

Environmental Impact Statement

Summit at Kemps Creek

706-752 Mamre Road, Kemps Creek

Submitted to the Department of Planning, Housing and Infrastructure
on behalf of ISPT Pty Ltd

SSD-30628110





'Gura Bulga'

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.



'Dagura Buumarri'

Liz Belanjee Cameron

'Dagura Buumarri' – translates to Cold Brown Country. Representing Victoria.



'Gadalung Djarri'

Liz Belanjee Cameron

'Gadalung Djarri' – translates to Hot Red Country. Representing Queensland.

Ethos Urban acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We pay our respects to their Elders past, present and emerging.

In supporting the Uluru Statement from the Heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

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19 January 2024

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19 January 2024

Version No.	Date of issue	Prepared by	Approved by
1.0 (DRAFT)	09/09/2022	LJ, CD	GK
2.0 (DRAFT)	20/09/2022	LJ, CD	GK
3.0 (TEST OF ADEQUACY)	27/09/2022	LJ, CD	GK
4.0 (TEST OF ADEQUACY)	02/03/2023	LJ, CD	GK, TW
5.0 (FINAL)	19/01/2024	LJ, CD	GK, TW

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D. Community Engagement Table	<i>Ethos Urban</i>
E. Consolidated Mitigation Measures	<i>Ethos Urban</i>
F. CIV Cost Plan	<i>MBM</i>
G. Detailed Site Survey	<i>Land Partners</i>
H. Design Statement	<i>Watson Young Architects</i>
I. Civil Infrastructure Report	<i>AT&L</i>
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L. Landscape Drawings	<i>Geoscapes</i>
M. Proposed Plan of Subdivision	<i>Land Partners</i>
N. Mamre Road Precinct DCP Compliance Table	<i>Ethos Urban</i>
O. Crime Prevention Through Environmental Design Report	<i>Ethos Urban</i>
P. Community and Stakeholder Participation Outcomes Report	<i>Urbis</i>
Q. Transport Management & Accessibility Plan	<i>Ason Group</i>
R. Detailed Geotechnical Investigation	<i>PSM</i>
S. Salinity Management Plan	<i>PSM</i>
T. Flood Impact Assessment	<i>J. Wyndham Prince</i>
U. Visual Impact Assessment	<i>Geoscapes</i>
V. Noise Impact Assessment	<i>SLR Consulting</i>
W. Aboriginal Cultural Heritage Assessment	<i>Biosis</i>
X. Archaeological Report	<i>Biosis</i>
Y. Historical Heritage Impact Assessment	<i>Biosis</i>
Z. Biodiversity Development Assessment Report	<i>Cumberland Ecology</i>
AA. Weed Eradication Management Plan	<i>Cumberland Ecology</i>
BB. Construction Environmental Management Plan	<i>Cumberland Ecology</i>
CC. Social and Economic Impact Assessment	<i>Ethos Urban</i>
DD. Ecologically Sustainable Development Report	<i>Northrop</i>

Appendix	Author
EE. Air Quality Impact Assessment	<i>SLR Consulting</i>
FF. Waste and Resource Recovery Management Plan	<i>SDC</i>
GG. Detailed Site Investigation	<i>JBS&G</i>
HH. Remediation Action Plan	<i>JBS&G</i>
II. Bushfire Assessment Report	<i>Bushfire Consulting Services</i>
JJ. Hazard and Risk Assessment	<i>Riskcon Engineering</i>
KK. Aeronautical Impact Assessment	<i>Landrum & Brown</i>
LL. BCA 2022 Assessment and Accessibility Report	<i>Blackett Maguire + Goldsmith</i>
MM. East-West Collector Road Coordination	<i>ISPT, The GPT Group</i>
NN. Trunk Drainage Realignment Correspondence	<i>AT&L, Sydney Water</i>

Signed Declaration

Project Details		
Project Name	Summit at Kemps Creek	
Application Number	SSD-30628110	
Land to be Developed	706-752 Mamre Road, Kemps Creek identified as Lot 1 DP 104958	
Applicant Details		
Applicant Name	ISPT Pty Ltd	
Applicant Address	Level 6, 24 York Street, Sydney NSW 2000	
Prepared by		
Name	Costa Dimitriadis	Gordon Kirkby
Qualifications	BCP (Hons), MPIA	BUrbanEnvPlan, DipPM, MPIA
Address	Level 4, 180 George Street, Sydney NSW 2000	
Declaration		
Name	Timothy Ward	
Qualifications	BSc(Hons), MEnvMgt, MPIA	
Registration Number	R80023	
Organisation Registered With	Certified Environmental Practitioner Scheme (CEnvP)	
The undersigned declares that this EIS: • has been prepared in accordance with the <i>Environmental Planning and Assessment Regulation 2021</i>; • contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates; • does not contain information that is false or misleading; • addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project; • identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments; • has been prepared having regard to the Department's State Significant Development Guidelines - Preparing an Environmental Impact Statement; • contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development; • contains a consolidated description of the project in a single chapter of the EIS; • contains an accurate summary of the findings of any community engagement; and • contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.		
Signature		
		
Date	19 January 2024	

Summary

Overview

This Environmental Impact Statement (EIS) has been prepared on behalf of ISPT Pty Ltd (ISPT) (the Applicant) in support of a State Significant Development Application (SSDA) for an industrial estate identified as 'Summit at Kemps Creek'. The EIS is submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) and seeks approval for a Concept Masterplan and Stage 1 development on land at 706-752 Mamre Road, Kemps Creek (the site).

Development for the purposes of *Warehouses or distribution centres* where the relevant environmental assessment requirements have been notified under the Act before 31 May 2023 is considered State Significant Development (SSD) if it comprises a capital investment value in excess of \$30 million as identified in Schedule 1 of *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP). Given that the Proposal was notified under the act before 31 May 2023 and the proposed Stage 1 Development has a CIV greater than \$30 million, it is classified as SSD.

The site is located at 706-752 Mamre Road, Kemps Creek, within the Penrith Local Government Area (LGA). It is legally described as Lot 1 DP 104958 and is approximately 522,477m² in area. It is located within the Mamre Road Precinct (MRP) which is located within the Western Sydney Employment Area (WSEA) and Western Sydney Aerotropolis. The site was rezoned in 2020 as part of the gazettal of the *State Environmental Planning Policy (Western Sydney Employment Area) 2009*, which has since been consolidated into *State Environmental Planning Policy (Industry and Employment) 2021* (Industry and Employment SEPP). The Industry and Employment SEPP rezoned the site to IN1 General Industrial.

The MRP is a major industrial precinct that is proposed to deliver approximately 850 hectares of industrial land, as well as complementary areas for environmental conservation, open space as well as the potential for a Western Sydney freight intermodal terminal. In accordance with the Structure Plan that accompanied the precinct's rezoning the site is identified for industrial purposes, and therefore the proposed industrial development aligns with the strategic intent for the site.

The site's location within its surrounding context is illustrated in **Figure 1** below.

