	Main switchboard	1300 662 077 Customer.Helpdesk@waternsw.com.au	
	Incident Notification Number – 24 hours	1800 061 069	
NSW Public Health Unit	Sydney Local Health District	Business hours: 1300 066 055 After hours: 02 9515 6111	
SafeWork NSW	Incident Notification Hotline	131 050 Select Option 3 to report a “Serious Incident or Fatality” – this will result in the incident being recorded and the appropriate person being contacted.	
Emergency Services	NSW Police NSW Fire and Rescue NSW Ambulance Service	131 444 1300 729 579-	In case of emergency – 000

In accordance with Condition C10 of Development Consent SSD-10436, ESR is required to provide written notification to DPIE following any incident as defined by the POEO Act. The procedure for notification will be as follows

- Tenant’s representative is to immediately provide written notification to the ESR Representative when they become aware of an environmental incident/potential incident.
- When ESR becomes aware of this environmental incident/potential incident, they will notify DPIE immediately.
- Tenant’s Representative will provide a written incident notification to the ESR Representative within 5 calendar days.
- The ESR Representative will review and submit the written incident notification to DPIE within 7 calendar days from the original notification to ESR.
- Tenant’s Representative will provide a written incident report within 25 calendar days to ESR Representative in accordance with **Section 2.5.4** item 3 of this report.
- ESR Representative will review and submit the written incident report to DPIE within 30 calendar days from the notification of the original event occurrence.

2.5.3.2 Non-Compliances

In accordance with Condition C11 of SSD-10436, the DPIE will be notified by ESR in writing, addressed to compliance@planning.nsw.gov.au within seven (7) days of becoming aware of any non-compliance. Non-compliances will be treated with the incident notification procedure identified in **Section 2.5.3.1**.

Conditions C12 and C13 of SSD-10436 states a non-compliance notification will identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.

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

2.5.4 Incidents and Non-Compliance Handling Procedure

Upon becoming aware of an incident and/or non-compliance, the procedure outlined below will be followed.

1. Preventative Action

Where possible and safe to do so, immediate action will be taken to prevent, stop, contain and/or minimise the environmental impact of the incident and/or non-compliance.

In the unlikely event that an incident and/or non-compliance requires the evacuation of the site, actions will be completed in accordance with evacuation procedures. All employees and contractors are to be made aware of the location of emergency assembly areas through site inductions and signage.

2. Assistance

If adequate internal resources are not available and the incident and/or non-compliance threatens public health, property, or the environment, it is essential that Fire and Rescue NSW be contacted by telephoning "000" for emergency assistance.

Contacting Fire and Rescue NSW does not negate the notification requirements in **Section 2.5.3**.

3. Notify

Under the provisions of the POEO Act, there is a duty to notify any incident that has caused or threatens to cause material harm to the environment and all relevant information about the incident. The specific duties to notify are outlined above in **Section 2.5.3**.

In the event of a serious incident or emergency, it is more than likely that Fire and Rescue NSW will take control and manage the required investigation and remedial activities. Any instructions issued will be strictly adhered to.

Condition C10 and Appendix 3 of Development Consent SSD-10436 requires that the DPIE and other relevant authorities be provided with a written incident notification via email within seven (7) days of the incident.

A written notification will:

- Identify the development and application number;
- Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
- Identify how the incident was detected;

- Identify when the Applicant became aware of the incident;
- Identify any actual or potential non-compliance with conditions of consent;
- Describe what immediate steps were taken in relation to the incident;
- Identify further action(s) that will be taken in relation to the incident; and
- Identify a contact for further communication regarding the incident.

Non-compliances will be notified in accordance with **Section 162.5.3.2**.

4. Investigate

Undertake immediate investigative work to determine the cause of the incident and/or non-compliance.

5. Remedial Action

Undertake appropriate remedial action to address the cause of the incident and/or non-compliance and mitigate any further environmental impact. In some instances, outside resources such as specialist contractors/consultants may be required.

6. Record

It is imperative that an honest assessment of the situation is carried out and documented to minimise the potential for similar events in the future. On this basis, every incident is to be recorded in a Complaint Form. A copy of the completed report will be maintained for at least five years.

Condition C10 and Appendix 5 of Development Consent SSD-10436 requires that a detailed incident report be provided to the DPIE within 30 days of the incident occurring.

The Incident Register will include:

- A summary of the incident;
- Outcomes of an incident investigation, including identification of the cause of the incident;
- Details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and
- Details of any communication with other stakeholders regarding the incident.

All non-compliances are recorded in accordance with Condition C12 of SSD-10436.

7. Preventative Action

Once the incident and/or non-compliance has been suitably handled, appropriate measures will be identified and implemented to reduce the possibility of re-occurrence.

2.5.5 Incident and Non-Compliance Register

Records of all incidents and non-compliances will be maintained in ESR's incident register system. Details of all incidents and complaints will be retained for at least five years after the event to which they relate.

2.5.6 Minor Environmental Incidents

There is the possibility of minor environmental incidents occurring as part of this project. SLR have defined a 'Minor Environmental Incident' as an incident where there has been no potential or actual material harm to the environment (see 'material harm' definition outlined in **Section 2.6.3**). Examples may include excessive dust impacts sighted by the project team or a small, contained hydrocarbon spill that does not leave a site boundary and is cleaned up without residual on-site environmental harm (RMS 2018).

Minor environmental incidents will still be handled under the process outlined in **Section 2.6.4** except there will be no requirement for government notification. All minor or major incidents will be recorded in the Incident Register. A minor incident does not constitute a non-compliance with the Development Consent.

2.6 Complaints Response and Handling Procedure

A complaints and disputes resolution procedure has been developed in the Community Consultation Plan (Urbis 2021) (see **Appendix B**) as required by Condition B57(g) of Development Consent SSD-10436.

2.6.1 Objective

To ensure that all environmental complaints in relation to the operation of Lots 201 and 202 are promptly and effectively received, handled, and addressed.

