Stage 3 Facilities, Sydney Business Park

Environmental Impact Statement

August 2020

Prepared for:

Marsden Park Developments Pty Ltd (Sydney Business Park)
25 Harris Avenue
MARSDEN PARK NSW 2765

Together with:

Australian Pharmaceutical Industries Ltd
11 Grand Avenue
CAMELLIA NSW 2142

TJX Australia Pty Ltd
Level 3, 189 O'Riordan Street
MASCOT NSW 2020

Prepared by:

pjep environmental planning pty ltd, abn. 73 608 508 176
tel. 02 9918 0830
striving for balance between economic, social and environmental ideals…

PJEP Ref: SBP Stage 3 Facilities_EIS_Aug20

DISCLAIMER

This document was prepared for the sole use of Marsden Park Developments Pty Ltd (Sydney Business Park), Australian Pharmaceutical Industries Ltd, TJX Australia Pty Ltd and the regulatory agencies that are directly involved in this project, the only intended beneficiaries of our work. No other party should rely on the information contained herein without the prior written consent of PJEP Environmental Planning, Marsden Park Developments Pty Ltd, Australian Pharmaceutical Industries Ltd and TJX Australia Pty Ltd.

DECLARATION BY AUTHOR

Environmental Impact Statement

Prepared under Part 4 of the *Environmental Planning and Assessment Act 1979*

EIS prepared by

Name	Phillip Jones
Position	Principal Planner
Qualifications	BAppSc
Company	PJEP Environmental Planning

Development to which Part 4 applies

Application number	SSD 10477
Development	Sydney Business Park Stage 3 Facilities
Applicant name	Marsden Park Developments Pty Limited
Applicant address	15 Hollinsworth Road MARSDEN PARK NSW 2765
Land to be developed	Part Lots 4 and 5 in DP 1210172 and Part Lot 36 in DP 262886, Astoria Street, Marsden Park

Declaration

I certify that I have prepared the contents of this document, and to the best of my knowledge the EIS:

(i) has been prepared in accordance with Part 4 Division 4.7 of the EP&A Act and the Regulations (including Schedule 2);
(ii) contains all available information that is relevant to the environmental assessment of the development; and
(iii) is neither false nor misleading.

Signature

Name Phillip Jones
Date 4 August 2020

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EXECUTIVE SUMMARY

Marsden Park Developments Pty Ltd (Sydney Business Park) is proposing to develop four world-class warehouse and distribution facilities in the area known as 'Stage 3' of Sydney Business Park, within the Marsden Park Industrial Precinct in Western Sydney.

Two of the facilities would be developed for known end users, namely Australian Pharmaceutical Industries Ltd (API) and TJX Australia Pty Ltd (TJX). The other warehouses would be developed for as-yet unidentified end users. The facilities would be used for the storage and distribution of general consumer goods.

The site of the proposed Stage 3 Facilities has an overall area of approximately 15.9 hectares, and is within the western part of the industrial estate known as Sydney Business Park. Sydney Business Park forms a large part of the Marsden Park Industrial Precinct, one of the key employment precincts in the North West Growth Centre. The site is zoned for employment purposes under *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* (the Growth Centres SEPP), and is subject to a Precinct Plan under the SEPP.

The key components of the proposed development include:

- site subdivision;
- vegetation clearing and earthworks;
- construction of two estate roads and associated intersections;
- construction and operation of four warehouse and distribution facilities with ancillary offices, including:
    - Warehouse 1 (TJX Facility) – 44,495 m^2 total building area;
    - Warehouse 2 (unidentified end user) – 17,135 m^2 total building area;
    - Warehouse 3 (unidentified end user) – 3,860 m^2 total building area;
    - Warehouse 4 (API Facility) – 34,201 m^2 total building area; and
- ancillary development including car parking, infrastructure provision and landscaping.

The development has a capital investment value of approximately $157 million (exc. GST), and would generate approximately 610 jobs once operational.

The proposal constitutes 'State Significant Development' under Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979,* and consequently the Minister for Planning and Public Spaces[1] is the consent authority for the development.

The key environmental issues identified for assessment in this environmental assessment include:

- design and visual amenity;
- consistency with strategic and statutory planning instruments;
- soil and water, including integrated water cycle management;
- traffic and transport; and
- noise.

Assessment of these and other environmental issues indicates that the development is able to be conducted in a manner that would not result in any significant environmental impacts, or impacts on the amenity of surrounding land users. In particular, environmental assessment indicates that:

- the development is not expected to result in any adverse visual impacts, as it:
    - has been designed to a high architectural quality, particularly on the key frontages;
    - is conservative in terms of setbacks, scale, bulk, height and site cover;

[1] Or the Independent Planning Commission if the proposal meets certain thresholds.

  - respects and addresses the attributes and constraints of the site, including the TransGrid easements that traverse through the site, and the industrial-zoned Ingenia Lifestyle Stoney Creek caravan park to the east of the site; and
  - adopts a high quality landscape plan;
- the development complies with the built form development standards of the Marsden Park Industrial Precinct Plan;
- soil and water aspects (including erosion and sedimentation, contamination, salinity, drainage, riparian areas, pollution) are not significant, and are able to be effectively managed;
- traffic volumes are consistent with those assumed in planning for the wider industrial estate, and would not result in any significant traffic impacts;
- the development has been designed to accommodate the potential future development of a rail line through the site;
- noise emissions are predicted to comfortably comply with applicable operational noise criteria; and
- all required infrastructure for the development is (or will be) in place, with the proposal providing for the development of two roads and associated intersections as identified in the Marsden Park Industrial Precinct Plan.

The development is considered to be compatible with the future desired character of the area under the Marsden Park Industrial Precinct Plan, Growth Centres SEPP and Growth Centres DCP, as well as the wider Greater Sydney Region Plan and other applicable strategic plans.

The facilities would have significant social and economic benefits for the local area through the provision of increased employment opportunities and a significant capital investment in Western Sydney. Importantly, the employment densities generated by the development (ie. about 38 jobs per hectare) would be considerably above those being achieved by contemporary warehousing developments in Western Sydney.

Accordingly, it is considered that the development represents orderly development of the land. It is respectfully requested that the Minister or his delegate[2], having due regard for the information submitted in this Environmental Impact Statement, grants approval to the proposed Stage 3 Facilities in Sydney Business Park.

[2] Or the Independent Planning Commission

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1 INTRODUCTION

1.1 Overview

Marsden Park Developments Pty Ltd (Sydney Business Park) is proposing to develop four world-class warehouse and distribution facilities in the 'Stage 3' area of Sydney Business Park, within the Marsden Park Industrial Precinct in Western Sydney (see **Figure 1.1**).

This Environmental Impact Statement (EIS) has been prepared by PJEP Environmental Planning Pty Ltd (PJEP) on behalf of Sydney Business Park and the end users of the facilities, including Australian Pharmaceutical Industries Ltd (API) and TJX Australia Pty Ltd (TJX), to assist the consideration of the development under the *Environmental Planning and Assessment Act 1979* (EP&A Act).

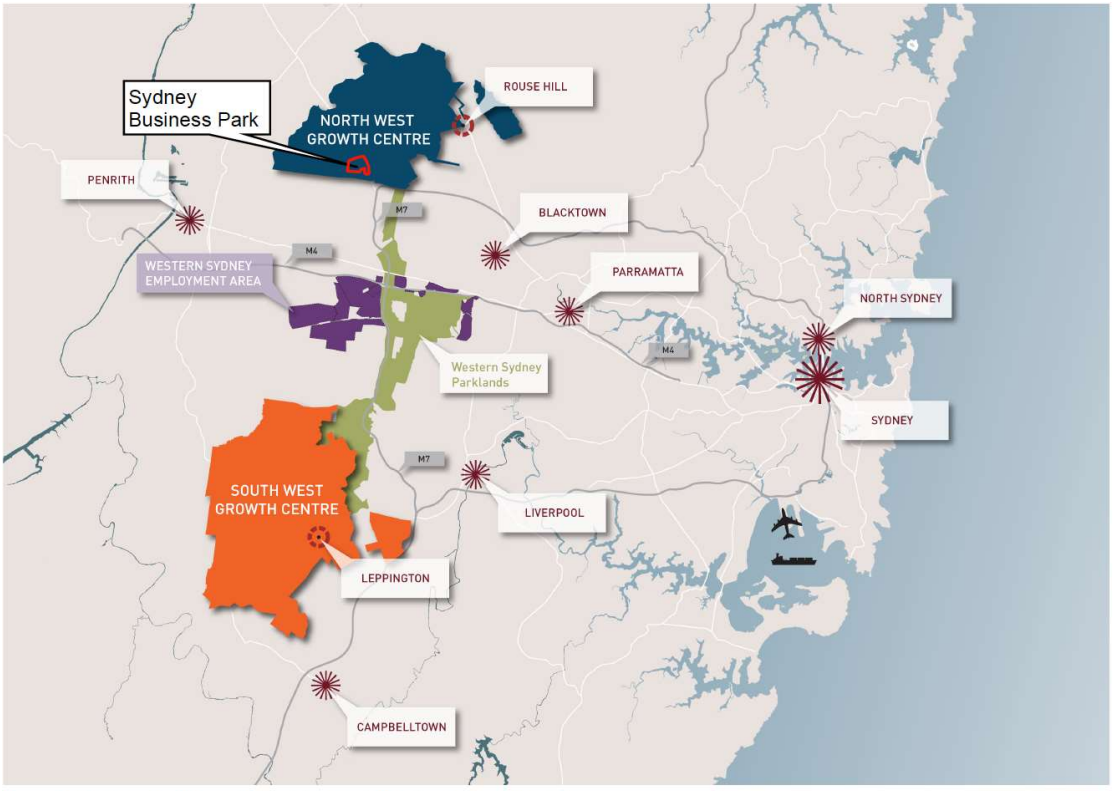


***Figure 1.1:** Regional Context (Source: Department of Planning, Industry & Environment)*

1.2 Marsden Park Developments

Marsden Park Developments is the developer of Sydney Business Park, which is being established as a world-class master planned estate. With plans to deliver 17,000 jobs, the project is the largest and fastest growing employment area in Sydney's North West Growth Centre.

Sydney Business Park aims to provide benchmark standards for business parks in Australia, prioritising staff amenity and creating a positive legacy for the local community. The business park provides high quality telecommunications and infrastructure provisions, landscaping, retail and recreational amenities and integrated green technology.

Sydney Business Park is already home to a wide range of national and international businesses, including ALDI, Bunnings, Coles Express, Costco Wholesale, Dulux, Home Hub Marsden Park

(comprising a number of commercial end-users), IKEA Marsden Park, IKEA Distribution Centre, Lindt & Sprungli, ASICS, Linfox, Bucher Municipal, TigerPak, Storage King, NewCold, McDonald's, Reece, Shell and Toll.

1.3 Australian Pharmaceutical Industries

Australian Pharmaceutical Industries Ltd (API) is one of Australia's leading pharmaceutical distributors and health and beauty retailers. API owns some of the country's biggest pharmacy brands including Priceline Pharmacy, Soul Pattinson Chemist and Pharmacist Advice. API's services include wholesale product delivery, retail services, marketing programs and business advisory services.

Since its humble beginnings in 1910, API has grown from a small co-operative of three pharmacists to a multi-national organisation. With locations in all Australian states, the API network has more than 488 Priceline Pharmacy stores and 975 independent Soul Pattinson Chemist, Pharmacist Advice and Club Premium pharmacy members. The company also has a network of over 55 Clear Skincare clinics in Australia and New Zealand, and markets products throughout Australasia and the United Kingdom.

API's vision of "Enriching Life" reflects its aspiration as an organisation that embodies wholistic growth in health and beauty.

1.4 TJX Australia

TJX Australia Pty Ltd (TJX) is the local arm of TJX Companies Inc., a leading off-price apparel and home fashions retailer in the US and worldwide. The company has grown strongly over its 43 year history, and in 2019 was ranked 85 in the Fortune 500 company listings, with around $42 billion in annual sales.

TJX has more than 4,500 stores and four e-commerce sites in nine countries, including the US, Canada, the UK, Ireland, Germany, Poland, Austria, the Netherlands, and Australia. The company's brands include TJ Maxx and TK Maxx, Marshalls, HomeGoods, Sierra and Homesense, with TK Maxx being recently launched in Australia.

TJX's mission is to deliver great value to its customers every day. It does this by offering an ever-changing assortment of quality, fashionable, brand name and designer merchandise at prices generally 20% to 60% below full-price retailers' regular prices on comparable merchandise. With its value proposition, TJX reaches a broad range of fashion- and value-conscious customers across many geographies, income levels, and demographic groups.

1.5 EIS Project Team

This EIS has been prepared by PJEP in conjunction with a range of specialist consultants as listed in the following table.

Table 1.1: *EIS Project Team*

Discipline	***Organisation***	***Study/Deliverable***
Project Management	Marsden Park Developments	Project Management
Environmental Planning	PJEP Environmental Planning	Environmental Assessment
Architecture	Reid Campbell	Architectural Plans
	SBA Architects	Architectural Plans – API Facility
Landscape Design	Site Image	Landscape Plans

Discipline	*Organisation*	*Study/Deliverable*
Soil and Water	Orion Consulting	Civil Plans Erosion and Sediment Control Plan Stormwater Management Plan
Noise	Wilkinson Murray	Noise Assessment
Biodiversity	Eco Logical	Biodiversity Review
Traffic and Parking	Arup	Traffic Assessment
Bushfire	Eco Logical	Bushfire Assessment
Waste	PJEP	Waste Management Plan
Hazards	Riskcon Engineering	SEPP 33 Analysis
BCA Compliance	Blackett Maguire & Goldsmith	BCA Compliance Report
Cost Estimate	MBM	Construction Cost Estimate

The EIS also benefits from a range of documents and studies that have been undertaken for the broader Sydney Business Park and Marsden Park Industrial Precinct. These studies include those listed in the following table.

Table 1.2: *Additional Sydney Business Park Studies*

Study/Document	*Date*	*Organisation*
Salinity Assessment and Management Plan	Oct 11	GHD
Salinity Assessment and Management Plan – Stage 3.02	Mar 17	Douglas Partners
Site Contamination Assessment – Phase 1	Nov 08	GHD
Site Contamination Assessment – Phase 2	May 09	GHD
Site Contamination Assessment – Stage 3.02	Apr 17	Douglas Partners
Site Contamination Assessment – Stockpile	2019	Douglas Partners
Ecological Assessment	Oct 11	Eco Logical
Aboriginal Heritage Assessment – Marsden Park	May 09	Kelleher Nightingale Consulting
Aboriginal Heritage Assessment	Nov 11	Kelleher Nightingale Consulting
Aboriginal Heritage Review – Stage 3.02	Oct 16	Kelleher Nightingale Consulting
Aboriginal Heritage Impact Permit No.C0001495	Nov 15	Office of Environment & Heritage
Non-Indigenous Heritage Assessment	Jul 09	Godden Mackay Logan
Transport Assessment	Oct 11	AECOM
Bushfire Assessment	Oct 11	Eco Logical

2 THE SITE

2.1 Location and Context

The Stage 3 Facilities site (the site) is located within the employment estate known as Sydney Business Park, Marsden Park.

Sydney Business Park forms a large part of the Marsden Park Industrial Precinct, one of the key employment precincts of the North West Growth Centre. Sydney Business Park has an area of 256 hectares, while the wider Marsden Park Industrial Precinct has a total area of 551 hectares.

The North West Growth Centre and Marsden Park Industrial Precinct are shown on **Figure 2.1**, and the Sydney Business Park master plan is shown on **Figure 2.2**.

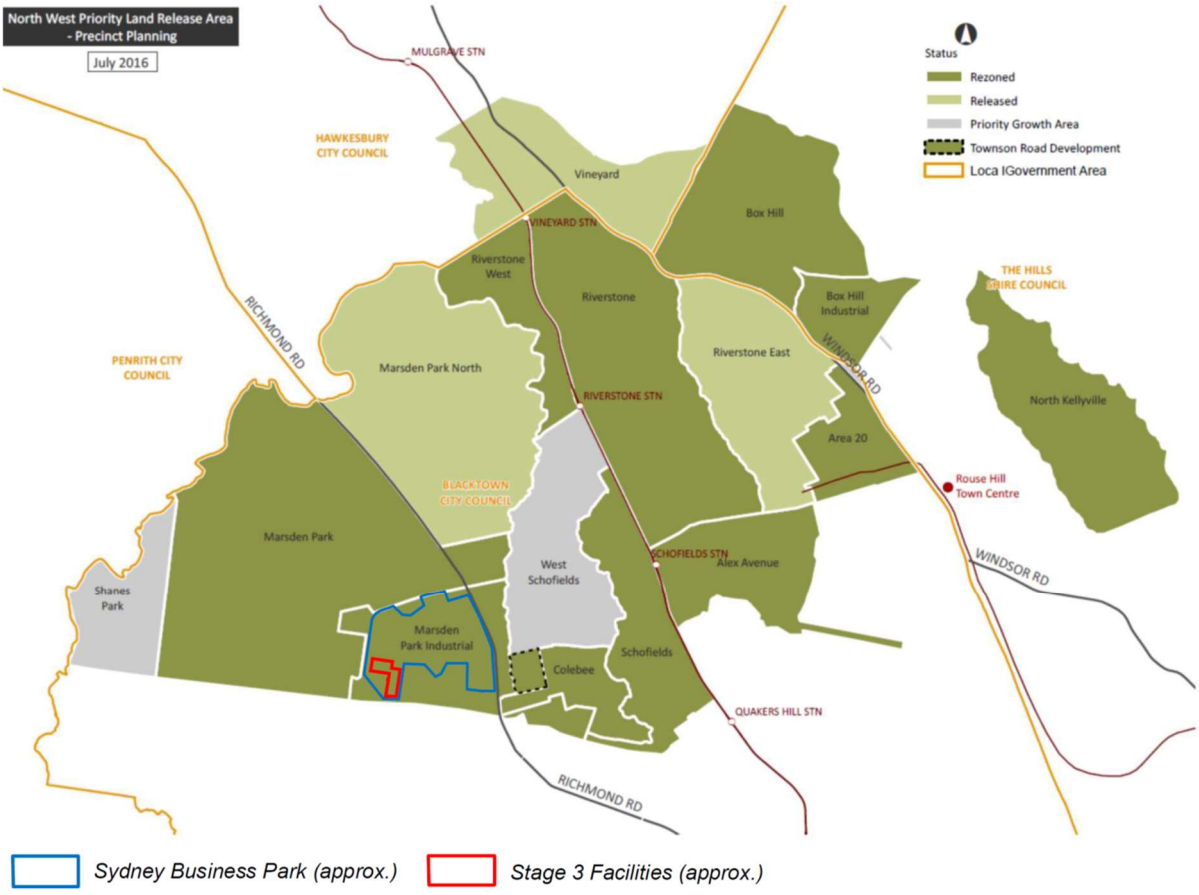


Figure 2.1: *North West Growth Centre (Source: Growth Centres DCP)*

2.2 Sydney Business Park Estate Development

Sydney Business Park is being developed on a staged basis by Marsden Park Developments Pty Limited (Sydney Business Park). The current estate master plan is shown on **Figure 2.2**.

The four warehouse and distribution facilities are proposed to be developed in the south-western part of Sydney Business Park, in an area known internally as 'Stage 3'. Stage 3 includes areas to the north of Astoria Street, known as 'Stage 3.01', and areas to the south of Astoria Street, known as 'Stage 3.02'. The proposed development falls within the Stage 3.02 area (see **Figure 2.3**).

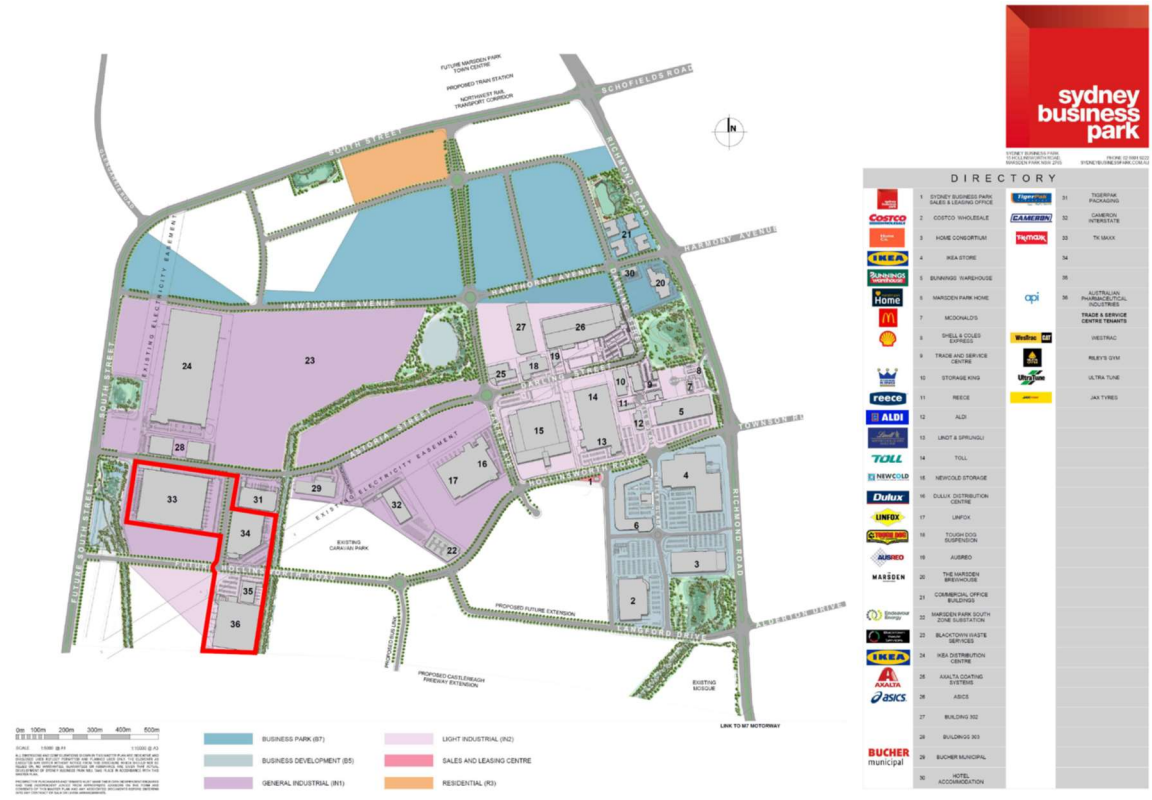


Figure 2.2: *Sydney Business Park Master Plan (Source: Sydney Business Park)*

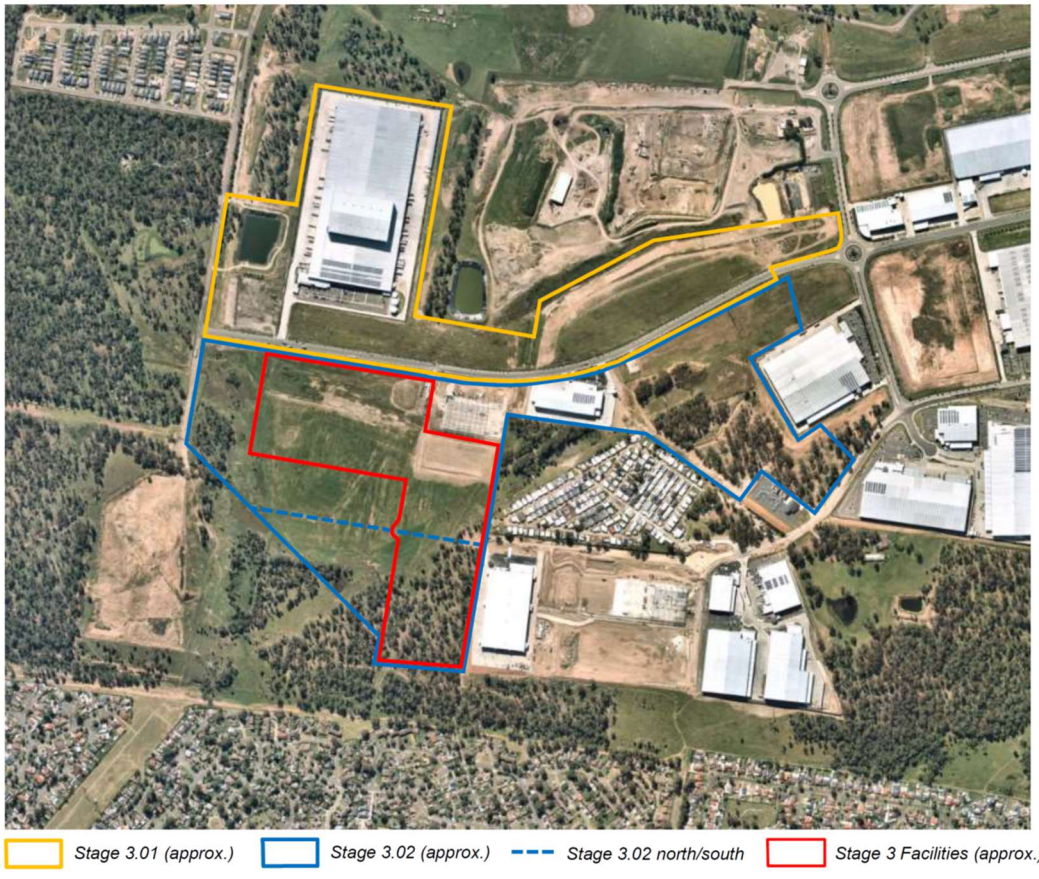


Figure 2.3: *Sydney Business Park Stage 3 (Source: Sydney Business Park)*

On 28 August 2015, Blacktown City Council (Council) approved certain estate works across the Stage 3.01 area. The development consent (DA 15-1088) provides for:

- tree removal across the stage area;
- bulk earthworks across the stage area;
- importation of fill material;
- preparation for road construction;
- construction of a building pad for an IKEA warehouse and distribution centre; and
- associated works.

The area has since been developing in accordance with this and other development consents. The development of Stage 3.02 follows on from the estate works undertaken in Stage 3.01. The development of Stage 3.02 is being progressed via individual development applications for the lots within the stage, as end-users (and their requirements) are identified.

A range of environmental assessments have been undertaken for the Stage 3.02 area, which inform the subsequent development of the stage. These include assessments for site contamination, salinity, geotech and Aboriginal cultural heritage (see **Table 1.2** above). Before the current proposal, these assessments generally focussed on the areas in Stage 3.02 to the north of Hollinsworth Road (as indicated by the dashed line on **Figure 2.3**). As the proposed development also includes development to the south of Hollinsworth Road, these assessments have been updated to address the additional southern part of the Stage 3 area.

A number of other employment facilities in Stage 3 of Sydney Business Park have already been approved and/or constructed, or are pending approval. These facilities are shown on **Figure 2.2**, and include the:

- IKEA Distribution Facility (SSD 6954) in Stage 3.01 to the north of the site – approved, constructed and operating;
- Lot 3 Warehouse Facilities (DA 17-02162) in Stage 3.01 to the north of the site (also known as Buildings 303) – approved and under pre-construction;
- TigerPak Warehouse Facility (DA 19-00984) in Stage 3.02 to the north-east of the site – approved and under construction;
- Bucher Municipal Industrial and Warehouse Facility (DA 18-02532) in Stage 3.02 to the north-east of the site – approved, constructed and operating; and
- Cameron Interstate Warehouse Facility (DA 20-00792) in Stage 3.02 to the east of the site – pending approval.

2.3 Site Description and Ownership

The real property description of the site is Part Lots 4 and 5 in DP 1210172 and Part Lot 36 in DP 262886 (see **Figure 2.4**). The site has frontage to Hollinsworth Road and Astoria Street.

The site has an overall area of approximately 17.2 hectares (or 15.9 hectares excluding roads), and is located in the Blacktown local government area. It is owned by Ganian Pty Ltd.

As outlined in Section 3, the proposal also includes subdivision of the wider Stage 3 area within Lots 4, 5 and 36. The three lots have a total area of approximately 60.9 hectares, including:

- Lot 4 – 6.867 hectares;
- Lot 5 – 37.06 hectares; and
- Lot 36 – 16.94 hectares.

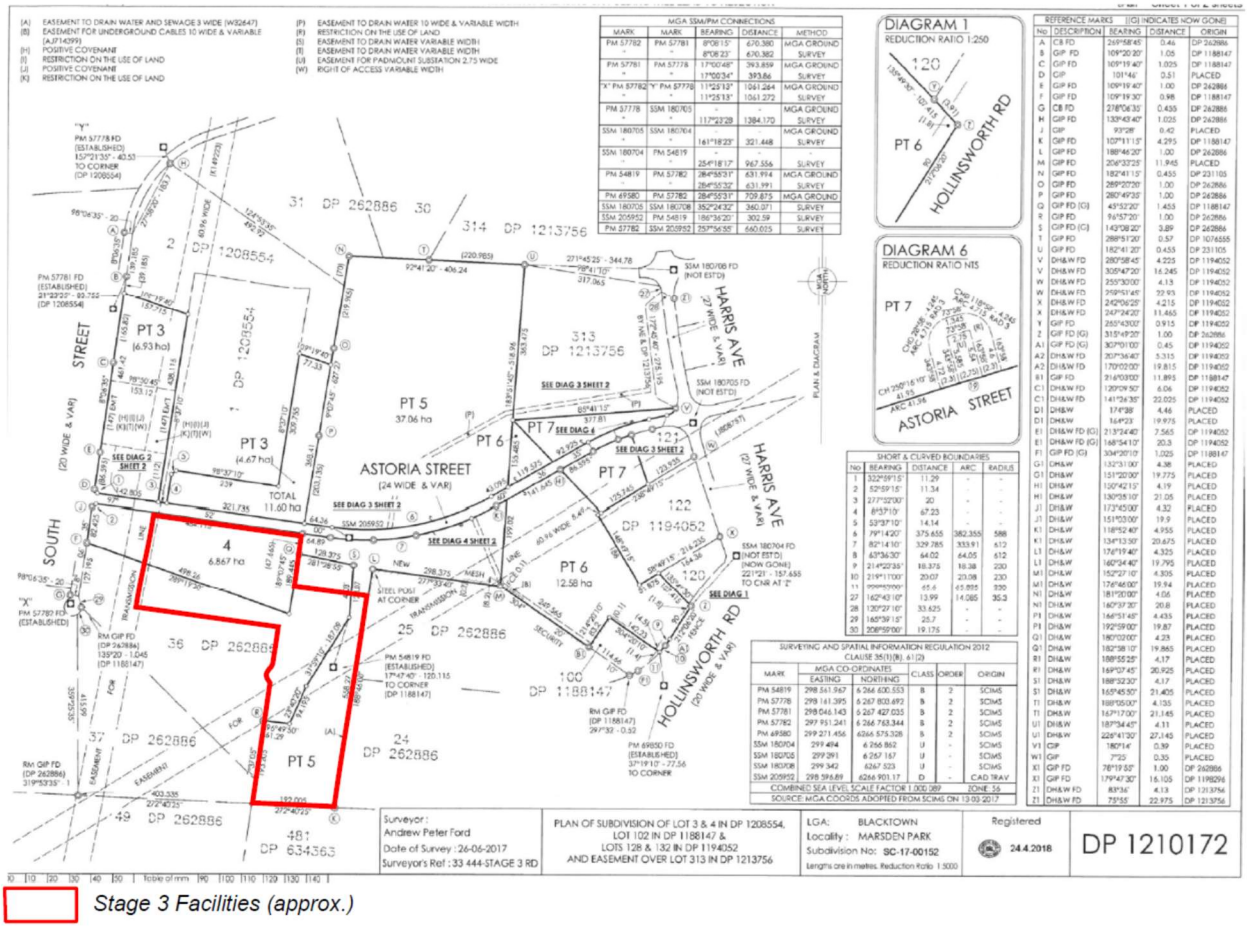


Figure 2.4: *Existing Survey Plan (Source: Sydney Business Park)*

2.4 Land Use

The site is currently vacant, predominately cleared and awaiting redevelopment for employment purposes (see **Figure 2.5**).

Prior to development of the business park, the site had been used predominantly for agricultural purposes (mainly grazing) and/or vacant bushland (in more recent times).

2.5 Surrounding Land Use

The site is surrounded on most sides by industrial and infrastructure (local roads and drainage) zoned land associated with Sydney Business Park and the wider Marsden Park Industrial Precinct. Further to the south lies infrastructure zoned land reserved for a future major roadway (ie. Castlereagh Freeway), beyond which is the residential area of Bidwill.

Land use immediately surrounding the site includes:

- North – Astoria Street, with Sydney Business Park and the existing Blacktown Waste Services quarry/landfill beyond;
- East – infrastructure and industrial-zoned parts of the Marsden Park Industrial Precinct, including parts of Sydney Business Park to the north-east, the Ingenia Lifestyle Stoney Creek facility (former Town & Country caravan park) to the east, and LOGOS' Marsden Park Logistics Estate to the south-east;
- South – undeveloped parts of Sydney Business Park to the south-west, and infrastructure-zoned land to the south-east (for the future Castlereagh Freeway), with the residential area of Bidwill beyond; and

- West – industrial and infrastructure (drainage) zoned undeveloped land associated with the Marsden Park Industrial Precinct, along with some environmental conservation zoned land beyond the infrastructure zoned land.

Figure 2.5: *Aerial Photo (Source: Sydney Business Park)*

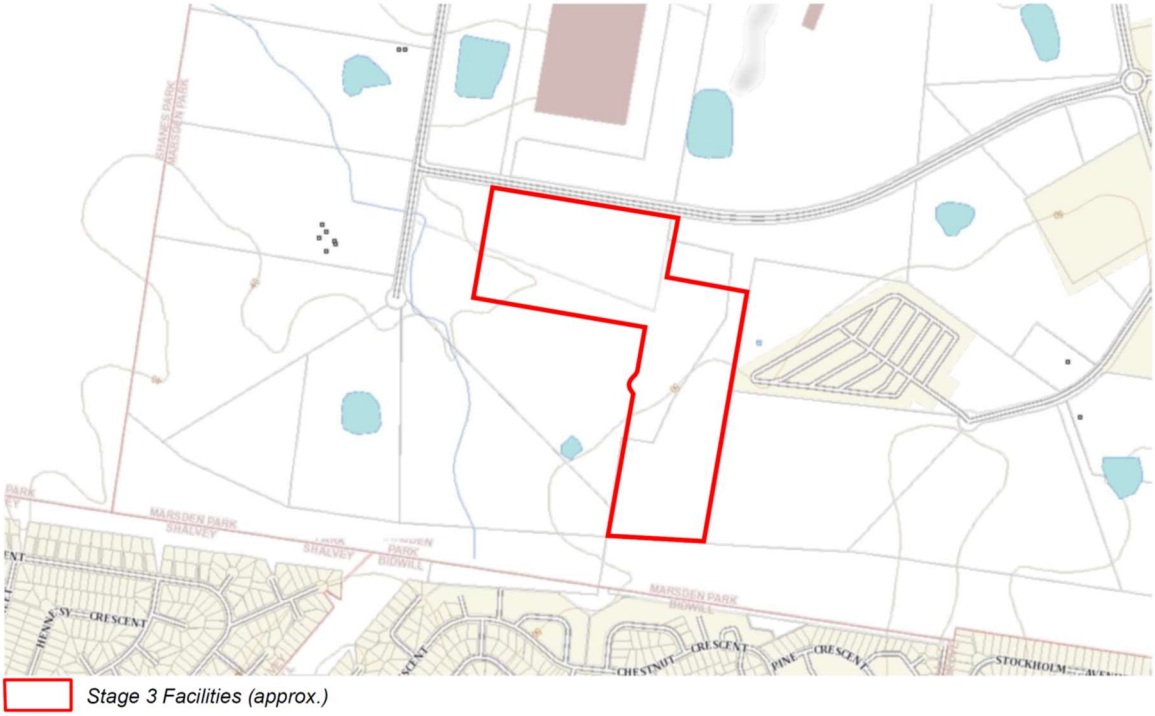


Figure 2.6: *Topographic Plan (Source: Sixmaps)*

As outlined above, a number of other employment facilities in proximity to the site are currently either under construction or have commenced operations in recent years, including facilities for IKEA, Bucher Municipal, TigerPak and Cameron Interstate[3] (see **Figure 2.2**).

There remain some residential land users within the re-zoned areas of the Marsden Park Industrial Precinct at present, including the Ingenia Lifestyle Stoney Creek caravan park to the east of the site. The caravan park is separated from the site by a drainage easement for the Marsden Park Industrial Precinct[4].

The closest residential zoned land is located in Bidwill approximately 120 metres to the south of the site. Additional residential zoned land is located approximately 500 metres to the north-west of the site.

2.6 Existing Environment

The site has a slightly sloping topography, sloping gently to the north-west. Site elevation ranges from about 52 mAHD on the south-eastern side of the site to about 40 mAHD in the north-western corner of the site.