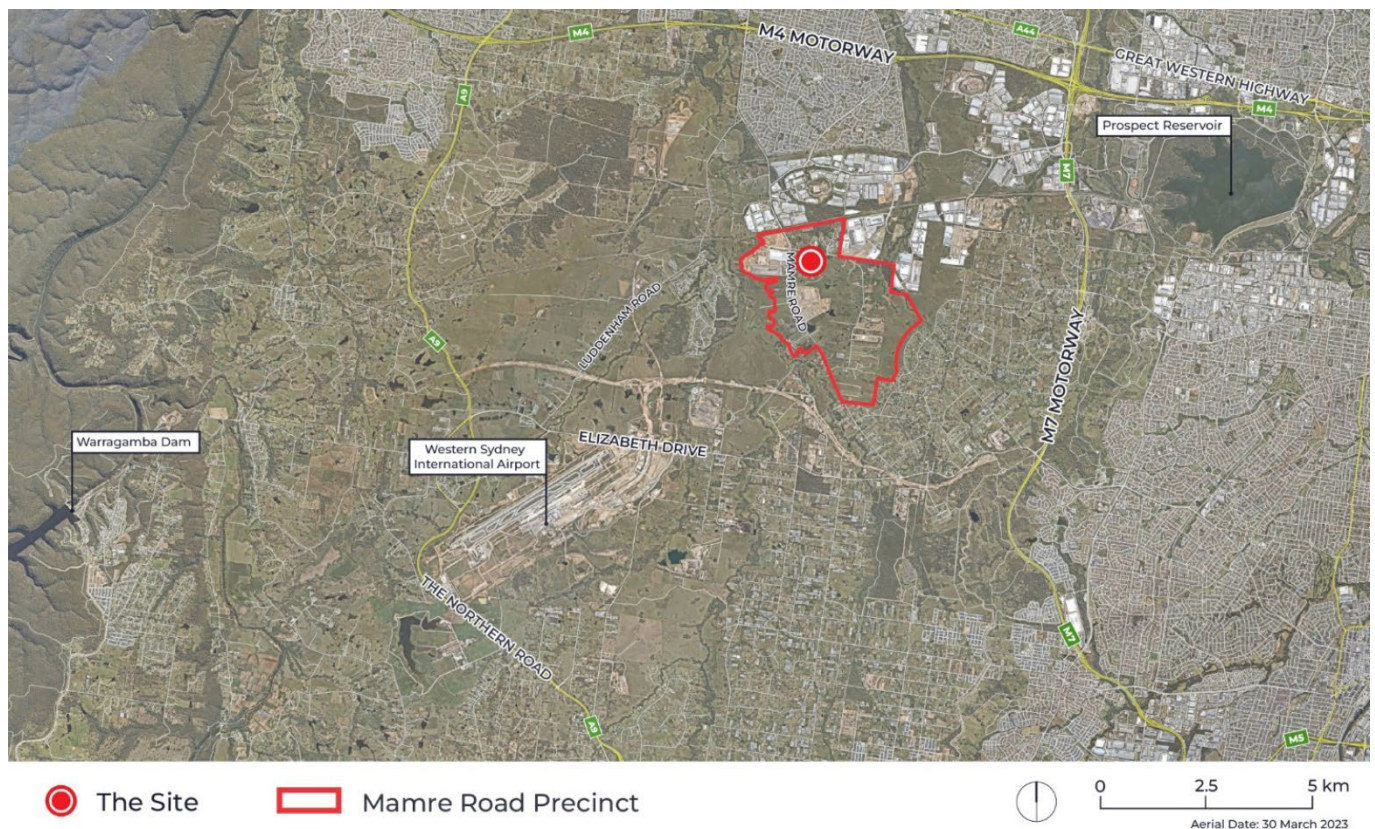


Figure 1 Site Location and Context Map

Source: Nearmap, Ethos Urban

Analysis of Alternatives

During the design process of the proposed development, feasible alternative options for the site were explored. This included the following:

- **Do Nothing** – Doing nothing and retaining the current rural-residential usage of land at the site would represent a significant missed opportunity that is contrary to the envisioned usage of the site under the Industry and Employment SEPP. Doing nothing would fail to support the orderly development of industrial land at the site and fail to contribute towards jobs and the current shortage of industrial land within the Western Sydney and the Greater Sydney Metropolitan Area more broadly.
- **Use of the site for an Alternative Purpose** – Use of the site for an alternate purpose (outside of industrial uses) is generally not appropriate given the IN1 General Industrial zoning of the site. Using the site for non-industrial uses would also be inconsistent with the desired outcomes of the Industry and Employment SEPP and therefore would be an inappropriate course of action.
- **Alternative Design** – Alternative designs to the estate design and layout as well as the proposed buildings pad levels were considered throughout the development of the Proposal. The proposed building pad heights have been thoroughly considered due to the complexity of the existing topography on the site. In addition, the following required consideration:
 - The need to achieve a balanced cut and fill and retaining walls compliant with the MRP Development Control Plan (DCP);
 - Accommodate necessary infrastructure such as stormwater management, the Southern Link Road (SLR) and internal road network; and
 - Connect to the potential future dedicated freight network at grade.

As such, it was determined that the feasible alternative options for the site do not represent the highest and best use nor the best overall outcome when compared against the Proposal, which is detail in the following section.

The Proposal

This SSDA seeks consent for a Concept Masterplan and Stage 1 Development of an industrial estate. Specifically, the following is sought for consent under this SSDA:

Concept Masterplan

A Concept Masterplan for the site is proposed, comprising eight (8) industrial warehouse buildings including ancillary office space and a café, including:

- Proposed use of the land for Warehouse or distribution centre, General industrial, *Food and drink premises* and ancillary *Office premises* development;
- An indicative total Gross Floor Area (GFA) of 244,413m², comprising;
 - Warehouse 1 – 40,422m²;
 - Warehouse 2 – 21,220m²;
 - Warehouse 3 – 17,621m²;
 - Warehouse 4 – 44,491m²;
 - Warehouse 5 – 20,544m²;
 - Warehouse 6 – 20,561m²;
 - Warehouse 7 – 42,922m²;
 - Warehouse 8 – 36,390m²; and
 - Café – 242m².
- Road layout including high order roads with external connections, and internal estate local industrial roads;
- Conceptual building locations, hardstand areas, car parking arrangements, building heights, setbacks, built form parameters and site landscaping; and
- Provision of land for the potential future dedicated freight corridor.

Stage 1 Development

The delivery of the Concept Masterplan is proposed to be staged, under this application Stage 1 development works are proposed, that comprise:

- Site preparation works, including:

- Demolition and clearing of all existing built form structures;
- Clearing of all existing vegetation and farm dam decommissioning;
- Site wide bulk earthworks including 'cut and fill' to create flat development platforms for the proposed built form (Warehouses 1-3) and future built form (Warehouse 4-8); and
- Construction of inter-allotment, road and boundary retaining walls.
- Site servicing and infrastructure works, including:
 - Construction of an internal road network, comprising:
 - One (1) Collector Road; and
 - Two (2) Local Industrial Roads;
 - Construction of stormwater and servicing infrastructure; and
- Subdivision of the site into three (3) lots is proposed to facilitate the delivery of the Concept Masterplan, the three (3) lots comprise:
 - 1 super lot comprising Warehouses 1-3;
 - 1 residue super lot to comprise the future Warehouses 4-8; and
 - 1 lot dedicated for the proposed road network.
- Construction of three (3) warehouse buildings with ancillary offices comprising a total GFA of 79,263m², including:
 - Warehouse 1 with a total GFA of 40,422m², comprising:
 - 39,037m² of warehouse GFA; and
 - 1,385m² of office and dock office GFA.
 - Warehouse 2 with a total GFA of 21,220m², comprising:
 - 20,352m² of warehouse GFA; and
 - 868m² of office and dock office GFA; and
 - Warehouse 3 with a total GFA of 17,621m², comprising:
 - 16,859m² of warehouse GFA; and
 - 762m² of office and dock office GFA.
- Hardstand area for loading and vehicle manoeuvring;
- Car parking and landscaping;
- Estate signage and external façade signage; and
- Hours of operation of 24 hours a day, 7 days a week.