2.6.2 Responsibility

ESR's Representative is responsible for ensuring that the appropriate management response and handling procedures are instigated and carried through in the event of an environmental complaint. The induction outlined in **Section 2.5** should be used to ensure the Tenant Representative is aware of and understand their obligations for complaint response. It is the responsibility of the Tenant Representative to ensure all other employees and contractors are aware of the complaint's response and handling procedures.

All employees and contractors will immediately notify their respective Tenant Representative following a complaint, either verbal or written. The Tenant Representative will then contact ESR's Representative regarding the matter.

2.6.3 Handling Procedure

Upon becoming aware of a complaint, the protocol outlined below must be followed.

1. Record and Acknowledge

Any employee who take receipt of a complaint, either verbal or written, are to immediately notify the tenant representative who will then contact the ESR's Representative.

In the normal course of events, the first contact for complaints will usually be made in person or by telephone.

The complainant's name, address and contact details, along with the nature of the complaint, will be requested. If the complainant refuses to supply the requested information, a note will be made on the form and complainant advised of this.

2. Assess and Prioritise

The ESR's Representative will prioritise all complaints by considering the seriousness of the complaint including risk to health and safety and will attempt to provide an immediate response via phone or email.

3. Investigate

A field investigation will be initiated in an attempt to confirm details relevant to the complaint and the cause of the problem. Any monitoring information and/or records at and around the time of the complaint will be reviewed for any abnormality or incident that may have resulted in the complaint.

If the complaint is due to an incident, the notification requirements and handling procedures outlined in **Section 2.7** must be followed.

4. Action or Rectify

Once the cause of the complaint has been established, every possible effort will be made to undertake appropriate action to rectify the cause of the complaint and mitigate any further impact. The ESR's Representative will assess whether the complaint is founded or unfounded and delegate the remediation of the issue to the tenant representative for action, as required.

5. Inform

The ESR's Representative will oversee the rectification of the issue and respond to the complainant once the issue has been resolved. The complainant will be provided with a follow up verbal response on what action is proposed. Where a complaint cannot be resolved by the initial or follow-up verbal response, a written response will be provided to the complainant.

6. Record

It is imperative that an honest assessment of the situation is carried out and documented in order to minimise the potential for similar complaints in the future. On this basis, every complaint received is to be recorded in the Complaint Form. A copy of the completed form should be maintained for at least five years.

7. Preventative Action

Once the complaint has been suitably handled, appropriate measures should be identified and implemented to negate the possibility of re-occurrence.

2.6.4 Complaints Register

A Complaints Register is to be maintained for Lots 201 and 202 at Horsley Logistics Park. The register should contain the following:

- A copy of the environmental complaint handling procedure contained in **Section 2.6.3**;
- A separate reference sheet containing the contact details for ESR's Representative and the Tenant Representative;
- Blank hard copies of the Complaint Form;
- Copies of all completed Complaint Report, which are to be maintained for at least five years after the event to which they relate; and
- The Complaint Register will be either kept on site as hard copy or maintained digitally in soft copy, as appropriate to site operations.

2.7 Dispute Resolution

In the event that a dispute arises between ESR and Council or a public authority, in relation to an applicable requirement in this consent or relevant matter relating to the operation of Lots 201 and 202, either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary's determination of any such dispute will be final and binding on the parties.

In the case of a dispute between ESR and a community member/complainant, either party may refer the matter to the DPIE and/or relevant regulatory authority for consideration, advice and/or negotiation. If the matter escalates, a third-party mediator may be required.

2.8 Consultation

A Community Consultation Plan has been prepared by Urbis (2021) in line with the requirements of Conditions B56, B57 and B58 of Development Consent SSD-10436 for Lot 202 at Horsley Logistics Park. Any high noise generating activities or traffic disruptions will follow the procedure provided in Section 5.3 of the Community Consultation Plan (see **Appendix B**) as required by Condition B57(e) of the Development Consent SSD-10436.

The Stormwater Management Plan (Costin Roe Consulting 2021) included consultation with Fairfield City Council as part of the SSD approval process. Section 11.2 of the report prepared by Costin Roe '*12990.05-02d.rpt*' dated 20 October 2020.

Consultation is currently being undertaken with Transport for NSW as part of the Green Travel Plan (Ason Group 2022).

3 Environmental Management Commitments

Environmental aspects with the potential to be impacted by Lot 202 at Horsley Logistics Park are addressed in the following sub-sections. These issues have specific regulatory requirements (imposed by Development Consent SSD-10436) and/or are considered to have the highest potential to result in a non-compliance with a legislative requirement or generate community complaints.

3.1 General

Table 4 lists the general environmental controls that will be implemented throughout the life of the development to minimise the potential for adverse impacts on the local environmental and surrounding receptors.

Table 4 General Environmental Management Controls

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenant Representative	Fairfield City Council		
All reasonable and feasible measures will be implemented to prevent and minimise, any material harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.	X	X		Ongoing	SSD-10436 Condition A1
All plant and equipment will be maintained and operated in a proper and efficient manner.		X			SSD-10436 Condition A23
All licences, permits, and approvals/consents will be obtained prior to Lease commencement.	X			Prior to commencing and ongoing	SSD-10436
All licences, permits, and approvals/consents required for the tenant's specific operational purposes will be obtained and maintained as required post lease approval.		X		Ongoing post lease commencement	Advisory Notes AN1
All signage and fencing will be erected in accordance with the plans in the EIS, RTS, Supplementary RTS, Supplementary Information and Modification 2 report.	X	X		Prior to commencing	SSD-10436 Condition B6
Lot 202 will operate within the hours outlined in the consent.		X		Ongoing	SSD-10436 Condition B7
All monitoring records will be maintained to demonstrate compliance with the OEMP, including:	X			Ongoing	Best Practice

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenant Representative	Fairfield City Council		
<ul style="list-style-type: none"> Site environmental inspection reports; Environmental monitoring data; Internal and external audit reports; Reports of environmental incidents, environmental, associated actions taken, and follow up actions; Minutes of management review meetings; and Induction and training records. 					
Tenant Representative and maintenance contractors engaged by ESR are appropriately inducted and aware of their general obligations under this OEMP.	X			Ongoing	OEMP Section 2.5
The incidents and complaints management strategies contained within Sections 2.6 and 2.7 will be implemented to ensure that any incidents and/or complaints relating to the construction activities are promptly and effectively addressed.	X			Ongoing	OEMP Sections 2.6 and 2.7.