Site drainage matches the topography, however there are no defined watercourses on the. There is a drainage line located approximately 50 metres (at the closest point) to the west of the site (see **Figure 2.6**), which forms part of the headwaters of Little Creek.

A proposed precinct stormwater detention basin (Basin A), which will service the site and wider areas of the Marsden Park Industrial Precinct, is located to the west of the site, in proximity to the abovementioned drainage line. This basin is being developed separately by Blacktown City Council (Council), and is discussed in more detail below.

The site and surrounds are predominately cleared, although there is some remnant/regrowth woodland vegetation in the south-eastern area of the site (see **Figure 2.5**).

2.7 Infrastructure and Services

Sydney Business Park has direct access to Richmond Road via Hollinsworth Road and Hawthorne Avenue, which have been constructed or upgraded by Sydney Business Park to service the needs of the industrial precinct. Hollinsworth Road and Hawthorne Avenue both accommodate 4 lanes, and have signalised intersections with Richmond Road. Richmond Road provides direct access to the M7 Motorway, which is located approximately 1 kilometre to the south of the business park.

The site has direct frontage to Astoria Street to the north, and Hollinsworth Road to the east. Astoria Street is an internal estate road that has recently been constructed by Sydney Business Park to service the industrial estate. Astoria Street comprises 2 lanes (and 2 parking lanes), and links with Hollinsworth Road to the south and Hawthorne Avenue to the north via Harris Avenue.

Two 60 metre wide TransGrid high voltage electricity easements traverse through the site, with one along the western boundary and the other through the eastern part of the site.

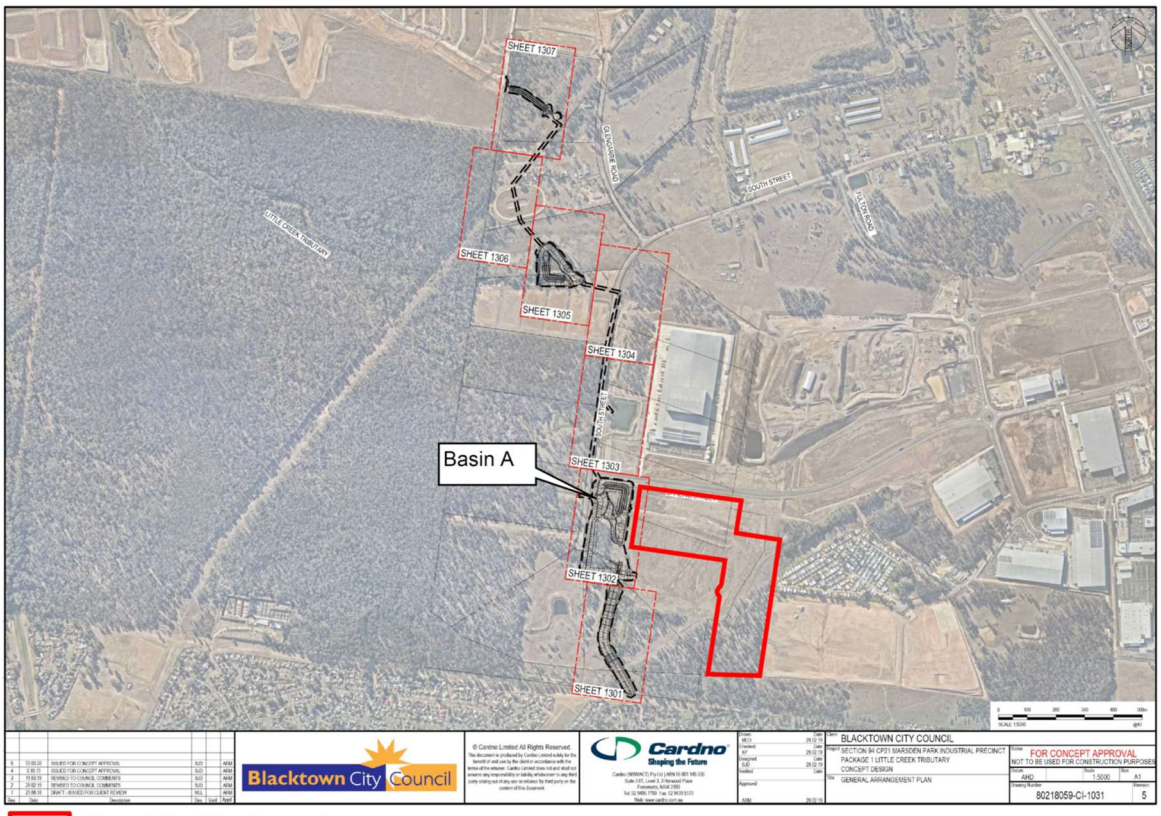
A proposed precinct stormwater detention (and bioretention) basin is located immediately to the west of the site, which will service the site and wider areas of the precinct. The basin, known as

[3] Pending approval
[4] This drainage easement was originally proposed to be located slightly east of the constructed location, as indicated on the zoning plan (see Figure 4.3). However, it has since been approved and constructed immediately adjacent to the eastern boundary the site. The zoning plan is in the process of being updated (by others) to reflect the constructed location.

Basin A[5], forms part of a wider package of stormwater works for the Little Creek catchment (see **Figure 2.7**), which are being delivered by Blacktown City Council under the *Section 94[6] Contributions Plan No.21 – Marsden Park*.

In January 2020, Council approved the Review of Environmental Factors (REF) for the stormwater works under Part 5 of the EP&A Act, and is currently undertaking detailed design for the project. Council advises that it is currently planning to commence construction works in the second half of calendar 2020, and to complete the works within 3 to 6 months. As part of the works, Sydney Business Park will subdivide and dedicate the Basin A land area to Council (subject to separate approval).

Sydney Business Park and Council are planning to enter into an agreement which would see Sydney Business Park partially deliver Basin A on Council's behalf (under Council's Part 5 approval). The partial construction would enable the basin to be used as a temporary sediment and detention basin for the proposed development.



Stage 3 Facilities (approx.)

Figure 2.7: *Little Creek Catchment Stormwater Works (Source: Blacktown Council/Cardno)*

[5] Also known as Basin 3.2 (under the Section 94 Contributions Plan)

[6] Now Section 7.11 of the EP&A Act

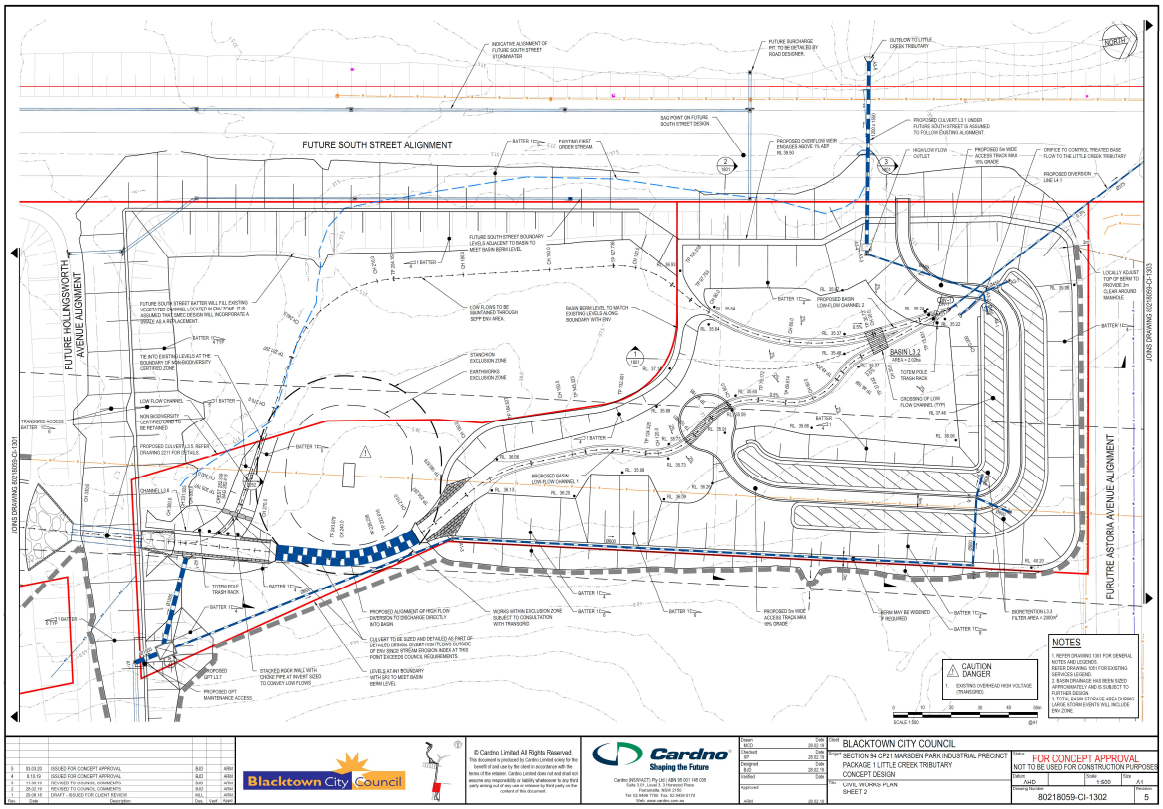


Figure 2.8: *Approved Basin A Works (Source: Blacktown Council/Cardno)*

3 PROPOSED DEVELOPMENT

3.1 Development Summary

Sydney Business Park is proposing to develop four world-class warehouse and distribution facilities within the Stage 3 area of Sydney Business Park.

Two of the warehouses would be developed for known end-users, including:

- Warehouse 1 – to be developed for TJX, which would use the facility for the warehousing and distribution of general consumer products for its TK Maxx and related brands; and
- Warehouse 4 – to be developed for API, which would use the facility for the warehousing and distribution of its pharmaceutical and related consumer products.

The other two warehouses are located between Warehouses 1 and 4, and are proposed to be developed for as-yet unidentified end users.

The master plan and layout plans for the Stage 3 development are shown on **Figures 3.1** to **3.7**, and the main components of the proposed development are outlined in **Table 3.1**. The full set of architectural design plans is attached at **Appendix B**, and the landscape plans are attached at **Appendix C**.

Table 3.1: *Stage 3 Facilities Development Summary*

Development Summary	**Development of the Sydney Business Park Stage 3 Facilities, including:** • **subdivision;** • **vegetation clearing and earthworks;** • **construction of two estate roads and associated intersections;** • **construction and operation of four warehouse and distribution facilities, including ancillary offices; and** • **ancillary development including car parking, infrastructure provision and landscaping**
Proposed Use	Warehousing and distribution, with ancillary office. Warehouse 1 would be used for storage and distribution of TJX's range of general consumer products, including clothing, footwear, home wares, beauty products, accessories and related consumer products. Warehouses 2 and 3 would also be used for storage and distribution of general consumer products by as-yet unidentified end users. Warehouse 4 would be used for storage and distribution of API's range of pharmaceutical and related consumer products, including pharmaceutical and therapeutic goods
Subdivision	Lots 4, 5 and 36 would be subdivided to provide seven development lots, one lot for precinct stormwater infrastructure (which would be dedicated to Council), and a lot for the proposed roads (which would also be dedicated to Council)
Clearing, Demolition and Earthworks	Vegetation clearing across the site would be undertaken to facilitate the development. Most of the site is already cleared, though there are some trees in the south-eastern part of the site. Demolition of minor site structures (mainly fencing and a small section of road) would be undertaken, along with bulk and detailed earthworks across the site to facilitate the development

Facility Development	Construction and operation of the Stage 3 Facilities, including: • Warehouse 1 (TJX Facility) – 44,495 m^2 total building area; • Warehouse 2 (unspecified end user) – 17,135 m^2 total building area; • Warehouse 3 (unspecified end user) – 3,860 m^2 total building area; and • Warehouse 4 (API Facility) – 34,201 m^2 total building area. All warehouse facilities would include attached ancillary offices. The warehousing facilities in Warehouse 4 would include a basement level and mezzanine level. Warehouses 1 and 4 would be temperature-controlled warehouses, and Warehouses 2 and 3 would be ambient-temperature warehouses
Landscaping	Implementation of site landscaping consistent with estate landscaping, including street trees in roadways and landscaping within each individual warehouse facility site
Signage	Building identification, business identification and directional signage
Hours of Operation	24 hours a day, 7 days a week
Capital Investment Value	$157.4 million (exc. GST)
Employment[1]	Construction: 670 Operation: 610
Infrastructure and Services	
Roads	Sydney Business Park would extend Hollinsworth Road to the western side of the site, and construct a new north-south collector road between Hollinsworth Road and Astoria Street, as well as constructing associated intersections. The proposal also involves construction of internal driveways, hardstand and parking for each warehouse facility
Stormwater	Development of site stormwater infrastructure would be undertaken for the facilities, draining to estate stormwater infrastructure (including existing Basin E and future Basin A).
Potable Water, Sewer, Electricity and Telecoms	Extension and connection to existing mains in Hollinsworth Road and Astoria Street and/or South Street, and reticulation through the site

1 Estimate

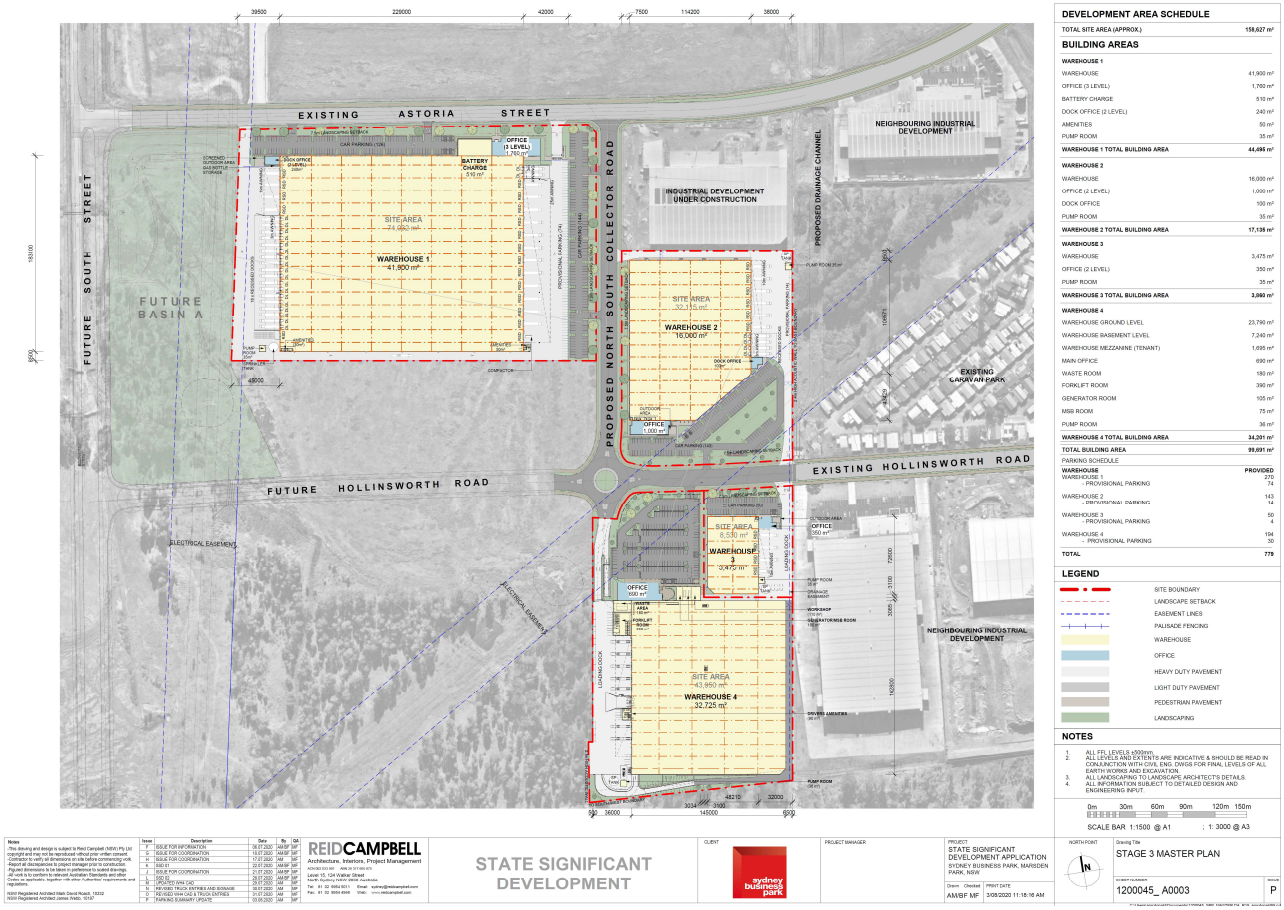


Figure 3.1: *Stage 3 Master Plan (Source: Reid Campbell)*

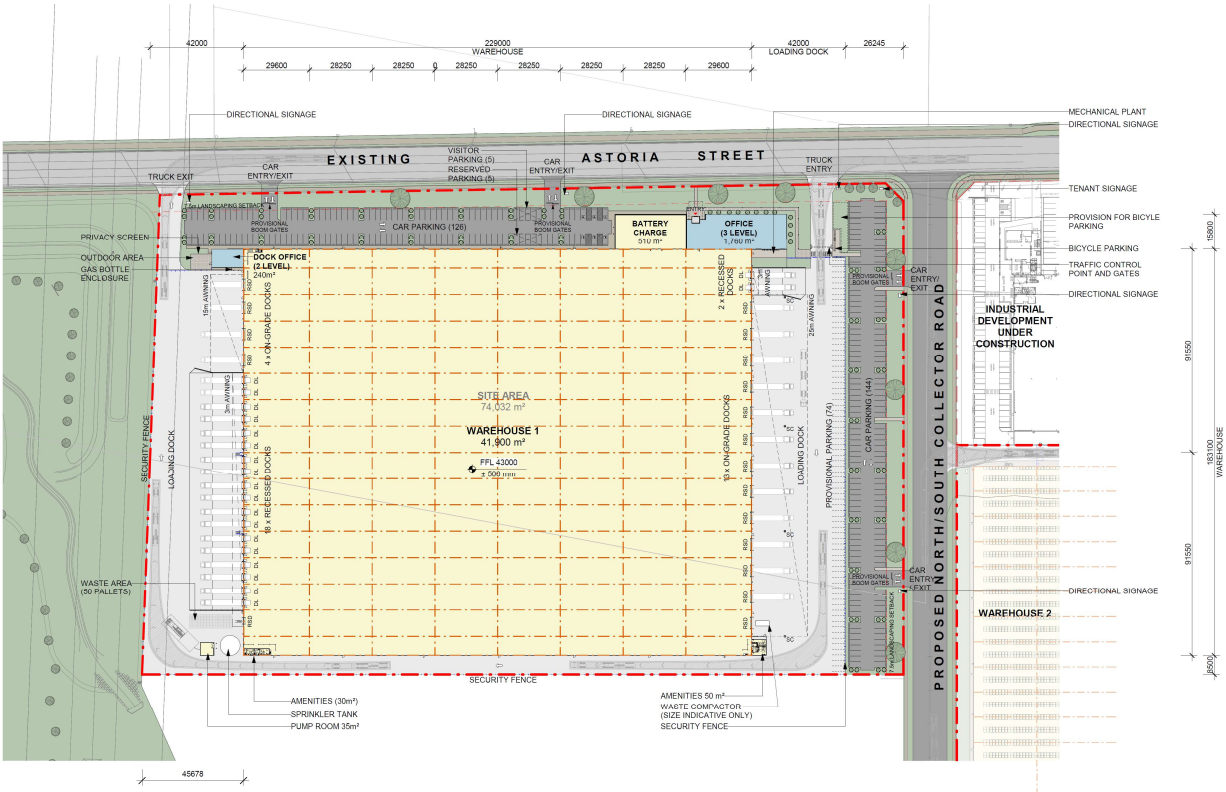


Figure 3.2: *Warehouse 1 Site Plan (Source: Reid Campbell)*

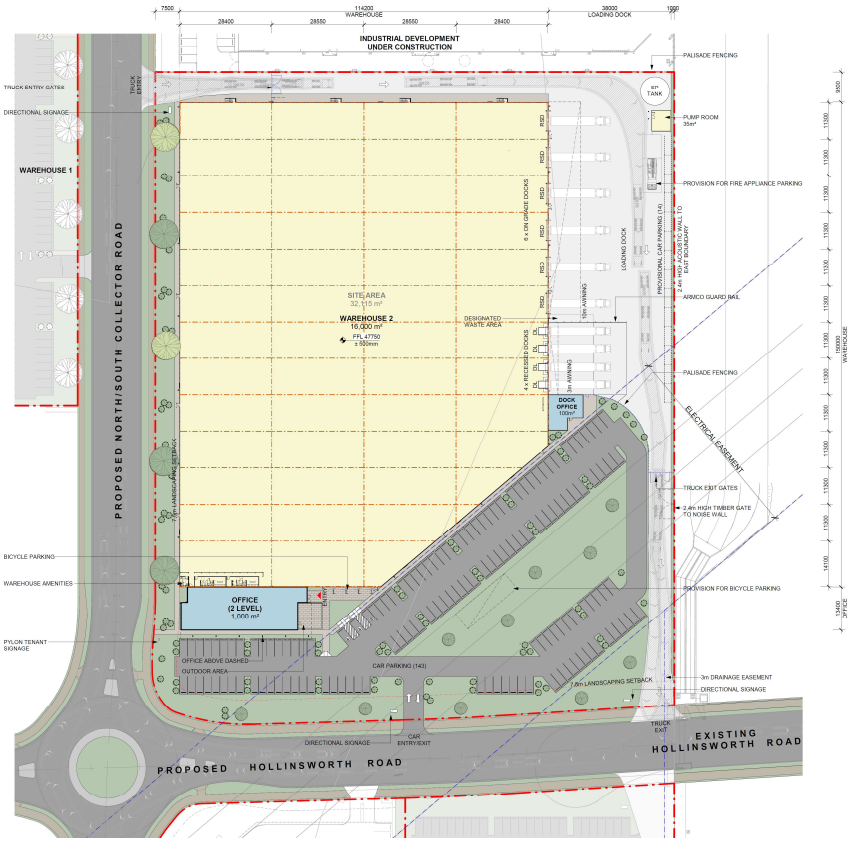


Figure 3.3: *Warehouse 2 Site Plan (Source: Reid Campbell)*

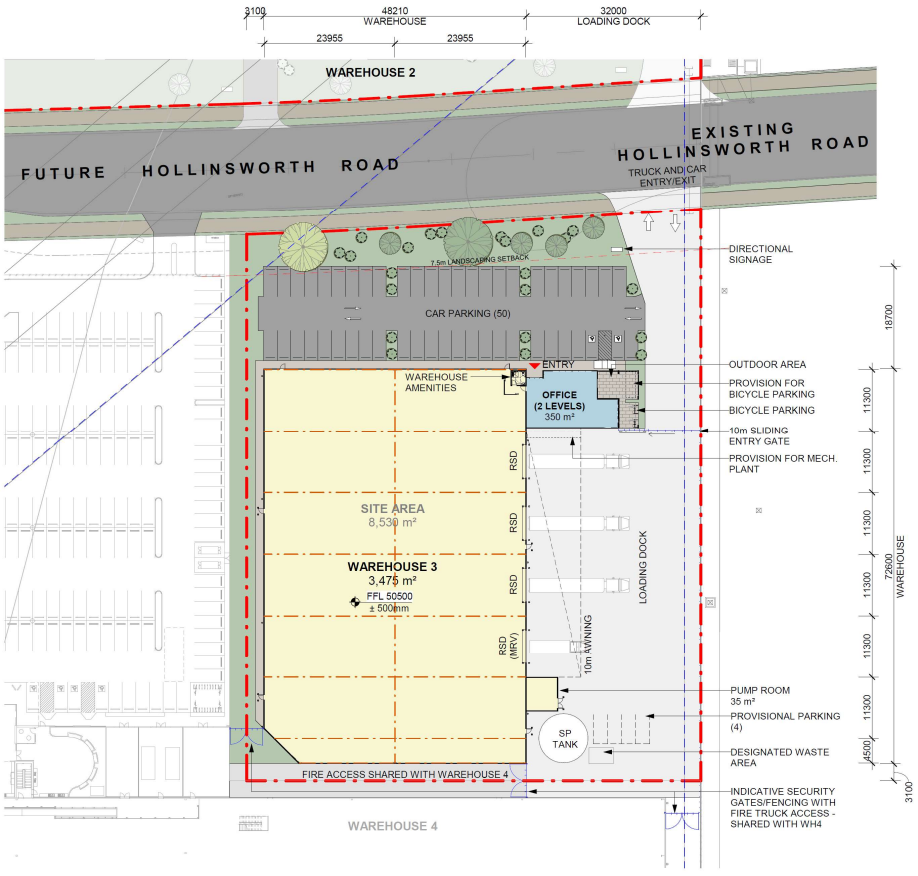


Figure 3.4: *Warehouse 3 Site Plan (Source: Reid Campbell)*

Figure 3.5: *Warehouse 4 Site Plan (Source: SBA)*

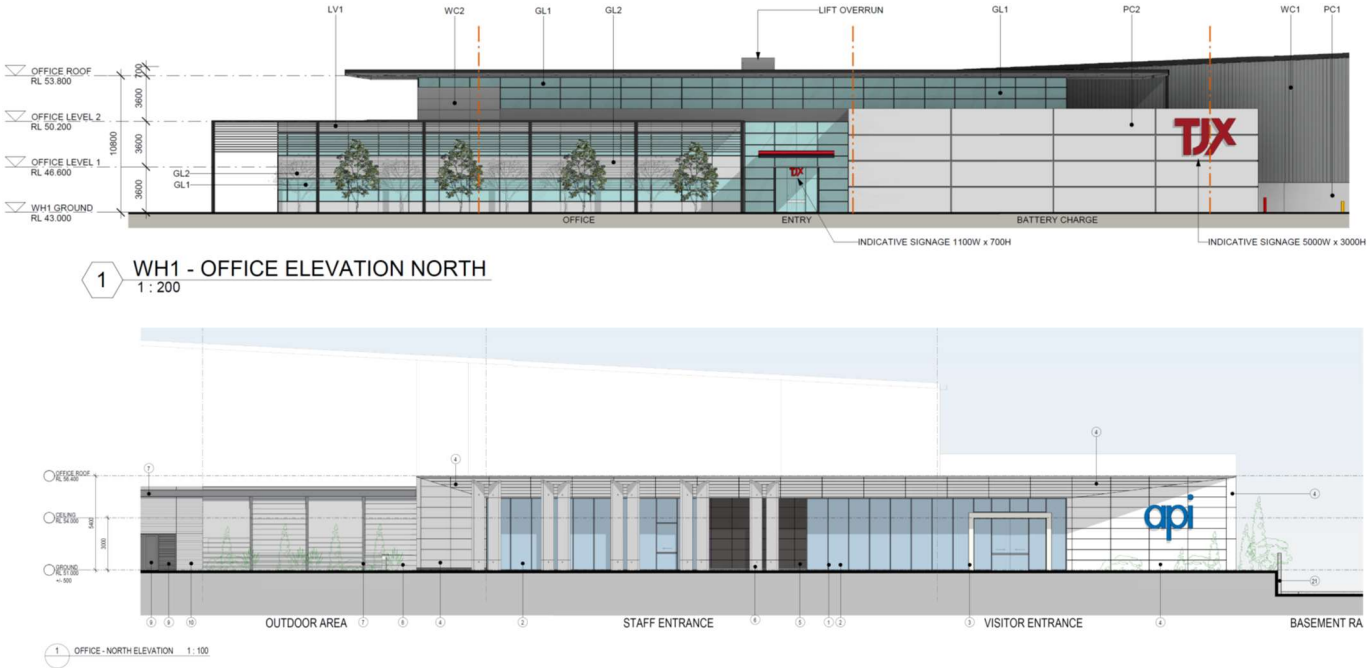


Figure 3.6: *Representative Elevations (Source: Reid Campbell/SBA)*

Figure 3.7: *Representative Perspectives (Source: Reid Campbell/SBA)*

3.2 Subdivision

The proposal involves subdivision of Lots 4 and 5 in DP 1210172 and Lot 36 in DP 262886 to create seven development lots, as well as a lot for existing precinct stormwater infrastructure, and a lot for the proposed roads.

The proposed draft plan of subdivision is shown on **Figure 3.8**, and attached in **Appendix D**. A summary of the proposed lots is provided in the following table.

Table 3.2: *Proposed Subdivision Lots*

Lot No.	*Area (hectares)*	*Purpose*
3001	7.403	Development lot for Warehouse 1 (TJX Facility)
3002	1.951	Development lot for the approved TigerPak Facility (DA-19-00984)
3003	0.2666	Lot for the existing precinct stormwater drainage infrastructure to the east of the TigerPak Facility. This lot would be dedicated to Council
3004	3.211	Development lot for Warehouse 2
3005	0.8529	Development lot for Warehouse 3
3006	4.394	Development lot for Warehouse 4 (API Facility)
3007	7.763	Residue lot for future employment/infrastructure development
3008	26.19	Residue lot for future employment/infrastructure development to the north of Astoria Street
Road lot	1.35	Lot to accommodate the proposed north-south collector road and the extension of Hollinsworth Road. This lot would also be dedicated to Council.

It is noted that Lots 4, 5 and 36 are also subject to separate subdivision applications/approvals, which have not been registered to date. These include the creation of development lots for

approved or proposed facilities to the east of the site[7], and lots (ie. Lots 101 to 104) for the development of Council's precinct stormwater Basin A and associated infrastructure. Lots 101 to 104 are to be dedicated to Council.

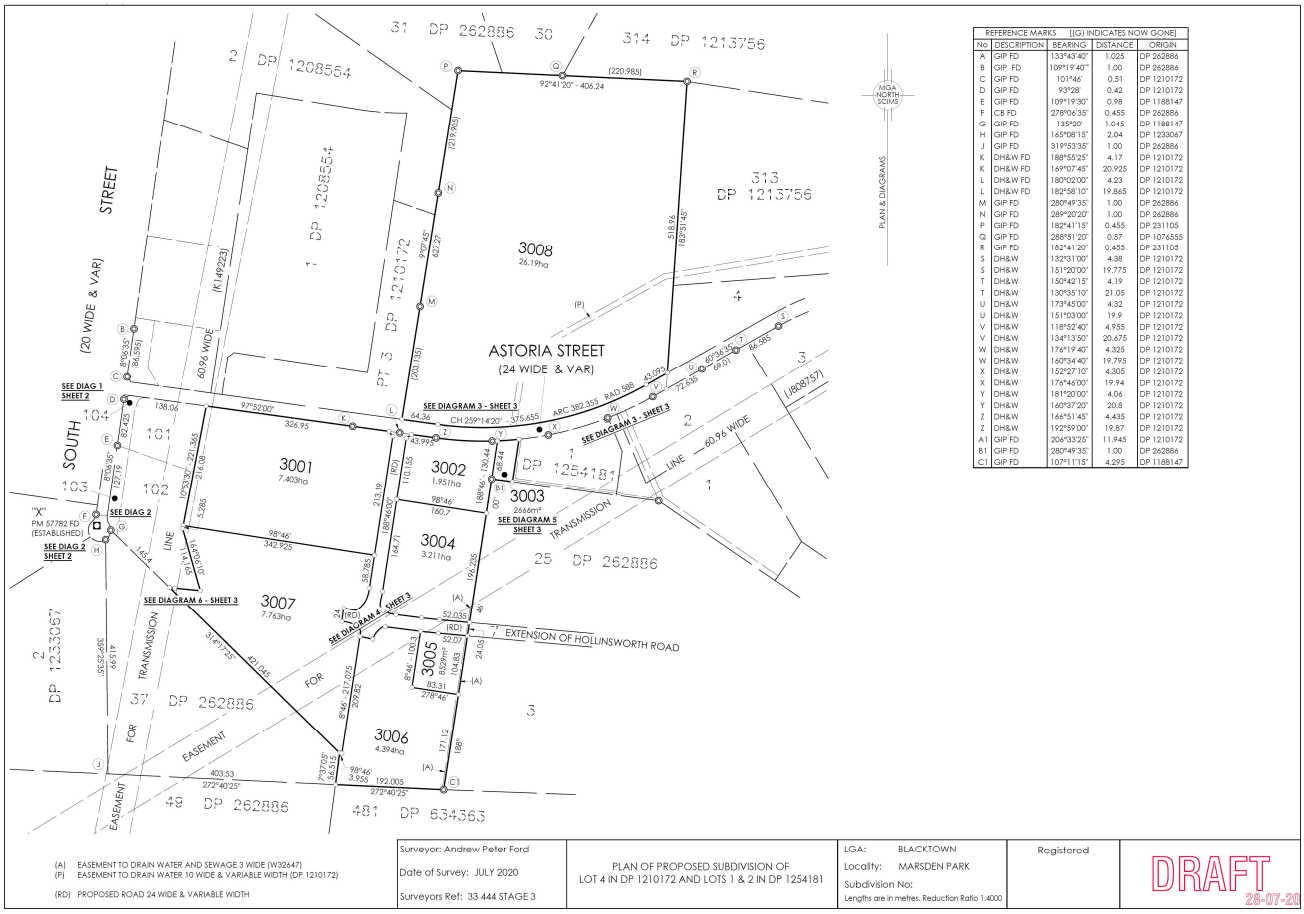


Figure 3.8: *Proposed Subdivision Plan (Source: Sydney Business Park)*

3.3 Demolition and Earthworks

The proposed development would not require significant demolition, apart from removal of some existing fencing and services, and the existing cul-de-sac head at the end of Hollinsworth Road (see demolition plan in **Appendix E**).

Vegetation clearing, and bulk and detailed earthworks would be undertaken across the site, and part of the wider Stage 3 area, to enable the construction of the warehouse facilities, roads and associated services. All vegetation within the site would be required to be cleared, as the warehouse facility sites require widespread regrading to provide level surfaces for the warehouse pads.

The earthworks would be undertaken on a cut to fill basis, with the works expected to require export of approximately 16,920m^3 of excess fill material (for beneficial reuse in other areas of Sydney Business Park).

Relatively low masonry retaining walls would be constructed along parts of the site boundaries, with varying heights up to approximately:

- Warehouse 1 (TJX Facility):

[7] Including the approved Bucher Municipal Facility (DA-18-02532) and proposed Cameron Interstate Facility (DA 20-00792).

  - West – up to 2.5m;
  - South – up to 2.5m;
  - East – up to 1m;
- Warehouse 2:
  - North – up to 0.5m;
  - East – up to 1.5m;
- Warehouse 3:
  - East – up to 0.5m;
- Warehouse 4 (API Facility):
  - East – up to 0.5m;
  - South – up to 5.5m (assoc. with basement ramp); and
  - West – up to 1m.

3.4 Facility Description

The proposed warehouse facilities would comprise four standalone warehouse facilities, each with attached ancillary offices. The facilities would comprise single-level warehouses, apart from Warehouse 4 (the API Facility) which would also include basement level and mezzanine level warehousing areas.

A development schedule outlining the building elements, and the associated areas and heights, is presented in **Table 3.3** below.

Table 3.3: *Stage 3 Facilities Development Schedule*

Aspect	***Warehouse***				***Total***
	1	***2***	***3***	***4***	
End User	TJX	Not specified	Not specified	API	-
Site Area[1] (m^2)	74,032	32,115	8,530	43,950	158,627
Building Areas (m^2)					
- Warehouse	41,900	16,000	3,475	32,725[4]	94,100
- Ancillary Office	1,760	1,000	350	690	3,800
- Dock Office	240	100	-	-	340
- Ancillary Services[2]	595	35	35	786	1,451
- Total Building Area	44,495	17,135	3,860	34,201	99,691
- Gross Floor Area[3]	43,900	17,100	3,825	26,175	91,000
Awning Area (m^2)	4,890	748	452	1,415	7,505
Hardstand Area (m^2) (heavy + light duty)	24,660	9,440	3,785	15,585	53,470
Landscaping Area (m^2)	5,278	5,020	806	3,115	14,219
Site Cover (%) (inc. awnings)	66	56	51	63	59 (av.)
Floor Space Ratio (%)	59	53	45	60	57
No. Office Levels	3	2	2	1	1-3
Max. Building Height (m)	14.6	14.6	13.7	14.6	13.7-14.6
Minimum Building Setbacks (m)					
- Astoria Street	7.5	-	-	-	≥7.5
- Hollinsworth Road	-	>7.5	>7.5	>7.5	>7.5
- North-South Road	>7.5	7.5	-	-	≥7.5
Car Parking Spaces	344 (6 disabled)	157 (3 disabled)	54 (2 disabled)	224 (4 disabled)	779 (15 disabled)

1 Excludes roads

2 Includes pump rooms, battery charging rooms, forklifts rooms, generator rooms, switch rooms, attached waste rooms and external amenities
3 Excludes ancillary services, and basement warehousing in Warehouse 4 (as the definition of gross floor area in the Growth Centres SEPP excludes basement storage)
4 Including ground level (23,790 m^2), basement level (7,240 m^2) and mezzanine level (1,695 m^2)

All of the facilities would be used for warehousing and distribution, with ancillary office.