Perspectives of the proposed Concept Masterplan and Stage 1 Development is provided in **Figure 2** below and **Figure 3** on the following page.



Figure 2 *Concept Masterplan – Aerial View*

Source: Watson Young Architects



Figure 3 *Street Frontage of Warehouses 2 and 3*

Source: Watson Young Architects

Stakeholder Engagement

Engagement with the community and stakeholders has been undertaken and included the following stakeholders:

- Penrith City Council;
- Government and agencies, including:
 - Department of Planning, Housing and Infrastructure,
 - Transport for NSW (TfNSW); and
 - Sydney Water.
- Aboriginal parties;
- Surrounding landowners, including:
 - The GPT Group (Yiribana Logistics Estate, 754-786 Mamre Road);
 - Residents located on Aldington Road, Bakers Lane and Mamre Road (between Bakers Lane and Abbots Road)
 - Catholic Healthcare Emmaus Retirement Village and Aged Care Home;
 - Little Smarties Learning Centre;
 - Emmaus Catholic College;
 - Trinity Catholic Primary School;
 - Mamre Anglican School; and
 - Catholic Education Office, Diocese of Parramatta.

Environmental Impacts and Mitigation Measures

This EIS provides an assessment of the environmental impacts of the Proposal in accordance with the issued SEARs (refer to **Appendix A**), and sets out the undertakings made by the Applicant to manage and minimise potential impacts arising from the development. The key potential environmental impacts and issues associated with the Proposal include:

- **Urban Design and Visual Impact** – The site is located on steep and sloping terrain requiring the construction of retaining walls across the site, while achieving a balanced cut and fill as required by the MRP DCP. The creation of large flat building pads are required to facilitate the current market demands for industrial

floorspace in the Greater Sydney Region. To manage the visual impact of retaining walls, the earthworks across the site have been designed to minimise retaining walls with all retaining walls being designed in accordance with the MRP DCP and landscaping provided next to retaining walls where appropriate. A Visual Impact Assessment of the Proposal determined that it would have major/moderate to minor visual impact in the short to medium term only while sensitive receivers within the MRP surrounding the site remain present.

- **Roadworks** – In order for the development to accommodate the predicted traffic flows, external road network upgrades are required. In the absence of a staging strategy from government agencies, a landowners group has been established for the SLR upgrades (known as Land Owners Group North (LOG-N)) which is seeking to construct an interim upgrade of the SLR, intersections and sections of Bakers Lane and Aldington Road. Ason Group has undertaken an assessment of the associated LOG-N development and confirm that the interim design can accommodate the minimum development yield.
- **Stormwater Management** – The Proposal will result in the significant increase in impervious areas which is to be accommodated through on-site and regional stormwater management infrastructure. The MRP SSP identifies the indicative regional stormwater infrastructure and includes naturalised trunk drainage in the north-eastern corner of the site. The Applicant has consulted with Sydney Water regarding the design of the proposed trunk drainage channel with Sydney Water providing principal endorsement of the proposed design.

It is recognised by the Applicant that the LOG-N roadworks, consultation with adjacent schools on Bakers Lane, bulk earthworks and connection to neighbouring developments, and waterway health are assessment issues that require further resolution during the assessment of the SSDA following formal lodgement.

A complete assessment of each issue identified within the issued SEARs is provided in **Section 6.0**. A consolidation of mitigation measures proposed is provided at **Appendix E**.

Conclusion and justification

Having regard to environmental, economic, and social considerations, including the principles of ecologically sustainable development, the carrying out of the Proposal is justified for the following reasons:

- The Proposal is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including *State Environmental Planning Policy (Industry and Employment) 2021*;
- The Proposal is consistent with the desired future character of the area and relevant strategic planning documentation, including the Greater Sydney Region Plan and Mamre Road Structure Plan;
- The Proposal is generally consistent with the MRP DCP with minor inconsistencies being justified on a site-specific merit basis;
- The Proposal will not result in adverse environmental impacts, will contribute much-needed industrial land in Western Sydney, and will provide significant employment outcomes during both construction and operation; and
- The Proposal is suitable for the site and in the public interest.

1.0 Introduction

This Environmental Impact Statement (EIS) has been prepared on behalf of ISPT Pty Ltd (ISPT) (the Applicant) in support of a State Significant Development Application (SSDA) to be submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) for the Concept Masterplan and Stage 1 Development of an industrial estate (the Proposal) at 706-752 Mamre Road, Kemps Creek (the site) known as ‘Summit at Kemps Creek’.

Development for the purposes of *Warehouses or distribution centres* where the relevant environmental assessment requirements have been notified under the Act before 31 May 2023 is considered State Significant Development (SSD) if it comprises a capital investment value in excess of \$30 million as identified in Schedule 1 of *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP). Given that the Proposal was notified under the act before 31 May 2023 and the proposed Stage 1 Development has a CIV greater than \$30 million, it is classified as SSD.

A request for the issue of Secretary’s Environmental Assessment Requirements (SEARs) was sought on 25 October 2021. Accordingly, the SEARs were issued on 22 November 2021. Additional SEARs were issued on 25 March 2022. This submission is in accordance with the DPHI’s guidelines for SSD applications lodged under Part 4 of the EP&A Act, and addresses the issues raised in the SEARs.

ISPT Pty Ltd (ISPT) has exchanged contracts to acquire 706-752 Mamre Road, Kemps Creek (Lot 1 in DP 104958) and have appointed Aliro Pty Ltd (Aliro) as the Development Manager for the property. The current landowners have provided consent for the lodgement of this application, as per the landowners consent issued with the lodgement of this SSDA.

This EIS is based on the Architectural Drawings provided by Watson Young Architects (see **Appendix B**) and other supporting technical information appended to the report (see Table of Contents).

This EIS has been prepared in accordance with the requirements of Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), Clause 175 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), and the Secretary’s Environmental Assessment Requirements (SEARs) for the preparation of the EIS. A SEARs Compliance Table is provided at **Appendix A** that identifies where the SEARs have been addressed in the EIS. This EIS should be read in conjunction with the supporting information and plans appended to and accompanying this report. The EIS intends to inform the community and stakeholders about the Proposal, including its social, economic and environmental impacts, mitigation measures and benefits.

1.1 The Applicant

The Applicant’s details are presented in **Table 1** below.