3.2 Traffic

Operation of traffic at Lot 202 will be managed in accordance with the Green Travel Plan (GTP) prepared by Ason Group (2022) and attached as **Appendix C**. It is proposed that during operation of Lot 202 at Horsley Logistics Park staff shall be provided with a ‘welcome pack’ as part of the on-site induction process, which includes a GTP Pamphlet and other information relating to sustainable traffic practices.

The environmental management controls in **Table 5** will be implemented to further minimise the potential for adverse impact associated with operational traffic at Lot 202 at Horsley Logistics Park.

Table 5 Traffic Environmental Management Controls

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenant Representative	Fairfield City Council		
Heavy vehicles entering and exiting Lot 202 will be limited to two inbound and two outbound movements during any 15-minute period during the night.		X		Ongoing	SSD-10436 Condition A9
The swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, will be in accordance with the relevant Austroads guidelines.	X			Prior to operation	SSD-10436 Condition B27(b)
Vehicles will not queue on the public road network.	X			Ongoing	SSD-10436 Condition B27(c)
Heavy vehicles and bins associated with the development will not be parked on local roads or footpaths within the vicinity of the site.		X			SSD-10436 Condition B27(d)
All vehicles will be wholly contained on the site before being required to stop.		X			SSD-10436 Condition B27(e)
All loading and unloading of materials will be carried out on-site.		X			SSD-10436 Condition B27(f)
All trucks will have loads covered while entering or leaving the site and will not track dirt onto the public road network.		X		Ongoing	SSD-10436 Condition B27(g)

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenant Representative	Fairfield City Council		
The turning areas in the car parks will be kept clear of any obstacles, including parked cars, at all times.		X			SSD-10436 Condition B27(h)
Parking provision for the lots	X			Prior to operation	SSD-10436 Condition B28(b) Section 2.2.2 GTP
Outline facilities and measures to promote public transport usage, such as car share schemes and employee incentives.		X		Ongoing	SSD-10436 Condition B28(c) Section 4.2 GTP
Include specific accessibility requirements for employees with mobility impairments, and the measures that are in place to address the requirements including any priority arrangements.	X				SSD-10436 Condition B28(d) Section 2.6 GTP
Cycle parking provision at each site and recommended last mile cycle route from local cycle network to each site.	X			Prior to operation	SSD-10436 Condition B28(e)(i) Figure 4 GTP Section 2.3.4 GTP
A website link to TfNSW trip planner.	X				SSD-10436 Condition B28(e)(ii)
A communication strategy for engaging employees and visitors regarding sustainable transport use for the site.	X				SSD-10436 Condition B28(f) Appendix A GTP
Measures to promote the health and wellbeing benefits of active travel to the site.		X		Ongoing	SSD-10436 Condition B28(g) Section 4.2 GTP

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenant Representative	Fairfield City Council		
Identification of the number of staff who can reasonably access the site from walking or cycling.	X			Prior to operation	SSD-10436 Condition B28(h) Section 3.6.3 GTP
Describe pedestrian and bicycle linkage and end of trip facilities available on-site.	X				SSD-10436 Condition B28(i) Section 2.2.2 GTP
Not commence operation until the GTP is approved by Planning Secretary.	X	X			SSD-10436 Condition B29(a)
Implement the most recent version of the GTP approved by the Planning Secretary for the duration of the development	X	X		Ongoing	SSD-10436 Condition B29(b)
Provide a copy of the latest GTP and Transport Access Guide to each tenancy in the development	X				SSD-10436 Condition B29(c)
Staff to be provided with a 'welcome pack' that includes a GTP Pamphlet that provides information on sustainable travel choices.		X			Section 4.3.1 GTP

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenant Representative	Fairfield City Council		
<p>The GTP shall be reviewed shortly after first occupation of the development and then every 1-2 years with the following key considerations:</p> <ul style="list-style-type: none"> • Update baseline conditions to reflect any changes to the transport environment; • Track progress against target travel mode targets; • Identify any shortfalls and develop an updated action plan to address issues; and • Ensure travel modes targets are updated. 		X			Section 5.1 GTP

3.3 Noise

Operational noise at Lot 202 at Horsley Logistics Park will be managed in accordance with the operational noise limits implemented in Condition B12 of Development Consent SSD-10436 and replicated in **Table 6**.

Table 6 Operational Noise Limits

Location	Day	Evening	Night	
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{AMax}
NCA01	44	43	38	52
NCA02	40	40	38	52
NCA03	44	43	38	52

Note: Noise generated by the development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Noise Policy for Industry (EPA 2017) (as may be updated or replaced from time to time). Refer to the plan in Appendix 1 for the location of residential sensitive receivers.

A *Noise Verification Report* will be prepared prior to the Occupation Certificate for the Lot 202 warehouse to confirm the required noise mitigation measures in accordance with Condition B14 of Development Consent SSD-10436.

A *Noise Verification Report* will also be prepared within three months of commencement of operations of each warehouse in accordance with Condition B14 of Development Consent SSD-10436.

Additional *Noise Verification Reports* will be required within three months of the occupation of the warehouses by new tenants for the life of the development in accordance with Condition B14 of Development Consent SSD-10436.

The environmental management controls will be implemented to minimise the potential for adverse noise emissions from the operation of the warehouses at Lot 202 at Horsley Logistics Park.