Warehouse 1 would be used for storage and distribution of TJX's range of general consumer products, including clothing, footwear, home wares, beauty products, accessories and related consumer products. The warehouse would be temperature-controlled (for staff amenity), and include standard racking and associated warehouse facilities. The three-storey ancillary office would be attached to the north-eastern corner of the warehouse building, and would be used to provide administrative support for the business. It would also include a kitchen and dining area (including indoor and outdoor dining) for staff on the top level.

Warehouses 2 and 3 would also be used for storage and distribution of general consumer products by as-yet unidentified end users. The warehouses would be ambient-temperature facilities, and include standard racking and associated warehouse facilities. They would each include two-level ancillary offices facing the road frontages.

Warehouse 4 would be used for storage and distribution of API's range of pharmaceutical products, including pharmaceutical and therapeutic goods, and related consumer products. The warehouse component of the facility would include a main ground level warehouse (23,790 m^2 floor area), as well as a secure basement warehouse (7,240 m^2 floor area), and a mezzanine level (1,695 m^2 floor area). The warehouse would be temperature-controlled, and include high-technology automated warehouse storage and picking facilities, as well as standard racking and associated warehouse facilities. The single-level ancillary office would be attached to the northern side of the warehouse building, and would be used to provide administrative support for the business.

An assessment of the facilities compliance with the Building Code of Australia (BCA) is attached as **Appendix G**.

3.5 Hours of Operation

The proposed facilities would operate up to 24 hours a day, 7 seven days a week, 365 days a year. These hours are consistent with the approved hours of operation for other industrial uses in Sydney Business Park.

Construction works for the development would be undertaken in accordance with the hours as stipulated in EPA's *Interim Construction Noise Guideline*, namely:

- 7:00am to 6:00pm Monday to Friday;
- 8:00am to 1:00pm Saturdays; and
- no work on Sundays or public holidays.

Construction works that are inaudible at surrounding receivers may be undertaken outside these times.

3.6 Capital Investment

The development has a total capital investment value of approximately $157.4 million (exc. GST).

3.7 Employment

It is estimated that the facilities would provide employment for approximately 610 people (full-time equivalents) once operating, including:

- Warehouse 1 (TJX Facility) – 290 employees;
- Warehouse 2 (unspecified end user) – 125 employees;
- Warehouse 3 (unspecified end user) – 35 employees; and
- Warehouse 4 (API Facility) – 160 employees.

The estimates for Warehouse 1 and Warehouse 4 are based on advice from TJX and API, while the estimates for Warehouse 2 and Warehouse 3 are based on the warehouse sizes and contemporary facilities in Sydney Business Park.

The project would generate approximately 670 jobs (full-time equivalents) during the construction phase, which is expected to extend over a period of approximately 24 months.

3.8 Infrastructure and Services

3.8.1 Access and Road Network

External Roadworks

Sydney Business Park is proposing to extend Hollinsworth Road to the western side of Warehouses 2 and 4, and to construct a new north-south collector road (Road 1) between Hollinsworth Road and Astoria Street.

The roadworks would include a roundabout intersection between Hollinsworth Road and the north-south collector road, and a priority give-way intersection between the north-south collector road and Astoria Street.

A short additional section of road (Road 2) would also be constructed south from the roundabout, to provide safe and efficient access to Warehouse 4 (API Facility).

The proposed road design cross sections are shown on **Figure 3.9**, with detailed designs provided on the civil design plans in **Appendix E**.

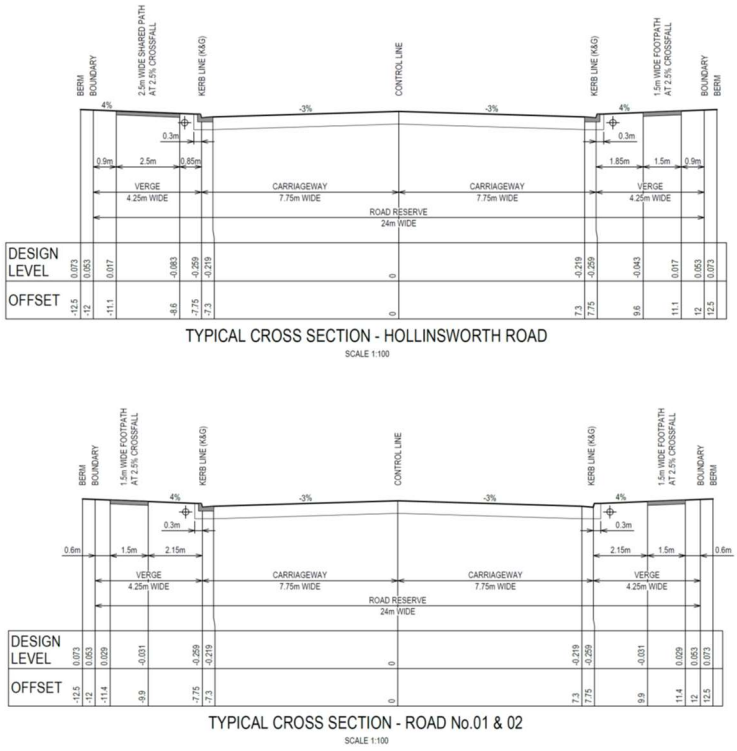


Figure 3.9: *Proposed Road Design (Source: Orion)*

The proposed roads are consistent with the road locations identified on the zoning plan for the Marsden Park Industrial Precinct (see Section 4.2), and generally consistent with the road designs in the *Blacktown City Council Growth Centre Precincts Development Control Plan 2010* (Growth Centres DCP) (see Section 6.7). The Hollinsworth Road extension and the proposed roundabout are identified as contribution items in the Marsden Park Section 94 Contributions plan (see Section 4.5).

Site Access and Internal Circulation

Vehicular access to the Stage 3 Facilities would be provided via Astoria Street, the proposed Hollinsworth Road extension, and/or the proposed north-south collector road (including Road 1 and Road 2).

Separate truck and car accesses would be provided to each facility (with the exception of Warehouse 3), to minimise potential conflicts.

For Warehouse 1 (TJX Facility), truck access and egress would be provided to Astoria Street via two driveways in the north-east and north-west corners of the facility site. Trucks would access via the eastern driveway, and circulate around the site in a clockwise direction, before egressing via the western driveway. Approximately 30 metres of queuing space would be provided between the street entrance and the security gates to ensure that trucks do not queue on the public road network. The facility has been designed to accommodate truck sizes up to and including 30m Super B-double vehicles.

Two car parks would be provided for Warehouse 1, with one accessed from Astoria Street and the other accessed via the north-south collector road.

For Warehouse 2, truck access would be provided from the north-south collector road and egress provided via Hollinsworth Road, with trucks circulating in a clockwise direction around the facility site. Approximately 35 metres of queuing space would be provided between the street entrance and the security gates to ensure that trucks do not queue on the public road network. The facility has been designed to accommodate truck sizes up to and including 25m B-double vehicles.

Passenger vehicle access/egress to the main car park would be provided via a driveway on Hollinsworth Road. Additional parking spaces would be provided for warehouse staff adjacent to the loading docks.

For Warehouse 3, truck access/egress would be provided via a single driveway from Hollinsworth Road. Approximately 40 metres of queuing space would be provided between the street entrance and the security gates to ensure that trucks do not queue on the public road network. The facility has been designed to accommodate truck sizes up to and including 19m articulated vehicles.

Passenger vehicle access/egress to the facility car park would be provided via a driveway from the main access driveway.

For Warehouse 4 (API Facility), truck access/egress would be provided via a dedicated exit from the roundabout on Hollinsworth Road (ie. Road 2). Approximately 75 metres of queuing space would be provided between the street entrance and the security gates to ensure that trucks do not queue on the public road network. The facility has been designed to accommodate truck sizes up to and including 25m B-double vehicles. Access to the warehouse basement would be provided for vans, with entry via a dedicated ramp in the north-western corner of the warehouse, and egress via a ramp in the south-western corner of the warehouse.

Passenger vehicle access/egress to the main car park would be provided via a driveway on Hollinsworth Road.

Parking and Loading
A total of 779 car parking spaces (including 15 disabled spaces) would be provided for the Stage 3 warehouse facilities. Car parking spaces for each warehouse facility are shown in **Table 3.3**.

The car parking areas have been designed to provide separation between passenger vehicles and trucks as far as possible. The car parks have also been designed to avoid parking within the central portion of the TransGrid easement (ie. beneath the transmission lines), to avoid potential conflicts with the easement.

The facilities would provide ample loading facilities to service the warehouses, with facilities designed to accommodate expected demand. The loading areas and internal circulation have been designed so that all vehicles can enter and exit the site in a forward direction.

All parking spaces would be appropriately sealed and linemarked in accordance with Australian Standards (AS2890).

3.8.2 Stormwater Drainage

Stormwater management for the development has been designed in a manner that is consistent with Council's standards and the precinct stormwater strategy. The proposed stormwater management strategy is shown on **Figure 3.10** (and **Appendices E** and **F**), and would include (generally from upstream to downstream):

- rainwater harvesting tanks draining part of the warehouse and office roofs, for re-use in toilet flushing and irrigation;
- primary treatment to parking and hardstand areas via the provision of OceanGuard (or equivalent) pit inserts;
- secondary treatment to roof and hardstand areas via the provision of treatment tanks containing StormFilter cartridges (or equivalent) gross pollutant traps; and
- stormwater pits, pipes and drains to direct stormwater, prior to discharge to the estate stormwater system, with:
    - Warehouses 1, 2 and 4 (and the undeveloped catchment of Lot 36) draining to future Basin A; and
    - Warehouse 3 and a small portion of the north-south collector road draining to existing Basin E[8] via existing estate drainage infrastructure.

It is noted that on-site detention (OSD) is not required for the development, as precinct-based OSD ether has already been provided by Sydney Business Park as part of the wider estate works (ie. Basin E), or is being provided by Council as part of wider precinct works (ie. Basin A).

In this regard, as outlined in Section 2.7 Council has approved the development of Basin A as part of a package of stormwater works for the Little Creek catchment, and is currently undertaking detailed design for the works. Sydney Business Park is planning to assist Council with partial construction of the basin (under Council's approval), which would enable the basin to be used as a temporary sediment and detention basin for the proposed development.

[8] Basin E is currently constructed as a temporary basin arrangement. In April 2020, Sydney Business Park lodged a development application with Council for the upgrade of the basin (DA 20-00743). That application is currently pending approval.

Whilst the Basin A works would be undertaken under Council's existing approval, the proposed development would include the construction of some stormwater pipes and related infrastructure in the Basin A area, as shown on the civil design plans.

Stormwater management is discussed further in Section 6.2.

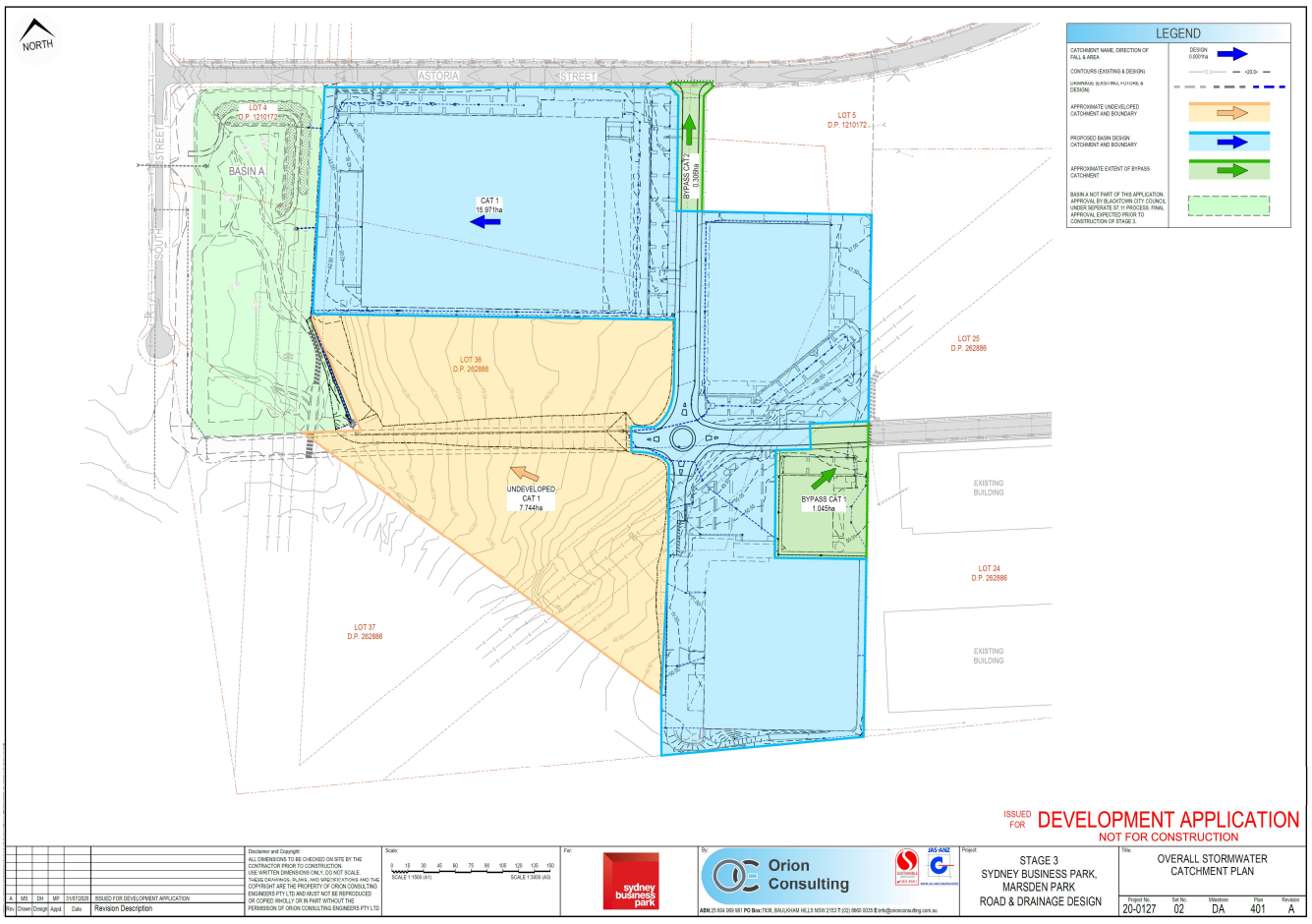


Figure 3.10: *Concept Stormwater Management Plan (Source: Orion)*

3.8.3 Other Services

The facilities would be connected to underground reticulated services (including potable water, sewer, electricity and telecommunications) in Astoria Street or Hollinsworth Road, with these services extended underground into the Stage 3 area via the proposed roads, with subsequent connection into the individual sites. The existing services in Sydney Business Park have been designed to accommodate the demand generated by the entire business park, and are adequate to accommodate the demand from the development (as detailed in **Appendix F**).

No on-site bulk fuel storage is proposed (other than batteries and LPG tanks for forklifts, and minor amounts of diesel for generators).

As discussed in Section 3.9 below, the development includes a number of water savings measures which would significantly reduce potable water use on the site.

3.9 Resource Use Management

3.9.1 Energy Conservation

The development includes a number of energy savings measures, including:

Passive measures:

- use of translucent roof sheeting (approx. 10%) to Warehouses 1, 2 and 3[9] to maximise natural lighting;
- maximising natural lighting to the offices; and
- use of performance glazing, eves, awnings or shading to protect windows and loading areas from summer sun;

Active measures:

- roof and facility insulation (in accordance with BCA requirements);
- rooftop photovoltaic solar systems for each warehouse, including nominally:
  - 1,000 kilowatt systems for Warehouse 1 (TJX Facility) and Warehouse 4 (API Facility); and
  - 100 kilowatt systems for Warehouses 2 and 3;
- use of low energy and LED lighting; and
- use of energy efficient plant, equipment and appliances.

3.9.2 Water Conservation

The development includes a number of water savings measures, including:

- roof rainwater harvesting tanks servicing each warehouse building, for use in toilet flushing and/or irrigation. The tanks have been designed to cater for at least 80% of the non-potable water demand for the facilities, which translates to the following tank sizes:
  - Warehouse 1 – 175 kL;
  - Warehouse 2 – 75 kL;
  - Warehouse 3 – 40 kL; and
  - Warehouse 4 – 125 kL;
- installation of water efficient (4-star) fixtures to all sanitary fixtures; and
- adoption of water efficient landscaping techniques, including:
  - draining hardstand areas to soft landscaping areas where feasible and practical;
  - incorporating water efficient native landscaping species and mulched beds; and
  - installation of water efficient irrigation systems.

3.10 Landscaping

Landscaping would be undertaken in accordance with the Landscape Plans prepared for the proposed development by Site Image (see **Appendix C**).

The landscaping includes provision of street trees along the proposed roads, in a manner that is consistent with existing street trees in the estate. Landscaping for each warehouse facility site would include landscaping to the street frontages and other boundaries, in carparking areas, and within the central portion of the TransGrid easement that traverses though the Warehouse 2 and Warehouse 4 sites. Landscaped outdoor staff communal areas would also be provided adjacent to the ancillary office areas for each facility.

Refer to Section 6.1 for detail on the landscaping principles.

[9] Warehouse 4 (API Facility) is not able to adopt translucent roof sheeting given the nature of the pharmaceutical goods to be stored.

3.11 Fencing, Lighting and Security

Security and other fencing for each warehouse facility would include:

- 2.1m palisade fencing to the street frontages where required (it is noted that fencing to the street frontages has been minimised and would be kept behind the landscaped setback);
- 2.1m palisade fencing (or black vinyl coated chainwire fencing) to other boundaries;
- 2.4m acoustic wall along the eastern boundary of the Warehouse 2 Facility site; and
- 2.7m acoustic wall on the south-western boundary of the Warehouse 4 Facility site adjacent the loading docks.

The acoustic walls would be constructed as specified on the architectural design plans (see **Appendix B**) and the noise assessment (see **Appendix J**). The acoustic wall on the Warehouse 2 site would incorporate a timber gate (approx. 8m wide by 2.4m high) to ensure that access is not restricted within the TransGrid easement.

All fencing would be sited so it does not impede sight lines for drivers, and would be co-ordinated with the landscape, signage and lighting design.

The facilities would include a range of other security installations, including:

- security gates, bollards and retaining walls to control vehicular entry;
- security personnel;
- closed circuit TV security networks;
- security lighting; and
- internal security authorisation systems.

The Warehouse 4 Facility (API Facility) would include additional internal security facilities (including a vault area in the basement) to provide secure storage for pharmaceutical products.

All external lighting would be installed in compliance with *AS 4282(INT) - Control of Obtrusive Effects of Outdoor Lighting*.

3.12 Signage

The facilities would include business identification signage (as façade mounted signs and pylon signs) and directional signage, as indicated on the architectural design plans (see **Appendix B**). The signage strategy plan is reproduced on **Figure 3.11**.

A pylon sign (with maximum dimensions of 4m height by 1.35m width) would be located within the setback to the main street frontage for each warehouse facility. Additional small directional pylon signs (with maximum dimensions of 2m height by 0.675m width) would be located adjacent to the main site access points.

Façade mounted business identification signs would be located on the key warehouse and ancillary office facades, with locations and dimensions as indicated on the architectural plans. The signage has been designed to integrate with the building design for each facility.

The signage would be illuminated (either internally or externally) up to 24 hours a day, 7 days a week.

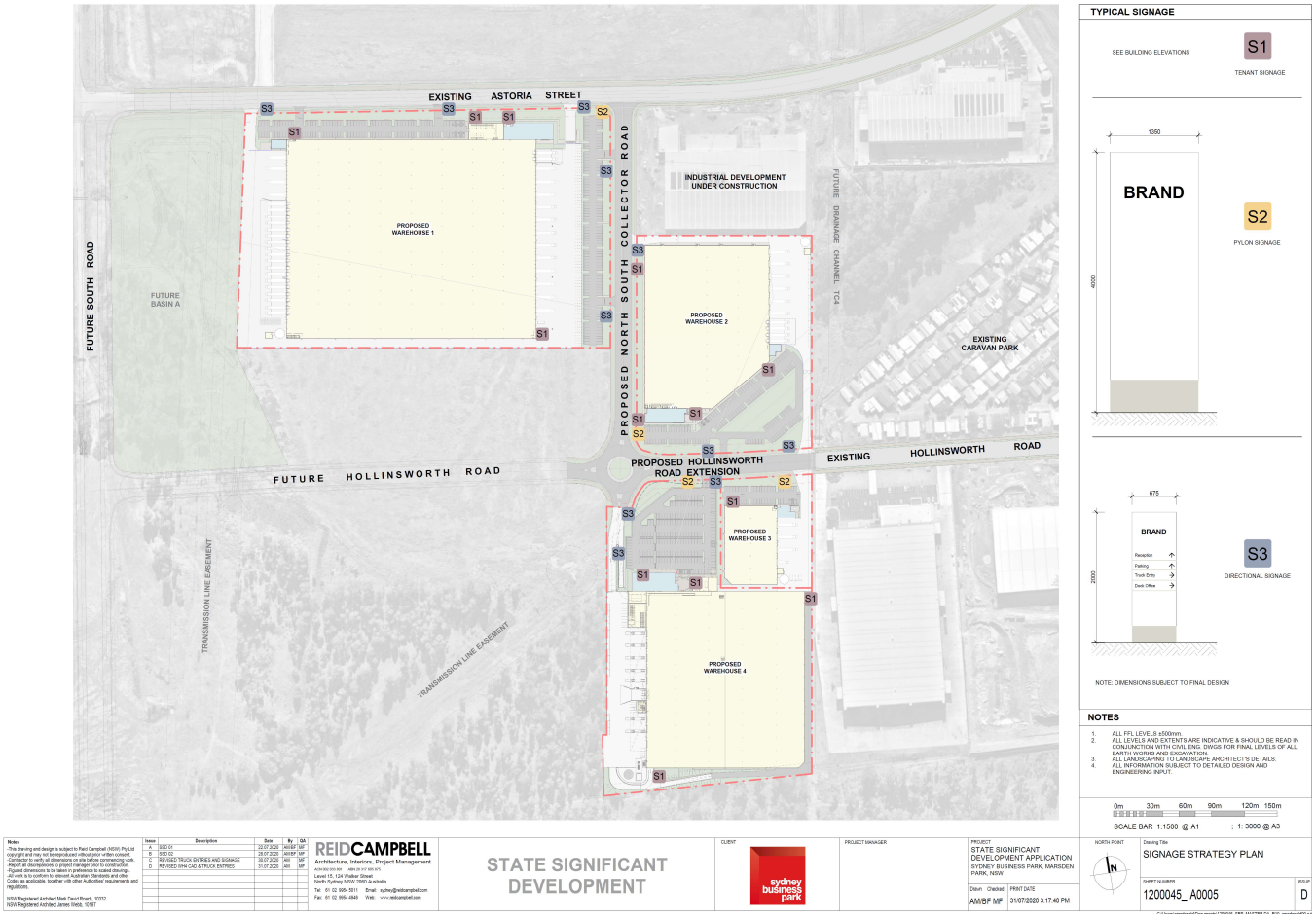


Figure 3.11: *Signage Strategy Plan (Source: Reid Campbell)*

3.13 Staging

Sydney Business Park seeks flexibility in the staging of the proposal, to enable it to respond to the needs of individual end users. Accordingly, it is proposed to development the individual facilities across the site in line with market demand for the individual facilities.

However, the indicative staging for the development is shown on **Figure 3.12**, and would include:

- Stage 1 – Hollinsworth Road and north-south collector road, and associated intersections;
- Stage 2 – Warehouse 4 (API Facility);
- Stage 3 – Warehouse 1 (TJX Facility);
- Stage 4 – Warehouse 2 Facility; and
- Stage 5 – Warehouse 3 Facility.

It is noted that these stages may be undertaken concurrently.

Staging would also be constrained by the construction of site infrastructure by Sydney Business Park and others. In this regard, Sydney Business Park has committed to:

- not commencing construction works on site until the temporary sediment basin in the Basin A area has been commissioned;
- not commencing operations of any building on site until all infrastructure necessary for the operation of that building has been commissioned, including:
    - external roadworks (including Hollinsworth Road and/or the north-south collector road);
    - stormwater drainage infrastructure, either via:

- Basin E for Warehouse 3; or
- Basin A for Warehouses 1, 2 and 4; and

○ other services, including water, sewer, electricity and telecommunications.

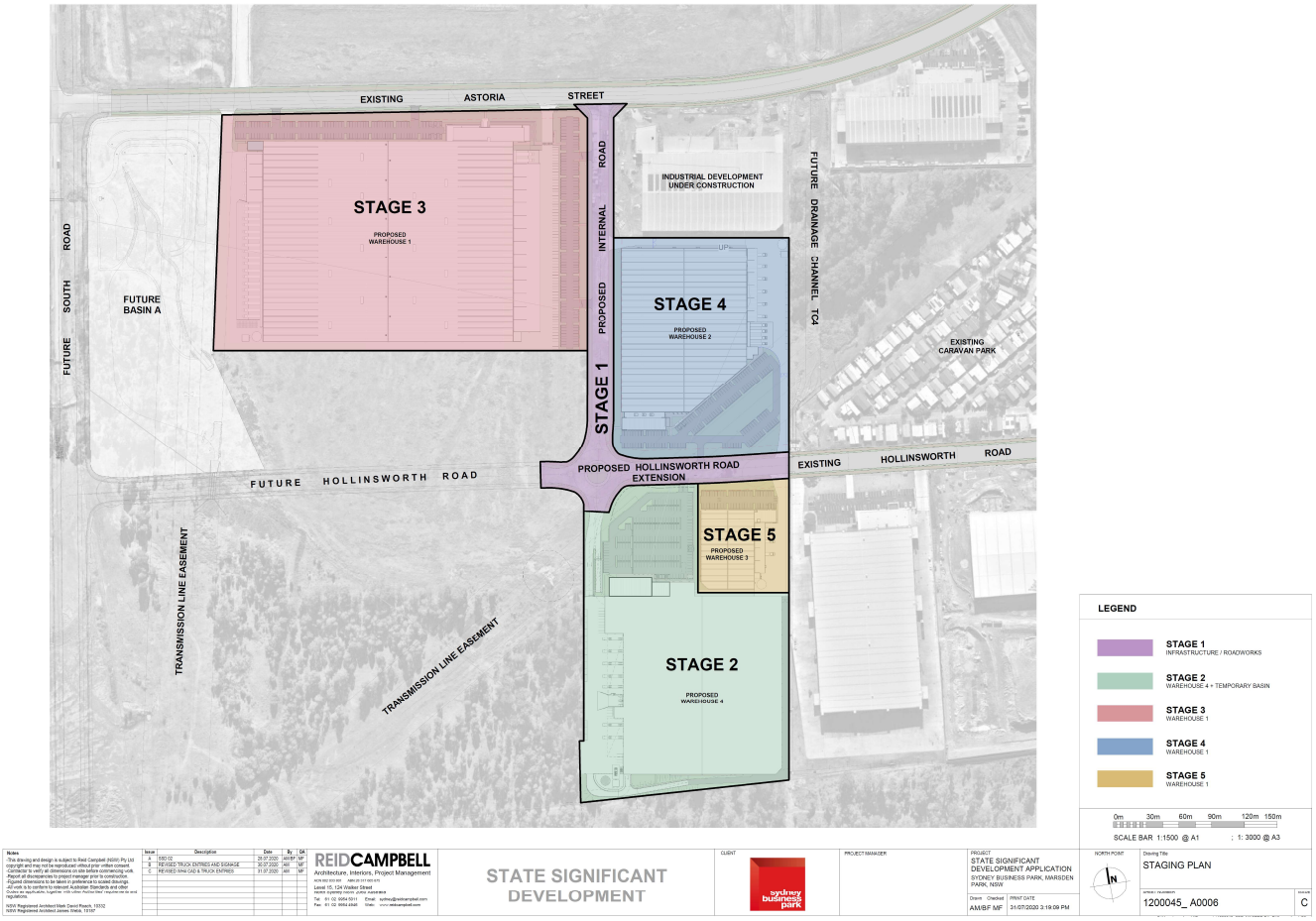


Figure 3.12: *Indicative Staging Plan (Source: Reid Campbell)*

4 PLANNING CONTEXT

4.1 Strategic Context

4.1.1 Greater Sydney Region Plan

The *Greater Sydney Region Plan – A Metropolis of Three Cities*, released in March 2018, is the NSW Government's long term planning blueprint for the Sydney Metropolitan Area. The plan sets a 40-year vision (to 2056) and establishes a 20-year plan to manage growth and change for Greater Sydney in the context of social, economic and environmental matters.

The plan integrates land use, transport and infrastructure planning between the three tiers of government and across State agencies. In this regard, the Plan has been prepared concurrently with *Future Transport 2056* and *State Infrastructure Strategy 2018–2038* to align land use, transport and infrastructure outcomes for Greater Sydney.

The plan's vision is to transform Greater Sydney into a metropolis of three cities, including the:

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

The site is located within the Western Parkland City, and is identified as part of a land release area within the North West Growth Area under the plan's conceptual structure plan (see **Figure 4.1**).

The plan seeks to 'retain and manage' industrial land in the North West Growth Area, stating that:

> *"All existing industrial and urban services land should be safeguarded from competing pressures, especially residential and mixed-use zones. This approach retains this land for economic activities required for Greater Sydney's operation…"*

Marsden Park is identified as one of seven 'strategic centres' under the plan. Strategic centres are expected to accommodate high levels of private sector investment, enabling them to grow and evolve. The plan states that the centres will become increasingly important parts of the region's structure.

The proposed Stage 3 Facilities are consistent with, and indeed promote, the directions and objectives of the *Greater Sydney Region Plan*, particularly in relation to providing jobs and skills for the city, and investment and business activity in the strategic centres.

As shown on **Figure 4.1**, the plan identifies a potential train link in the vicinity of (or traversing through) the site. This potential link is part of the North South Rail Link, which will connect the Western Sydney Airport and the Badgerys Creek Aerotropolis (as well as the Sydney Science Park) to St Marys. The link will also potentially extend to Marsden Park and Rouse Hill in the north, and to Oran Park, Narellan and Campbelltown-Macarthur in the south.

Whilst the alignment of the rail link in the vicinity of the site is yet to be confirmed (and no corridor established), the alignment under the plan appears to follow the TransGrid easement in the vicinity of the site. Through discussions with Transport for NSW (TfNSW), Sydney Business Park understands that the rail link would be elevated, and that one of the potential alignment options for the elevated rail link it may also follow the western side of the proposed north-south collector road within the site. To accommodate this potential rail link option, Sydney Business Park has designed the development to avoid buildings in this area of the site, with a 60 metre wide building setback

provided on the western side of the proposed north-south collector road. Sydney Business Park understands that the elevated rail link would not preclude the development of parking areas or driveways beneath the rail line.

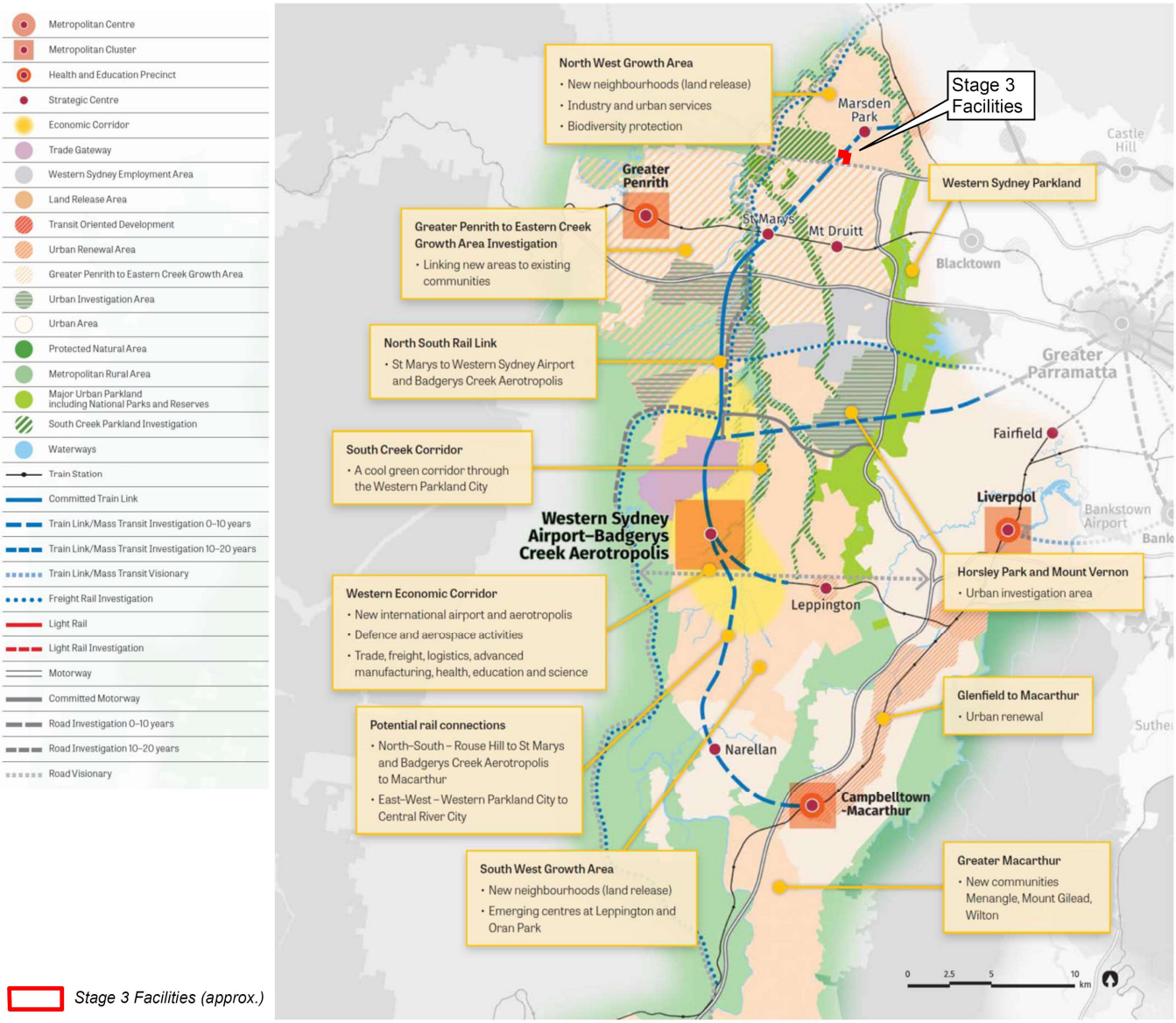


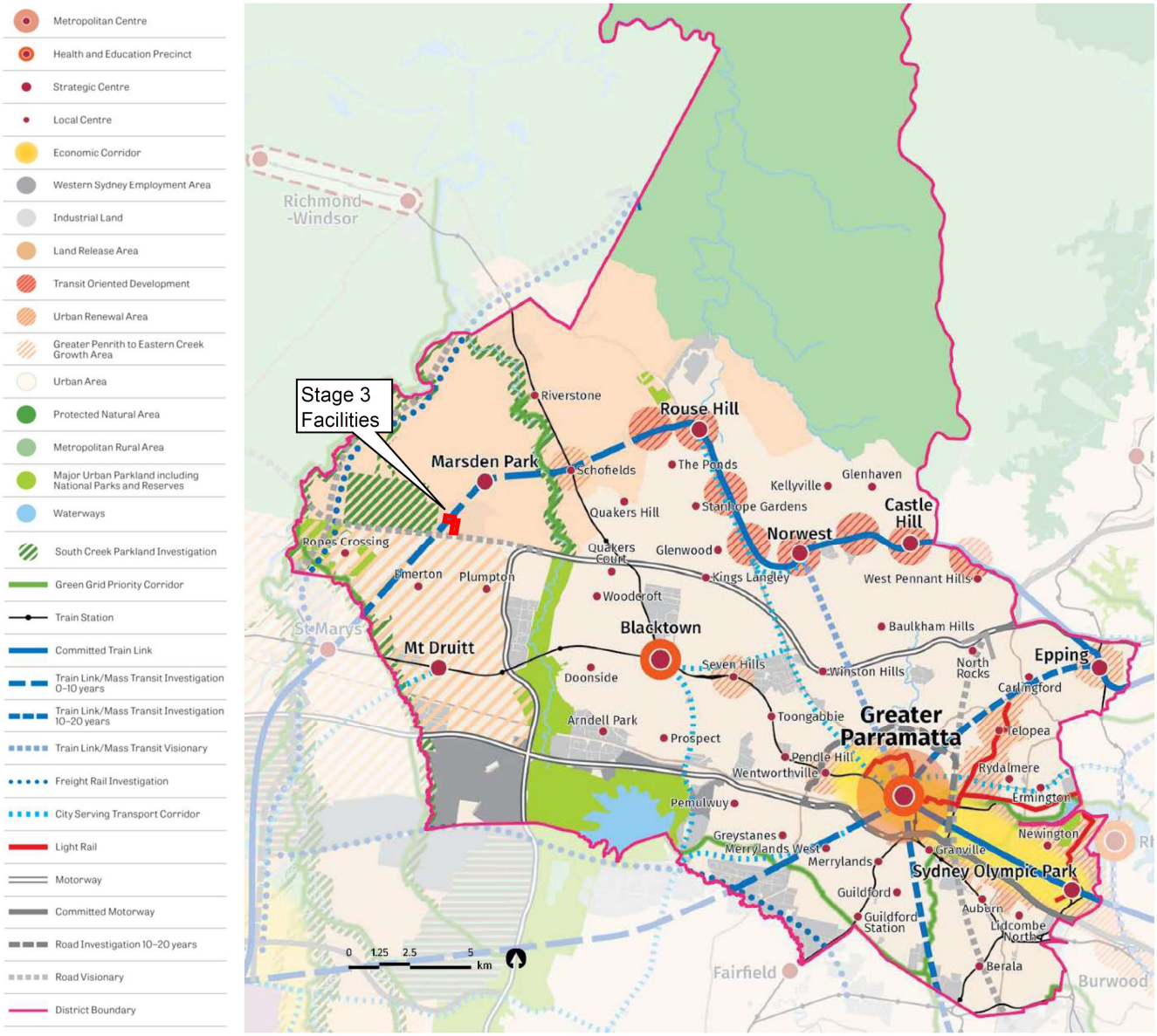
Figure 4.1: *Western Parkland City Vision (Source: Greater Sydney Region Plan)*

4.1.2 Central City District Plan

The *Central City District Plan*, also released in March 2018, is a guide for implementing the *Greater Sydney Region Plan* at the district level, and forms a bridge between regional and local planning.