Table 1 **Applicant Details**

Applicant:	ISPT Pty Ltd
Address:	Level 6, 24 York Street, Sydney NSW 2000
ACN:	064 041 283

1.2 Overview of Proposed Development

This SSDA seeks consent for a Concept Masterplan and Stage 1 Development of an industrial estate. Specifically, the following is sought for consent under this SSDA:

Concept Masterplan

A Concept Masterplan for the site is proposed, comprising eight (8) industrial warehouse buildings including ancillary office space and a café, including:

- Proposed use of the land for *Warehouse or distribution centre, General industrial, Food and drink premises* and ancillary *Office premises* development;
- An indicative total Gross Floor Area (GFA) of 244,413m², comprising;
 - Warehouse 1 – 40,422m²;
 - Warehouse 2 – 21,220m²;

- Warehouse 3 – 17,621m²;
- Warehouse 4 – 44,491m²;
- Warehouse 5 – 20,544m²;
- Warehouse 6 – 20,561m²;
- Warehouse 7 – 42,922m²;
- Warehouse 8 – 36,390m²; and
- Café – 242m².
- Road layout including high order roads with external connections, and internal estate local industrial roads;
- Conceptual building locations, hardstand areas, car parking arrangements, building heights, setbacks, built form parameters and site landscaping; and
- Provision of land for the potential future dedicated freight corridor.

Stage 1 Development

The delivery of the Concept Masterplan is proposed to be staged, under this application Stage 1 development works are proposed, that comprise:

- Site preparation works, including:
 - Demolition and clearing of all existing built form structures;
 - Clearing of all existing vegetation and farm dam decommissioning;
 - Site wide bulk earthworks including 'cut and fill' to create flat development platforms for the proposed built form (Warehouses 1-3) and future built form (Warehouse 4-8); and
 - Construction of inter-allotment, road and boundary retaining walls.
- Site servicing and infrastructure works, including:
 - Construction of an internal road network, comprising:
 - One (1) Collector Road; and
 - Two (2) Local Industrial Roads;
 - Construction of stormwater and servicing infrastructure; and
- Subdivision of the site into three (3) lots is proposed to facilitate the delivery of the Concept Masterplan, the three (3) lots comprise:
 - 1 super lot comprising Warehouses 1-3;
 - 1 residue super lot to comprise the future Warehouses 4-8; and
 - 1 lot dedicated for the proposed road network.
- Construction of three (3) warehouse buildings with ancillary offices comprising a total GFA of 79,263m², including:
 - Warehouse 1 with a total GFA of 40,422m², comprising:
 - 39,037m² of warehouse GFA; and
 - 1,385m² of office and dock office GFA.
 - Warehouse 2 with a total GFA of 21,220m², comprising:
 - 20,352m² of warehouse GFA; and
 - 868m² of office and dock office GFA; and
 - Warehouse 3 with a total GFA of 17,621m², comprising:
 - 16,859m² of warehouse GFA; and
 - 762m² of office and dock office GFA.
- Hardstand area for loading and vehicle manoeuvring;
- Car parking and landscaping;
- Estate signage and external façade signage; and
- Hours of operation of 24 hours a day, 7 days a week.

Further detail and discussion of the proposed development is provided in **Section 3.0**. The Proposal will be undertaken in accordance with the Architectural Drawings prepared by Watson Young Architects (**Appendix B**) with the Concept Masterplan provided in **Figure 4** below.

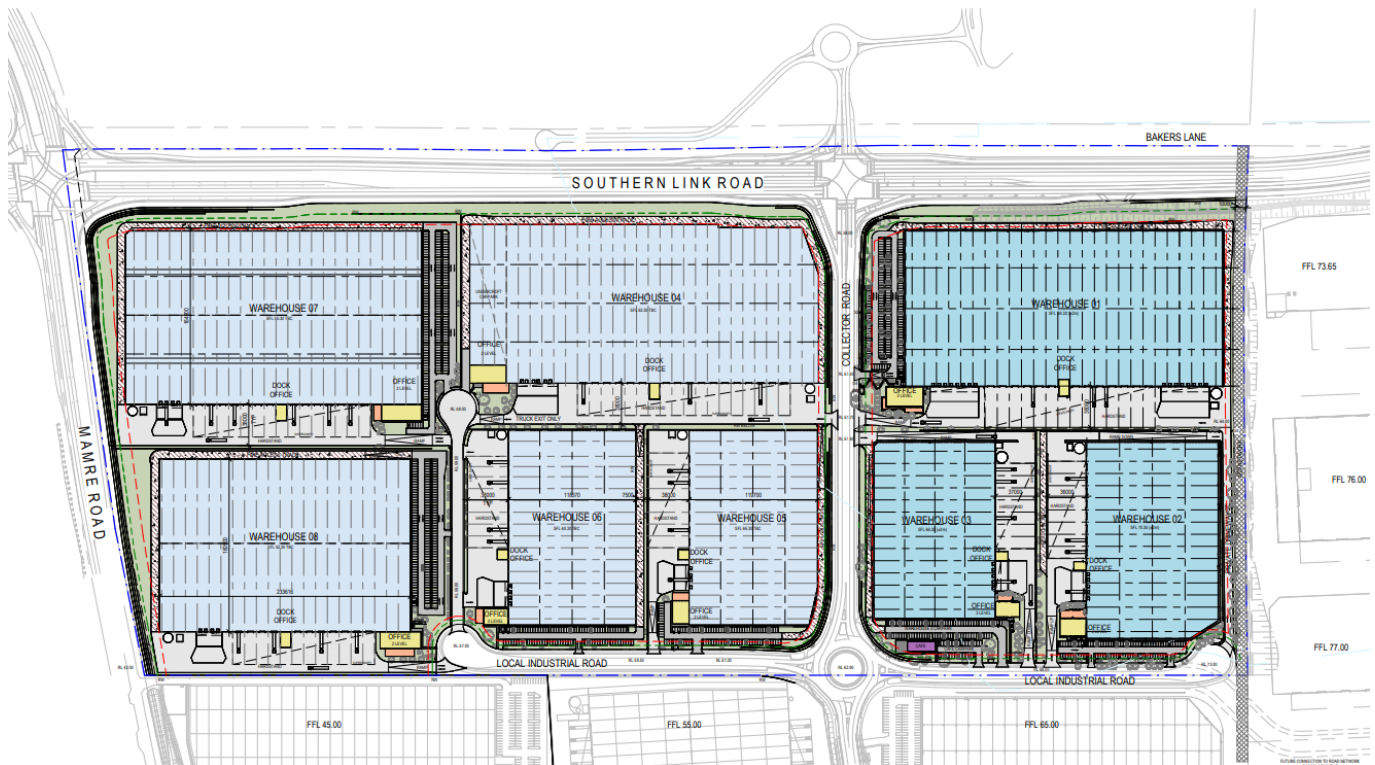


Figure 4 Concept Masterplan

Source: Watson Young Architects

1.3 Objectives of the Development

The primary objective of the Proposal is to facilitate an industrial estate on the site consistent with the vision for the precinct and the June 2020 amendments to the *State Environmental Planning Policy (Western Sydney Employment Area) 2009* (Western Sydney Employment Area SEPP), which has now been consolidated into *State Environmental Planning Policy (Industry and Employment) 2021* (Industry and Employment SEPP).