A Loading Area Management Plan (LAMP) (provided in **Appendix D**) has been prepared by Ason Group (2022) to address Condition B18 of Development Consent SSD-10436 for Lot 202 at Horsley Logistics Park. Operation of the site is permitted to be undertaken 24 hours a day, 7 days a week as stated by Condition B7 of Development Consent SSD-10436. General loading and dock activities movements during operational periods will be undertaken with the discretion and responsibility of each tenant's management.

Table 7 Noise Environmental Management Controls

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenant Representative	Fairfield City Council		
The applicant must comply with the operational hours detailed in Table 3 of SSD-10436.		X		Ongoing	SSD-10436 Condition B7 Section 2.3 LAMP

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenant Representative	Fairfield City Council		
The noise limits outlined in Table 6 will be complied with.		X		Ongoing	SSD-10436 Condition B12
Noise Verification Report to confirm operational noise complies with the predictions in the EIS in accordance with Condition B13.	X	X		Within 3 months of commencing operation	SSD-10436 Condition B13
The awning shown on Lot 204 (Lot 202) Site & Facility Plan (Drawing Number 200226-DA-204-A100, Issue C) must be constructed prior to operation.	X			Prior to operation	SSD-10436 Condition B16
Detail the management measures to restrict the number of heavy vehicles permitted to access Lot 202 during the night to two, two-way movements over any 15-minute period.	X			Prior to operation	SSD-10436 Condition B18(a) Section 4.2 LAMP
Require provision of annual heavy vehicle noise measurements from each tenancy on Lot 202 in operation to verify the sound power level of heavy vehicle manoeuvring in the loading areas are below the sound power levels used in the Supplementary Information.		X		Ongoing	SSD-10436 Condition B18(b) Table 1 LAMP
Avoiding the use of waste areas.		X		Ongoing	SSD-10436 Condition B18(c)(i) Table 1 LAMP
Limiting the use of forklifts		X		Ongoing	SSD-10436 Condition B18(c)(ii) Table 1 LAMP
Ensuring non-tonal reversing beepers (or equivalent mechanism) are fitted to forklifts		X		Ongoing	SSD-10436 Condition B18(c)(iii) Table 1 LAMP
Not commence occupation of Lot 202 until the LAMP required by B18 is approved by the Planning Secretary	X	X		Prior to operation	SSD-10436 Condition B19(a)

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenant Representative	Fairfield City Council		
Implement the most recent version of the LAMP approved by the Planning Secretary		X		Ongoing	SSD-10436 Condition B19(b)
All plant and equipment will be maintained and operated in a proper and efficient manner.		X		Ongoing	SSD-10436 Condition A23
Where practicable, all roller doors will be kept closed during the night-time period.		X		Ongoing	Best practice
Outdoor fixed plant installed as part of the Base Building will be enclosed where possible.		X		Ongoing	Best practice

3.4 Air Quality

Air quality impacts associated with the operational phase of Lot 202 are anticipated to be neutral, with the main source of emissions to be from emissions of products of fuel combustion and particulate matter associated with trucks and other vehicles entering and leaving the site during loading/unloading operations.

The environmental controls in **Table 8** will be implemented to further minimise the potential for adverse air quality impacts associated with operational activities at Lot 202 at Horsley Logistics Park.

Table 8 Air Quality Environmental Management Controls

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenant Representative	Fairfield City Council		
All reasonable steps to minimise dust generated will be undertaken during all works.				Ongoing	SSD-10436 Condition B34
All vehicles and mobile plant will be switched off (i.e. not left idling) when not in use for an extended period of time.		X			Best practice

3.5 Waste

As part of the EIS, a Waste Management Plan (WMP) was prepared which will be implemented during the operation of Lot 202 at Horsley Logistics Park. The anticipated operations are anticipated to generate primarily packaging waste including plastic and cardboard.

The environmental management controls in **Table 9** will be implemented to minimise the potential for adverse waste impacts from the operation of Lot 202 at Horsley Logistics Park.

Table 9 Waste Environmental Management Controls

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenant Representative	Fairfield City Council		
Waste must be secured and maintained within designated storage areas at all times and must leave the site onto neighbouring public or private properties.		X		Ongoing	SSD-10436 Condition B53
The WMP must be implemented during operation of the site.		X		Ongoing	Best practice

3.6 Stormwater

Stormwater at Lot 202 at Horsley Logistics Park will be managed in accordance with the Stormwater Management Plan (SMP) prepared by Coston Roe Consulting (2021) and attached in **Appendix E**. As part of the condition B32 of SSD-10436, a Stormwater Management Plan must form part of the OEMP required by C5. The environmental controls in **Table 10** will be implemented to ensure the effective management of stormwater at Lot 202 at Horsley Logistics Park.

Table 10 Stormwater Environmental Management Controls

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenants Representative	Fairfield City Council		
A Stormwater Management Plan will be prepared and followed throughout operation of the lots.	X			Ongoing	SSD-10436 Condition B32 SWMP is provided in Appendix E
The stormwater management system will be operated in accordance with Condition B36.					SSD-10436 Condition B36
All stormwater drainage infrastructure on the site, including bio-retention basins, shall remain under the care, control and ownership of the registered proprietor of the lots.					SSD-10436 Condition B37
Auditing of the maintenance requirements for the system are to be completed by the applicant and their estate management team.	X	X		As required	Section 11.1 SMP
Water quality monitoring shall be undertaken, with water discharge performance undertaken in accordance with Section 8.1 of the SMP.					Section 11.2 SMP
Inspections of permanent drainage systems must be undertaken following heavy rainfall or major storm events (greater than 100mm over 48 hours as measured at Horsley Park Weather Station No. 67119).					Appendix D Section 1.1 SMP
Proactive maintenance of Water Sensitive Urban Design (WSUD) assets as detailed in the SMP (typically three to four month cycle).					Appendix D Section 1.2 SMP

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenants Representative	Fairfield City Council		
Water storage basins and stormwater infrastructure owned and managed by ESR will be managed and maintained in accordance with the manufacturer's specifications.	X				Best practice

3.7 Landscaping and Visual Amenity

Landscaping at Lot 202 at Horsley Logistics will be managed in accordance with the Landscape Management Plan (LMP) prepared by Site Image Landscape Architects (2022) and attached in **Appendix F**. Outdoor lighting will be in accordance with the Outdoor Lighting Management Plan (OLMP) prepared by Alland Group (2022) which is provided in **Appendix G**. As part of Condition B2 of Development Consent SSD-10436, a LMP and OLMP must form part of the OEMP.