The Structure Plan for the district builds on the conceptual plan in the regional plan, and is shown on **Figure 4.2**. As with the regional plan, the site is identified as part of a land release area within the North West Growth Area under the Structure Plan.

The plan notes that Marsden Park is an emerging strategic centre and the largest employment zone in the North West Growth Area, and has experienced rapid transformation in recent years. The plan states that: *"Planning and investment must enable this momentum to continue"*.



Stage 3 Facilities (approx.)

Figure 4.2: *Central City District Structure Plan (Source: Western City District Plan)*

The plan includes a specific action to facilitate this goal, as reproduced below:

> *"Action 43. Strengthen Marsden Park through approaches that:*
> *a. facilitate a variety of activities that meet the needs of the residents of the western part of the North West Growth Area*
> *b. establish the potential station location to ensure transport access supports the development of the town centre*
> *c. work with NSW Government to identify a corridor west of Marsden Park town centre to extend the public transport network to Western Sydney Airport*
> *d. integrate the Marsden Park Industrial Precinct with the town centre, including walking and cycling connections."*

The proposed development is considered to be consistent with these actions, through providing significant employment opportunities, designing the project to facilitate potential corridors for the future North South Rail Link, and providing road, pedestrian and cycling facilities in accordance with

the applicable development control plans for the Marsden Park Industrial Precinct (see Section 4.4 below).

4.1.3 Other Strategic Plans

A number of other strategic plans are of some relevance to the development, including:

- *North West Priority Growth Area Land Use and Infrastructure Implementation Plan (LUIIP)* – This plan sets out a number of key actions to support the delivery of new homes and jobs in the North West Priority Growth Area. These actions include:
  - providing more land supply for new homes;
  - protecting and planning for major transport corridors;
  - managing residential densities to align with infrastructure;
  - protecting assets and plan for evacuation;
  - transferring more planning controls back to local councils;
  - simplifying planning controls within the Blacktown precincts in the North West Priority Growth Area;
  - reviewing infrastructure requirements and accelerating funding for capital works; and
  - improving pedestrian, cycle and green connectivity;
- *NSW State Priorities* – These 14 priorities represent the NSW Government's commitment to enhancing the quality of life of the people of NSW, and include improving education and opportunities for young people, reducing domestic violence and homelessness, improving health care, greening the city, and improving public service;
- *State Infrastructure Strategy 2018-2038* – This long term infrastructure strategy identifies policies and strategies needed to provide the infrastructure to meet the needs of NSW's growing population and economy. As outlined in Section 4.1.1 above, the strategy was prepared concurrently with the *Greater Sydney Region Plan*, and identifies similar infrastructure needs. Of relevance to the proposed development, this includes the potential North South Rail Link between Marsden Park and St Marys. For the Western Parkland City, the strategy seeks to facilitate development of 'a new city built on new knowledge industries', based on strategic directions including:
  - prioritising intercity road connections;
  - providing a freight network to support a growing city;
  - providing health, education and social infrastructure to support population growth;
  - facilitating high quality digital connectivity infrastructure; and
  - protecting and enhancing the South Creek catchment;
- *Future Transport Strategy 2056* – This strategy, also prepared in concert with the strategic plans including the *Greater Sydney Region Plan*, sets the 40 year vision, directions and outcomes framework for transport in NSW. The strategy will be delivered through a series of supporting plans, including *Greater Sydney Services and Infrastructure Plan* which sets outcomes for movement of people and freight, and a number of supporting plans which provide detailed issues-based or place-based planning documents to implement the strategy. These supporting plans include:
  - *Connected and Automated Vehicles Plan;*
  - *Electric and Hybrid Vehicle Plan;*
  - *NSW Freight and Ports Plan 2018-2023;*
  - *Road Safety Plan (Towards Zero);*
  - *Maritime Safety Plan;*
  - *Disability Inclusion Plan;*
  - *Tourism and Transport Plan; and*
  - *Older Persons Transport and Mobility Plan 2018-2022.*

The Sydney Business Park Stage 3 Facilities have been prepared in a manner that is broadly consistent with the aims, objectives and provisions of these strategic plans, including:

- generating considerable capital investment ($157 million) and job creation (some 610 operational jobs) in Western Sydney, thereby facilitating the NSW Government's goal of generating more jobs and investment closer to home;
- providing world-class, integrated warehouse and distribution facilities in Western Sydney that provide key assets for some of Australia's and the world largest companies;
- providing modern warehouse and distribution centres with efficient and direct access to Sydney's arterial road network, which would facilitate the efficient movement of freight;
- providing key infrastructure identified in the LUIIP, including the extension of Hollinsworth Road and the north-south collector road;
- providing for the potential development of the North South Rail Link through the site (see Section 4.1.1); and
- providing infrastructure and facilities to encourage the use of public transport, walking, cycling and healthy living.

4.2 Statutory Context

4.2.1 Permissibility

The site forms part of the Marsden Park Industrial Precinct located within the North West Growth Centre, with land use planning regulated predominately under the Marsden Park Industrial Precinct Plan (the Precinct Plan) in Appendix 5 of the *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* (the Growth Centres SEPP).

The site is zoned IN1 General Industrial, IN2 Light Industrial, and SP2 Infrastructure (Local Roads) under the SEPP's Precinct Plan (see **Figure 4.3**).

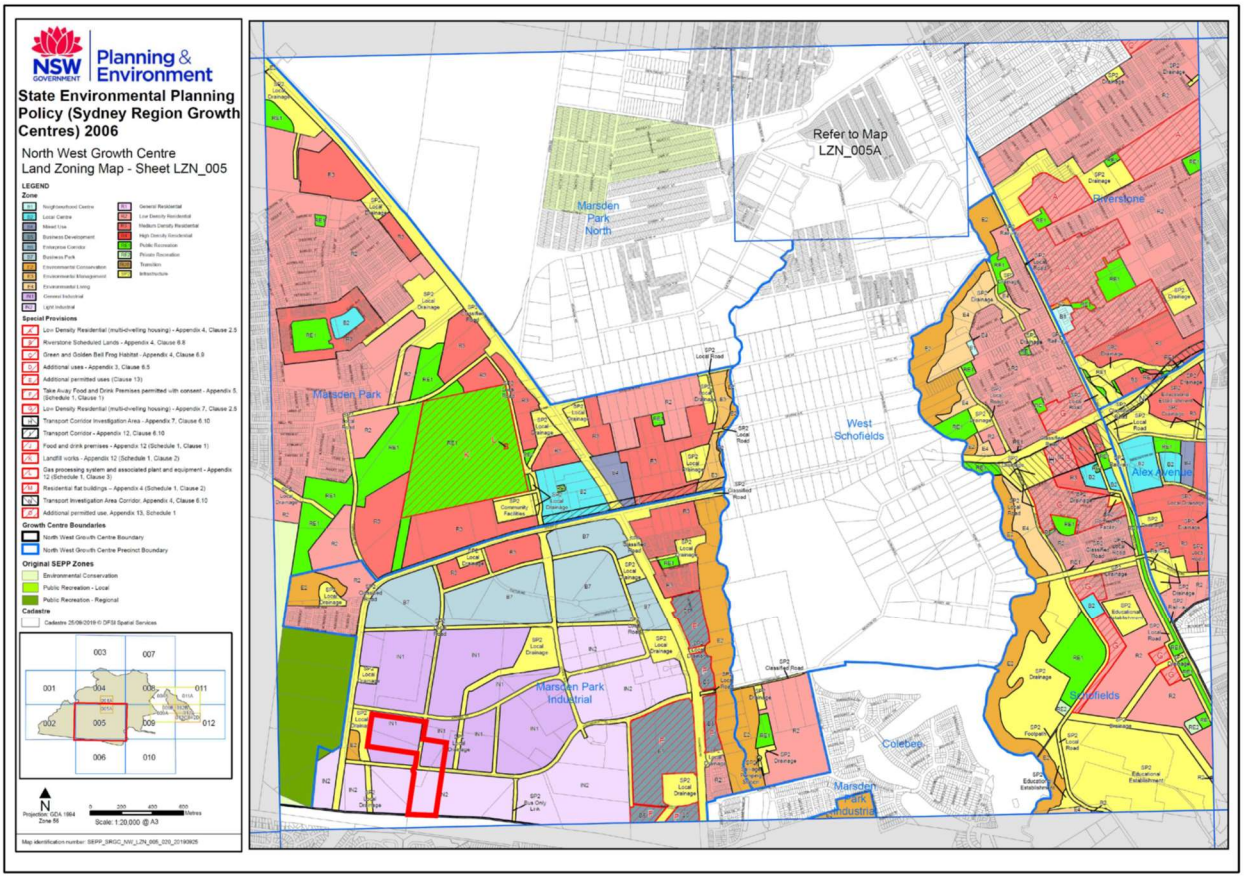


Figure 4.3: *Zoning Plan (Source: Growth Centres SEPP)*

The proposed Stage 3 Facilities represent development for the purpose of warehousing and distribution centres, and the proposed roadworks represent development for the purpose of roads.

The Precinct Plan provides that development for these purposes is permissible with consent in the IN1 and IN2 zones, and roads and drainage works are permissible with consent in the SP2 zone.

The office components of the development are considered to be ancillary and subservient to the dominant warehousing purposes, and are therefore permissible as part of the development.

The wider subdivision of Lots 4, 5 and 36 does not preclude these areas from being developed in the future (subject to separate approval) for purposes consistent with the land use zones.

As outlined in Section 3.8, Sydney Business Park is also planning to undertake some drainage works in the Basin A area to the west of the site, which is zoned SP2 Infrastructure (Local Drainage). Whilst most of these works would be undertaken under separate approval (ie. Council's existing Part 5 approval), it is noted that earthworks and local drainage works are permissible with consent in the SP2 zone.

4.2.2 State Significant Development

The proposal is classified as State Significant Development under Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), as it involves development with a capital investment value of more than $50 million for the purposes of warehousing and distribution, and therefore triggers the criteria in Clause 12 of Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011*.

Consequently, the Minister for Planning and Public Spaces[10] is the consent authority for the proposed development.

4.2.3 Integrated and Other Approvals

Under Section 4.41 of the EP&A Act, a number of other approvals have been integrated into the State Significant Development approval process, and consequently are not required to be separately obtained for the proposal. Applicable approvals that would otherwise apply for the proposed development include an:

- Aboriginal heritage impact permit under the *National Parks and Wildlife Act 1974*;
- bush fire safety authority under the *Rural Fires Act 1997*; and
- activity approval under the *Water Management Act 2000*.

Under Section 4.42 of the EP&A Act, a number of further approvals are still required to be obtained, but must be substantially consistent with any development consent for the proposal. Applicable approvals for the proposed development include approvals for roads and intersection construction under the *Roads Act 1993*.

Sydney Business Park has consulted with the relevant public authorities responsible for granting these integrated and other approvals, and considered the relevant issues in the assessment of the proposed development (see Sections 5 and 6).

4.2.4 Objects of the Act

Development under the EP&A Act is required to have regard to the objects set out in Section 1.3 of the Act. The proposal is considered to be consistent with the objects of the Act, the most relevant of which are reproduced below:

[10] Or the Independent Planning Commission if the proposal subsequently meets certain thresholds.

(a) *to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources* – the proposal is located within an existing industrial estate and is not expected to adversely affect the State's natural and other resources;

(b) *to facilitate ecologically sustainable development (ESD) by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment* – the proposal is consistent with the principles of ESD, including:
- *the precautionary principle* – the proposed development is not predicted to pose any threat of serious or irreversible environmental damage;
- *inter-generational equity* – the proposed development is not predicted to adversely affect the health, diversity and productivity of the environment for the benefit of future generations;
- *conservation of biological diversity and ecological integrity* – the proposed development is not predicted to have any significant adverse impacts on biodiversity; and
- *improved valuation, pricing and incentive mechanisms* – the project is consistent with this principle.

(c) *to promote the orderly and economic use and development of land* – the proposal facilitates the generation of significant economic activity and jobs in an existing industrial estate, and in an environmentally acceptable and orderly manner;

(e) *to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats* – the proposal is not expected to result in any significant adverse environmental or biodiversity impacts;

(f) *to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage)* – the proposal is not expected to result in any significant adverse heritage impacts;

(g) *to promote good design and amenity of the built environment* – the proposed facilities have been designed to a high standard with quality architecture, materials and landscaping; and

(h) *to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants* – the proposed facilities have been designed in accordance with the requirements of the BCA and in a manner that provides for safe and efficient access and circulation.

4.3 Environmental Planning Instruments

The following environmental planning instruments are relevant to and have been considered during the preparation of the EIS:
- *State Environmental Planning Policy (SEPP) No.19 – Bushland in Urban Areas;*
- *SEPP No.33 – Hazardous and Offensive Development;*
- *SEPP No.55 – Remediation of Land;*
- *SEPP No.64 – Advertising and Signage;*
- *SEPP (Infrastructure) 2007;*
- *SEPP (State and Regional Development) 2011;*
- *SEPP (Vegetation in Non-Rural Areas) 2017;* and
- *SEPP (Sydney Region Growth Centres) 2006*.

Consideration of these instruments is provided below. Based on this assessment it is considered that the development is able to be conducted in a manner that is consistent with the aims, objectives and provisions of all of the applicable instruments.

SEPP No.19 – Bushland in Urban Areas

SEPP 19 aims to protect and preserve bushland in urban areas for its value to the community as part of the natural heritage, its aesthetic value, and its value as a recreational, educational and scientific resource.

Clause 9 of the SEPP applies to land which adjoins bushland zoned or reserved for public open space, and amongst other things requires a consent authority to consider the effect of that development on the bushland zoned or reserved for public open space, particularly by way of soil erosion and sedimentation and spread of weeds and exotic plants within the bushland.

The site does not adjoin land which contains bushland zoned or reserved for public open space, however there is such zoned bushland further to the west of the site in Shanes Park, beyond South Street (see **Figure 4.3**). Most of the stormwater from the site eventually drains through this land.

The proposal has been designed to ensure that stormwater runoff from the site does not impact this urban bushland. As outlined in Section 6.2, the proposal includes an Erosion and Sediment Control Plan, along with a detailed stormwater management strategy designed in accordance with Council's standards for stormwater quantity and quality.

The landscape plan for the proposal has been designed to comprise predominantly native species, including species associated with the critically endangered Cumberland Plain Woodland, and does not comprise any noxious weeds.

SEPP No.33 – Hazardous and Offensive Development
SEPP 33 provides definitions for hazardous and offensive industry to enable decisions on developments to be made on the basis of merit, rather than on industry type per se.

The API Facility (Warehouse 4) is proposed to be used for the storage and distribution of pharmaceutical products, including a range of dangerous goods. The other warehouses would be used for the storage and distribution of general consumer goods, although they do have the potential to store minor amounts of dangerous goods, including the TJX Facility (Warehouse 1) which would store some aerosols and flammable liquids (eg. hand sanitisers).

An analysis of the proposed dangerous goods storage for the facilities with regard to SEPP 33 and the Department's *Applying SEPP 33* guidelines is provided in Section 6.8. As outlined, the proposed dangerous goods storage for each facility would not exceed the screening thresholds in the guidelines.

Consequently, the facilities are not considered to constitute 'potentially hazardous industries' or 'potentially offensive industries', and the development is able to be conducted in a manner that is consistent with the aims, objectives and provisions of SEPP 33.

SEPP No.55 – Remediation of Land
SEPP 55 aims to provide for a statewide planning approach to the remediation of contaminated land, and in particular, to promote the remediation of contaminated land for the purpose of reducing risk of harm to human health or any other aspect of the environment.

Clause 7 of the SEPP requires a consent authority to consider whether the land to which a development application relates is contaminated, and if the land is contaminated, to be satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation), prior to granting consent.

The potential for site contamination on the subject land has been assessed, which found that the land is not significantly contaminated and is fit for the intended industrial use, subject to removal of a small amount of asbestos-containing material and surficial waste (see Section 6.2 for detail). As such, the development is able to be conducted in a manner that is consistent with the aims, objectives and provisions of SEPP 55.

SEPP No.64 – Advertising and Signage

SEPP 64 aims to ensure that any signage associated with a development, including any advertisement, that is visible form a public place is compatible with the desired amenity and visual character of an area, provides effective communications in suitable locations, and is of a high quality and finish.

The Stage 3 Facilities would involve business identification signs as defined in the policy. Clause 8 of the SEPP requires that a consent authority must not grant consent to an application to display signage unless it is satisfied that the signage:

- is consistent with the aims and objectives of the SEPP (as outlined above); and
- satisfies the assessment criteria in Schedule 1 of the SEPP.

A review of the proposed signage in relation to the assessment criteria in Schedule 1 of the SEPP is provided in the following table. Based on this review it is considered that the proposed signage is consistent with the aims, objectives and assessment criteria of SEPP 64.

Table 4.1: *Consideration of SEPP 64 Assessment Criteria*

Aspect	***Assessment Criteria and Consideration***
Character of the area	• *Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?* • *Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?* The proposed signage is considered to be compatible with the industrial/commercial nature of Sydney Business Park and the key visual catchment, as well as with signage on surrounding industrial buildings. The signage is of similar proportion as other business signs in the business park, which typically involve building identification and/or business identification façade signage. The signage would assist in place marking the facilities and activating the streetscape to Astoria Street, Hollinsworth Road and/or the north-south collector road, and enhancing the overall quality of the estate.
Special areas	• *Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?* The proposed signage would not detract from the amenity of any sensitive areas. As outlined above the site is located within Sydney Business Park and surrounded by industrial and infrastructure (drainage and local road) lots of the business park on all sides. The signage is not expected to detract from the amenity of the future precinct stormwater basin to the west of the site (Basin A), and would not be particularly visible or obtrusive when viewed from the Ingenia Lifestyle caravan park to the east of the site, given the setback and intervening landscaping/vegetation.
Views and vistas	• *Does the proposal obscure or compromise important views?* • *Does the proposal dominate the skyline and reduce the quality of vistas?* • *Does the proposal respect the viewing rights of other advertisers?* The site is located within Sydney Business Park and surrounded by industrial and infrastructure zoned lots on all sides. The signage would all be located below the maximum building height of the site and would not obscure or compromise any important views, or dominate the skyline. The signage would be located within the site boundaries, and would not affect the viewing rights of other land users or advertisers.

Aspect	*Assessment Criteria and Consideration*
Streetscape, setting or landscape	• *Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?* • *Does the proposal contribute to the visual interest of the streetscape, setting or landscape?* • *Does the proposal reduce clutter by rationalising and simplifying existing advertising?* • *Does the proposal screen unsightliness?* • *Does the proposal protrude above buildings, structures or tree canopies in the area or locality?* • *Does the proposal require ongoing vegetation management?* The scale, proportion and form of the signage has been designed to integrate with the scale of the facilities and their setting. The signage would provide for consistent themes for each facility to ensure that the signage contributes to, and integrates with, the architectural merit of each individual facility. The signage would not protrude above the prevailing height of buildings, structures and tree canopies in the area, and would not require ongoing vegetation management.
Site and building	• *Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?* • *Does the proposal respect important features of the site or building, or both?* • *Does the proposal show innovation and imagination in its relationship to the site or building, or both?* The signage is consistent with the scale and proportion of the individual sites and the proposed buildings. The signage dimensions have been designed to be compatible with the overall design of each facility, and provide a high quality, consistent theme for each individual facility.
Associated devices and logos	• *Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?* Ancillary signage features would be hidden and/or integrated into the signage design.
Illumination	• *Would illumination result in unacceptable glare?* • *Would illumination affect safety for pedestrians, vehicles or aircraft?* • *Would illumination detract from the amenity of any residence or other form of accommodation?* • *Can the intensity of the illumination be adjusted, if necessary?* • *Is the illumination subject to a curfew?* The proposed 24 hour, 7 day illumination of the signage is compatible with the approved 24/7 operations for industrial facilities within Sydney Business Park. The illumination is not expected to result in any adverse safety or amenity issues, given that the site is within Sydney Business Park, is surrounded by industrial or infrastructure zoned land, and is not in proximity to any residential-zoned receivers. All external lighting would be installed in accordance with *AS 4282(INT) - Control of Obtrusive Effects of Outdoor Lighting*.
Safety	• *Would the proposal reduce the safety for any public road?* • *Would the proposal reduce the safety for pedestrians or bicyclists?* • *Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?* The proposed signage is not expected to result in any safety issues on local roads within Sydney Business Park including Astoria Street, Hollinsworth Road and the north-south collector road, given the nature of the signage and its location.

SEPP (Infrastructure) 2007

SEPP (Infrastructure) 2007 aims to facilitate the effective delivery of infrastructure across the State.

Clause 45 of the SEPP applies to development in the vicinity of electricity easements and ensures that the relevant electricity service provider is given the opportunity to make representations on the development application before a consent authority makes a determination on the proposal.

Two 60 metre wide 330kV TransGrid high voltage electricity easements traverse through the site, with one easement in the western part of the site, and the other traversing through the eastern part of the site. Consequently, the application will need to be referred to TransGrid for comment.

The proposal has been designed to avoid any building works in these areas of the site, with the development in the easement restricted to car parking, hardstand and open space. Development within the central component of the easement (ie. that area beneath the powerlines) has been minimised as far as practicable, with this area restricted to access and landscaping only, in accordance with TransGrid's easement guidelines and contemporary developments in the estate.

Clause 104 of the SEPP applies to traffic generating development and ensures that the Roads and Maritime Services (RMS) is given the opportunity to make representations on certain traffic generating development (as listed in schedule 3 of the SEPP) before a consent authority makes a determination on the proposal.

The development meets the thresholds in schedule 3 of the SEPP (ie. warehouse facility over 8,000m^2, or parking for more than 200 cars), and is therefore considered to be traffic generating development for the purposes of the SEPP. Consequently, the application will need to be referred to RMS for comment.

A traffic assessment has been undertaken for the proposal, which indicates that the development is unlikely to result in any significant traffic impacts (see Section 6.7).

SEPP (State and Regional Development) 2011

SEPP (State and Regional Development) 2011 aims to identify developments of State or regional planning significance to which the approval and assessment process under the State significant provisions of the EP&A Act should apply.

As stated in Section 4.2.2 above, the development constitutes a class of development in Schedule 1 of the SEPP. Consequently, the Minister (or the Independent Planning Commission) is the consent authority for the development.

SEPP (Sydney Region Growth Centres) 2006

The Growth Centres SEPP is the dominant environmental planning instrument applying to the site. As outlined in Section 4.1 above, Appendix 5 of the SEPP contains the *Marsden Park Industrial Precinct Plan* (the Precinct Plan), which provides the key development controls applicable to the site.

Part 4 of the Precinct Plan provides a number of principal development standards for development in the Marsden Park Industrial Precinct, and Parts 5 and 6 provide a number of additional applicable provisions. An assessment of the development against the relevant standards and provisions is provided in the following table.

As indicated in the table, it is considered that the development is able to be carried out in a manner that is consistent with all of the applicable standards and provisions of the SEPP.

Table 4.2: *Marsden Park Industrial Precinct Plan Compliance*

Clause	*Issue*	*Key Controls Summary*	*Complies*	*Comments*
4.1	Minimum Subdivision Lot Size	Applicable minimum lot size is 2,000m^2	Yes	• The proposed lots are all more than 2,000m^2 (ie. min. 2,666m^2)
4.3	Height of Buildings	Applicable maximum building heights for the site are 18 metres (Warehouses 1 and 2) and 16 metres (Warehouses 3 and 4)	Yes	• The proposed maximum building heights (ie. max. 14.6m) are within the allowable maximum building height
4.4	Floor Space Ratio (FSR)	Applicable FSR for the site is 0.7:1	Yes	• The proposed facilities have FSRs ranging from 0.45:1 to 0.6:1
5.4	Miscellaneous Permissible Uses	Provides controls for certain permissible uses, including bed and breakfasts, home business, home industries, industrial retail outlets, farm stays, kiosks, neighbourhood shops, roadside stalls and secondary dwellings	Yes	• The proposed development does not include these uses
5.6	Architectural Roof Features	Provides controls for architectural roof features	Yes	• The proposed development does not involve architectural roof features above the maximum building height, and any rooftop plant would located so as to minimise obtrusiveness
6.1	Public Utility Infrastructure	Requires consent authority to be satisfied that required infrastructure is or will be available	Yes	• All required infrastructure is or will be available for the development
6.4	Development Controls – Native Vegetation Retention Areas and Riparian Protection Areas	Requires consent, and provides standards, for clearing of native vegetation in mapped native vegetation retention areas (NVRA) and riparian protection areas (RPA)	Yes	• There are no mapped NVRAs or RPAs on the site, with the closest area being a small triangle of NVRA approximately 200 metres to the west (see **Figures 6.7** and **6.11**).
6.5	Development Controls – Existing Native Vegetation Areas	Restricts clearing in mapped existing native vegetation areas (ENVA)	Yes	• There is no mapped ENVA on the site, with the closest area being approximately 50 metres to the west (see **Figure 6.11**).

4.4 Growth Centres Development Control Plan

The *Blacktown City Council Growth Centre Precincts Development Control Plan 2010* (the Growth Centres DCP) provides detailed guidance for development within the parts of the North West Growth Centre that are within the Blacktown LGA.

While DCPs do not strictly apply to State Significant Development[11], the Growth Centres DCP nevertheless provides guidance for development in Sydney Business Park. Provisions of the Growth Centres DCP of key relevance to the development include:

- Part 1, which provides a general introduction to the DCP;
- Part 2, which provides a number of development controls to achieve precinct-wide Precinct Planning Outcomes;
- Part 6, which provides detailed development controls relating to employment lands; and
- Schedule 3, which provides additional specific controls relating to the Marsden Park Industrial Precinct.

An assessment of the development against the applicable development controls in these parts is provided in the following table.

As indicated in the table, the proposed development complies with all of the development controls in the DCP, with minor non-compliances with landscaping area for the development, and car parking provision for two of the warehouses. These issues are addressed in Section 6.2 and Section 6.7.

Table 4.3: *Growth Centres DCP Compliance*

Clause	*Issue*	*Key Controls Summary*	*Complies (Yes or No)*	*Comments*
Part 2: Precinct Planning Outcomes				
2.2	Indicative Layout Plan	Requires development to be generally consistent with the Indicative Layout Plan (ILP), with any variations to be demonstrated to be consistent with the precinct planning vision.	Yes	• The proposed development has been designed in a manner that is generally consistent with the ILP (which is similar to the zoning plan for the precinct).
2.3.1	Flooding and Water Cycle Management	Requires residential development to be generally above the 1% AEP flood level, and provides controls for flood affected land.	Yes	• The site is not flood affected – see Section 6.2
		Provides stormwater quantity and quality controls.	Yes	• The development is consistent with the stormwater criteria in the DCP – see Section 6.2
2.3.2	Salinity and Soil Management	Requires salinity reports and salinity management plans for applications in areas of potential salinity and soil aggressivity risk	Yes	• The site has some potential for saline soils, and a salinity management plan has been prepared for the proposal – see Section 6.2
		Requires soil and water management plans to be prepared	Yes	• A Stormwater Management Plan (including Erosion and Sediment Control Plan) has been prepared for the proposal – see Section 6.2

[11] Clause 11 of *SEPP (State and Regional Development) 2011* provides that DCPs do not apply to State Significant Development.

Clause	*Issue*	*Key Controls Summary*	*Complies (Yes or No)*	*Comments*
2.3.3	Aboriginal and European Heritage	Requires archaeological and heritage assessments for applications on land identified as having potential archaeological and heritage value	Yes	• Archaeological and heritage assessments have been undertaken for the site and the wider estate, which have identified two Aboriginal heritage items of relatively low significance on the site – see Section 6.6
2.3.4	Native Vegetation and Ecology	Restricts clearing/development in riparian areas, other than for essential infrastructure	Yes	• The site is not within any riparian areas – see Section 6.2
		Restricts clearing of native vegetation, and requires development to avoid significant impact on the ecological values of the E2 Zone	Yes	• The proposal does not involve any clearing of mapped native vegetation areas under the Growth Centres SEPP, and the site is bio-certified, which provides offsets for the vegetation clearing required in the estate, including vegetation on the site – see Section 6.5
		Requires a landscape plan to be prepared	Yes	• A landscape plan has been prepared for the proposal – see Section 6.1
2.3.5	Bushfire Hazard Management	Requires Asset Protection Zones (APZs) and bushfire hazard management measures	Yes	• The Basin A area to the west of the site and the southern boundary of the site are identified in the DCP as requiring APZs. A specialist bushfire assessment has been undertaken for the proposal to determine appropriate APZs – see Section 6.8
2.3.6	Site Contamination	Requires site contamination assessments to be undertaken	Yes	• Phase 1 and Phase 2 site contamination assessments have been prepared for the estate, which indicate that the site is not significantly contaminated – see Section 6.2
2.3.7	Odour assessment and control	Notes that existing land uses have potential to generate odour	Yes	• The site is not expected to be adversely affected by odour-generating existing land uses in the area
Part 6: Employment Lands Subdivision and Development Controls				
6.2	Subdivision	Provides controls relating to subdivision in the employment lands.	Yes	• The proposed subdivision is consistent with the controls, with the proposed lots regular in shape, and affording good orientation to roads and solar access, with residue that allows subsequent development in a manner that is consistent with the ILP and DCP

Clause	*Issue*	*Key Controls Summary*	*Complies (Yes or No)*	*Comments*
6.3	Landscape Design	Provides landscape design controls, including provision of landscaping/shade trees in car parks (maximum 25 metre intervals, or every 9 spaces), and provision of communal areas (1% of site area in the IN1 zone and 3% of site area in the IN2 zone).	Yes	• Landscape plans have been prepared for the proposal, which are generally consistent with the development controls – see Section 6.1 • The facilities provide outdoor communal landscaped areas adjacent to office areas, with the area commensurate with the staffing levels for the facilities
6.4.1	Setbacks	Requires buildings and hardstand to be set back at least 7.5m from the front boundary, with the setback area fully landscaped	Yes	• The proposed facilities have minimum setbacks to Astoria Street, Hollinsworth Road and the north-south collector road of 7.5 metres. Minor carparking encroachments into the setback occur due to lot orientation in some areas, however where this occurs average setbacks of 7.5 metres have been provided
6.4.2	Building Design and Siting	Provides controls aimed at providing high quality architectural design and presentation to street frontages	Yes	• The proposed facilities have been designed to a high quality in a manner that is consistent with the development controls, paying particular attention to the facades fronting the streets – see Section 6.1
6.4.3	External Building Materials and Colours	Provides controls aimed at ensuring buildings provide a combination of high quality, durable, low maintenance and sustainable finishes and materials	Yes	• The proposed facilities have been designed with a range of high quality materials and in a manner that is consistent with the development controls – see Section 6.1
6.4.4	Entrance Treatment	Requires entries to be clearly visible and address the primary street frontage	Yes	• The proposed facilities have been designed with prominent entrances to the street frontages and main carparking areas – see Section 6.1
6.4.5	Ancillary Buildings, Storage and Service Areas	Requires that ancillary structures are integrated into the building design, setback and/or appropriately screened.	Yes	• The proposed facilities have been designed to ensure that ancillary structures are well setback from the street frontages and/or appropriately screened – see Section 6.1
6.5	Ecologically Sustainable Development	Provides controls aimed at maximising energy and water use efficiency, and management of waste and discharges	Yes	• The proposed development includes a number of energy and water efficiency measures – see Section 3.9

Clause	*Issue*	*Key Controls Summary*	*Complies (Yes or No)*	*Comments*
				• A waste management plan aimed at maximising waste resource efficiency has been prepared – see Section 6.8
6.6	Fencing, Signage and Lighting	Applicable controls include: • palisade fencing to be provided to front boundaries and side boundaries within the setback; • plastic-coated chainwire fencing can be provided to side fencing; • fencing to be setback 1m from the front property boundary • signage to relate to the business use and not occupy more than 10% of any facade	Yes	• Fencing for the proposal has been minimised, and designed in a manner that is consistent with the controls – see Section 3.10 • Signage and lighting would be installed in a consistent and architecturally integrated manner that is generally consistent with the controls – see Section 3.11
6.7	Access and Parking	Provides controls requiring vehicles to enter and exit sites in a forward direction, and provide safe and efficient on-site circulation	Yes	• The proposed internal circulation for each facility has been designed in a manner that is consistent with the relevant controls – see Section 6.7
6.8	Car Parking	Applicable car parking rates for industrial development include: • 1 space per 75 m^2 for GFA up to 7,500 m^2; • 1 space per 200 m^2 for GFA over 7,500 m^2; and • 1 space per 40 m^2 for ancillary office GFA. 2% of parking spaces should be provided for disabled parking. Bicycle parking facilities are to be provided.	Yes/No	• The proposal provides 779 car parking spaces, which is based on the required provision under the DCP, RMS' *Guide to Traffic Generating Development*, as well as the expected demand from the facilities • Under the DCP, a total of 756 parking spaces would be required in total, which is less than that proposed to be provided • Warehouses 1 and 4 comfortably comply with the required parking rate, however Warehouses 2 and 3 would provide marginally less spaces than required under the DCP • All of the warehouses would provide well in excess of the required parking spaces under the RMS' Guide – see Section 6.7 • The proposal has been designed generally in accordance with other applicable controls (inc. disabled and bicycle parking)

Clause	*Issue*	*Key Controls Summary*	*Complies (Yes or No)*	*Comments*
6.9	Waste Management	Requires waste management plans for development using best practice waste management principles	Yes	• A waste management plan has been prepared for the development, and waste management areas have been designed in accordance with the applicable controls – see Section 6.8
6.10	Safety and Surveillance	Requires development to meet 'Crime Prevention Through Environmental Design (CPTED)' principles	Yes	• The proposed facilities have been designed in accordance with CPTED principles – see Section 6.8
Schedule 3: Marsden Park Industrial Precinct				
2	Subdivision Planning and Design	Provides the planning vision for the precinct	Yes	• The proposed development is consistent with the precinct planning vision – see Section 6.9
2.3	Odour Management	Requires that consideration be provided for sensitive uses (such as dwellings) in the '2OU' odour buffer area of existing odour sources (poultry farms) in the locality	Yes	• The proposal does not constitute a sensitive use
2.4.1	Development of the Quarry Site	Provides controls for development within the 'quarry site'	Yes	• A small corner of the site is within the mapped 'quarry site', however it is not within the landfilling areas (see **Figure 4.4**) • The proposal is not expected to result in any impacts associated with contamination, stability, odour, gas, leachate and groundwater issues, given that the site does not form part of the landfilling area, and given the findings of the environmental assessment – see Section 6
3	Neighbourhood and Subdivision Design	Provides additional estate wide controls, including additional public transport and pedestrian cycle network controls	Yes	• The proposal has been designed in a manner that is consistent with the estate subdivision controls, including provision of the Hollinsworth Road extension and north-south collector road, and associated roadside pedestrian and cycling routes
4	Development in Residential Zones	Provides additional controls for residential development	Yes	• The proposal does not involve residential development

Clause	*Issue*	*Key Controls Summary*	*Complies (Yes or No)*	*Comments*
5	Employment Lands Subdivision and Development Controls	Provides additional controls relating to street types, development adjoining Richmond Road and South Street, development surrounding the existing caravan park, and ESD, including a requirement for 15% of the site area to be landscaped/pervious	Yes	• The proposed roads have been designed in a manner that is generally consistent with the DCP cross sections • The site does not adjoin the nominated roads • The site is located to the west of the caravan park, with the site and caravan park separated by a drainage easement. The closest warehouse to the caravan park (ie. Warehouse 2) is setback a minimum of 60 metres from the site boundary at the closest point. Consequently, the proposal complies with the minimum 20 metre buffer. An acoustic wall is proposed along the eastern boundary of the site in this area to minimise noise-related impacts on the caravan park - see Section 6.3 • The proposal has been designed in a manner that is generally consistent with the ESD controls, although landscaping represents approximately 10% of the total site (inc. roads)

4.5 Development Contributions

There are two separate development contributions that are applicable to the site, namely a Special Infrastructure Contribution (SIC) payable for regional infrastructure and a Section 7.11 (formerly Section 94) Contribution payable for local infrastructure. These contribution requirements are detailed below.