Accordingly, the key objectives of the Proposal include:

- Delivering industrial and warehouse floorspace to support the current critical shortfall of industrial floorspace within the Greater Sydney Region, enabling investment and support economic growth in NSW.
- Delivering a significant industrial development that will galvanise the development of the MRP into a high-quality industrial precinct.
- Delivering a development that adopts an architectural, urban and landscape design that exhibits design excellence, with the incorporation of substantial tree canopy coverage, commensurate with the landscape character of the area; and
- Delivering a development outcome that is consistent with the site's land zoning for industrial purposes.

1.4 Background

1.4.1 Overview

The Proposal provides ISPT with an opportunity to deliver a world-class industrial facility which will operate as the flagship estate for the ISPT NSW portfolio that is also complementary to existing ISPT assets at Blacktown, Greystanes, Rydalmere and Prestons. The Proposal will allow a combination of pre-lease and build-to-lease facilities that will house eight (8) warehouses and distribution centres in total.

The eastern portion of the site (Warehouse 1, 2 and 3) form the Stage 1 Development, with the western portion of the Proposal (Warehouse 4, 5, 6, 7 and 8) subject to Concept Approval only within this application, allowing flexibility in design to meet tenant requirements as they arise. As part of the Stage 1 Development, bulk earthworks and construction of the internal road network is proposed across the whole site to allow for a balanced cut and fill reducing the requirement for the export and import of material.

The Proposal is in response to strong demand for industrial floorspace within the Greater Sydney Region created by the continued growth of e-commerce, post-covid logistics effects and shortage of supply of industrial land

and floorspace. As part of the proposed Stage 1 Development, the Proposal will enable the construction of three (3) warehouse and distribution centres comprising 79,263m², accommodating up to three (3) separate tenants. While as part of the proposed Concept Masterplan, the Proposal will secure the approval for a further five (5) warehouse and distribution centres (subject to future detailed DAs) comprising an additional 165,150m² of GFA.

1.4.2 External Road Network Upgrades

In order for the development to accommodate the predicted traffic flows, external road network upgrades are required. The ultimate access arrangement will provide for a signalised intersection between the future Southern Link (SLR) and the north-south collector road as illustrated in the in **Figure 5** below.

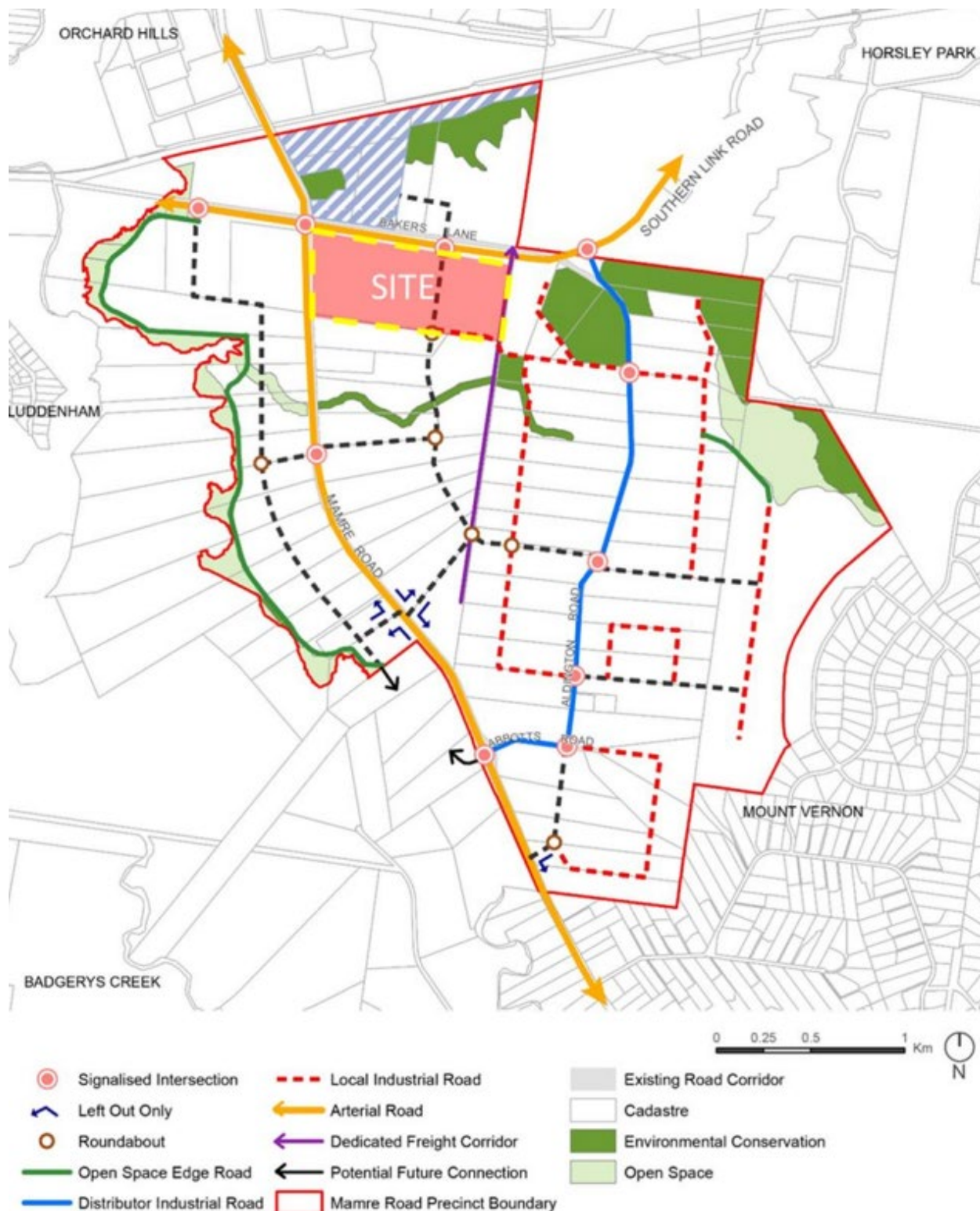


Figure 5 Mamre Road Precinct Road Network and Access Plan

Source: Mamre Road Precinct Development Control Plan, edits by Ason Group

In response to no staging strategy for the construction of the SLR being formulated by government agencies, a landowners group for the SLR upgrades has been established and known as Land Owners Group North (LOG-N). The LOG-N consist of:

- ISPT/Aliro – Applicant for Proposal at 706-752 Mamre Road (SSD-306281102)
- Dexus – Applicant for the proposed development at 113-153 Aldington Road (SSD327228343), and
- Gibb Group – Applicant for proposed development at 1-51 Aldington Road (SSD-225950324).

In order to enable the staged construction of the three (3) LOG-N sites (including the subject site), an interim arrangement for the SLR and associated intersections is to be constructed that will enable a minimum of 250,000m² of GFA across the sites, with opportunities to review the GFA at later stages.

Detailed modelling has been undertaken by Ason Group using SIDRA with ongoing consultation and collaboration with TfNSW and the DPHI taking place. In mid-2023, it was determined by TfNSW that the proposed interim solution was feasible from a traffic perspective. The planning approval pathway for the interim arrangement is still subject to ongoing consultation with LOG-N, the DPHI and TfNSW to determine if the works will be approved under Part 4 (by way of an amendment to this SSDA) or Part 5, Division 5.1 of the EP&A Act.