The environmental controls in **Table 11** will be implemented to minimise the visual impact of Lotat Horsley Logistics Park.

Table 11 Landscaping and Visual Amenity Environmental Management Controls

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenants Representative	Fairfield City Council		
Describe the monitoring and maintenance measures to manage revegetating and landscaping works.	X			Prior to operation	SSD-10436 Condition B2(b) Various sections of the LMP
Be consistent with the Applicant's Management and Mitigation Measures provided in Appendix 2 of the Consolidated Consent regarding visual impacts to sensitive receivers.	X				SSD-10436 Condition B2(c) Section 2.1 and Section 3.3 LMP
Describe the monitoring and maintenance procedures to ensure the landscaping works provide effective visual impact mitigation including the landscaped buffer, retaining walls and bund constructed along the southern boundary of the site.	X				SSD-10436 Condition B2(d) Section 2.1 LMP
All landscaping implemented as part of Lot 202, as shown in the developed Landscape Management Plan will be maintained for the life of the development.	X			Ongoing	SSD-10436 Condition B3(d)
Lighting will comply with the latest version of AS 4282-2019 - <i>Control of the obtrusive effects of outdoor lighting</i> .	X	X			SSD-10436 Condition B4 Section 1.3 OLMP
Lighting will be mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.					

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenants Representative	Fairfield City Council		
Prior to the commencement of operation of each warehouse building, an OLMP must be prepared by a suitably qualified and experienced person.					SSD-10436 Condition B5(a) OLMP document
The OLMP must describe the locations and types of any outdoor lights.					SSD-10436 Condition B5(b) OLMP Section 1.9 and drawings
Detail measures to mitigate light spill.					SSD-10436 Condition B5(c) OLMP Section 1.3
All signage and fencing will be erected in accordance with the plans in the EIS, RTS, Supplementary RTS, Supplementary Information and Modification 2 Report.					SSD-10436 Condition B6

3.8 Hazard, Risk and Emergency

The environmental controls in **Table 12** lists the management strategies for hazards, risks and emergencies for Lot 202 at Horsley Logistics Park.

Table 12 Hazard and Risk Environmental Management Controls

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenants Representative	Fairfield City Council		
For bushfire risk, the site must be managed as an inner protection area in perpetuity in accordance with the requirements of the latest version of <i>Planning for Bush Fire Protection</i> .				Ongoing	SSD-10436 Condition B38
All chemicals, fuels and oils must be stored in accordance with the requirements of all relevant Australian Standards. If the chemicals are liquids they must be stored in accordance with NSW EPA's <i>'Storing and Handling of Liquids: Environmental Protection – Participants Manual'</i> . In the event that there is an inconsistency, the most stringent requirements must prevail in accordance with Condition B48.					SSD-10436 Condition B47
The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department of Planning's <i>Hazardous and Offensive Development Application Guidelines – Applying SEPP 33</i> at all times.		X			SSD-10436 Condition B49
All chemicals, fuels and oils stored on-site must be stored in appropriately bunded areas in accordance with the requirements of all Australian Standards, and/or EPA's <i>Storing and Handling of Liquids: Environmental Protection – Participants Manual</i> .					SSD-10436 Condition B50
In the event of an emergency, the contact details in Table 3 will be contacted.					Section 2.6.3
Appropriate firefighting equipment will be provided as required for the safety of persons and property.					Best Practice
In the event of a major spill, the actions listed in Section 2.6 will be implemented.					Section 2.6
The actions specified on the relevant safety data sheets (SDS) will be implemented in the event of a minor spill/incident of a potentially hazardous material.		X		Ongoing	Best practice

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenants Representative	Fairfield City Council		
Spill kits will be provided and maintained on site.					

4 Monitoring and Reporting

4.1 Monitoring and Inspections

Table 13 summarises the monitoring requirements for the operation of Lot 202 at Horsley Logistics Park as set out in SSD-10436 and relevant management plans.

Table 13 Monitoring and Inspection Requirements

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenants Representative	Fairfield City Council		
General					
Within three months after the first year of operation, and in the same month of each subsequent year, compliance reporting will be undertaken in accordance with the Compliance Reporting Post Approval Requirements (Department 2020).	X			As required	SSD-10436 Condition C14
All monitoring will be undertaken in accordance with Division 9.4 of Part 9 of the EP&A Act.				Ongoing	SSD-10436 Condition C18
Noise					
Noise Verification Report to confirm operational noise complies with the predictions in the EIS in accordance with Condition B13.	X	X		Within 3 months of commencing operation	SSD-10436 Condition B13
Traffic					
The GTP will be monitored once a year, with the first survey undertaken shortly after first occupation of the development. travel mode surveys would determine the proposition of persons travelling to/from the site by each transport mode in the form of questionnaires.		X		Shortly after first occupation and every 1-2 year following	Section 5.2 GTP
Stormwater					
Water quality monitoring shall be undertaken, with water discharge performance undertaken in accordance with Section 8.1 of the SMP.	X	X			Section 11.2 SMP
Inspections of permanent drainage systems must be undertaken following heavy rainfall or major storm events (greater than 100mm over 48 hours as measured at Horsley Park Weather Station No. 67119).					Appendix D Section 1.1 SMP

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenants Representative	Fairfield City Council		
Proactive maintenance of Water Sensitive Urban Design (WSUD) assets as detailed in the SMP (typically three to four month cycle).					Appendix D Section 1.2 SMP
Landscaping and Visual Amenity					
Landscape treatments must be managed for the life of the development as per the LMP. Maintenance works shall include: <ul style="list-style-type: none"> • Replacing failed plantings; • Pruning; • Insect and pest control; • Fertilising; • Maintaining mulch; • Mowing; • Watering; • Weeding; • Rubbish and removal; and • Cleaning of the surrounding areas. 		X		Ongoing	SSD-10436 Condition B(3)(d) Section 2.1 LMP
A Maintenance Logbook will be kept that records when and what maintenance work has been done and what materials, including chemical materials have been used.		X		Ongoing	Section 2.2 LMP
A final inspection shall be made by the Project Manager, Landscape Contractor and Landscape Architect before the completion of the Plant Establishment Maintenance Period (Defects Liability Period).	X	X		As required	Section 2.14 LMP

4.2 Reporting

Table 14 Summarises the reporting requirements for the operation of Lot 202 at Horsley Logistics Park as set out in SSD-10436 and relevant management plans.