4.5.1 Special Infrastructure Contribution

The Special Infrastructure Contribution (SIC) is payable under the *Environmental Planning and Assessment (Special Infrastructure Contribution – Western Sydney Growth Areas) Determination 2011* (the Determination).

The SIC is designed to fund 50% of the roads, bus depots, open space, planning and delivery costs as well as land required for social infrastructure within the Growth Centres. The remaining 50% of these costs is to be funded by Government, as is the construction of social infrastructure – including emergency services and justice, education and health facilities.

The current contribution rate[12] under the SIC is $94,223 per hectare of net developable land for industrial land that is within a Western Sydney growth centre precinct subject to a precinct plan.

[12] As at 1 July 2019 (the rate is indexed annually on 1 July).

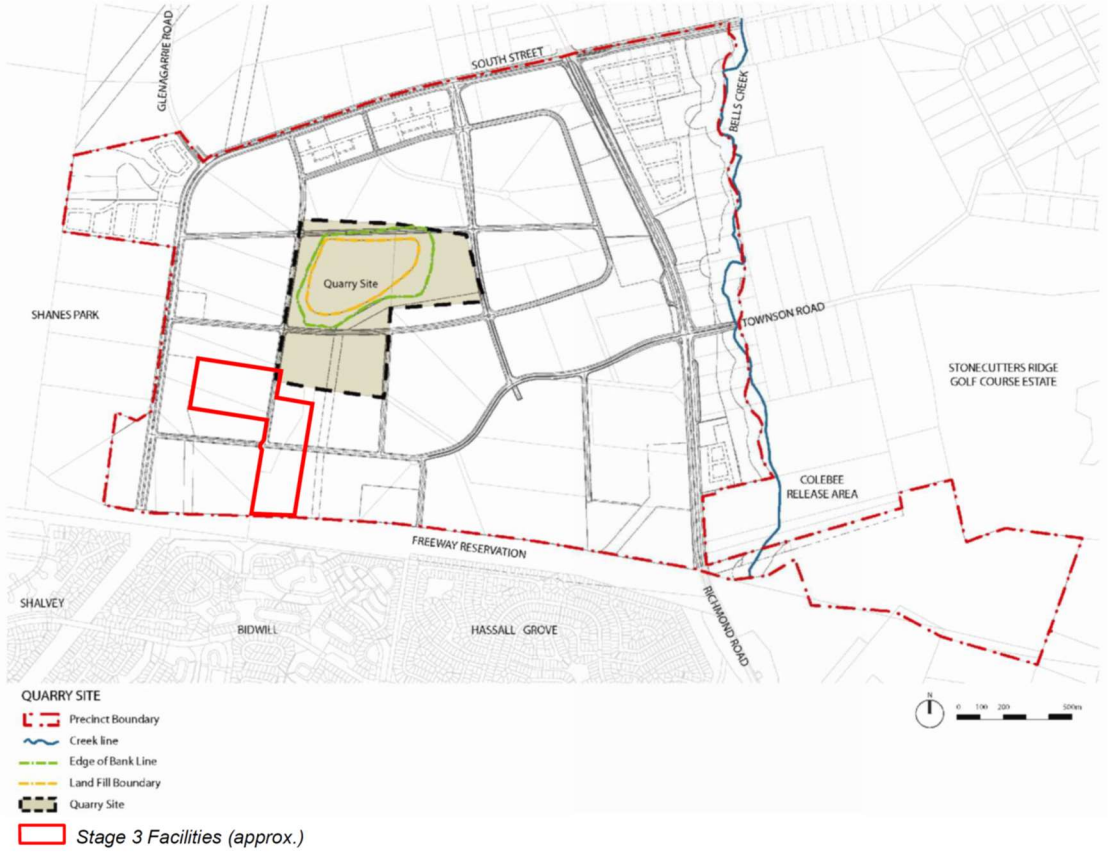


Figure 4.4: *Quarry Site (Source: Growth Centres DCP)*

4.5.2 Section 94 Contributions Plan No.21 – Marsden Park

Blacktown City Council's *Section 94 Contributions Plan No.21 – Marsden Park* requires contributions towards provision of local infrastructure and baseline facilities within the Marsden Park Industrial Precinct.

The applicable local infrastructure and contributions rates[13] for the proposal under the Section 94 plan include:

- Water Cycle Management Facilities (Little Creek Catchment) – $501,716/ha for stormwater quantity and $21,862/ha for stormwater quality (SWQ6); and
- Traffic & Transport Management Facilities – $155,423/ha.

The following relevant infrastructure within the site and surrounding area are works addressed in the contributions plan:

- Water Cycle Management Facilities:
  - Basin A and associated stormwater infrastructure, including a bioretention area within the basin;
- Traffic & Transport Management Facilities:
  - Hollinsworth Road extension;
  - Hollinsworth Road / north-south collector road intersection roundabout;
  - Astoria Street / north-south collector road intersection (roundabout); and
  - bus shelters within the industrial precinct as identified in the Growth Centres DCP (a bus stop is identified in the DCP near the Hollinsworth Road / north-south collector road intersection).

[13] As at June 2016. The contributions rates are subject to indexation

As outlined in Section 2.7, Council is currently undertaking detailed design for Basin A and associated stormwater infrastructure. Sydney Business Park will dedicate this land area to Council to enable the stormwater infrastructure to be developed, and may undertake partial construction of the basin on behalf of Council (under Council's Part 5 approval).

As outlined in Section 3.8, Sydney Business Park is proposing to construct the identified traffic and transport management facilities, although the Astoria Street / north-south collector road intersection is proposed as a priority give way intersection rather than a roundabout. Once constructed to the satisfaction of Council, these infrastructure items would also be dedicated to Council.

To address the land dedication and proposed works-in-kind, and the payment of any residual developer contributions, Sydney Business Park proposes to enter into a voluntary planning agreement (VPA) or works-in-kind agreement (WIKA) with Council, in accordance with Section 7.4 of the EP&A Act. Sydney Business Park and Council have entered into similar VPAs to address infrastructure provision in other areas of the industrial estate. The VPA or WIKA would be entered into prior to the commencement of construction of the relevant infrastructure.

5 CONSULTATION AND IDENTIFICATION OF KEY ISSUES

5.1 Stakeholder Identification

Development of Sydney Business Park has been subject to extensive consultation with government authorities, service providers, surrounding landowners and the wider community over a period of more than 10 years.

This consultation has occurred during the preparation of the original planning studies for the Marsden Park Industrial Precinct, during development applications for Sydney Business Park estate works, and during the numerous development applications for individual end-user facilities within the business park.

Planning for the proposed Stage 3 Facilities has involved additional consultation with relevant government authorities, infrastructure and service providers, and surrounding landowners. Stakeholder consultation mechanisms employed for the proposal included:

- pre-application meetings (via videoconference) with the Department of Planning, Industry & Environment (the Department) and Blacktown City Council (Council);
- telephone and/or email communications with authorities and service providers, including:
    - Council;
    - Environment Protection Authority (EPA);
    - Department's Environment, Energy and Science Group (EES);
    - Department's Water Branch (DPIE Water);
    - Natural Resources Access Regulator (NRAR);
    - Heritage NSW;
    - Transport for NSW (TfNSW) and Roads and Maritime Services (RMS);
    - Fire and Rescue NSW;
    - Rural Fire Service (RFS);
    - TransGrid;
    - Endeavour Energy; and
    - Sydney Water; and
- telephone and/or email communications with landowners immediately surrounding the site, including:
    - Ingenia Lifestyle Stoney Creek (owner of caravan park); and
    - LOGOS (owner of Marsden Park Logistics Estate).

The level of consultation undertaken for the proposed development is considered to be appropriate given the previous consultation undertaken during development of the estate, and given that the site and the wider estate are fully established for industrial development, and that the site does not contain any significant environmental features such as waterbodies, non-biocertified vegetation, or sites of high heritage significance.

It is noted that, in accordance with the requirements of the *Environmental Planning and Assessment Regulation 2000*, this EIS will be publicly exhibited for a period of at least 30 days by the Department following lodgment of the development application. During this time, any other interested stakeholders will have the opportunity to make a submission on the proposed development.

5.2 Secretary's Environmental Assessment Requirements

The Secretary of the Department issued Secretary's Environmental Assessment Requirements (SEARs) for the proposal on 24 July 2020. The SEARs were prepared in consultation with key applicable authorities, with written responses received from Council, EPA, EES, NRAR, Heritage

NSW, TfNSW/RMS, RFS, TransGrid and Sydney Water. The SEARs, including the authority responses, are attached as **Appendix A**.

The additional consultation undertaken by Sydney Business Park during preparation of the EIS did not result in any significant additional issues being raised above and beyond those identified in the SEARs. Surrounding landowners responded with positive feedback and did not raise any issues requiring further assessment. Written feedback received is attached in **Appendix A**.

5.3 Issue Identification

Based on the consultation undertaken, it is considered that the project team and the relevant stakeholders have gained a good appreciation of the key issues relevant to development of the site. Key issues raised by stakeholders consulted during recent and previous consultation are listed in the following table.

Table 5.1: *Stakeholder Consultation and Issues Raised*

Stakeholder	***Key Issues***
Government Authorities	
Department of Planning, Industry & Environment	• Strategic and statutory planning context • Consultation and stakeholder engagement • Design and visual • Traffic and transport • Soil and water, inc. flooding • Noise and vibration • Air quality • Hazards and risk, inc. bushfire risk • Heritage • Socio-economics • Waste management • Infrastructure, inc. interaction with the TransGrid easement • Ecologically sustainable development and suitability of the site
Blacktown City Council	• Statutory planning context • Design and visual, inc. landscaping, BCA compliance and lighting • Soil and water, inc. stormwater management and interactions with future Basin A • Noise and air quality • Biodiversity, inc. tree retention • Heritage • Traffic and transport, inc. road design • Hazards and risk, inc. bushfire risk • Waste management • Infrastructure, inc. interaction with the TransGrid easement • Developer contributions
Environment Protection Authority	• Licencing, inc. confirmation that an environment protection licence is not required • Air quality and odour • Noise
Environment, Energy and Science	• Biodiversity[2] • Soil and water, inc. flooding
DPIE Water and Natural Resources Access Regulator	• Soil and water, inc. water supply, surface water, groundwater, riparian areas and groundwater dependent ecosystems

Stakeholder	*Key Issues*
Heritage NSW	• Aboriginal heritage • Historical heritage, inc. confirmation that no State listed heritage items are in the vicinity
Transport for NSW / Roads & Maritime Services	• Traffic and transport, inc. traffic generation, road network impacts (inc. intersection performance), access and circulation, parking, public transport, pedestrian and cycle transport and construction traffic management • Soil and water, inc. drainage and flooding • Strategic and statutory planning context • Consultation
Rural Fire Service	• Bushfire hazard
Infrastructure and Service Providers	
TransGrid	• Electricity infrastructure, esp. the TransGrid easement
Endeavour Energy	• Electricity infrastructure, inc. confirmation that no Endeavour Energy easements are located within the site
Sydney Water	• Potable water, sewer and stormwater infrastructure • Soil and water, inc. integrated water cycle management
Surrounding landowners	
Ingenia Lifestyle Stoney Creek[1]	• Noise and vibration • Design and visual, inc. lighting • Traffic and transport
LOGOS[1]	• No specific issues raised

1 No specific written feedback received in relation to the proposed development to date
2 EES recommended that a biodiversity development assessment report is undertaken, however the site is bio-certified (see Section 6.5)

5.4 Key Issues

Environmental and socio-economic risks associated with the development of the site for employment purposes are considered to be relatively low, given that the site is located within an existing master-planned industrial estate, is zoned for industrial and infrastructure purposes, is largely surrounded by existing contemporary industrial facilities, is bio-certified, and has been subject to comprehensive environmental assessments over a number of years.

Based on the issues identified for assessment in the SEARs and/or consultation, and risk assessment of the project to date, it is considered that the key issues associated with the proposed Stage 3 Facilities include:

- design and visual amenity, including interaction with the TransGrid easement and surrounding receivers;
- consistency with strategic and statutory planning instruments;
- soil and water, including integrated water cycle management;
- traffic and transport; and
- noise.

These issues, along with other environmental issues of relevance to the project, are addressed in Section 6 below. Consistency with the relevant environmental planning instruments is addressed in Section 4.

6 ENVIRONMENTAL ISSUES

This section provides an assessment of the environmental impacts associated with the proposed Stage 3 Facilities. The environmental assessment is based on a number of specialist studies undertaken for the development, and benefits from a range of additional studies undertaken on behalf of Sydney Business Park and others for planning and development of the estate and the wider Marsden Park Industrial Precinct.

6.1 Design and Visual

Sydney Business Park's objective for the development is to develop four high-quality warehouse and distribution facilities that service the needs of TJX, API and other future end users in an efficient manner while contributing to the development of a world-class industrial estate.

To help realise this design intent, the project team engaged respected industrial architects Reid Campbell and SBA Architects, and landscape architects Site Image, to develop high quality architectural and landscape designs for the facilities.

In this regard, the architectural and landscape designs for the Stage 3 Facilities have been prepared in a manner that:

- respect and are consistent with the development standards for the Marsden Park Industrial Precinct in the Growth Centres SEPP, and generally consistent with the development controls in the Growth Centres DCP;
- maximise the realistic development potential of the individual facility sites, in accordance with current and foreseeable market demand;
- incorporate a range of building materials, architectural elements and colours to provide high quality and distinctive architectural themes for the individual facilities;
- are consistent with the design of contemporary warehouse facilities in Sydney Business Park;
- respect and highlight the natural attributes of the individual sites, particularly the street frontages and, where relevant, corner locations; and
- respect and address the site's key constraints, particularly the:
    - TransGrid easements that traverse through the site. In this regard, no building works are proposed within the easement, and no parking is proposed in the inner part of the easement (ie. that area directly below the powerlines);
    - potential North-South Rail Link 60 metre wide corridor on the western side of the proposed north-south collector road (see Section 4.1.1). In this regard, no building works are proposed in this area of the site, which would allow the potential elevated train link to be developed in this area of the site; and
    - Ingenia Lifestyle caravan park facility to the east of the site.

Architectural Design and Visual Amenity

As discussed in Section 2, the site is located well within Sydney Business Park and is surrounded by industrial and infrastructure (drainage and roads) zoned lots of the Marsden Park Industrial Precinct and wider area on all sides. There are few sensitive visual receivers in the vicinity of the site, with the closest residential-zoned land located in Bidwill approximately 120 metres to the south, beyond infrastructure (future motorway) zoned land. This corridor land is vegetated with semi-mature to mature native trees, and there are no significant views of the site from the Bidwill residences (see **Figure 6.1**).

There do remain some receivers within the rezoned portion of the industrial precinct, in particular the Ingenia Lifestyle caravan park facility located to the east of the central part of the site (ie adjacent Warehouse 2). The caravan park is separated from the site by a drainage easement for the precinct, which varies in width between 6.5 and 37 metres.

Sydney Business Park acknowledges that some residences in the caravan park are located relatively close to part of the eastern boundary of the site, and have direct views to the site (see **Figure 6.1**). Whilst these residences are on industrial-zoned land, and views would be similar to other facilities in the estate, Sydney Business Park has proposed measures to mitigate visual and amenity impacts on these residents. These measures include:

- setting back the Warehouse 2 and Warehouse 3 facilities as far as practicable from the caravan park (ie. more than 60 metres from each warehouse building); and
- installing a 2.4 metre high acoustic wall along the eastern boundary of the Warehouse 2 site.

These measures are similar to those implemented for the Bucher Municipal Facility (DA 18-02532) to the north of the caravan park site, and proposed to be implemented for the Cameron Interstate Facility (DA 20-00792) immediately to the east of the caravan park site. The measures are considered to provide an appropriate means of minimising visual and acoustic amenity impacts on the residents of the Ingenia Lifestyle facility. Ingenia has advised that it is supportive of the proposed acoustic wall (see **Appendix A**).

The site does have extended direct frontage to internal industrial estate roads, including Astoria Street, Hollinsworth Road and the north-south collector road. Whilst these roads will primarily cater for industrial and business-related traffic associated with the Marsden Park Industrial Precinct as the area is developed, the designers have been conscious of providing high quality frontages to these roads, including corner locations.

The architectural design for the facilities has paid particular attention to these key vistas. Measures to mitigate potential visual impacts, and ensure a high quality design, include:

- orienting the buildings, particularly the ancillary offices, to the key street frontages;
- siting the sprinkler tanks and main service facilities to the rear of the individual warehouse sites;
- building setbacks comply with the minimum requirements under the Growth Centres DCP (ie. 7.5 metres), with most buildings set back considerably more than the minimum;
- loading areas have been set back well into the individual sites;
- building heights (ie. ranging from 13.7 metres to 14.6 metres) are reasonable and comfortably comply within the maximum height in the Marsden Park Industrial Precinct Plan (ie. 18 metres for Warehouses 1 and 2, and 16 metres for Warehouses 3 and 4);
- floor space ratio for the facilities is relatively low (ie. ranging from 45% to 60%) and well within the maximum allowable FSR under the Growth Centres DCP (ie. 70%);
- building facades, including the offices and warehouses, have been designed to a high standard, providing good articulation and visual relief, particularly through the use of a mix of materials and colours, and extensive glazing to offices, to provide articulation and minimise the bulk and scale of the facilities;
- installation of the acoustic wall along the eastern boundary of the Warehouse 2 site, which would provide visual screening for the existing receivers within the Ingenia Lifestyle facility to the east of the site; and
- generous landscaping is to be provided to the street frontages and easement areas.

With the implementation of these measures, it is considered that the Stage 3 Facilities would not result in any significant adverse impacts on the visual amenity of the locality.

Landscape Design

The proposed landscape plans for the Stage 3 Facilities are attached as **Appendix C**. The plans aim to provide a high-quality landscape design for the facilities and associated streetscapes, in a manner that is consistent with the public domain and landscaping principles in the Growth Centres DCP, Sydney Business Park's landscaping guidelines, and existing landscaping in the developed parts of the estate.

Figure 6.1: *Views from Sensitive Receivers*

Key elements of the landscape plans include:

- use of predominantly locally endemic species of trees, large shrub screen planting, groundcover planting and native grasses, including Cumberland Plain Woodland species (including *Corymbia maculata*, *Poa labillardieri 'Eskdale'* and *Hardenbergia 'meema'*);
- provision of street trees along the proposed roads in a manner that is consistent with existing street trees in the estate, and in locations that do not affect estate services or traffic safety. Street tree species would include Spotted Gum (*Corymbia maculata*) and Brush Box (*Lophostemon conferta*);
- generous landscaping within the 7.5 metre setback to the road frontages for each individual warehouse facility;
- provision of a landscaped setback to the southern boundary of Warehouse 4;
- shade trees provided within and adjacent to the main car parking areas;
- carefully considered landscaping within the TransGrid easement, comprising low height trees and areas of open space so as not to constrain access within the easement;
- use of feature plantings and garden beds to mark building entries; and
- provision of generous outdoor and indoor/outdoor communal open space areas adjacent to ancillary office areas.

6.2 Soil and Water

6.2.1 Erosion and Sedimentation

A number of soil and water assessments have been undertaken for the Marsden Park Industrial Precinct, including salinity and contamination assessments by GHD (2011) for Sydney Business Park. The assessments indicate that the site is within the Blacktown (bt) and Berkshire Park (bp) soil landscape units, underlain by Bringelly Shale of the Wianamatta Group, which typically comprising shale, claystone, laminite and some coaly bands which weather to form clays of high plasticity.

This landscape is associated with dryland salinity and low permeability soils, which are moderately to highly reactive and dispersive. The units typically have a high capability for urban development, when conducted with appropriate salinity and geotechnical design measures.

The proposal involves land disturbance works, associated with bulk and detailed earthworks across the site, and construction of the individual facilities and infrastructure works. Erosion and sedimentation risks associated with the development are able to be effectively managed using standard best practice control measures, including:

- minimising disturbance areas as far as practicable;
- diverting 'clean' run-on water around disturbance areas;
- controlling 'dirty' run-off water from within the disturbance area via various controls such as sediment fencing and basins; and
- rehabilitating disturbed areas as quickly as possible following disturbance.

A detailed Erosion and Sediment Control Plan (ESCP) has been prepared for the Stage 3 Facilities by Orion, and is attached in **Appendix E**.

The ESCP has been prepared in accordance with the above principles and the Department's *Managing Urban Stormwater – Soils and Construction* (ie. the 'Blue Book').

Runoff from the majority of the site during construction would drain to the north-western corner of the site, and into the proposed Basin A site. As outlined in Section 2.7, Council has approved the construction of Basin A as part of a package of stormwater works for the Little Creek catchment, and is currently undertaking detailed design for the works.

Sydney Business Park is planning to enter into an agreement with Council to partially deliver the Basin A works (under Council's approval), which would enable Basin A to be used as a temporary sediment basin during construction of the Stage 3 Facilities project. Further details of this basin are provided in Section 6.2.8 below. Sydney Business Park would not commence construction of the proposed development until this temporary sediment basin is constructed.

6.2.2 Site Contamination

Site contamination assessments have been undertaken by GHD on behalf of Sydney Business Park for development of the estate. These assessments include:

- a Phase 1 assessment based on literature review, site history investigation, site inspection and risk analysis (November 2008); and
- a Phase 2 assessment including soil, groundwater and surface water sampling in the areas identified in the Phase 1 assessment as being potentially contaminated (May 2009).

The assessments found that the developable areas of the estate do not contain any extensive or widespread contamination that would inhibit development of the estate, although some contamination was reported in some areas, which require supplementary assessment and/or potential remediation prior to redevelopment.

Some areas of the site and its immediate surrounds were identified as forming part of the Marsden Park landfill and quarry (though the site is located outside the landfill cell areas), as well as an area known as 'The Paddock' which was a potential nightsoil disposal area (see **Figure 6.2**). The quarry and landfill area was characterised as having a 'likely' risk of contamination. The potential nightsoil disposal area was characterised as having a 'potential' risk of contamination.

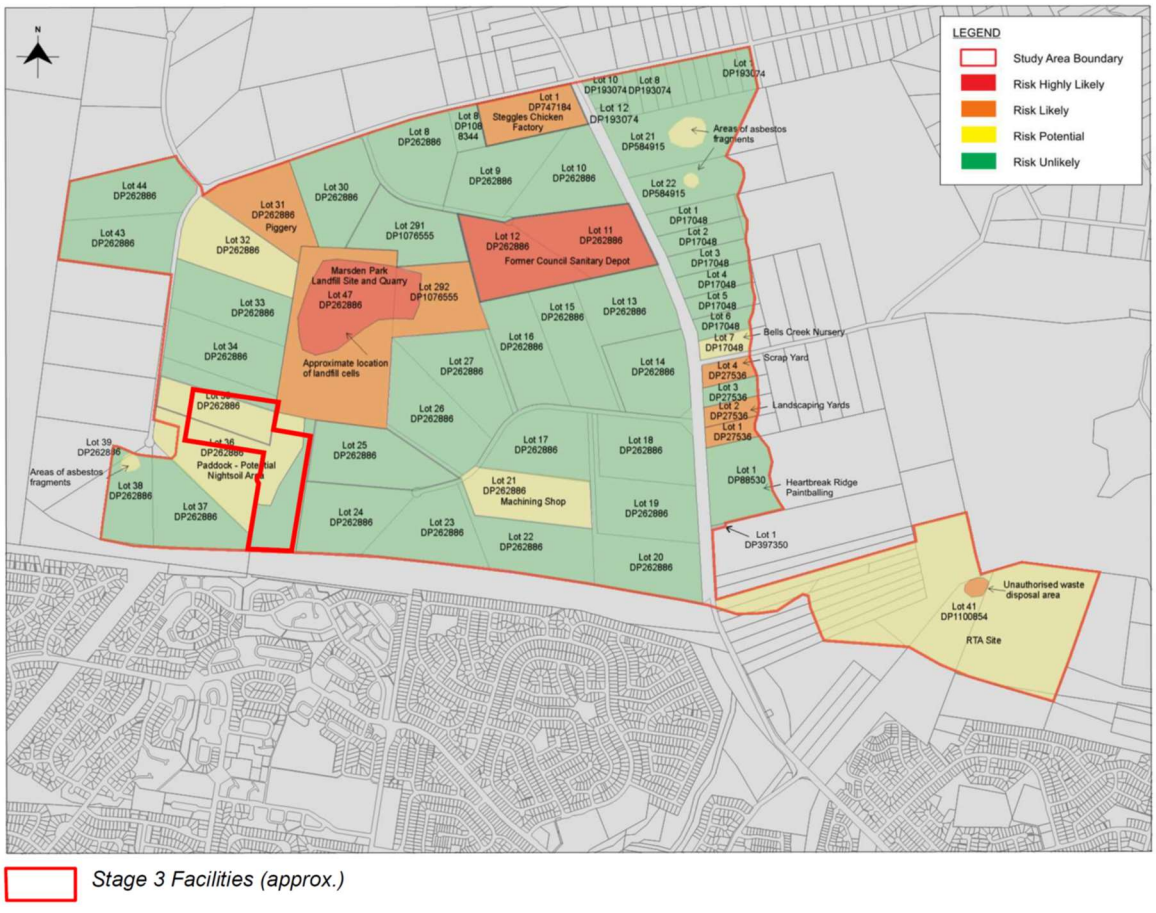


Figure 6.2: *Site Contamination Risk Ranking (Source: GHD, 2009)*

The assessments recommended that further investigation of these areas is undertaken to assess whether they are suitable for commercial/industrial land use and/or whether they require remediation.

A number of additional site contamination assessments have been undertaken in the Stage 3 area since this time, including:

- a Phase 2 assessment of the Stage 3.02 area, encompassing the northern part of the site, undertaken by Douglas Partners in 2017. The assessment included sampling from 38 test pits across the Stage 3.02 area (see **Figure 6.3**); and
- a targeted assessment of part of the Stage 3.02 area, also in the northern part of the site, undertaken by Douglas Partners in 2019. The assessment was undertaken to investigate a soil stockpile which had been spread across the northern part of the Stage 3 area (see 'Disturbed Area' on **Figure 6.4**), which was found to contain a small amount of sparsely-distributed bonded asbestos containing material (ACM, or asbestos cement).

These assessments have investigated the northern part of the Stage 3 site in detail, but did not include additional investigation of the southern part of the site. To address this, Douglas Partners has undertaken a supplementary assessment for the proposal covering the entirety of the Stage 3 area. That assessment is attached as **Appendix H**.

The assessment included:

- review of the previous assessments and available geological and hydrogeological information;
- desktop investigation to update the site history and identify areas of potential environmental concern in the Stage 3 area, based on review of aerial photography, contaminated sites registers and groundwater bore data;
- inspection of the site and the wider Stage 3 area (ie. in Lots 4, 5 and 36);
- excavation and sampling at 9 additional test pits in the southern area of the site[14]; and
- analysis for a range of potential contaminants, including heavy metals, total recoverable hydrocarbons, monocyclic aromatic hydrocarbons (BTEX), polycyclic aromatic hydrocarbons (PAHs), pesticides and polychlorinated biphenyls (PCBs) and asbestos.

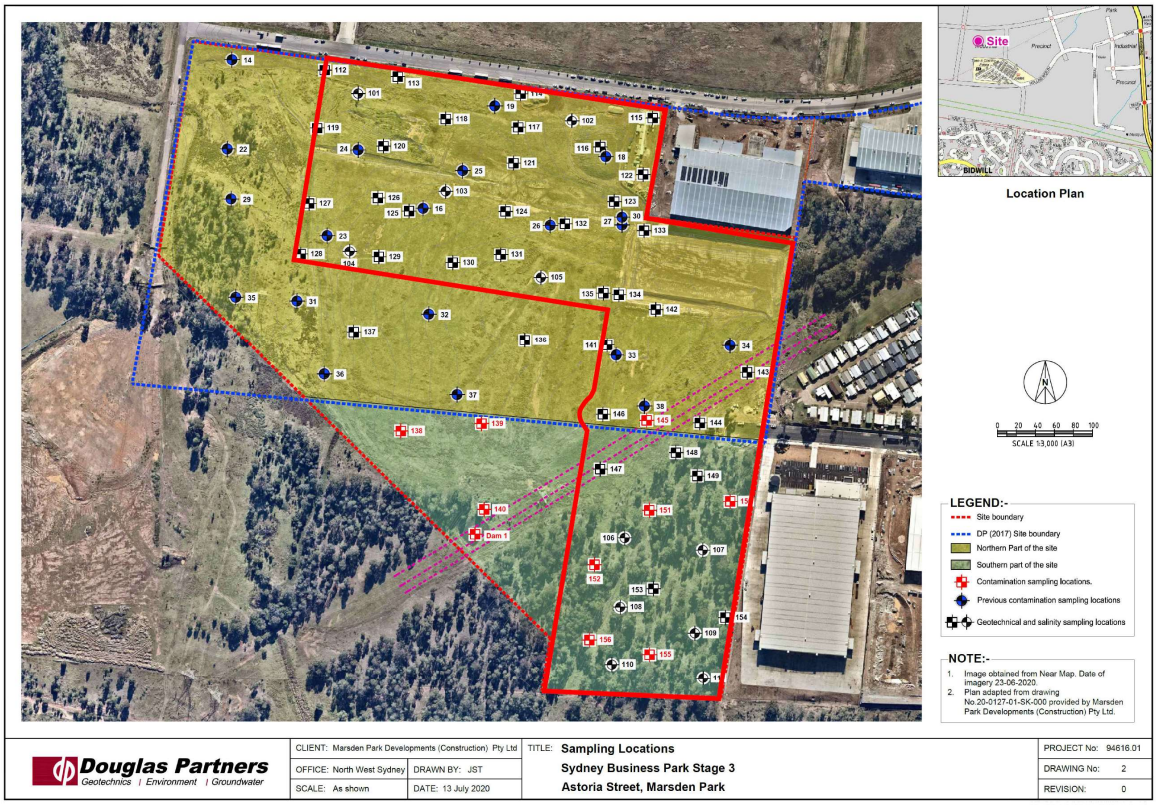
The assessment did not identify any significant contamination in the Stage 3 area, with no areas of potential concern identified in the southern area of the site. However, a number of small surficial non-hazardous waste stockpiles were identified in the southern area (see **Figure 6.4**), in addition to the previously identified asbestos-containing stockpile in the northern area.

The assessment concludes that the Stage 3 area is suitable for its intended commercial/industrial use, subject to the following:

- implementation of an Environmental Management Plan (EMP) to address the asbestos containing material identified in the 'Disturbed Area' in the northern part of the site, with the EMP including controls to:
  - manage any asbestos containing material identified during construction works; and
  - if necessary, cover asbestos impacted fill at the completion of construction, in accordance with NEPM 2013; and
- removal of the surficial waste and waste stockpiles from the southern part of the site.

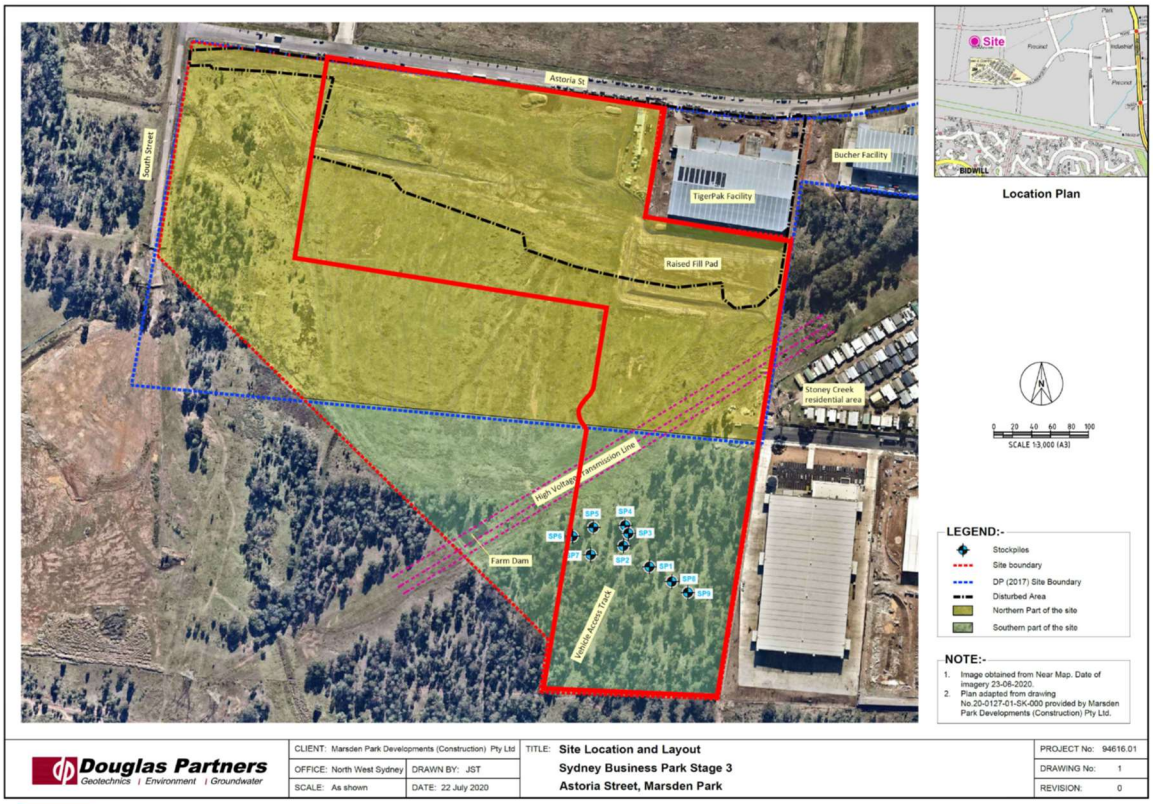
Sydney Busines Park would prepare the EMP and remove the surficial waste prior to the commencement of construction, and implement the EMP during the construction works for the development. The EMP would be prepared as part of a detailed Construction Environmental Management Plan (CEMP) for the proposal.

[14] As well as sediment sampling from the farm dam in the southern area of Lot 36 to the west of the site.



Stage 3 Facilities (approx.)

Figure 6.3: *Site Contamination Sampling Locations (Source: Douglas Partners)*



Stage 3 Facilities (approx.)

Figure 6.4: *Disturbed Area and Waste Stockpiles (Source: Douglas Partners)*

6.2.3 Salinity

A number of geotechnical and salinity assessments have been undertaken for the Marsden Park Industrial Precinct, including a Salinity Assessment of the Sydney Business Park estate by GHD in October 2011, and an additional investigation and management plan for the Stage 3.02 area by Douglas Partners in March 2017.

As with the site contamination assessment, the 2017 assessment did not include detailed assessment of the southern part of the site. To address this, Douglas Partners has prepared an updated salinity assessment and management plan for the entire Stage 3 area, which is attached as **Appendix I**.

The assessments were based on review of the *Salinity Potential in Western Sydney* mapping, soil sampling, groundwater review and site inspection.

The analysis found that the residual soils on the estate have some salinity, with low to moderate salinity in the higher areas (Salinity Domain 1, or SD1), and moderate to high salinity in lower areas (Salinity Domain 2, or SD2). Disturbed land was characterised as Salinity Domain 3, or SD3.