Until a point at which the planning pathway is agreed to the relevant parties, this SSDA does not seek consent for construction and operation of the interim access arrangement. The relevant aspects of the interim access arrangement are discussed in the applicable sections of the EIS to only provide adequate context and information to the DPHI.

In order to facilitate the interim access works, LOG-N will propose to enter into agreements with the NSW Government and Penrith City Council. LOG-N will continue to collaborate to deliver the necessary external road upgrades to facilitate each of the proposed developments.

1.4.3 Other Approvals

An approval under Section 138 of the *Roads Act 1993* is required for the development.

2.0 Strategic Context

This chapter identifies the key issues that are relevant to the Proposal's strategic context and provides a justification for the Proposal in light of this context. The chapter also provides an analysis of alternatives that were considered as part of the scoping process.

The site is located within the MRP, specifically placed within the Western Sydney Employment Area (WSEA). As aforementioned, the site was rezoned in 2020 as part of the gazettal of the *State Environmental Planning Policy (Western Sydney Employment Area) 2009*, now known as *State Environmental Planning Policy (Industry and Employment) 2021* (Industry and Employment SEPP), which rezoned the site to IN1 General Industrial. Further detail relating to the site and its surrounds is provided in the following subsections.

2.1 Site Location and Context

The site is located at 706-752 Mamre Road, Kemps Creek, within the Penrith local government area (LGA). It is approximately 13km southeast of the Penrith CBD and approximately 40km west of the Sydney CBD. The location of the site within its surrounding context is shown in **Figure 6** below.

The site is situated within the MRP, which sits within both the Western Sydney Aerotropolis and WSEA. The surrounding land uses comprise a predominantly rural typology, with a variety of rural dwellings, rural land, farm dams and scattered vegetation to the south, east and west of the site. Beyond this, Mamre Anglican School, Little Smarties Childcare Centre, Trinity Catholic Primary School and Emmaus Catholic College are located to the north of the site, with each site primarily zoned IN1 General Industrial. The nearest residential area is situated approximately 1.4km to the south-west of the site in Luddenham.

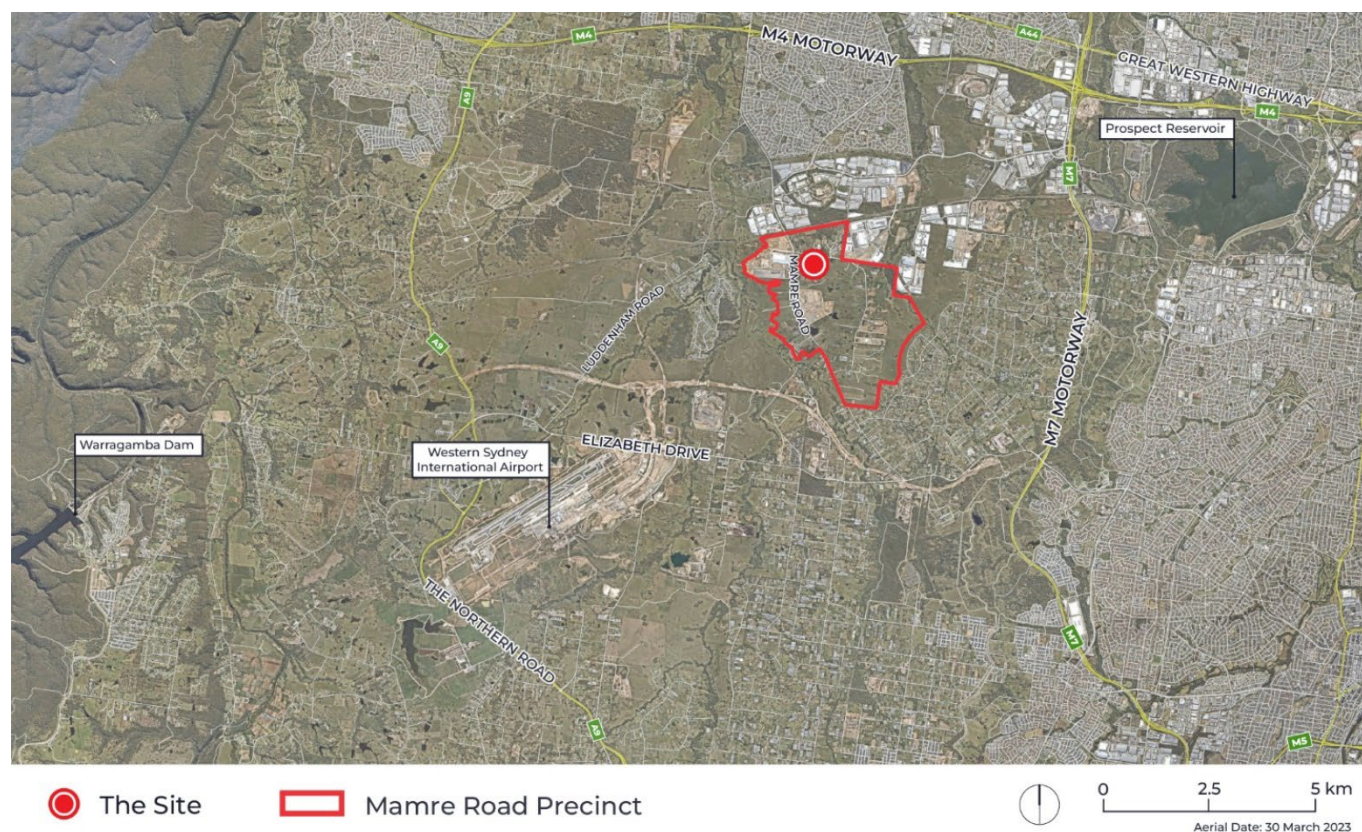


Figure 6 Site Location and Context Map

Source: Nearmap, Ethos Urban

2.2 Key features of the Site and its surrounds

The site is rectangular in shape, with direct frontages to Bakers Lane (spanning 1.1km) and Mamre Road (spanning 495m). The site comprises one allotment which is legally described as Lot 1 in DP 104958 and has an area of approximately 522,477m². An aerial image of the site is provided in **Figure 7** and an elevated drone image of the site is provided in **Figure 8** following.

The site currently comprises undulating and undeveloped rural land, one residential dwelling, as well as interspersed vegetation, livestock, and a number of farm dams. Photographs of the site are provided in **Figure 9** and **Figure 10**.



Figure 7 Site Aerial Map

Source: Nearmap, Ethos Urban



Figure 8 Elevated Image of the Site

Source: Watson Young Architects, edits by Ethos Urban



Figure 9 *The Site looking south-east from Bakers Lane*

Source: Ethos Urban



Figure 10 *The Site looking south from Bakers Lane*

Source: Ethos Urban

2.2.1 Topography

The site in its existing condition is characterised by undulating topography. The site's natural ground level ranges from RL41.33 in the south-west corner of the site to RL 86.02 in the south-east corner. A ridgeline runs across the site, generally aligned from south-east to north-west with the ground slope either side of the ridgeline is generally between 6% and 15%, elsewhere across the site the ground slope is generally 2-3%.

A Detailed Survey of the site has been prepared by Land Partners and included at **Appendix G** that accurately captures the sites topography, a Site Topography Map is provided in **Figure 11** below.