Table 14 Reporting Requirements

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenants Representative	Fairfield City Council		
General Environmental Performance					
Within three months after the first year of operation, and in the same month of each subsequent year, compliance reporting will be undertaken in accordance with the Compliance Reporting Post Approval Requirements (Department 2020).				As required	SSD-10436 Condition C14
Each Compliance Report will be made publicly available.	X			No later than 60 days after submitting it to the DPIE and notify the DPIE in writing at least 7 days before this is done.	SSD-10436 Condition C15
Regular reporting on environmental performance will be uploaded on the dedicated website as per the reporting arrangements in any plans or programs approved under the conditions of SSD-10436.				Ongoing	SSD-10436 Condition C19
Incident / Non-Compliance Reporting					
A written incident notification will be emailed to the DPIE at compliance@planning.nsw.gov.au and include the requirements outlined in Appendix 3 of SSD-10436.	X			Immediately (within 24hrs of becoming aware of the incident)	SSD-10436 Condition C10 and Appendix 3
A detailed incident report will be provided to the Planning Secretary and include the requirements outlined in Appendix 3 of SSD-10436.				Within 30 days of the incident occurring	

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenants Representative	Fairfield City Council		
The DPIE will be notified of any non-compliance in writing to compliance@planning.nsw.gov.au				Within 7 days of becoming aware of the non-compliance	SSD-10436 Condition C11
A register of all complaints and non-compliances will be kept.				For at least 5 years	Best practice
Traffic					
Annual reporting on GTP outcomes to Council.		X		Annually	Table 6 GTP
Stormwater					
All personal to report any urgent issues associated with stormwater or water quality.				Immediately	Best practice
Following WSUD asset inspections, any maintenance required must be reported to the building management for action.	X	X			Appendix D Section 1.3 SMP

4.3 Auditing

Table 15 summarises the audit requirements for the operation of Lot 202 at Horsley Logistics Park as set out in SSD-10436 and relevant management plans.

Table 15 Auditing Requirements

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenants Representative	Fairfield City Council		
Noise					
Within one year of the commencement of operation of any warehouse building, and every three years after, an Independent Noise Audit must be undertaken in accordance with the Independent Audit Post Approval Requirements (Department 2000).	X			Within one year of the commencement of operation	SSD-10436 Condition C16

Environmental Management Control	Person Responsible			Timing / Frequency	References / Notes
	ESR's Representative	Tenants Representative	Fairfield City Council		
A response to each Independent Audit Report must be prepared detailing implementation of recommendations in accordance with the Independent Audit Post Approval Requirements (Department 2000)	X			As required	SSD-10436 Condition C17

5 Contingency Management Plan

Table 16 lists the actions to be implemented if inspections, monitoring and/or auditing indicate that the mitigation measures listed in **Section 3** and the specialist management plans are not effective in managing environmental impacts.

Table 16 Contingency Plan

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
Operation Movements	Trigger	Visual monitoring of all traffic movements within the Site does not detect unsafe movement of traffic and risk to persons and property	Monitoring of all traffic movements within the Site detects unsafe movement of traffic and risk to persons and property	Monitoring of all traffic movements within the Site identifies several unsafe movements of traffic and risk to persons and property
	Response	Visual monitoring to continue daily as part of an ongoing process.	Review needed to address persistent unsafe movements. Modification of traffic controls to self-enforce appropriate vehicle manoeuvres within the site.	Condition Amber responses, plus the following additional responses; <ul style="list-style-type: none"> • Direct cessation of unsafe movements. • Notify the planning secretary within 7 business days of becoming aware of a non-compliance.
	Trigger	Following periods of adverse weather conditions (e.g., a significant heavy rain event), internal roads/aisles have been inspected prior to vehicle traffic use and no issues found	Internal roads / aisles have been inspected following adverse weather conditions and minor issues found (small potholes, dirt / debris, or pooling water)	Internal roads / aisles have been inspected following adverse weather conditions and major issues found (failed road integrity, large diameter potholes, fallen light poles or trees)
	Response	No further action required until next adverse weather event.	Any impediments to access roads will be cleared. Maintenance teams to repair any potholes and remove excess water when expected traffic volumes are lowest.	Condition Amber responses, plus Install the following additional responses: <ul style="list-style-type: none"> • Install a detour around any unsafe obstacle to ensure safety for all motorists and/or pedestrians.