The site of the proposed Stage 3 Facilities is located within each of these salinity domains (see **Figure 6.5**). The additional soil testing undertaken by Douglas Partners found that soils within the Stage 3 area range from slightly saline to highly saline, with 8% of soils non-saline, 34% slightly saline, 56% moderately saline and 2% very saline. The higher salinity soils are located particularly in the western parts of the Stage 3 area, to the west of the site. (see **Figure 6.6**). Salinity did not appear to vary significantly with depth.

The assessments also found that the site soils are non-aggressive to moderately/mildly aggressive to steel and concrete, and include some sodic soils (indicating the potential for erosion if left exposed).

The assessments conclude that the proposed development is not expected to adversely impact the existing salinity conditions of the site, provided good salinity management practices are adhered to in the development. These practices include:

- capping of the upper surface of sodic soils with permeable material;
- placing excavated materials in fill areas with similar salinity characteristics, where practicable;
- providing good surface and sub-surface drainage;
- adopting water efficient and considered landscaping with appropriate soil depths;
- adopting durable and saline resistant building materials and building techniques in accordance with applicable Australian Standards including AS2159, AS3600 and AS 4058; and
- undertaking additional salinity assessment in any areas which are excavated deeper than 3 metres (that is, areas outside the basement area for Warehouse 4, which was investigated as part of the assessment).

The proposed development would be undertaken in accordance with these salinity management measures.

6.2.4 Acid Sulfate Soils

The site does not contain the potential for acid sulfate soils, given its elevation (ie. approx. 40-52m AHD). Acid sulfate soils are generally restricted to areas below 10m AHD.

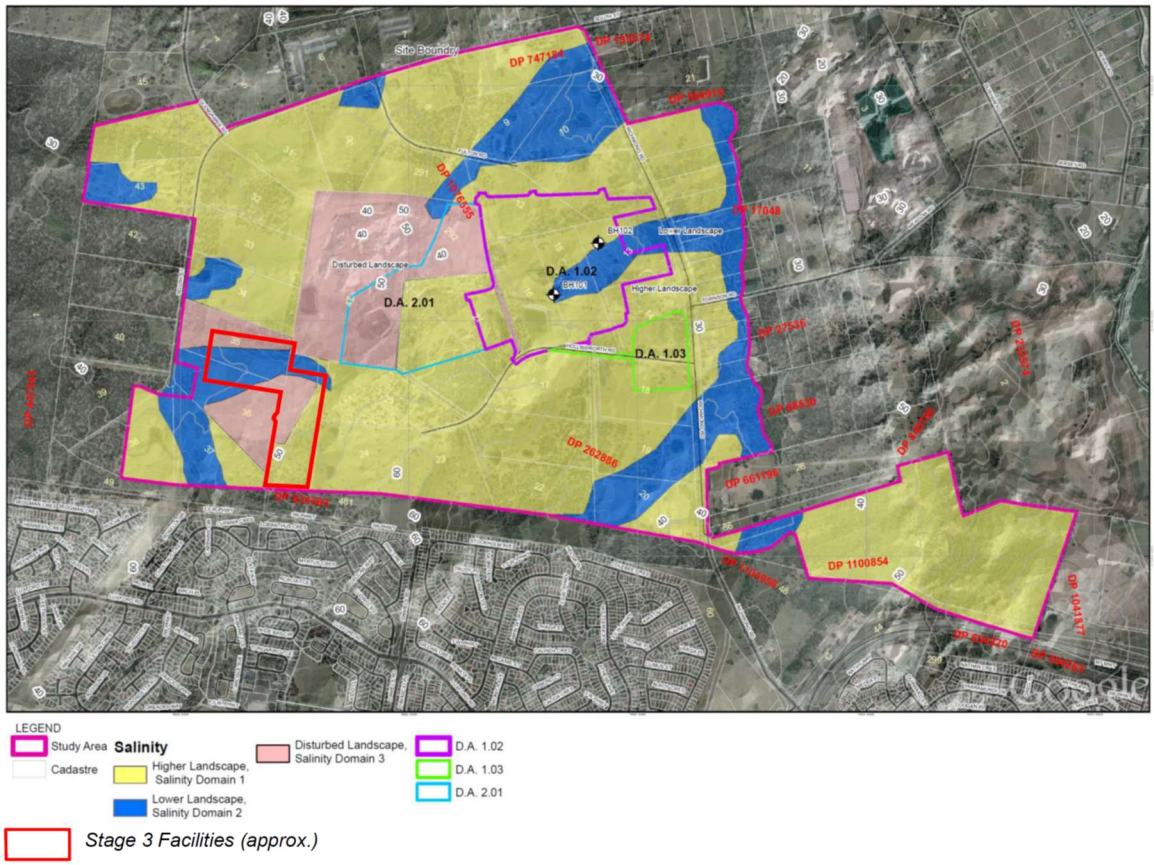


Figure 6.5: *Salinity Domains (Source: GHD, 2011)*

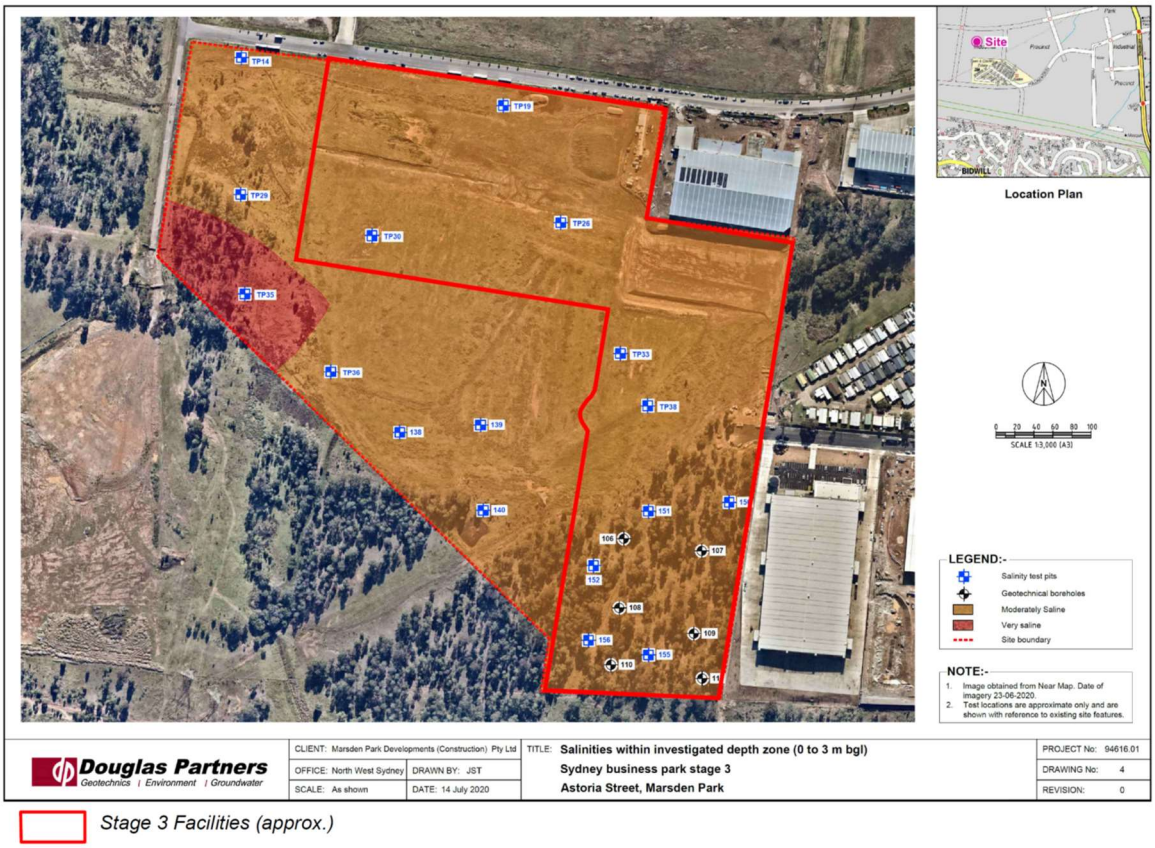


Figure 6.6: *Stage 3 Salinity Risk Areas (Source: Douglas Partners)*

6.2.5 Riparian Areas and Waterbodies

There are no riparian protection areas (ie. creeks and rivers), as mapped in the Growth Centres SEPP, on or in proximity to the site as (see **Figure 6.7**).

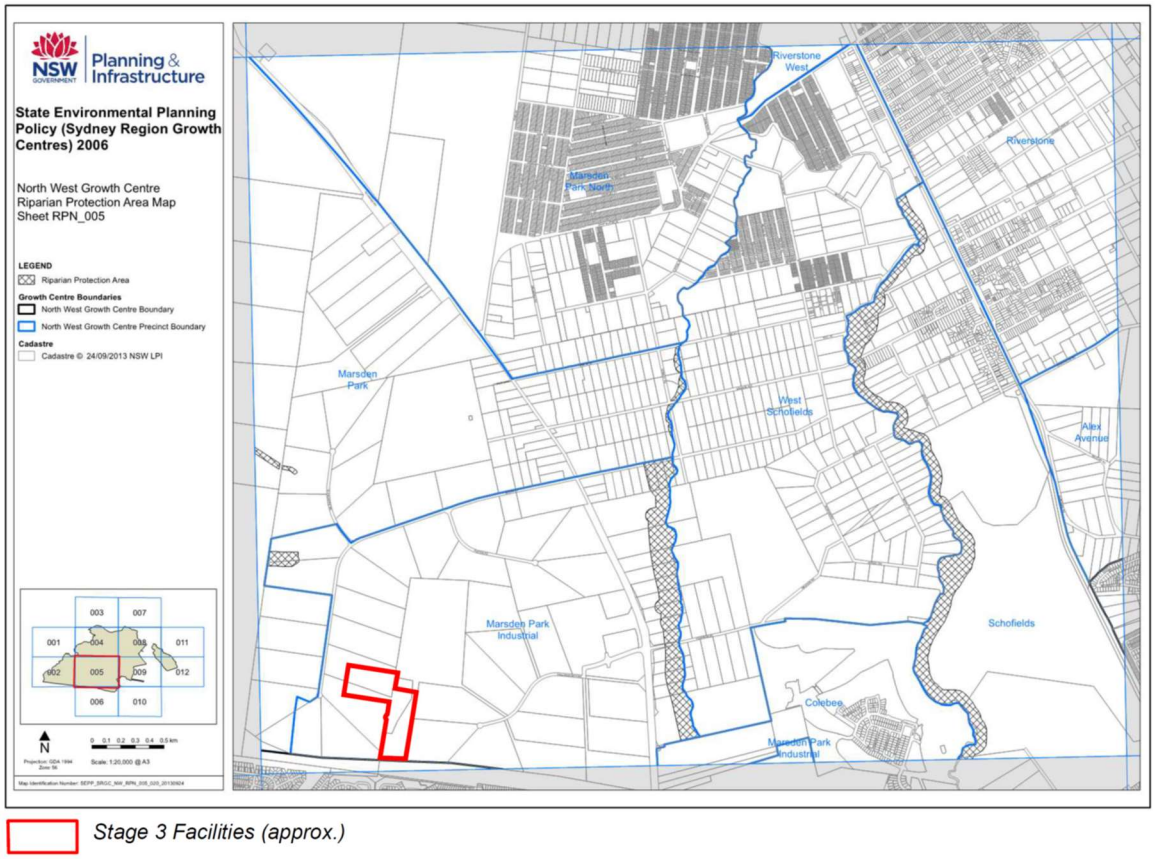


Figure 6.7: *Riparian Protection Areas (Source: Growth Centres SEPP)*

The closest riparian protection area is a small wetland located approximately 800 metres to the north-west of the site, which ultimately drains to Little Creek. Bells Creek is located approximately 1.5 kilometres metres to the east of the site, across Richmond Road. The site does not drain to either of these riparian areas, and the proposed development is not expected to result in any impacts on these areas or their riparian environments.

There is a drainage line located approximately 50 metres (at the closest point) to the west of the site (see **Figure 2.6**). This drainage line forms part of the headwaters of Little Creek, and is zoned SP2 Infrastructure (Local Drainage) and E2 Environmental Conservation under the Growth Centres SEPP (see **Figure 4.3**). There is also a small farm dam located within the TransGrid easement, approximately 80 metres to the west of the Warehouse 4 site, which would not be affected by the proposal.

The drainage line to the west of the site is planned to accommodate one of the precinct-based detention basins for the Marsden Park Industrial Precinct (ie. Basin A), and much of the runoff from the site will drain to this basin.

The stormwater management strategy for the proposed development has been designed in accordance with this wider precinct drainage planning, and is discussed in Section 6.2.8 below. Subject to the implementation of the stormwater management strategy as proposed, the development of the Stage 3 Facilities is not expected to result in any adverse impacts on the Little Creek riparian environment.

6.2.6 Groundwater

The proposed development does not involve significant cut or fill, nor does the proposal involve use of groundwater or activities that have the potential to result in significant contamination of groundwater. No significant groundwater has been encountered during geotechnical assessments for the estate.

As such, any groundwater intercepted in the construction of the basement for Warehouse 4 is expected to be minor, and would be managed through standard basement waterproofing and drainage construction techniques.

Consequently, the proposal is not expected to result in any significant impact on groundwater resources of the locality. Measures to minimise the potential for soil or water pollution are outlined below.

6.2.7 Flooding

The site is not identified as flood prone land in the Growth Centres SEPP or Growth Centres DCP, and the development is not expected to adversely affect flooding in the locality. Stormwater management measures are detailed in the following section.

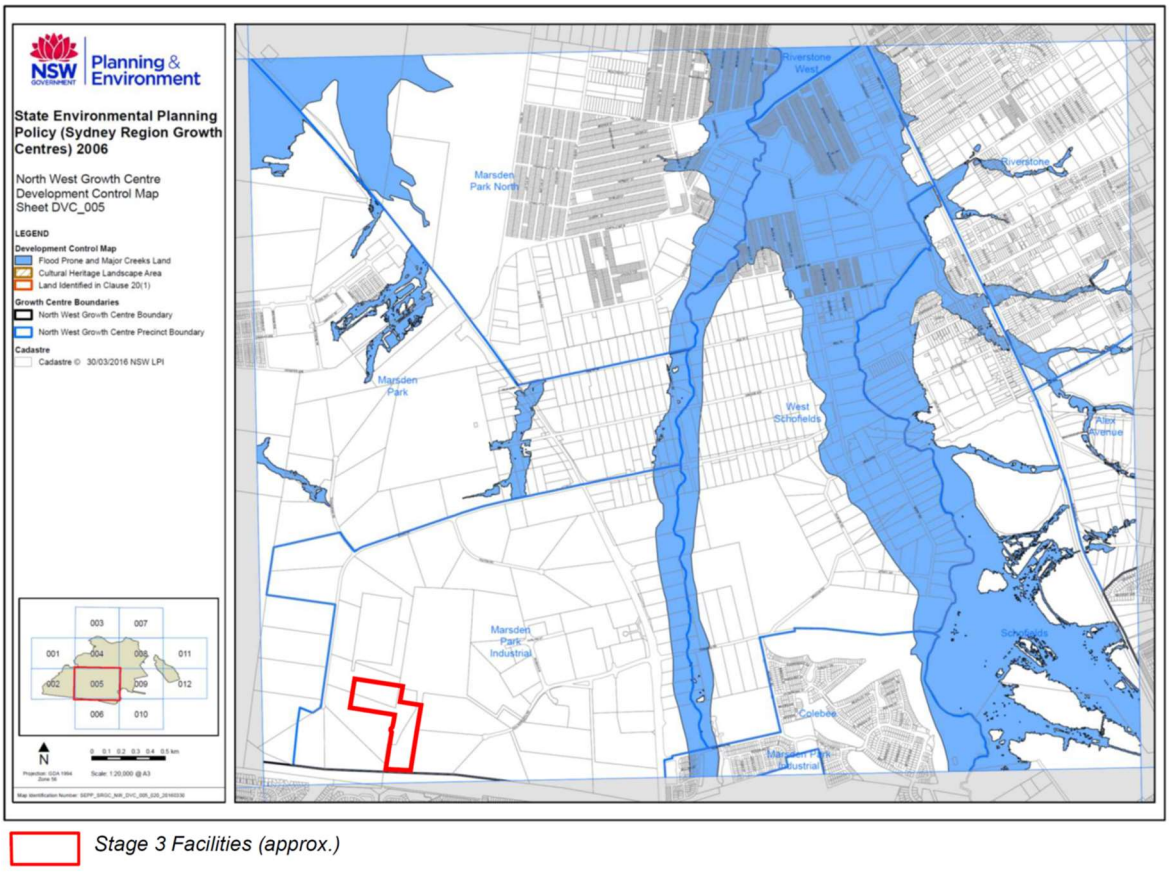


Figure 6.8: *Flood Prone Land (Source: Growth Centres SEPP)*

6.2.8 Stormwater Management

Broad drainage management for the industrial estate and the wider Marsden Park Industrial Precinct is being addressed by Sydney Business Park and Council as part of the development of the precinct.

In this regard, the estate stormwater infrastructure includes a number of precinct-based detention systems to ensure that stormwater flow (or 'quantity') from the developed estate does not exceed pre-development flow in downstream waterbodies.

The majority of the Stage 3 area drains to the planned precinct detention basin known as 'Basin A', which will be located directly to the west of the site. A small part of the site, including the Warehouse 3 site and the northern section of the north-south collector road, is proposed to drain to the existing precinct detention basin known as 'Basin E'[15], located to the north-east of the site (see **Figure 2.2**).

As outlined in Section 2.7 and shown on **Figure 2.7**, Basin A forms part of a package of stormwater works for the Little Creek catchment, which are being planned and delivered by Council. In this regard, Council has approved the stormwater works package under Part 5 of the EP&A Act, and is currently undertaking detailed design for the project. Council has advised that it intends to commence construction works in the second half of calendar 2020, and to complete the works within 3 to 6 months.

Sydney Business Park and Council are planning to enter into an agreement which would see Sydney Business Park partially deliver Basin A on Council's behalf (under Council's Part 5 approval). The partial construction would enable the basin to be used as a temporary sediment and detention basin for the proposed development.

Whilst the precinct-wide stormwater management system addresses stormwater quantity requirements for the estate (including the site), it does not manage all stormwater 'quality' requirements for the estate, with these aspects required to be addressed as part of the development of each lot.

In accordance with this broad strategy, a concept stormwater management plan for the proposed Stage 3 Facilities has been prepared by Orion, and is attached in **Appendix F** (and shown on **Figure 3.10**). The key elements of the plan include (generally from upstream to downstream):

- rainwater harvesting tanks draining part of the warehouse and office roofs, for re-use in toilet flushing and irrigation, with the following tank sizes proposed (to meet 80% of the facilities non-potable water demands):
    - Warehouse 1 – 175 kL;
    - Warehouse 2 – 75 kL;
    - Warehouse 3 – 40 kL; and
    - Warehouse 4 – 125 kL;
- primary treatment to parking and hardstand areas via the provision of OceanGuard (or equivalent) pit inserts;
- secondary treatment to roof and hardstand areas via the provision of treatment tanks containing StormFilter cartridges (or equivalent) gross pollutant traps; and
- stormwater pits, pipes and drains to direct stormwater, prior to discharge to the estate stormwater system, with:
    - Warehouses 1, 2 and 4 (and the undeveloped catchment of Lot 36) draining to Basin A; and
    - Warehouse 3 and a small portion of the north-south collector road draining to Basin E.

The stormwater management plan notes that alternative water quality measures, including above-ground bio-treatment devices, would be investigated as part of detailed design for the development. Sydney Business Park would investigate these and other stormwater management measures as

[15] Basin E is currently constructed as a temporary basin arrangement. In April 2020, Sydney Business Park lodged a development application with Council for the upgrade of the basin (DA 20-00743). That application is currently pending approval.

part of a final stormwater management plan for the development, which would be prepared in consultation with Council prior to the commencement of construction for the proposal.

Stormwater Quality
The proposed stormwater scheme for the development has been modelled using MUSIC software. The results of the analysis are summarised in the following table, and indicate that the development would comply with the stormwater quality criteria in the Growth Centres DCP and Council's *Engineering Guide for Development*.

Table: 6.1: *Water Quality Modelling Results*

Pollutant	***Reduction***				***Reduction Criteria***
	Warehouse 1	***Warehouse 2***	***Warehouse 3***	***Warehouse 4***	
Gross Pollutant Loading	99.4%	99.7%	98.6%	100%	90%
Total Suspended Solids	85.9%	85.9%	86.3%	86%	85%
Total Phosphorus	65%	65%	65.2%	65%	65%
Total Nitrogen	45.3%	45.2%	51.8%	45.4%	45%

Stormwater Quantity
The concept stormwater management plan also includes modelling of the Stream Erosion Index in accordance with Council's water sensitive urban design guidelines. The modelling confirms that runoff from all warehouse sites would meet the applicable erosion index criterion.

The stormwater management plan notes that, where practicable, the on-lot drainage systems would be designed for 1 in 100 year (1% AEP) flows to avoid the need for overland flow paths. Emergency overland flow paths (eg. for pipe blockage) would be provided via roads, drainage channels and/or an easement along the southern side of Warehouse 1.

As outlined above, Sydney Business Park is planning to partially deliver Basin A on Council's behalf (under Council's Part 5 approval), to allow the basin to be used as a temporary detention basin for the proposed development.

Until the permanent detention basin is complete (including downstream works in the Little Creek catchment), any excess runoff entering Basin A would be transferred to Basin E via pumping, as per the currently approved and operating system for Basin B[16].

The temporary detention basin would provide a storage volume of approximately 76,000m^3, which is significantly greater than the volume required for the temporary detention basin for the development (ie. 11,410m^3). As such, all flows entering the temporary basin would be able to be effectively managed during the interim period.

The proposed stormwater management scheme, including the temporary detention basin, would be further detailed in the final stormwater management plan, which would be prepared in consultation with Council prior to the commencement of construction for the proposal.

6.2.9 Soil and Water Pollution

Apart from the API Facility (Warehouse 4), the proposed facilities would involve storage of general consumer goods and do not present the potential for significant soil or water pollution associated with the uses. The proposed API Facility (Warehouse 4) does involves the storage of a range of dangerous goods and related products which, if not managed appropriately, present some risk of soil or water pollution.

[16] Basin B is located to the north-west of the site, adjacent to the Ikea Facility.

The proposed facilities would incorporate a number of measures to mitigate soil and water pollution risks, including:

- the warehouse facilities would be constructed as closed facilities with no internal drainage to the stormwater system;
- loading and unloading areas would be covered with generous awnings to minimise runoff to the stormwater system in the event of a spill;
- external stormwater pits would be located away from key loading areas as far as practicable;
- spill kits would be installed and maintained throughout the facilities; and
- the on-site stormwater systems would include stormwater treatment devices to collect and treat stormwater runoff from the site (see above).

All storage and handling of all dangerous goods and hazardous materials would be undertaken in accordance with the Dangerous Goods Code and *AS 1940-2004: The storage and handling of flammable and combustible liquids*.

6.3 Noise and Vibration

As detailed in Section 2, the site is surrounded on most sides by industrial and infrastructure (local roads and drainage) zoned land associated with Sydney Business Park and the wider Marsden Park Industrial Precinct. Road access between the site and the arterial road network (ie. Richmond Road) is available through industrial and business zoned land, and does not involve the need to travel through residential-zoned areas to access the site.

The nearest residential-zoned land is located in Bidwill approximately 120 metres to the south of the site, across infrastructure (major roadway) zoned land. Additional residential zoned land is located approximately 500 metres to the north-west of the site.

There also remain some residential land users within the industrial-zoned areas of the estate at present, including the Ingenia Lifestyle Stoney Creek caravan park located to the east of the site (beyond a drainage channel), and an isolated residence approximately 800 metres to the east of the site. The Baitul Huda Mosque is located over 1 kilometre to the south-east of the site.

To assess the potential noise and vibration impacts on these receivers, a Noise and Vibration Assessment has been undertaken for the development by Wilkinson Murray, and is attached as **Appendix J**. The assessment has been undertaken in accordance with applicable noise guidelines including the EPA's:

- *Noise Policy for Industry (NPfI)*;
- *Interim Construction Noise Guideline (ICNG)*; and
- *Road Noise Policy*.

A summary of the findings of the assessment is provided below.

With regard to vibration, the assessment notes that the proposal does not involve vibration intensive activities, and that the distance between the site and the nearest receivers would mitigate any adverse vibration impacts.

6.3.1 Operational Noise

Operational noise emissions have been modelled for the development, assuming that worst case operations are occurring concurrently on each of the proposed warehouse sites, based on conservative estimates of on-site noise sources including heavy vehicle movements, light vehicle movements, forklift operations and rooftop mechanical plant. In practice, these worst case operations are unlikely to occur concurrently across the development site.

The assessment also assumed the implementation of the following mitigation measures:

- installation of the proposed 2.4 metre high acoustic wall on the eastern boundary of the Warehouse 2 site (see Section 3.11);
- installation of the proposed 2.7 metre high acoustic wall on the boundary in the south-western corner of Warehouse 4 (see Section 3.11), to mitigate noise from the loading docks on the residents to Bidwill to the south; and
- that rooftop mechanical air-conditioning units are spread evenly across the roof of Warehouse 1 and Warehouse 4, however are grouped towards the western side of the office roof for Warehouse 2 and Warehouse 3 (with final placement subject to detailed design)[17].

It is noted that the proposed 2.4 metre acoustic wall on the eastern boundary is not required to meet the applicable noise criteria under the NPfI. Nonetheless, Sydney Business Park has proposed to install the wall (in consultation with Ingenia) to minimise noise emissions for the caravan park residents as far as practicable, and to minimise visual impacts on the industrial-zoned caravan park whilst it continues to operate. Similar acoustic walls have been installed, or are proposed to be installed, on the northern and eastern sides of the caravan park, as part of the development of the Bucher Municipal (DA 18-02532) and Cameron Interstate (DA 20-00792) facilities within Sydney Business Park.

Predicted operational noise levels from the combined noise sources of all warehouse facilities at the nearest residential and other receivers are provided in **Table 6.2** below, along with the applicable criteria. The receiver locations are shown on **Figure 6.9**.

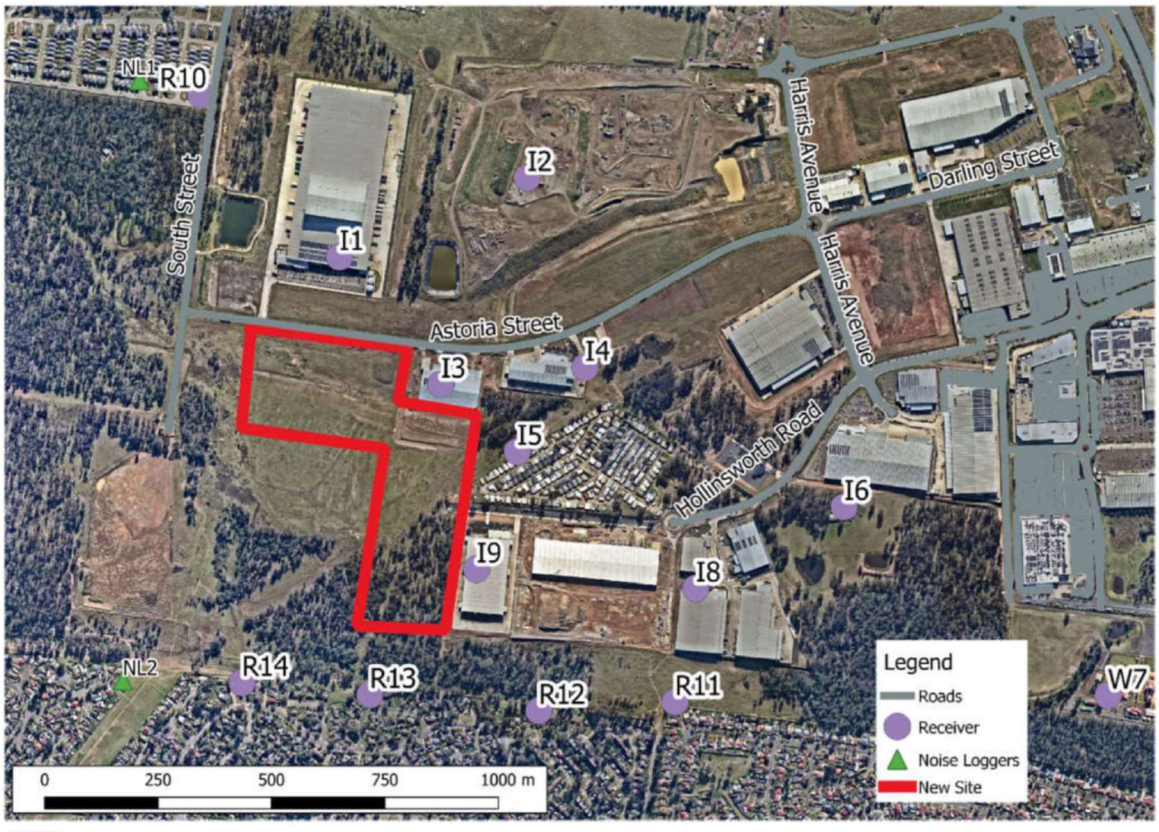


Figure 6.9: *Noise Receiver Locations (Source: Wilkinson Murray)*

[17] It is noted that Warehouses 2 and 3 would be ambient-temperature facilities, and therefore would not have significant rooftop plant.

Table 6.2: *Operational Noise Predictions*

Receiver ID and Location	***Receiver Type***	***Period[1]***	***Worst Case Noise Level, $dB_{LAeq(15min)}$***		
			Standard Conditions	***Adverse Winds/Inversion***	***Criterion***
I1 – 376 South St	Industrial	Day	38	42	68
		Evening	36	40	
		Night	35	39	
I2 – 25 Harris Ave	Industrial	Day	<30	<30	68
		Evening	<30	<30	
		Night	<30	<30	
I3 – 22 Astoria St	Industrial	Day	53	54	68
		Evening	52	53	
		Night	49	51	
I4 – 19 Astoria St	Industrial	Day	33	37	68
		Evening	32	36	
		Night	30	34	
I5 – 140 Hollinsworth Rd	Caravan Park in Industrial Zone	Day	43	46	68
		Evening	43	46	
		Night	41	43	
I6 – 105 Hollinsworth Rd	Residence in Industrial Zone	Day	<30	<30	68
		Evening	<30	<30	
		Night	<30	<30	
W7 – 45 Hollinsworth Rd	Place of Worship	Day	<30	<30	38
		Evening	<30	<30	
		Night	<30	<30	
I8 – 23 Hollinsworth Rd	Industrial	Day	<30	31	68
		Evening	<30	<30	
		Night	<30	<30	
I9 – 24 Hollinsworth Rd	Industrial	Day	49	50	68
		Evening	49	50	
		Night	47	48	
R10 – 372 Dortmund Cr, Marsden Park	Residential	Day	<30	<30	40
		Evening	<30	<30	35
		Night	<30	<30	35
R11 – 67B Amelia Way, Bidwill	Residential	Day	<30	<30	40
		Evening	<30	<30	38
		Night	<30	<30	35
R12 – 11 Pine Cr, Bidwill	Residential	Day	<30	<30	40
		Evening	<30	32	38
		Night	<30	31	35
R13 – 15 Loranthus Cr, Bidwill	Residential	Day	30	35	40
		Evening	31	35	38
		Night	<30	34	35
R14 – 8 Amaryllis Way, Bidwill	Residential	Day	<30	32	40
		Evening	<30	33	38
		Night	<30	32	35

1 With regard to time periods:
- Day is the period from 7am to 6pm on Monday to Saturday, and 8am to 6pm on Sundays and public holidays;
- Evening is the period from 6pm to 10pm; and
- Night is the period from 10pm to 5am on Monday to Saturday, and 10pm to 8am on Sundays and public holidays.

The modelling indicates that the concurrent worst case operation of the Stage 3 Facilities would comply with the applicable noise criteria during all time periods, at all surrounding receivers.

In its submission on the Bucher Municipal Facility (DA 18-02532) development located to the east of the site (and immediately to the north of the caravan park), Ingenia engaged acoustic consultants Day Design to review the Bucher proposal on the caravan park's behalf. Day Design suggested that the $L_{Aeq(15min)}$ noise criteria for the caravan park (Receiver I5) should be:

- 58 dBA during the day;
- 48 dBA during the evening; and
- 43 dBA during the night.

Whilst Sydney Business Park does not support these criteria (as they are not consistent with the NPfI), it is noted that the predicted worst case combined noise emissions associated with the Stage 3 Facilities would comply with Day Design's suggested criteria.

Cumulative Operational Noise

The noise assessment also includes consideration of the potential for the project and other industrial development in the area to impact on the residential-zoned area to the south of the site. The assessment found that noise levels from the project would be at least 9 decibels below the relevant acceptable amenity levels (eg. night time goal of 40dbA $L_{Aeq(night)}$). On this basis, the assessment concludes that the risk of impact on the residential area from cumulative industrial noise emissions is low.

Sleep Disturbance

In addition to the above operational noise emissions, which are based on average noise levels over a 15 minute period (ie. $L_{Aeq(15min)}$), sudden or short-lived noise emissions at night have the potential to result in sleep disturbance. Such sudden noise emissions associated with the development might include truck engine brakes, vehicle door closing or vehicle engine starting.

To provide consideration of the potential for sleep disturbance associated with the development, the noise assessment includes modelling of truck engine braking occurring at the nearest loading dock to off-site residential receivers. The predicted worst case sudden (ie. L_{AMax}) noise emissions at these receivers is presented in the following table, along with the applicable screening criteria under the NPfI. It is noted that the sleep disturbance criteria do not apply to receivers in an industrial zone.

Table 6.3: *Operational Noise Predictions – Sleep Disturbance (exceedances in bold)*

Receiver ID and Location	***Receiver Type***	***Worst Case Noise Level, dB$_{LAMax}$***		
		Standard Conditions	***Adverse Winds/Inversion***	***Screening Criterion***
R10 – 372 Dortmund Cr, Marsden Park	Residential	40	45	52
R11 – 67B Amelia Way, Bidwill	Residential	<30	<30	52
R12 – 11 Pine Cr, Bidwill	Residential	36	41	52
R13 – 15 Loranthus Cr, Bidwill	Residential	**54**	**57**	52
R14 – 8 Amaryllis Way, Bidwill	Residential	46	50	52

As outlined in the table, the project would comply with the applicable sleep disturbance screening criteria at all off-site residential receivers, with the exception of receiver R13 in Bidwill.

The NPfI states that where the screening noise levels cannot be met, a more detailed noise assessment should be undertaken. To this end, the noise assessment notes that the *Road Noise Policy* provides additional guidance on potential sleep disturbance impacts. Based on available research, the policy advises that:

- maximum internal noise levels below 50 dBA to 55 dBA are unlikely to cause awakening reactions; and
- one or two noise events per night, with maximum internal noise levels of 65 dBA to 70 dBA, are not likely to affect health and wellbeing significantly.

Based on a typical noise reduction of 10dB through an open bedroom window, the noise assessment concludes that the predicted maximum external noise levels (ie. 57 dB during adverse conditions, translating to 47dB internally), are unlikely to cause any awakening reactions in the surrounding area.

6.3.2 Traffic Noise

There is no residential zoned land between the site and the arterial road network (ie. Richmond Road). Given this, and the minor volume of traffic from the development compared to existing daily traffic volumes on Richmond Road (ie. more than 35,000 daily vehicles), the noise assessment concludes that the additional traffic noise associated with the development (ie. less than 0.1dB increase during construction and less than 0.5dB increase during operations) would be insignificant and consistent with the requirements of the *NSW Road Noise Policy*.

6.3.3 Construction Noise

The construction period for the development is expected to extend for approximately 24 months. The main noise-generating construction works would be the earthworks phase, and to a lesser extent building construction and concrete works.

Construction noise emissions have been modelled for the development, assuming that worst case construction activities are occurring concurrently on each of the proposed warehouse sites, during each of the main construction phases (including earthworks, concrete pouring, and warehouse construction). As with the operational noise assessment, in practice these worst case activities are unlikely to occur concurrently across the development site.

Predicted noise levels from the combined construction activities at the nearest residential and other receivers are provided in **Table 6.4** below, along with the applicable criteria.