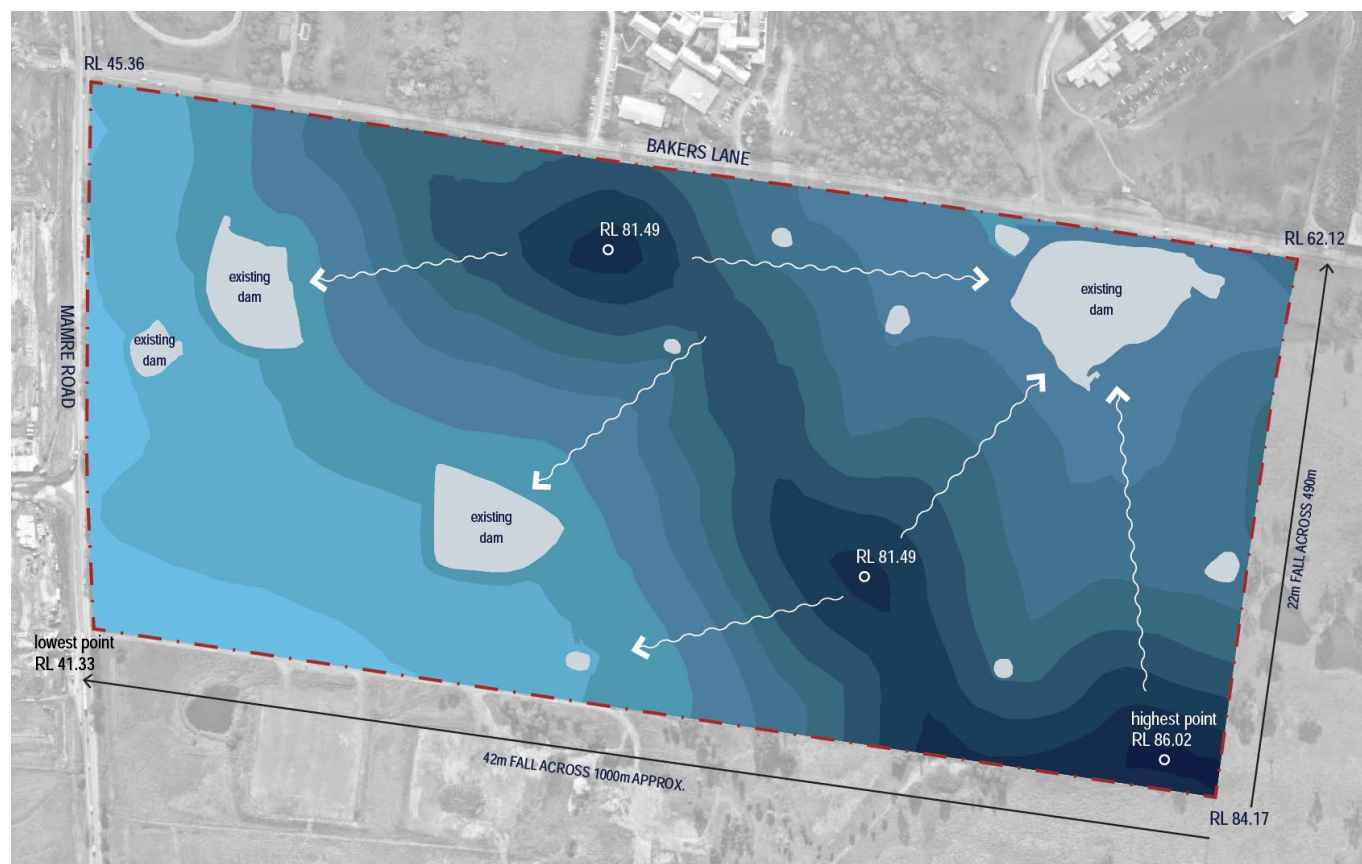


Figure 11 Site Topography Map

Source: Watson Young Architects

2.2.2 Vegetation

The site includes 13.24 ha of native vegetation with the remainder of the site classified as exotic vegetation, cleared land and dams. The native vegetation Plant Community Types (PCTs) are described in **Table 2**, with the site's vegetation illustrated in **Figure 12** below.

Table 2 Native Vegetation Description

PCT no.	PCT Name	Area
850	Grey Box – Forest Red Gum grassy woodland on shale of the southern Cumberland Plain, Sydney Basin Bioregion	13.02 ha
1800	Swamp Oak open forest on riverflats of the Cumberland Plain and Hunter Valley	0.22 ha
Total		13.24 ha