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
Operational Traffic Movements	Trigger	Parking occupancy less than provided on-site capacity	Parking bay requirements are within 90% of the provided spaces	Parking requirements exceed parking spaces provided.
	Response	No response required. Continue monitoring program	Review and investigate parking rates and where appropriate, implement additional remediation measures such as: <ul style="list-style-type: none"> • Undertake additional parking reviews to determine cause of higher limit parking space issues in more detail. • Review OTMP and update where necessary. • Provide additional training to tenants to provide information on lowering parking demands. 	Condition Amber responses, plus the following additional responses; <ul style="list-style-type: none"> • Temporary halting of activities and resuming when conditions have improved. • Provide incentives for car pooling and utilising active transport measures.
	Trigger	No unsafe pedestrian movements identified.	Pedestrian behaviour identified to be risky and unsafe.	Site design/operations identified to place pedestrians in unsafe situations and multiple near miss events

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
	Response	No response required. Continue monitoring program	Review needed to address persistent unsafe movements. Modification of traffic controls to self-enforce appropriate vehicle manoeuvres within the site.	Condition Amber responses, plus the following additional responses; <ul style="list-style-type: none"> • Direct cessation of unsafe movements by amending design of Site. • Notify the planning secretary within 7 business days of becoming aware of a non-compliance.
	Trigger	Operational traffic volume is in accordance with permissible and programmed volume constraints	Operational traffic volumes are within 90% of the permissible volume constraints	Operational traffic volumes exceed permissible volume constraints
	Response	This operational traffic volume review shall be completed monthly for the first 6 months of operation and bi-annually thereafter.	Review and investigate operational activities, and where appropriate, implement additional remediation measures such as: <ul style="list-style-type: none"> • Undertake review of the Site’s traffic generation in more detail. • Review OTMP and update where necessary. • Provide additional training to Tenant’s Representative. 	Condition Amber responses, plus the following additional responses; <ul style="list-style-type: none"> • Temporary halting of activities and resuming when conditions have improved. • Surveys of accesses shall be required to allow enforcement of site-specific thresholds. • Notify the planning secretary within 7 business days of becoming aware of a non-compliance.
	Trigger	Loading / service bays are within operational constraints	Loading / service bays are within 90% of capacity	Loading / service bays exceed capacity.
	Response	No response required. Continue monitoring program	Review and investigate operational activities, and where appropriate, implement additional remediation	Condition Amber responses, plus the following additional responses; <ul style="list-style-type: none"> • Approved traffic thresholds to be enforced for the peak periods • Review LAMP and update where necessary.

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
			measures such as: <ul style="list-style-type: none"> • Drivers be provided with additional training and an extra copy of the Driver Code of Conduct. • Provision of additional training to the tenants should be provided to ensure the most appropriate schedule can be created. 	<ul style="list-style-type: none"> • Notify the planning secretary within 7 business days of becoming aware of a non-compliance.
	Trigger	Service bays are not restricted and being utilized as intended.	Vehicles other than service vehicles are stopped within the service area.	Vehicles other than service vehicles are consistently parked within the service area.
	response	No response required. Continue monitoring program.	Review and investigate operational activities, and where appropriate, implement additional remediation measures such as: <ul style="list-style-type: none"> • Drivers be provided with additional training and an extra copy of the Driver Code of Conduct. • Provision of additional training to tenants should be provided to ensure the most appropriate schedule can be created. 	Condition Amber responses, plus the following additional responses: <ul style="list-style-type: none"> • Review LAMP and update where necessary. • Notify the planning secretary within 7 business days of becoming aware of the non-compliance.
Queuing	Trigger	No queuing identified at the Site access.	Queuing identified at the Site access.	Queuing identified on the public road as a direct result from activities within the Site.
	Response	No response required. Continue monitoring program.	Review the delivery schedules prepared by the Site Manager.	Review and investigate activities. If it is concluded that loading dock management activities were directly responsible for the exceedance, submit an incident report to government agencies.

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
			if drivers are not following the correct schedule prepared, then they should be provided with additional trainings, as necessary.	Where appropriate, implement additional remediation measures such as: <ul style="list-style-type: none"> • Temporary halting of activities and resuming when conditions have improved. • Stop all transportation into and out of the site. • Review LAMP and update where necessary. • Provide additional trainings.
Incidents	Trigger	No incidents observed or reported.	Near miss or minor incident occurred within the carriageway of OWE which did not require medical attention (such as tripping on raised footpath).	Major incident occurred within the carriageway of OWE which did not require medical attention (such as being hit by a truck while exiting a Site).
	Response	No action required at this stage, however continual reinforcement to all tenants to report all incidents shall continue.	Near miss to be reported to the appropriate Incident to be reported to Tenant's Representative and Estate Coordinator, for immediate remedy.	Condition Amber responses, plus the following additional responses; <ul style="list-style-type: none"> • Temporary halting of activities and resuming when incident has been remedied. • Incident to be reported to Site Manager and Estate Coordinator. • Review LAMP and update where necessary. • Notify the planning secretary within 7 business days of becoming aware of a non-compliance.
Noise	Trigger	Operational noise levels are below specified noise criteria.	Operational noise levels are 1-2 dB above the specified noise criteria.	Operational noise levels are >2 dB above the specified noise criteria.
	Response	No action. Continue ongoing monitoring activities.	Review and investigate noisy operational activities, and where appropriate, implement additional remediation measures such as:	Condition Amber responses, plus the following additional responses; <ul style="list-style-type: none"> • Undertake additional noise surveys to review cause in more detail.

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
			<ul style="list-style-type: none"> Undertake additional noise reviews to determine cause of higher limit noise issues in more detail. Review OTMP (and other sub-plans) and update where necessary. Provide additional training to tenants to provide information on lowering noise emissions. 	<ul style="list-style-type: none"> Surveys of each tenancy shall be required to allow enforcement of site-specific thresholds. Review OTMP and update where necessary. Provide additional training to Tenant's Representative to provide information on lowering noise emissions. Notify the planning secretary within 7 days of becoming aware of a non-compliance.
Irrigation	Trigger	Irrigation system operating at optimum frequency.	Irrigation system yet to be installed.	Irrigation system fails.
	Response	No response required. Continue to monitor.	Provide additional hand watering until system is installed.	Provide additional hand watering until system is repaired. The irrigation system must be fully functional at all times to ensure that all plants, trees and lawns receive adequate water at optimal frequency.
Stormwater	Response	WSUD assets are operating as required. Monitoring verifies that water quality is within acceptable guideline values.	Inspection identifies a maintenance issue at a WSUD asset which can be solved with proactive treatment.	Inspection identifies that a WSUD asset has failed and requires reactive treatment.
		No response required. Continue to monitor.	Refer to SMP. Report maintenance issue and identify cause to building manager. Undertake proactive treatment prior to WSUD asset failure.	Refer to SMP. Report maintenance issue and identify cause to building manager. Undertake reactive treatment as soon as possible.