Table 6.4: *Construction Noise Predictions (exceedances in bold)*

Receiver ID and Location	***Receiver Type***	***Worst Case Construction Noise Level, $dB_{LAeq(15min)}$***			***Noise Management Level***
		Earthworks	***Concrete Works***	***Warehouse Construction***	
I1 – 376 South St	Industrial	59	54	58	70
I2 – 25 Harris Ave	Industrial	32	<30	30	70
I3 – 22 Astoria St	Industrial	69	62	65	70
I4 – 19 Astoria St	Industrial	62	57	63	70
I5 – 140 Hollinsworth Rd	Caravan Park in Industrial Zone	64	59	63	70
I6 – 105 Hollinsworth Rd	Residence in Industrial Zone	32	<30	33	70

Receiver ID and Location	*Receiver Type*	*Worst Case Construction Noise Level, $dB_{LAeq(15min)}$*			*Noise Management Level*
		Earthworks	*Concrete Works*	*Warehouse Construction*	
W7 – 45 Hollinsworth Rd	Place of Worship	<30	<30	<30	55
I8 – 23 Hollinsworth Rd	Industrial	68	63	68	70
I9 – 24 Hollinsworth Rd	Industrial	42	39	45	70
R10 – 372 Dortmund Cr, Marsden Park	Residential	39	35	41	45
R11 – 67B Amelia Way, Bidwill	Residential	34	<30	34	45
R12 – 11 Pine Cr, Bidwill	Residential	**48**	43	**48**	45
R13 – 15 Loranthus Cr, Bidwill	Residential	**56**	**48**	**56**	45
R14 – 8 Amaryllis Way, Bidwill	Residential	**49**	43	**49**	45

The assessment indicates that worst case construction activities (if all warehouses are being constructed concurrently) would comply with the applicable noise management levels in the ICNG at all non-residential receivers, but could exceed the management levels at Receivers R12 to R14.

The predicted exceedances (ie. noise levels between 48 and 56 dB) remain well below the 'highly affected' noise limits in the ICNG (ie. 75 dB), and the noise assessment concludes that the exceedances can be managed subject to implementation of standard best practice construction noise mitigation measures. The noise assessment includes a preliminary construction noise management plan outlining such measures, which include:

- noise management controls, including:
  - site induction training;
  - operator instruction;
  - site noise planning, including locating noisy plant away from nearby receivers;
  - scheduling noisy activities so that they do not occur simultaneously, and/or during less sensitive time periods;
  - selecting less noisy plant and equipment where practicable;
- maintaining effective community consultation; and
- maintaining a complaints handling and management system.

Sydney Business Park would implement these measures as part of a detailed Construction Environmental Management Plan (CEMP) for the development.

Further, Sydney Business Park would undertake construction activities within the hours stipulated in the ICNG (as reproduced in Section 3.4).

6.4 Air Quality and Odour

6.4.1 Air Emissions

The main sources of air emissions associated with the operation of the development would be vehicle emissions and emissions from plant and equipment, the levels of which are not expected to result in any significant adverse incremental or cumulative impact on the air quality of the locality.

Dust emissions during construction works are able to be managed in accordance with standard best practice techniques, including:

- minimising the area of disturbance as far as practicable during works;
- minimising drop heights for materials being worked on the site;
- keeping exposed surfaces moist at all times;
- rehabilitating/revegetating disturbed surfaces as soon as practicable; and
- ensuring that trucks are covered and do not track sediment onto public roads.

6.4.2 Odour

The Stage 3 Facilities would involve the storage and distribution of general, packaged, non-odorous consumer goods and are not expected to generate any significant odours.

6.4.3 Greenhouse Gases and Energy Efficiency

The main sources of direct and indirect greenhouse gas emissions associated with the proposed facilities would be electricity use and exhaust emissions from vehicles. These emissions are expected to be similar to those associated with any comparable, modern warehouse facility, and would not be significant.

The proposed development includes a number of measures to maximise energy efficiency and therefore greenhouse gas emissions, as outlined in Section 3.9. This includes the installation of considerable rooftop solar systems for each facility.

6.5 Flora and Fauna

The site is largely cleared of vegetation, however there are some semi-mature eucalypt trees in the south-eastern area of the site, to the south of the TransGrid easement (see **Figure 2.5**). Given its relatively small size and proximity within Sydney Business Park and industrial development in the area, the remnant vegetation within the site is not expected to provide significant habitat value.

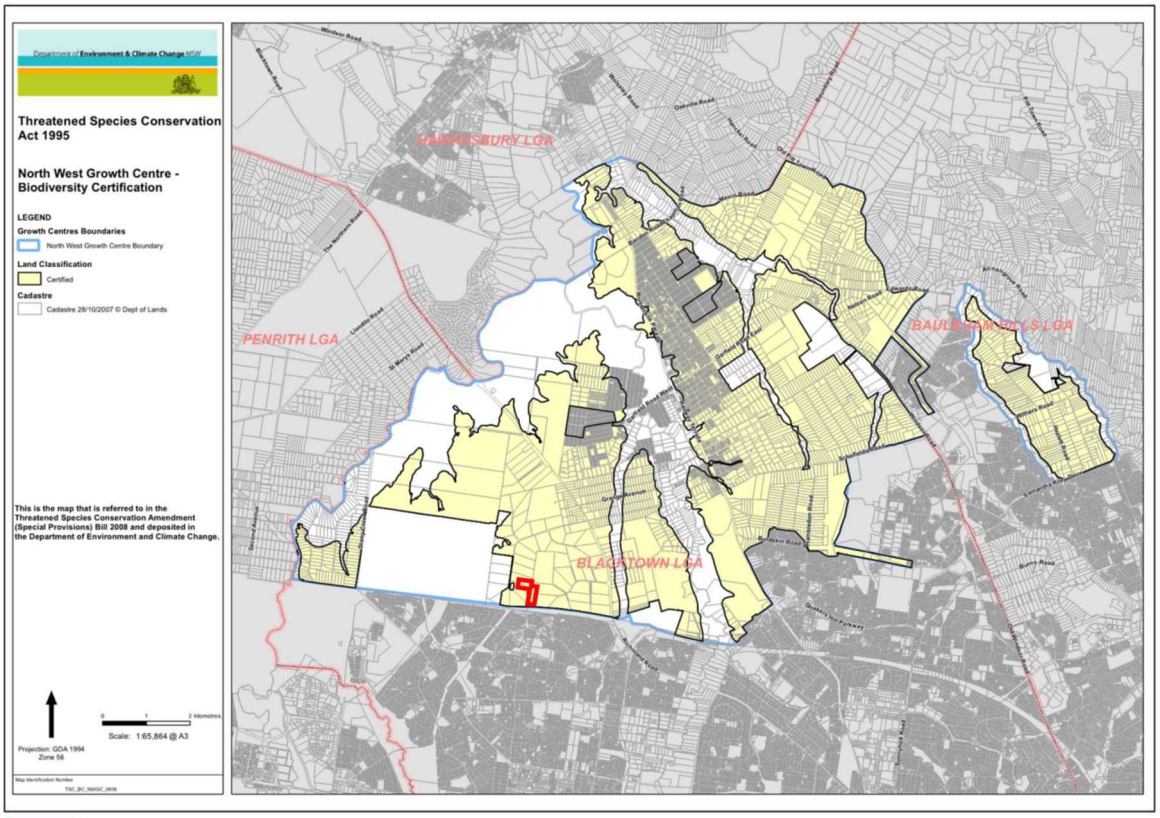
Notwithstanding, a biodiversity review of the proposal has been prepared by Eco Logical, and is attached as **Appendix K**.

As outlined in the review, biodiversity impact assessment for the Marsden Park Industrial Precinct has been addressed and resolved as part of the strategic planning for the North West Growth Centre.

In this regard, large areas of the North West Growth Centre have been biodiversity 'certified' under the former *Threatened Species Conservation Act 1995* (the TSC Act)[18], meaning that the assessment of threatened species has already been done at the rezoning stage and does not need to be further considered at the development application stage. As outlined in the Growth Centres DCP, this approach provides for more strategic assessment and management of threatened species issues, and streamlines the development application process.

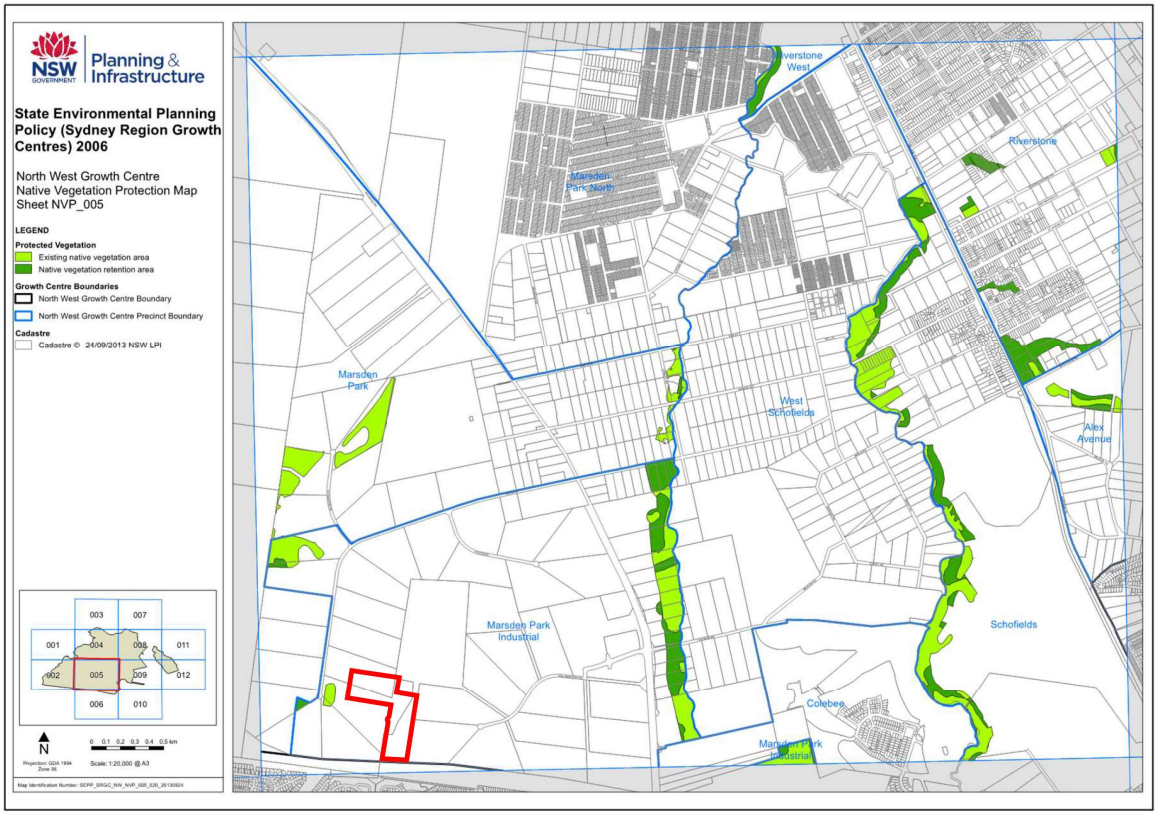
Biodiversity Certification was conferred upon the Growth Centres SEPP on 14 December 2007 via the gazettal of a Biodiversity Certification Order signed by the then Minister for Climate Change and the Environment. The biodiversity certified land is shown on **Figure 6.10**, and includes all of the site and much of the surrounding area. Accordingly, no further assessment of threatened species is required for the development.

[18] Now *Biodiversity Conservation Act 2016*



Stage 3 Facilities (approx.)

Figure 6.10: *Biodiversity Certified Areas (Source: Threatened Species Conservation Act 1995)*



Stage 3 Facilities (approx.)

Figure 6.11: *Native Vegetation Areas (Source: Growth Centres SEPP)*

To offset the ecological impacts of development of the Growth Centre, the Biodiversity Certification Order requires 2,000 ha of 'existing native vegetation area' (ENVA) to be retained across the Growth Centres. ENVA, as well as native vegetation retention areas (NVRA), in proximity to the site are shown on **Figure 6.11**, in light green and dark green respectively.

As indicated on the figure, the site does not contain any ENVA or NVRA areas. There is some ENVA within the Basin A area to the west of the site, however the proposal does not involve any disturbance of this area.

6.6 Archaeology and Heritage

6.6.1 Aboriginal Heritage

The Marsden Park Industrial Precinct has been subject to comprehensive archaeological assessments, including a precinct-wide assessment undertaken by Kelleher Nightingale Consulting for the Department of Planning, Industry & Environment in 2009.

An additional Aboriginal heritage assessment for the proposed development has been undertaken by Kelleher Nightingale Consulting, and is attached as **Appendix L**.

The assessment notes that the 2009 assessment included a comprehensive survey and assessment of the precinct, including the Stage 3 site and the site of the proposed development. The 2009 assessment was undertaken in accordance with applicable Aboriginal assessment guidelines, and in consultation with a number of key Aboriginal stakeholders, including:

- Deerubbin Local Aboriginal Land Council (LALC);
- Darug Tribal Aboriginal Corporation;
- Darug Custodian Aboriginal Corporation;
- Darug Aboriginal Cultural Heritage Assessments; and
- Darug Land Observations.

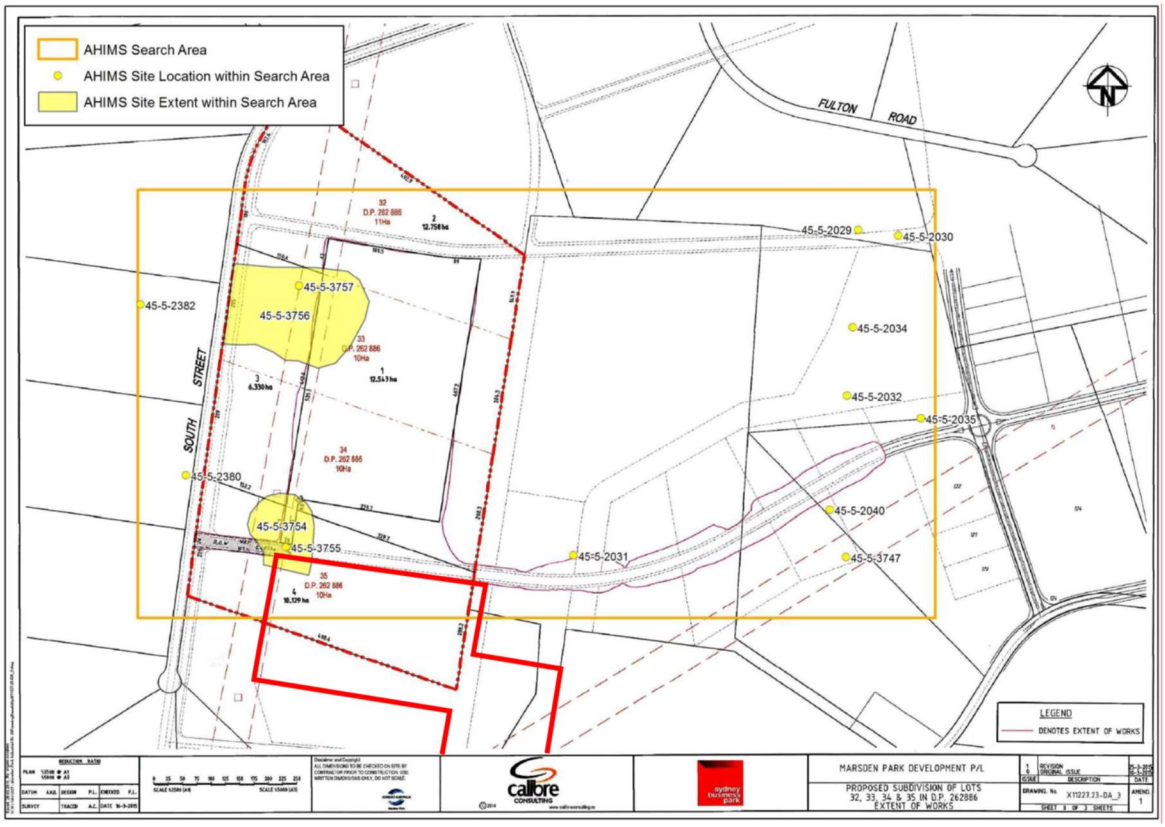
The 2009 assessment identified a relatively small number of Aboriginal sites/objects in the Stage 3 area. This included five sites in the Stage 3.01 area to the north of the Stage 3 Facilities site[19], four of which combined to form two large site complexes (see **Figure 6.12**). These Aboriginal sites/complexes have since been removed in accordance with an Aboriginal Heritage Impact Permit (AHIP No. C0001495), issued by the then Office of Environment and Heritage in November 2015.

The 2020 assessment notes that two extant Aboriginal sites remain in the southern area of the Stage 3 Facilities site, within the footprint of the Warehouse 4 Facility. No other Aboriginal sites within the Stage 3 Facilities site are identified on the NSW Aboriginal Heritage Information System (AHIMS). The two extant sites are shown on **Figure 6.13**, and include:

- MPIP 17 (AHIMS 45-5-3748) – comprising two stone artefacts (red silcrete); and
- MPIP 18 (AHIMS 45-5-3749) – comprising a scatter of eight stone artefacts (yellow and red silcrete).

Both sites were assessed as having some (low) archaeological value. The low level of significance was agreed to by the Aboriginal stakeholders involved in the 2009 assessment. With the agreement of the stakeholders, the 2009 assessment recommended that an impact permit be granted for the removal of both the MPIP 17 and MPIP 18 sites.

[19] And including a small part of the northern area of the site.



Stage 3 Facilities (approx.)

Figure 6.12: *Stage 3.01 Aboriginal Heritage Sites (Source: Kelleher Nightingale Consulting, Apr 15)*

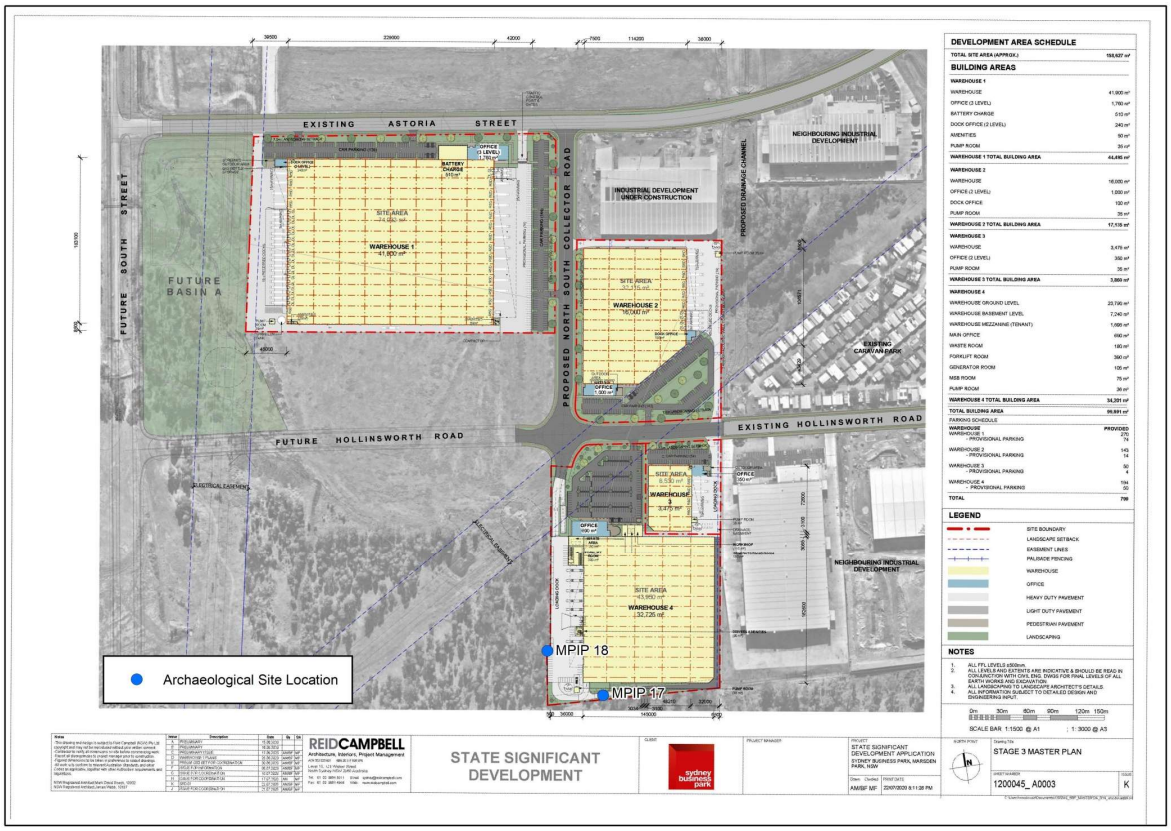


Figure 6.13: *Extant Aboriginal Heritage Sites (Source: Kelleher Nightingale Consulting)*

Given the findings of the 2009 assessment, the 2020 assessment indicates that the proposed development is unlikely to result in any significant impact on Aboriginal heritage values of the area. However, the assessment recommends that an updated targeted investigation is undertaken for the MPIP 17 and MPIP 18 sites, in consultation with the Aboriginal community, to inform the management of the sites.

The consultation process for the targeted investigation would be undertaken in accordance with Heritage NSW's *Aboriginal Cultural Heritage Consultation Requirements for Proponents (2010)*, and would result in the preparation of a management strategy for the identified Aboriginal sites. Kelleher Nightingale Consulting has already commenced the consultation process for the updated investigation.

Sydney Business Park would implement the targeted investigation and management strategy prior to the commencement of construction for the Warehouse 4 Facility.

6.6.2 Historical Heritage

The site does not contain any significant improvements (apart from TransGrid's electricity infrastructure and some rural fencing), and no items of historical heritage significance are identified within the Marsden Park Industrial Precinct on the maps to the Growth Centres SEPP or Growth Centres DCP (see **Figure 6.14**).

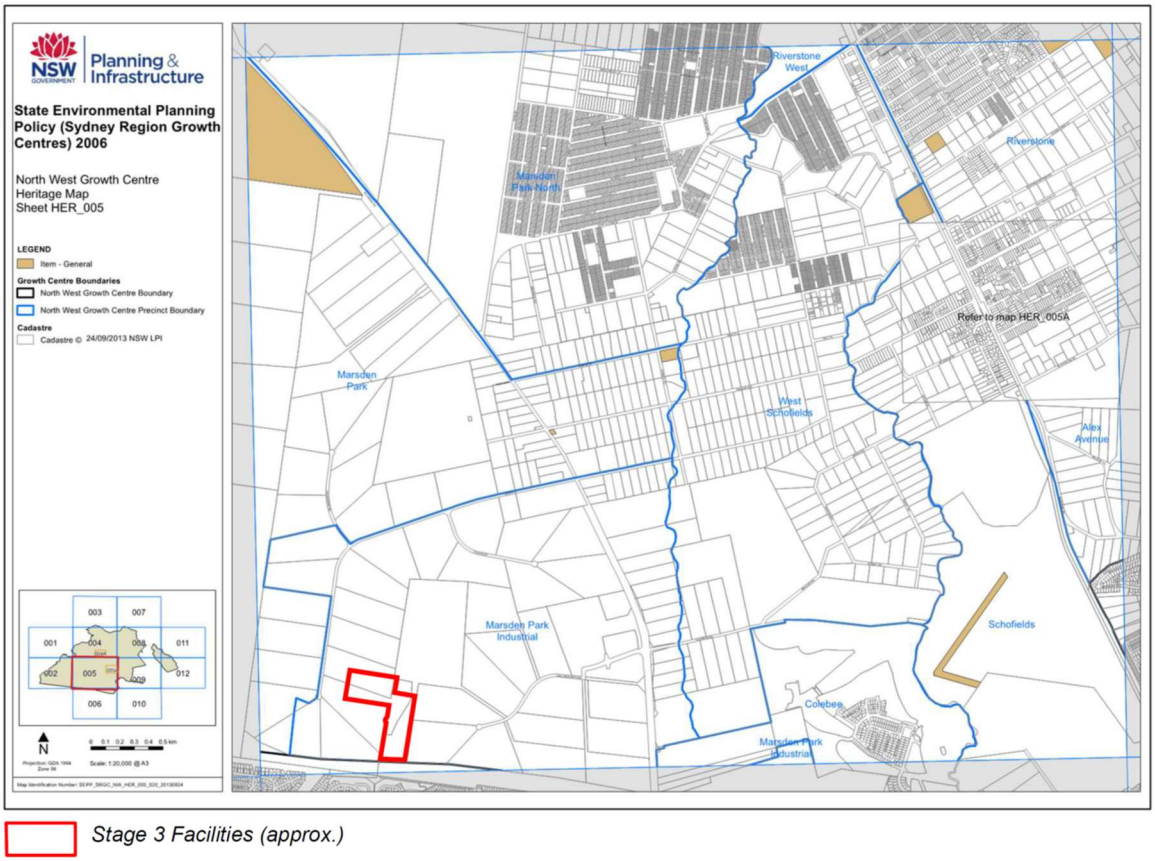


Figure 6.14: *Heritage Items (Source: Growth Centres SEPP)*

This follows a detailed heritage assessment of the Marsden Park Industrial Precinct undertaken by Goddan Mackay Logan in 2009, which did not identify any non-indigenous heritage items in the precinct.

Accordingly, the development is not expected to have any historical heritage impact.

6.7 Traffic and Parking

A Traffic Assessment has been undertaken for the development by Arup, and is attached as **Appendix M**. A summary of the assessment is provided below.

6.7.1 Existing and Proposed Road Network

As outlined in Section 2, the site has access to Astoria Street to the north and Hollinsworth Road to the east, which are both internal estate roads within Sydney Business Park.

Astoria Street accommodates 2 traffic lanes and 2 parking lanes, and links with Hollinsworth Road to the south and Hawthorne Avenue to the north via Harris Avenue. Hollinsworth Road and Hawthorne Avenue both accommodate 4 lanes, and have signalised intersections with Richmond Road. Richmond Road provides direct access to the M7 Motorway, which is located approximately 1 kilometre to the south of the business park.

The existing estate road network within Sydney Business Park has been designed to cater for the anticipated traffic generation from the completed industrial estate, in accordance with relevant Australian Standards (including AS2890.1 and AS2890.2) and a number of precinct-wide traffic assessments, including the:

- Marsden Park Industrial Precinct Transport and Access Study (Arup, Aug 2009); and
- Marsden Park Industrial Precinct DA2 Transport Impact Assessment (Aecom, Oct 2011).

To this end, the estate road network provides for the safe and efficient circulation (including adequate sight distances) of industrial traffic to, from and within the estate and the site.

The proposal involves the extension of this estate road network, in a manner that is consistent with the precinct-wide traffic assessments and the Marsden Park Industrial Precinct Indicative Layout Plan (ILP), as well as the Growth Centres DCP. It is noted that the ILP layout is generally similar to that shown on the zoning plan, which is shown on **Figure 4.3**.

Under the Growth Centres DCP, the western end of Hollinsworth Road and the north-south collector road are identified as collector roads (see **Figure 6.15**). The typical collector road layout under the DCP is reproduced on **Figure 6.16**.

As shown on the civil engineering plans in **Appendix E** (and **Figure 3.1**), the proposal provides for the extension of Hollinsworth Road and the development of the north-south collector road, generally in accordance with the ILP layout and the road design in the Growth Centres DCP. The proposal also involves the construction of associated intersections, including a roundabout intersection between Hollinsworth Road and the north-south collector road, and a priority give-way intersection between Astoria Street and the north-south collector road.

Sydney Business Park would complete these roadworks to the satisfaction of Council, prior to the commencement of operation of any of the Stage 3 Facilities that require access from that road.

It is noted that that the Hollinsworth Road extension, and the roundabout at the intersection of Hollinsworth Road and the north-south collector road, are identified as a contributions items in the Marsden Park Section 94 Contributions Plan. Sydney Business Park would develop this infrastructure as works-in-kind as part of the proposed Voluntary Planning Agreement (VPA) or Works-in-Kind Agreement (WIKA) with Council (see Section 4.5).

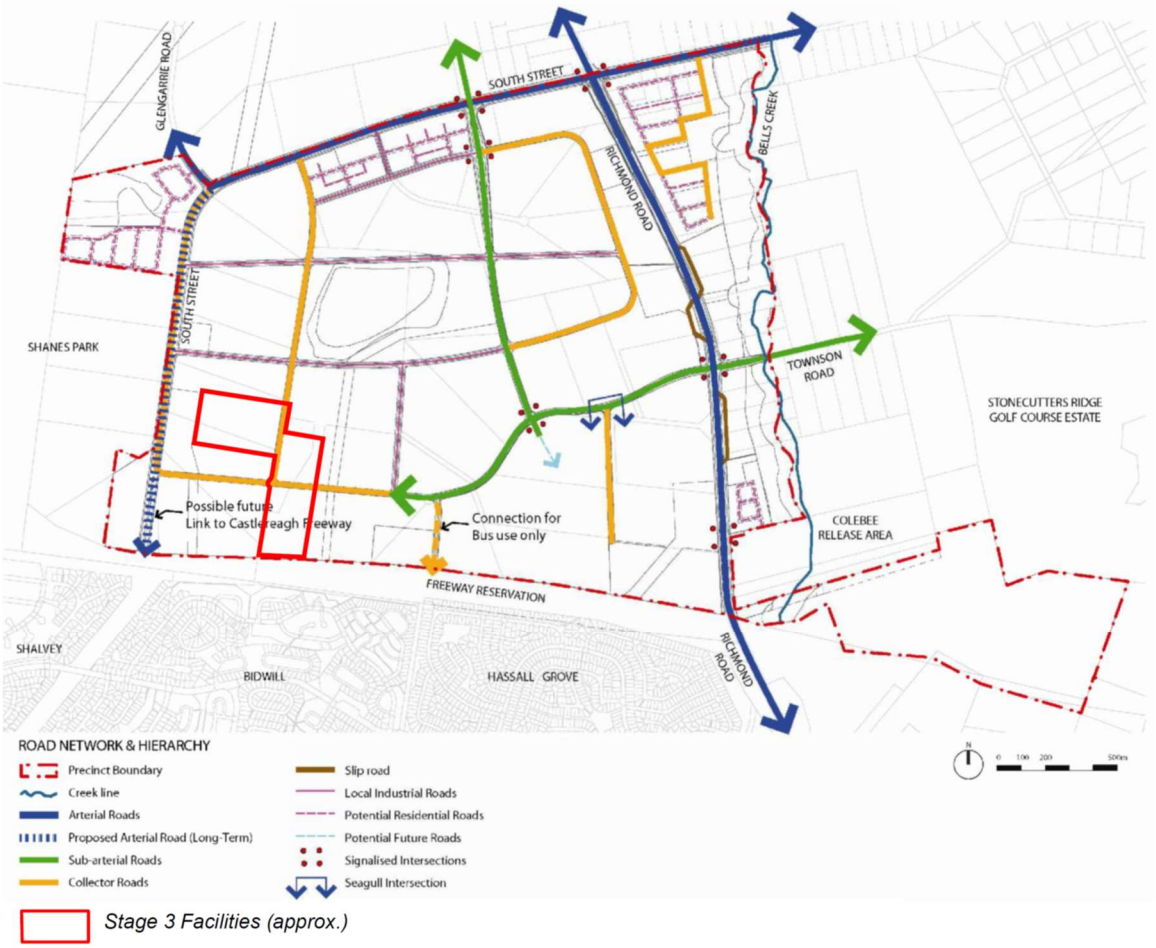


Figure 6.15: *Growth Centres DCP – Precinct Road Network (Source: Growth Centres DCP)*

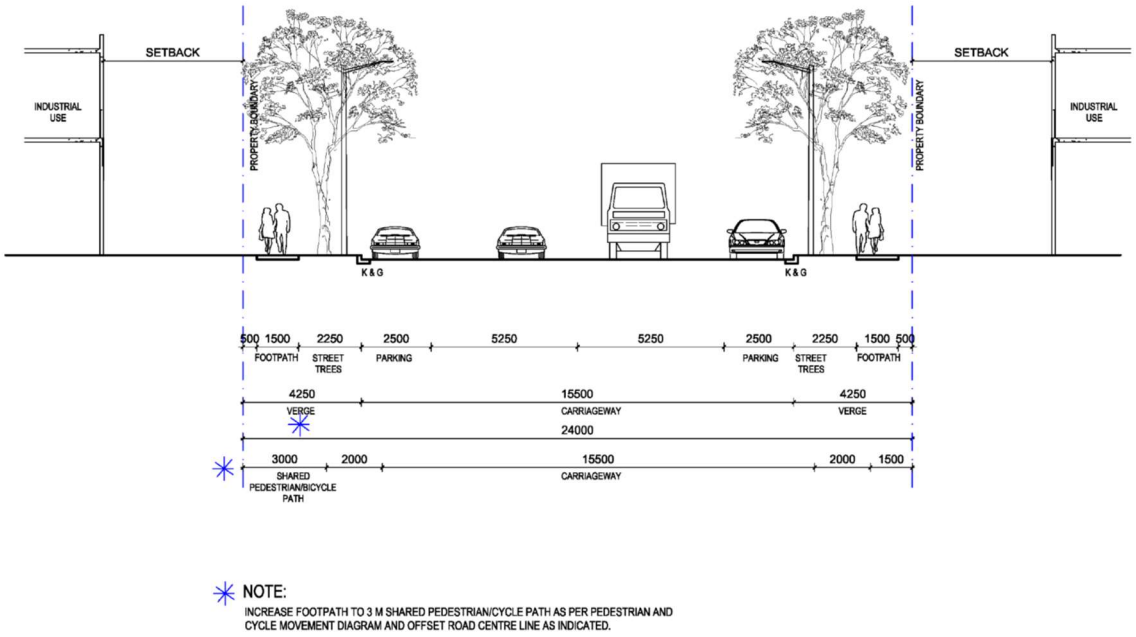


Figure 6.16: *Growth Centres DCP – Typical Collector Road Layout (Source: Growth Centres DCP)*

6.7.2 Proposed Access and Internal Circulation

Vehicular access to the Stage 3 Facilities would be provided via Astoria Street, the proposed Hollinsworth Road extension and/or the proposed north-south collector road.

Separate truck and car accesses would be provided to each facility, to minimise potential conflicts.

For Warehouse 1 (TJX Facility), truck access and egress would be provided to Astoria Street via two driveways in the north-east and north-west corners of the facility site. Trucks would access via the eastern driveway, and circulate around the site in a clockwise direction, before egressing via the western driveway. Approximately 30 metres of queuing space would be provided between the street entrance and the security gates to ensure that trucks do not queue on the public road network. The facility has been designed to accommodate truck sizes up to and including 30m Super B-double vehicles.

Two car parks would be provided for Warehouse 1, with one accessed from Astoria Street and the other accessed via the north-south collector road.

For Warehouse 2, truck access would be provided from the north-south collector road and egress provided via Hollinsworth Road, with trucks circulating in a clockwise direction around the facility site. Approximately 35 metres of queuing space would be provided between the street entrance and the security gates to ensure that trucks do not queue on the public road network. The facility has been designed to accommodate truck sizes up to and including 25m B-double vehicles.

Passenger vehicle access/egress to the main car park would be provided via a driveway on Hollinsworth Road. Additional parking spaces would be provided for warehouse staff adjacent to the loading docks.

For Warehouse 3, truck access/egress would be provided via a single driveway from Hollinsworth Road. Approximately 40 metres of queuing space would be provided between the street entrance and the security gates to ensure that trucks do not queue on the public road network. The facility has been designed to accommodate truck sizes up to and including 19m articulated vehicles.

Passenger vehicle access/egress to the facility car park would be provided via a driveway from the main access driveway.

For Warehouse 4 (API Facility), truck access/egress would be provided via a dedicated exit from the roundabout on Hollinsworth Road (ie. Road 2). Approximately 75 metres of queuing space would be provided between the street entrance and the security gates to ensure that trucks do not queue on the public road network. The facility has been designed to accommodate truck sizes up to and including 25m B-double vehicles. Access to the warehouse basement would be provided for vans, with entry via a dedicated ramp in the north-western corner of the warehouse, and egress via a ramp in the south-western corner of the warehouse.

Passenger vehicle access/egress to the main car park would be provided via a driveway on Hollinsworth Road.

The internal circulation has been designed so that all vehicles can enter and exit the site in a forward direction. All parking spaces would be appropriately sealed and linemarked in accordance with Australian Standards (AS2890).

The traffic assessment includes consideration of the site access, parking and internal circulation arrangements against the relevant Australian Standards (including AS2890), concluding that the

internal layout is appropriate, efficient and compliant with the relevant standards (see swept paths for truck movements in **Appendix M**).

6.7.3 Traffic Generation and Impacts

Operational Traffic

The traffic assessment estimates that the Stage 3 Facilities would generate up to 473 vehicle movements per hour in the AM peak and 510 vehicle movements per hour in the PM peak, and up to approximately 5,100 vehicle movements per day, using the rates in the *RMS Guide to Traffic Generating Developments*. Peak hour movements for each warehouse are shown in the following table.

Table 6.5: *Peak Hour Traffic Generation*

Peak	Peak Hour Trips (trips/hr)				Total (trips/hr)	Precinct Total[1] (trips/hr)
	Warehouse 1	Warehouse 2	Warehouse 3	Warehouse 4		
AM	228	89	20	136	473	4,021
PM	246	96	21	147	510	4,487
Weekend	154	60	13	92	319	5,227

1 As per traffic modelling for the Marsden Park Industrial Precinct

As indicated in the table, traffic generation from the proposed Stage 3 Facilities would constitute a relatively small proportion (ie. less than 12%) of the total predicted traffic generation associated with the Marsden Park Industrial Precinct.

The traffic assessment notes that the traffic volumes for the proposal are consistent with the traffic volumes estimated for the wider precinct. The assessment concludes that the proposed development would not have any significant impacts on the surrounding road network performance, which as noted above has been designed to perform efficiently for the completed industrial estate.

The assessment includes modelling of the performance of the two proposed intersections, based on project-related and background traffic growth in two scenarios, namely:

- Scenario 1 – Year 2021, assuming the proposed estate road layout; and
- Scenario 2 – Year 2036, assuming the ultimate layout plan for the precinct, which includes Hollinsworth Road extended west to South Street, and South Street extended to Bidwill.

The results of the SIDRA intersection modelling are provided in the following table, and indicate that the intersections would perform satisfactorily in both scenarios, with good levels of service and minor delay.

Table 6.6: *Intersection Modelling Results*

Intersection	Control	AM Peak			PM Peak		
		Degree of Saturation	Delay (sec)	Level of Service	Degree of Saturation	Delay (sec)	Level of Service
Scenario 1 – Opening Year 2021							
Hollinsworth Road / North-South Collector Road	Round-about	0.089	4.7	A	0.094	5.3	A
Astoria Street / North-South Collector Road	Priority	0.318	7.6	A	0.311	12.4	A
Scenario 2 – Horizon Year 2036							
Hollinsworth Road / North-South Collector Road	Round-about	0.506	3.8	A	0.517	4.0	A

Intersection	*Control*	*AM Peak*			*PM Peak*		
		Degree of Saturation	*Delay (sec)*	*Level of Service*	*Degree of Saturation*	*Delay (sec)*	*Level of Service*
Astoria Street / North-South Collector Road	Priority	0.297	8.1	A	0.289	7.8	A

Construction Traffic

The proposal would also generate construction-related traffic during the approximate 24 month construction period. The traffic assessment estimates that the construction phase would generate approximately 25 to 50 truck movements a day (or up to 5 trucks an hour on average), with truck movements varying depending on the construction activities.

Construction traffic would access the site via the existing internal estate road network, with no access through residential areas required.

As such, construction-related traffic is unlikely to result in any significant traffic or safety issues. Nonetheless, a Construction Traffic Management Plan (CTMP) would be prepared to appropriately manage traffic during construction works. The plan would include best practice traffic management measures, including:

- minimising disruption to all road users during the construction period;
- providing traffic control to regulate construction traffic movements when required;
- ensuring construction traffic uses the estate arterial access roads, and minimising traffic during peak traffic periods where practicable;
- maintaining property access throughout the construction period with suitable alternative access arrangements provided otherwise; and
- providing clear signage and alternate pedestrian routes if footpaths are affected.

6.7.4 Parking

The proposed development includes the provision of a total of 779 car parking spaces (including 15 disabled spaces). In addition to these parking spaces, bicycle racks and change facilities would be provided, as indicated on the site plans.

The car parking provision is based primarily on the expected parking demand from the facilities, as well as consideration of the required parking rates in the RMS's *Guide to Traffic Generating Developments* and the Growth Centres DCP.

The proposed parking provision for each facility, together with the requirements of the Growth Centres DCP and the RMS Guide, are shown in the following table.

Table 6.7: *Proposed Parking Provision*

Land Use	*Gross Floor Area (m^2)*	*Growth Centres DCP*		*RMS Guide*		*Proposed Spaces*
		Required Parking Space Rate	*Total Required*	*Required Parking Space Rate*	*Total Required*	
Warehouse 1						
Warehouse	41,900	1 per 75m^2 for GFA <7,500m^2 1 per 200m^2 for GFA >7,500m^2	272	1 per 300m^2	139.7	344
Office	2,000	1 per 40m^2	50	1 per 40m^2	50	
Total	43,900		322		190	

Land Use	*Gross Floor Area (m^2)*	*Growth Centres DCP*		*RMS Guide*		*Proposed Spaces*
		Required Parking Space Rate	*Total Required*	*Required Parking Space Rate*	*Total Required*	
Warehouse 2						
Warehouse	16,000	1 per 75m^2 for GFA <7,500m^2 1 per 200m^2 for GFA >7,500m^2	142.5	1 per 300m^2	53.3	157
Office	1,100	1 per 40m^2	27.5	1 per 40m^2	27.5	
Total	17,100		170		81	
Warehouse 3						
Warehouse	3,475	1 per 75m^2 for GFA <7,500m^2 1 per 200m^2 for GFA >7,500m^2	46.3	1 per 300m^2	11.6	54
Office	350	1 per 40m^2	8.8	1 per 40m^2	8.8	
Total	3,850		56		21	
Warehouse 4						
Warehouse	25,485	1 per 75m^2 for GFA <7,500m^2 1 per 200m^2 for GFA >7,500m^2	189.9	1 per 300m^2	85	224
Office	690	1 per 40m^2	17.3	1 per 40m^2	17.3	
Total	26,175		208		103	
Grand Total			**756**		**395**	**779**

As shown, the proposed parking provision for each facility is well above the requirements of the RMS Guide, but marginally below the requirements of the Growth Centres DCP for Warehouses 2 and 3. However, overall the development provides more spaces than required under the DCP, due to the considerable surplus provided for Warehouse 1 and Warehouse 4.

It is noted that the required warehouse parking provision under the Growth Centres DCP is based on traditional industrial facilities, and is considered to be significantly in excess of the demand generated by modern large-footprint warehouse developments.

On this basis, and given that the Warehouse 2 and 3 facilities would provide only marginally less parking spaces than required under the Growth Centres DCP, it is considered that the proposed parking supply is adequate to satisfy the parking demands of the development.

6.7.5 Pedestrians, Cycling and Public Transport

The proposed roads would include provision of footpaths and shared paths in accordance with the requirements of the Growth Centres DCP, namely (see **Figure 6.16**):

- a 1.5 metre footpath on one side of the Hollinsworth Road extension, and a 2.5 metre shared path on the other side; and
- 1.5 metre footpaths on both sides of the north-south collector road.

The individual warehouse facilities would also include a network of pedestrian pathways on-site to enable efficient and safe access to and between the warehouses, ancillary offices and car parks.

The facilities would also include the provision of bicycle parking spaces near the main entrances to the warehouse and office buildings, as well as internal change facilities.

Two bus services currently provide access to the business park, including Bus 757 which provides access to Riverstone and Mount Druitt Stations, and Bus 751 which provides access to Blacktown Station. The Growth Centres DCP identifies a future bus stop on Hollinsworth Road near the intersection with the north-south collector road, which would provide efficient access to the individual warehouse sites.

The traffic assessment concludes that the proposed on-site infrastructure, and existing off-site infrastructure and services, are adequate to accommodate and facilitate pedestrian, cycling and public transport demand from the proposed development.

6.8 Wastes and Hazards

6.8.1 Wastes

A Waste Management Plan for the construction and operational phases of the proposed development has been prepared by PJEP, and is attached in **Appendix N**. This plan has been prepared in accordance with the waste avoidance, reduction and recycling principles in the *NSW Waste Avoidance and Resource Recovery Strategy 2014*.

Construction Waste

The construction phase of the proposed development would generate wastes associated with:

- demolition of existing minor improvements (mainly fencing):
- clearing;
- excavation; and
- facility construction and infrastructure development.

Green waste generated during clearing would be mulched on-site for on-site beneficial reuse, or disposed of to an appropriately licensed facility for recycling.

The earthworks have been designed on a cut-to-fill basis, however approximately 16,920m^3 of excess fill would be generated and would be required to be exported from the site. Excess fill would be exported to other areas of Sydney Business Park for beneficial reuse. In the interim, the excess would be stockpiled in the area to the south of Warehouse 1, as shown on the Erosion and Sediment Control Plan (see **Appendix E**).

Construction of the facilities and infrastructure would also generate waste. Wastes would be avoided as far as practicable through proper construction planning, and recyclable wastes would be separated and recycled as per the Waste Management Plan.

Operational Waste

The operation of each of the Stage 3 Facilities is not expected to generate significant amount of waste, with waste streams typical of standard warehousing developments. The main waste types and anticipated disposal methods include:

- cardboard and paper – separated for off-site recycling;
- plastic packaging – separated for off-site recycling (where possible);
- pallets – returned to supplier or separated (where broken) for recycling (where possible);
- waste/reject product – returned to supplier or disposed to licensed waste management facility;
- recyclable glass, metal and plastic containers – separated for off-site recycling;
- non-recyclable general waste (inc. putrescible waste) – to licensed waste management facility;
- hazardous solid waste (inc. any dangerous goods) – to licensed waste management facility;
- liquid waste from kitchens – to sewer in accordance with Sydney Water requirements; and
- ablutions waste – to sewer.

6.8.2 Bushfire Hazard

The Basin A area to the west of the site is identified as a bushfire risk area in the Growth Centres DCP, with the DCP requiring a 15 metre Asset Protection Zone (APZ) to the future conservation area (see **Figure 6.17**). The DCP also provides for a 15 metre APZ on the southern boundary of the site, adjacent to the infrastructure zoned corridor for the future Castlereagh Freeway.

The site is also identified as bushfire prone land as mapped in Council's bushfire prone maps, and existing bushland is located on and around the site (see **Figure 6.18**).

The NSW Rural Fire Services' (RFS') *Planning for Bush Fire Protection* applies to development applications on bushfire prone land, and sets out requirements for assessment and management of bushfire risk at the planning stage of development.

Given the existing bushfire risk, a bushfire assessment has been undertaken for the proposal by Eco Logical, and is attached in **Appendix O**.

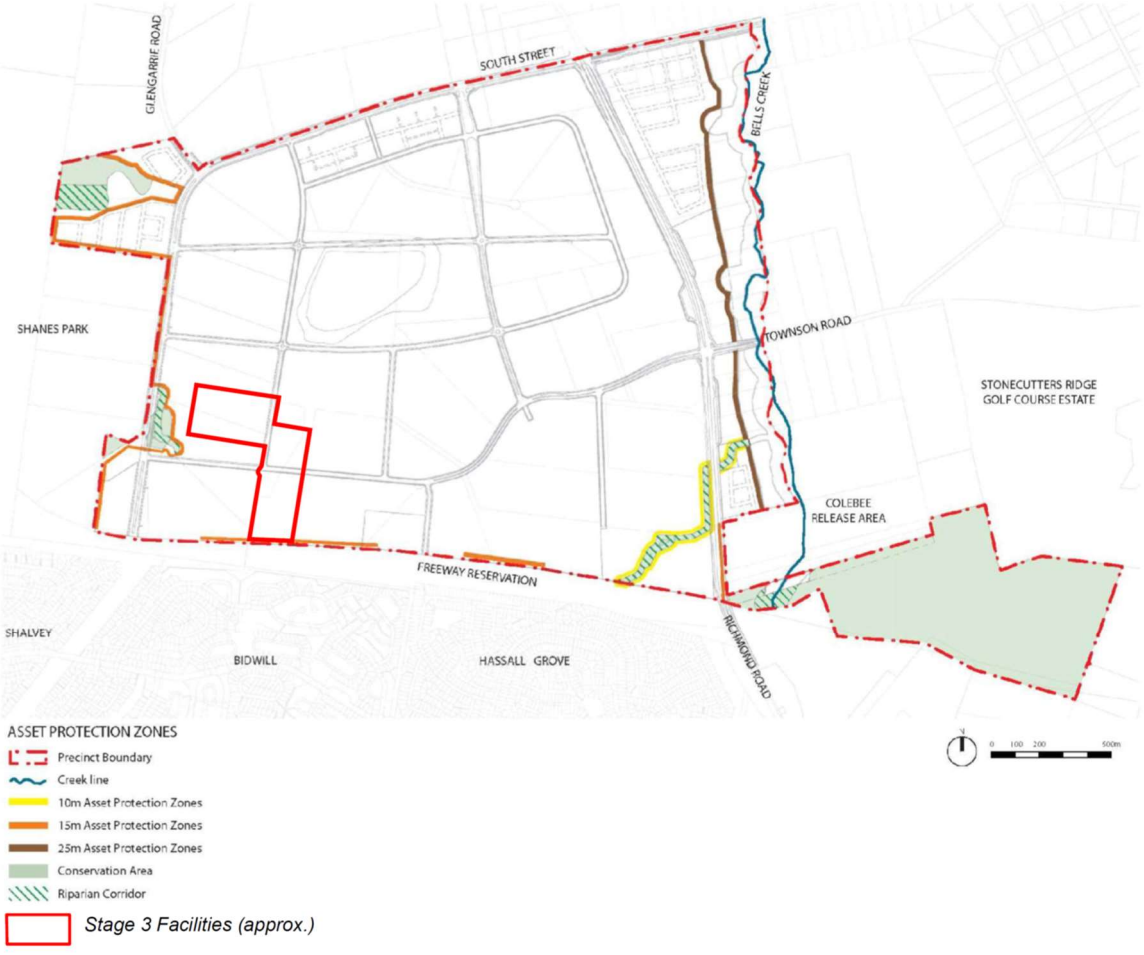


Figure 6.17: *Bushfire Risk Areas (Source: Growth Centres DCP)*

The assessment confirms that the development is able to satisfy the aims and objectives of the *Planning for Bush Fire Protection* guidelines, subject to a number of measures, including:

- Asset Protection Zones (APZs) are provided and maintained in accordance with the *Planning for Bush Fire Protection* guidelines. The assessment notes that all of the proposed facilities provide adequate APZs to bushfire hazards within the boundaries of the individual warehouse sites. Whilst the APZ for part of the southern boundary of Warehouse 4 (ie. ≥8-20 metres) is

less than the 15 metre APZ identified in the Growth Centres DCP, the assessment concludes that the APZ would meet the performance criteria and objectives in the guidelines;

- landscaping is implemented and maintained in accordance with the guidelines, which are aimed at minimising flame contact, radiant heat and fuel loads;
- construction of facilities in accordance with the general fire safety provisions in the National Construction Code, with provision of additional ember protection measures for facilities in proximity to bushfire hazard (ie. Warehouses 1, 2 and 4);
- provision of water supply and hydrants in accordance with the BCA and relevant Australian Standards;
- electrical services to be provided underground, and any gas services to be installed and maintained in accordance with relevant Australian Standards; and
- preparation of an Emergency Plan for each facility in accordance with the requirements of the *Work Health and Safety Regulation 2017* and relevant legislation.

The proposed development would be undertaken in accordance with the recommendations of the bushfire assessment. The Emergency Plans would be prepared prior to the commencement of operation of each facility.

Figure 6.18: *Bushfire Hazard Assessment (Source: Eco Logical)*

6.8.3 Crime Risk

The Stage 3 Facilities are not expected to increase crime rates in the locality, as the proposed development has been designed to a high standard and does not involve any offensive activities, and is therefore not expected to degrade the amenity of the locality.

Notwithstanding, the facilities have been designed in accordance with crime prevention through environmental design (CPTED) principles, and include a number of security measures, including:

- design that provides for casual surveillance, and activation of the streetscape;
- providing clear sightlines and transitions between public and private space;
- high quality and attractive landscaping which does not provide opportunities for hiding or concealment;
- clear access and egress points;
- security fencing, located generally behind the building setback so as to not dominate the streetscape;
- security gates, bollards and retaining walls to control vehicular entry;
- closed circuit TV security networks for each facility;
- security lighting; and
- internal security authorisation systems, including high security facilities for controlled pharmaceutical products in the API Facility.

With the implementation of these measures, the security threats associated with the development are expected to be able to be effectively managed.

Further details of CPTED measures are provided in the attached NSW Police checklist[20] (see **Appendix P**).

6.8.4 Dangerous Goods and Hazardous Substances

As outlined in Section 4.3, SEPP 33 and the Department's *Applying SEPP 33* guidelines are used to ascertain whether a proposal is a hazardous industry. If a proposed development involves storage of dangerous goods in excess of the risk screening thresholds in the SEPP 33 guidelines then it is deemed to be a 'potentially hazardous industry', and a more detailed Preliminary Hazard Analysis (PHA) is required to assess whether the development is a 'hazardous industry'.

The API Facility (Warehouse 4) is proposed to be used for the storage and distribution of pharmaceutical products, including a range of dangerous goods. The other warehouses would be used for the storage and distribution of general consumer goods, although they do have the potential to store minor amounts of dangerous goods, including the TJX Facility (Warehouse 1) which would store some aerosols and flammable liquids (eg. hand sanitisers).

Given the proposed storage of dangerous goods, a specialist SEPP 33 Analysis for the proposal has been undertaken by Riskcon Engineering, and is attached as **Appendix Q**. The analysis reviewed the proposed and/or assumed[21] dangerous goods storage for each of the proposed facilities, and compared this to the SEPP 33 screening thresholds. A summary of the analysis is provided in **Table 6.8** below.

As indicated in the table, the proposed dangerous goods storage for each facility would not exceed the screening thresholds in the guidelines. With regard to Class 3 Flammable Liquids storage for Warehouses 1, 2 and 4, this compliance is subject to meeting certain minimum boundary separation distances.

[20] These checklists are generally required to be completed for local development applications to Blacktown Council.

[21] In the case of Warehouse 2 and Warehouse 3

Table 6.8: *Dangerous Goods Storage*

Dangerous Goods Class	*Maximum Quantity*	*SEPP 33 Threshold*	*Exceeds Threshold?*
Warehouse 1 (TJX Facility)			
2.1 – Flammable Gases (aerosols)	4,000 kg[1]	10,000 kg	No
3 – Flammable Liquids (eg. hand sanitisers)	20,000 kg	6.5m boundary separation required	No
Warehouse 2[2]			
2.1 – Flammable Gases (aerosols)	7,500 kg[1]	10,000 kg	No
3 – Flammable Liquids	15,000 kg	5m boundary separation required	No
8 – Corrosive Substances	10,000 kg	25,000 kg	No
Warehouse 3[2]			
2.1 – Flammable Gases (aerosols)	4,000 kg[1]	10,000 kg	No
3 – Flammable Liquids	4,500 kg	5,000 kg[3]	No
8 – Corrosive Substances	5,000 kg	25,000 kg	No
Warehouse 4 (API Facility)			
2.1 – Flammable Gases (aerosols)	9,500 kg[1]	10,000 kg	No
2.2 – Non-flammable, non-toxic gases	700 kg	N/A	No
3 – Flammable Liquids (eg. hand sanitisers)	60,000 kg	8.5m boundary separation required	No
4.1 – Flammable Solids (eg. ethanol wipes)	2,000 kg	5,000 kg	No
5.1 – Oxidising Substances	3,500 kg	5,000 kg	No
6.1 – Toxic Substances	100 kg	2,500 kg	No
8 – Corrosive Substances	1,000 kg	25,000 kg	No
9 – Miscellaneous Goods	5,000 kg	N/A	No

1 LPG in canister, based on 25% of the product weight being LPG
2 Assumed dangerous goods storage based on warehouse size and conservative estimate of typical storage
3 Limit before assessment becomes distance based

For Warehouses 1 and 2, this minimum separation distance is provided by the proposed building setbacks. For Warehouse 4, this minimum separation distance would be achieved by restricting flammable liquids storage from certain areas of the warehouse, namely within:

- 6 metres of the northern warehouse wall;
- 1 metre of the eastern warehouse wall; and
- 3 metres of the southern warehouse wall.

It is noted that the proposed Class 3 Flammable Liquids storage in Warehouse 4 is considerably higher than normal (ie. an approximate increase of 100%) as a result of the significant current demand for hand sanitiser as a result of the COVID-19 pandemic.

The SEPP 33 Analysis also includes consideration of dangerous goods transport, concluding that the cumulative transport of dangerous goods from all of the facilities would not exceed to relevant transport thresholds.

Consequently, the proposed facilities are not considered to constitute 'potentially hazardous industries'. Nonetheless, the SEPP 33 Analysis includes a number of recommendations for the storage of dangerous goods in each facility, including that:

- dangerous goods are stored in accordance with applicable standards (ie. AS/NZS 3833:2007 and AS 1940-2017);
- risk assessment reporting is undertaken in accordance with the *Work Health and Safety Regulation 2017* (WHS Regulation);

- hazardous area classification is prepared for flammable gases and liquids storage in accordance with AS/NZS 60079.10.1:2009 and the requirements of the WHS Regulation; and
- that Class 3 Flammable Liquids storage in the Warehouse 4 (API Facility) are restricted from the areas outlined above.

Sydney Business Park and the respective end users would carry out the development in accordance with these recommendations.

6.9 Social and Economic

Schedule 3 of the Growth Centres DCP outlines the precinct planning vision for the Marsden Park Industrial Precinct. The relevant part of this vision is reproduced below:

> *"The vision for the Marsden Park Industrial Precinct is to create an attractive employment precinct that provides for a diverse range of job opportunities to support the growing residential areas in Sydney's North West. The precinct will be characterised by a mix of employment generating uses such as general and light industrial, business parks, and commercial uses. It will also consist of some smaller medium and low density residential areas near the future Marsden Park Town Centre to the north.*
>
> *Industrial land will form the majority of the precinct. It is intended to support a range of light and general industrial uses from large floor-plate warehousing and storage facilities which capitalise on the precinct's location near Richmond Road, to smaller factory unit style developments for more intensive trade based activities. Industrial uses are to operate to best practice industry standards and not impose any adverse impacts on the nearby residential lands. Buildings are to be appropriately designed to address the street and other public domain areas, and all street frontages will contain quality landscaping that establishes a high standard of character and design."*

The proposed Stage 3 Facilities are considered to be wholly consistent with this precinct planning vision. In this regard, the proposed development:

- would facilitate the creation of an attractive employment precinct through the development of four world class warehouse and distribution centres that have been designed to a high architectural and landscape quality;
- would create a diverse range of job opportunities;
- is consistent with the Indicative Layout Plan for the precinct and the relevant built form controls in the Growth Centres SEPP, and generally consistent with the development controls in the Growth Centres DCP;
- would provide a range of warehouse sizes and employment opportunities;
- is predicted to comply with applicable noise and amenity criteria at all surrounding residential and other receiver locations; and
- would provide a high quality public domain that is consistent with existing part of Sydney Business Park and the surrounding precinct.

Importantly, the development would result in significant socio-economic benefits for Western Sydney, including:

- a significant capital investment of some $157 million;
- generation of 610 operational jobs, which is well above the typical employment density achieved for employment land in Western Sydney (see Section 7.3); and
- delivery of key infrastructure required for the Marsden Park Industrial Precinct, including the extension of Hollinsworth Road and the North-South Collector Road.

Given the socio-economic benefits, and that environmental assessment indicates that the proposal is unlikely to result in any significant adverse impacts on the amenity of surrounding receivers or on

the environment, it is considered that the proposed Stage 3 Facilities are unlikely to result in any significant adverse social or socio-economic impacts.

7 JUSTIFICATION AND CONCLUSION

7.1 Summary of Mitigation Measures

A summary of the proposed measures to mitigate and/or manage the environmental aspects of the proposed development is provided in the following table.

Table 7.1: *Summary of Mitigation Measures*

Issue	***Mitigation Measure***	***EIS Ref.***
Staging and Infrastructure	• Sydney Business Park would not commence construction works (involving land disturbance) on site until the temporary sediment basin in the Basin A area has been commissioned	• S.3.8
	• Sydney Business Park would not commence operations of any building on site until all infrastructure necessary for the operation of that building has been commissioned, including: o external roadworks (including Hollinsworth Road and/or the north-south collector road); o stormwater drainage infrastructure, either via: - Basin E for Warehouse 3; or - Basin A (temporary or permanent basin) for Warehouses 1, 2 and 4; and o other services, including water, sewer, electricity and telecommunications	• S.3.8
	• Sydney Business Park would enter into a voluntary planning agreement (VPA) or works-in-kind agreement (WIKA) with Council, in accordance with Section 7.4 of the EP&A Act, to facilitate the proposed construction of relevant infrastructure, including the: o Hollinsworth Road extension; o Hollinsworth Road / north-south collector road intersection roundabout; and o Basin A stormwater basin works. • The VPA or WIKA would be entered into prior to the commencement of construction of the relevant infrastructure	• S.4.5
General Environmental Management	• Sydney Business Park would prepare a detailed Construction Environmental Management Plan (CEMP) for the Stage 3 Facilities development, prior to the commencement of construction	• S.6
Design and Visual	• The Stage 3 Facilities would be developed generally in accordance with the architectural and landscape plans for the facilities	• S.3 • App. B • App. C
	• All external lighting would be installed in accordance with *AS 4282(INT) - Control of Obtrusive Effects of Outdoor Lighting*	• S.3.11
Soil and Water	• The Stage 3 Facilities would be developed generally in accordance with the Erosion and Sediment Control Plan for the facilities, and the Department's *Managing Urban Stormwater – Soils and Construction* guidelines	• S.6.2 • App.E
	• The Stage 3 Facilities would be developed generally in accordance with the salinity management measures in the Salinity Assessment and Management Plan (Douglas Partners, 2020), applicable Australian Standards including AS2159, AS3600 and AS4058, and the Department's *Building in a Saline Environment* guideline	• S.6.2 • App.I
	• The Stage 3 Facilities would be developed generally in accordance with the concept stormwater management plan for the facilities. A	• S.6.2 • App. F

Issue	*Mitigation Measure*	*EIS Ref.*
	final stormwater management plan would be prepared in consultation with Council prior to the commencement of construction, including provision of: o rainwater tanks for each facility; o primary and secondary stormwater quality improvement devices and related stormwater infrastructure for each facility; and o temporary stormwater detention infrastructure in the Basin A area	
Noise and Air Quality	• Construction and operation of the Stage 3 Facilities would be managed in accordance with the relevant noise criteria under the: o *Noise Policy for Industry (NPfI)*; o *Interim Construction Noise Guideline (ICNG)*; and o *Road Noise Policy*	• S.6.3
	• Construction activities would be undertaken generally within the hours stipulated in the EPA's *Interim Construction Noise Guideline*	• S.3.5 • S.6.3
	• Construction noise would be managed in accordance with the measures outlined in the Noise Assessment, which would be addressed the CEMP for the development. The measures would include: o noise management controls, including: - site induction training; - operator instruction; - site noise planning, including locating noisy plant away from nearby receivers; - scheduling noisy activities so that they do not occur simultaneously, and/or during less sensitive time periods; and - selecting less noisy plant and equipment where practicable; o maintaining effective community consultation; and o maintaining a complaints handling and management system	• S.6.3 • App.J
	• Sydney Business Park would implement the following noise mitigation measures as soon as practicable during construction of the applicable facilities: o installation of a 2.4 metre high acoustic wall on the eastern boundary of the Warehouse 2 site; o installation of a 2.7 metre high acoustic wall on the boundary in the south-western corner of the Warehouse 4 site; and o ensure that rooftop mechanical air-conditioning units are located towards the western side of the office roof for Warehouse 2 and Warehouse 3 (with final placement subject to detailed design)	• S.3.11 • S.6.3
	• Dust emissions during construction works would be managed in accordance with standard best practice techniques, including: o minimising the area of disturbance as far as practicable; o minimising drop heights for materials being worked on the site; o keeping exposed surfaces moist at all times; o rehabilitating/revegetating disturbed surfaces as soon as practicable; and o ensuring that trucks are covered and do not track sediment onto public roads	• S.6.4
Greenhouse Gas and Resource Use	• The Stage 3 Facilities would be developed in accordance with the energy and water resource use efficiency measures outlined in this EIS. This would include, amongst other things, rooftop photovoltaic solar systems for each warehouse, including nominally: o 1,000 kilowatt systems for Warehouse 1 (TJX Facility) and Warehouse 4 (API Facility); and o 100 kilowatt systems for Warehouses 2 and 3	• S.3.9

Issue	*Mitigation Measure*	*EIS Ref.*
Aboriginal Heritage	• An updated targeted investigation of the two Aboriginal sites on the site (MPIP 17 and MPIP 18) would be undertaken by a suitably qualified archaeologist, in consultation with the Aboriginal community, to inform the management of the sites • The consultation process for the investigation would be undertaken in accordance with Heritage NSW's *Aboriginal Cultural Heritage Consultation Requirements for Proponents (2010)*, and would result in the preparation of a management strategy for the identified Aboriginal sites • Sydney Business Park would implement the targeted investigation and management strategy prior to the commencement of construction for the Warehouse 4 Facility	• S.6.6
Traffic	• Sydney Business Park would complete the following roadworks to the satisfaction of Council, prior to the commencement of operation of any of the Stage 3 Facilities that require access from that road: o Hollinsworth Road extension to the western side of the site; o North-south collector road between Astoria Street and Hollinsworth Road; o Roundabout intersection between Hollinsworth Road and the north-south collector road; and o Priority give-way intersection between Astoria Street and the north-south collector road.	• S.3.8 • S.6.7
	• Site access, parking and internal circulation arrangements for the Stage 3 Facilities would be developed in accordance with relevant Australian Standards (including AS2890.1 and AS2890.2)	• S.6.7
	• Construction Traffic Management Plans would be prepared to appropriately manage traffic and traffic-safety construction works	• S.6.7
Wastes and Hazards	• The Stage 3 Facilities would be developed and managed generally in accordance with the Waste Management Plan for the facilities	• S.6.8 • App. N
	• The Stage 3 Facilities would be developed in accordance with the recommendations of the Bushfire Assessment for the facilities, including provision of: o Asset Protection Zones; o landscaping in accordance with the Planning for Bushfire Protection guidelines; o facility construction in accordance with the National Construction Code, with additional ember protection measures for Warehouses 1, 2 and 4; o water supply and hydrants in accordance with the BCA and relevant Australian Standards; o underground electrical services; and o preparation of an Emergency Plan for each facility	• S.6.8 • App. O
	• All dangerous goods and hazardous substances would be stored in accordance with applicable standards, including AS/NZS 3833:2007 and AS 1940-2017	• S.6.8
	• Risk assessment and reporting would be undertaken in accordance with the *Work Health and Safety Regulation 2017* (WHS Regulation)	• S.6.8
	• Hazardous area classification would be prepared for flammable gases and liquids storage in accordance with AS/NZS 60079.10.1:2009 and the requirements of the WHS Regulation	• S.6.8
	• If total Class 3 Flammable Liquids storage in Warehouse 4 exceeds 30,000kg, such storage would not be located within: o 6 metres of the northern warehouse wall; o 1 metre of the eastern warehouse wall; or o 3 metres of the southern warehouse wall.	• S..6.8

7.2 Consideration of Alternatives

Alternatives to carrying out the development on the site in the proposed manner include:

- developing the site to a lesser or higher scale;
- developing the site with a different layout and/or design; and
- not undertaking the development, or components of it, at all.

In terms of scale, it is noted that:

- the floor space ratio (FSR) for the Stage 3 Facilities ranges from 45% to 60%, which is well below the 70% maximum FSR permitted under the Marsden Park Industrial Precinct Plan;
- the proposed facilities have maximum ridge heights ranging from 13.7 metres to 14.6 metres, which is within the 16 metre and 18 metre maximum heights permitted under the Marsden Park Industrial Precinct Plan, and is consistent with contemporary warehouse buildings in the North West Growth Centre and Western Sydney Employment Area;
- the proposed facilities have building setbacks to Astoria Street, Hollinsworth Road and the north-south collector road that comply with the applicable setbacks in the Growth Centres DCP (ie. 7.5 metres);
- the proposed scale of each building has been designed in accordance with the constraints of the site, in particular the TransGrid easement that traverses through the site;
- the proposed buildings have generous setbacks to surrounding receivers, including a minimum setback of 60 metres to the Ingenia Lifestyle caravan park; and
- environmental assessment indicates that the development is able to be undertaken in a manner that would not adversely affect the environment or surrounding land users.

Accordingly, it is considered that the proposed scale of the Stage 3 Facilities provides a reasonable balance between maximising the development and employment opportunities of the site whilst ensuring that the amenity of the surrounding area is not adversely affected.

In terms of alternative layouts and/or designs, it is noted that:

- the proposed Stage 3 Facilities have been designed to a very high quality with a range of architectural forms, articulation and materials that respond to the site's attributes and constraints;
- the design of the facilities has paid particular attention to key frontages to Astoria Street, Hollinsworth Road and the north-south collector road. Loading areas, utilities, plant and equipment have been located away from the key frontages and/or effectively screened with landscaping;
- the proposal has been designed in a manner that addresses one of the site's main constraints (ie. the TransGrid easement), by avoiding building and minimising parking within the easement area;
- the proposed facilities provide appropriate open space areas, with generous landscaping provided to key street frontages;
- the facilities comply with the built form development controls of the Marsden Park Industrial Precinct Plan and Growth Centres DCP, with the exception of a minor non-compliance with car parking rates under the DCP; and
- environmental assessment indicates that the development is able to be undertaken in a manner that would not adversely affect the environment or surrounding land users.

Accordingly, it is considered that the layout and design of the proposed Stage 3 Facilities provides a reasonable balance between the utilitarian needs of the facilities, and the desire for an attractive and appealing development that complements the Sydney Business Park estate.

Not undertaking the development at all on the site is not considered to be a reasonable alternative, as:

- the development is permissible on the land and is consistent with the objectives of the Growth Centres SEPP and the Marsden Park Industrial Precinct Plan, particularly as it represents development for non-obtrusive warehousing and distribution purposes and incorporates a high quality architectural and landscape design;
- the development is not predicted to have any significant impacts on the environment or surrounding land users; and
- not undertaking the development would negate the facility's significant socio-economic benefits, including a capital investment of $157 million in the Marsden Park Industrial Precinct and the generation of approximately 610 jobs in Western Sydney.

7.3 Project Need and Justification

The proposed Stage 3 Facilities would provide high quality integrated warehouse and distribution centres in a manner that would complement the character of Sydney Business Park. Together with the proposed infrastructure, the proposal would deliver a considerable portion of the business park in a manner that is consistent with the Indicative Layout Plan for the Marsden Park Industrial Precinct.

The development represents a significant capital and labour investment by Sydney Business Park and the identified end users in the Marsden Park Industrial Precinct and the wider North West Growth Centre, identified in the *Greater Sydney Region Plan* as a key centre for employment and urban growth in Western Sydney over the next 20 years.

Importantly, the development will generate approximately 610 operational jobs, which represents a considerable employment density compared to contemporary warehousing developments in Western Sydney. To illustrate, the development would achieve an employment density of about 38 jobs per developable hectare, notwithstanding that a considerable portion of the site is effectively constrained from development by the presence of the TransGrid easement. This employment density is well above the 20 jobs per hectare traditionally used in strategic planning for employment lands in Western Sydney[22].

Environmental assessment indicates that the development is unlikely to result in any significant environmental impacts or adversely affect the amenity of the surrounding area. Further, the development is able to be undertaken in a manner that is consistent with the principles of ecologically sustainable development, which include[23]:

- *the precautionary principle* – the development is not predicted to pose any threat of serious or irreversible environmental damage;
- *inter-generational equity* – the development is not predicted to adversely affect the health, diversity and productivity of the environment for the benefit of future generations;
- *conservation of biological diversity and ecological integrity* – the development is not predicted to have any significant adverse impacts on biodiversity; and
- *improved valuation, pricing and incentive mechanisms* **–** the development is consistent with this principle.

The site is well suited to the development, as it is zoned for employment uses, is adjacent to other industrial and infrastructure zoned land, has or will have access to all required services and utilities, and is removed from residential zoned land and potential environmental hazard.

[22] As used in the former Sydney Metropolitan Plan

[23] As outlined in the *Environmental Planning and Assessment Regulation 2000*

On balance, it is considered that the development represents the orderly and reasonable development of the land, and is therefore in the public interest.

7.4 Conclusion

Having regard to all the salient environmental, social and economic issues, it is considered that the proposed development represents orderly development of the land. It is respectfully requested that the Minister for Planning and Public Spaces (or his delegate)[24], having due regard for the information submitted in this document, grants approval to the proposed Stage 3 Facilities in Sydney Business Park.

[24] Or the Independent Planning Commission if the proposal meets the thresholds for the Commission to be consent authority

APPENDIX A

APPENDIX B

APPENDIX C

APPENDIX D

APPENDIX E

APPENDIX F

APPENDIX G

APPENDIX H

APPENDIX I

APPENDIX J

APPENDIX K

APPENDIX L

APPENDIX M

APPENDIX N

APPENDIX O

APPENDIX P

APPENDIX Q