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
Plant failure	Trigger	No significant plant failure is present. Monitoring verifies that there is <5% of plants failing.	Monitoring verifies there is plant failure at a rate between 5-10%.	Monitoring verifies there is plant failure at a rate greater than 10%.
	Response	No response required. Continue to monitor.	If the cause of failure is due to a controllable situation then correct situation prior to replacing plants. All planting areas are to be free of grass and weed. Replace plants with one of similar size and quality and identical species of variety of the ones failed.	If the cause of failure is due to a controllable situation then correct situation prior to replacing plants. All planting areas are to be free of grass and weed. Replace plants with one of similar size and quality and identical species of variety of the ones failed.
Revegetation failure	Trigger	Revegetation is growing to desired design surface levels.	Monitoring verifies that weed emergence has occurred.	Monitoring verifies that weed emergence and plant failure has occurred.
	Response	No response required. Continue to monitor.	Refer to LMP for monitoring requirements once problem has been identified. Possible solutions include the removal of weeds as per Section 5.3.7 of the LMP.	Refer to LMP for monitoring requirements once problem has been identified. Possible solutions include removal of weeds and re-seeding of revegetation cover crop as per Section 5.3.7 of the LMP.
Slope failure	Trigger	No significant erosion is present that would constitute a safety hazard. Monitoring and inspection indicates that there are significant erosion features present.	Monitoring and inspections indicate the development of erosion features up to 200mm deep.	Monitoring and inspections indicate erosion features greater than 200mm deep.

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
	Response	No response required. Continue to monitor.	A suitably trained person to inspect the site. Investigate opportunities to install water management infrastructure to address erosion. Remediate as appropriate.	Undertake a review of the drainage of the area and provide recommendations to appropriately remediate the erosion. Remediate as soon as practicable.
Wildlife protection	Trigger	No unexpected wildlife is encountered in the estate.	Unexpected uninjured wildlife is encountered in the estate.	Unexpected injured/deceased wildlife is encountered in the estate.
	Response	Continue OEMP implementation.	Stop Work Procedure: <ul style="list-style-type: none"> • Stop Work / Prevent personnel and contractors from entering area where fauna encountered • Tenant Representative to notify relevant ESR Representative • ESR Representative to assess if animal can be encouraged to leave site voluntarily and safely or if WIRES or wildlife carer is required to capture and relocate animal. 	Stop Work Procedure: <ul style="list-style-type: none"> • Stop Work / Prevent personnel and contractors from entering area • Tenant Representative to notify the ESR Representative • ESR Representative to immediately contact WIRES or other relevant wildlife carer.
Waste	Trigger	Monitoring/Inspections/Audits show waste and recycling is managed/segregated as per WMP and best practice	Monitoring/Inspections/Audits show waste and recycling management/segregation could be improved.	Monitoring/Inspections/Audits show waste and recycling management/segregation is poor and needs immediate improvement.

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
	Response	Continue to implement the WMP.	Undertake additional staff training and re-examine signage.	Undertake additional staff training, re-examine signage, review collection services provided and the WMP.
Bushfire	Trigger	No bushfire or bushfire prone weather.	Bushfire prone weather during summer.	Bushfire in the vicinity of the site.
	Response	Continue OEMP implementation.	Ensure grass is kept short and vegetation is minimal at the site. Weather is to be monitored twice daily for chance of bushfire.	Stop work and contact NSW Fire and Rescue on '000'. Evacuate the site as directed by NSW Fire and Rescue.
Dust	Trigger	No observable dust.	Minor quantities of dust in the air and tracking on the road.	Large quantities of dust in the air and tracking on to the road.
	Response	No response required. Continue monitoring program.	Review and investigate activities and respective control measures, where appropriate. Implement additional remedial measures, such as: <ul style="list-style-type: none"> Relocation or modification of dust generating sources. Check condition of wash down bay to ensure it is functioning correctly. Temporary halting of activities and resuming when conditions have improved. 	Review and investigate activities and respective control measures. If it is concluded that loading dock activities were directly responsible for the exceedance submit an incident report to government agencies. Implement relevant responses and undertake immediate review to avoid such occurrence in future.

6 OEMP Review

The OEMP will be reviewed, and if necessary, updated within three months of the following:

- The submission of a Compliance Report under Condition C14 (see Development Consent provided in **Appendix A**);
- Submission of an incident report under Condition C10 (see Development Consent provided in **Appendix A**);
- The approval of any modification of the conditions of this consent; or
- The issue of a direction of the Planning Secretary under condition (a) which requires a review.

As per Condition C9 the revised documents will be sent to DPIE within 6 weeks of review. All employees and contractors will be informed of any revisions to the OEMP by the ESR Representative.

7 References

Ason Group (2022) Green Travel Plan Horsley Logistics Park, 327-355 Burley Road, Horsley Park.

Ason Group (2022) Loading Dock Management Plan, 327-355 Burley Road, Horsley Park.

Costin Roe Consulting (2020) Stormwater Management Plan Lot 204.

Site Image Landscape Architects (2022) Landscape Management Plan Lot 202.

Urbis (2021) Community Consultation Plan.

(DO NOT DELETE SECTION BREAK)

APPENDIX A

Development Consent

See Appendix A – Development Consent pdf attached

APPENDIX B

Community Consultation Plan

See Appendix B - Community Consultation Plan pdf attached

APPENDIX C

Green Travel Plan

See Appendix C – Green Travel Plan pdf attached

APPENDIX D

Loading Area Management Plan

See Appendix D – Loading Area Management Plan pdf attached

APPENDIX E

Stormwater Management Plans

See Appendix E – Stormwater Management Plan pdf attached

APPENDIX F

Landscape Management Plan

See Appendix F – Landscape Management Plan pdf attached

APPENDIX G

Outdoor Lighting Management Plan

See Appendix G – Outdoor Lighting Management Plan pdf attached

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