Source: Cumberland Ecology

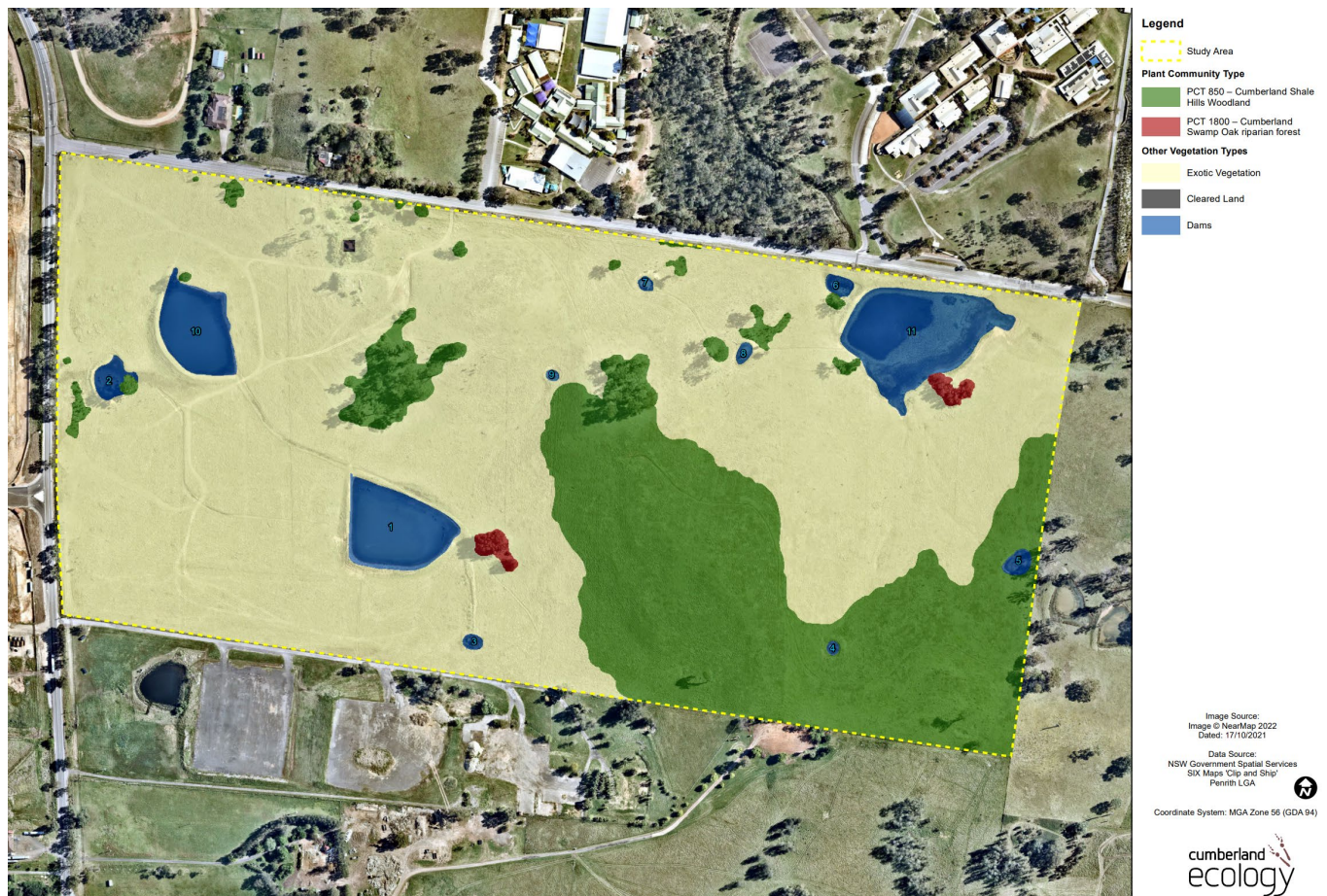


Figure 12 Site Vegetation

Source: Cumberland Ecology

2.2.3 Heritage

There are no state or local heritage items located on or in close proximity to the site. For further discussion refer to **Section 6.7**.

2.2.4 Bushfire

The entirety of the site is identified as 'Vegetation Category 2' bushfire prone land under the Penrith Bush Fire Prone Land map. Vegetation Category 2 is considered to be at lower risk of bushfires than Vegetation Category 1 lands, but subject to higher risk compared to unmarked areas. Bushfire impacts are discussed further in **Section 6.14**.

2.2.5 Road Network

The site is located on the corner of Mamre Road and Bakers Lane, both of which are to be upgraded in the future. Part of the site is to be dedicated to the development of the Southern Link Road and widening of Mamre Road. The Mamre Road/Bakers Lane intersection is currently in the process of being upgraded and widened. Mamre Road provides a north-south link between the M4 and M7 via Elizabeth Drive. Being located in the Western Sydney Employment Area, the site will also benefit from the future M12 Motorway and potential M9 (Outer Sydney Orbital) Motorway.

2.2.6 Surrounding Development

The site's surrounding context predominantly comprises rural residential allotments that have been rezoned for industrial purposes and are awaiting development. To the east and south of the site is a continuation of the rural agricultural land that characterises the site, with scattered farm dams and vegetation throughout.

Given the site's strategic context, surrounding development activity is predominantly industrial. The current and future industrial developments within the MRP are identified in **Section 2.4** below.

Beyond the immediate surrounds of the site is a range of existing development, of particular note is the following developments/locations:

- Oakdale West and South Industrial Estates are located approximately 1-2km east of the site;
- Large lot residential development at Mount Vernon is located approximately 3km to the southeast;
- Emmaus Catholic College is located approximately 150m to the north of the site;
- Mamre Anglican School is located approximately 20m to the north of the site;
- Trinity Primary School is located approximately 265m to the north of the site;
- Little Smarties Early Learning Centre is located approximately 20m to the north of the site;
- Emmaus Retirement Village is located approximately 450m to the north of the site;
- Erskine Park Industrial Area is located approximately 1.3km to the north of the site; and
- Badgerys Creek Airport site/construction area is located approximately 6km to the southwest of the site.

2.3 Strategic Planning Context

As required by the SEARs, the relevant strategies, policies and guidelines are addressed in the following subsections.

2.3.1 Greater Sydney Region Plan – A Metropolis of Three Cities

The Greater Sydney Region Plan is the overarching strategic plan that seeks to shape future development for the Sydney metropolitan area until 2056. Under the Region Plan, Sydney will comprise three cities, with the site being located within the Western Parkland City.

The Western Parkland City will be centred on the new Western Sydney Airport and Aerotropolis, while capitalising on the established centres of Liverpool, Greater Penrith and Campbelltown-Macarthur. It is envisioned that the Western Economic Corridor will attract globally significant defence and aerospace activities and contribute to a strong trade, freight, logistics, advanced manufacturing, health, education and science economy. This will create employment close to areas of high population growth and drive the development of the corridor and the metropolitan cluster.

Given that the Proposal's primary function is to create industrial employment opportunities by virtue of delivering eight warehouse/distribution centres, the future development will contribute to underpinning the envisioned function of its locality to supporting Greater Sydney's broader strategic vision.

As such, the proposed development is consistent with the following relevant objectives of the Region Plan:

- **Objective 16** – Freight and logistics network is competitive and efficient.
 - Objective 16 details the significance of Greater Sydney's key trade gateways to underpinning the continued global competitiveness of Sydney's supply chain operations. The proposed development will support the projected growth in transport and distribution activity principally by virtue of its location, which is poised to leverage the proximity to Western Sydney Airport and service the logistical requirements of such a major trade gateway. The Proposal also includes the provision of a corridor for the potential future dedicated freight network, also referred to as the automated guided vehicle (AGV) freight network at the eastern edge of the site that would bolster the competitiveness and efficiency of the freight and logistics network.
- **Objective 20** – Western Sydney Airport and Badgerys Creek Aerotropolis are economic catalysts for Western Parkland City.
 - Objective 20 contemplates the development of the Western Sydney Airport and the Aerotropolis as an economic catalyst for the broader Western Parkland City. In particular, the Airport (and the proposed transport initiatives to support the Airport) will increase the significance of the Western Sydney Employment Area and its role as a long-term land supplier for industrial and employment activities. The proposed development will support internationally competitive warehouses that will leverage on their proximity to the Airport. The proposed development will also facilitate freight throughout the area through the provision of the corridor to the east of the site for the potential future dedicated freight network.
- **Objective 23** – Industrial and urban services land is planned, retained, and managed.
 - The proposed development will support the provision of in-demand industrial land that will support the retention and enhancement of industrial land within Greater Sydney.

- **Objective 33** – A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change.
 - The proposed development will consider a suite of energy efficiency measures to improve the energy efficiency and contribute to reduced greenhouse gas emissions. The improved building efficiency measures are outlined in **Section 6.10** and **Section 6.16** and within the Ecologically Sustainable Development Report at **Appendix DD**.

2.3.2 Western City District Plan

The objectives of the Region Plan are supported by actions and priorities detailed in the respective District Plans that were released by the GSC in March 2018. The subject site is located within the Western City District. As with the Region Plan, the Western City District Plan (District Plan) places significant emphasis on the Western Sydney Airport as a driver for growth within the region, supported by the established centres of Liverpool, Penrith and Campbelltown-Macarthur.

Due to the substantial similarity between the Region Plan and the District Plan, the objectives identified above translate into the achievement of the following planning priorities under the District Plan:

- **Planning Priority W8** – Leveraging industry opportunities from the Western Sydney Airport and Badgerys Creek Aerotropolis.
- **Planning Priority W9** – Growing and strengthening the metropolitan cluster.
- **Planning Priority W10** – Maximising freight and logistics opportunities and planning and managing industrial and urban services land.
- **Planning Priority W19** – Reducing carbon emissions and managing energy, water and waste efficiently.

In particular, the proposed development will provide substantive warehousing floorspace, as well as the potential to build on the dedicated freight network through the eastern edge of the site. Therefore, the development will support freight opportunities and deliver significant industrial and urban services land. The Western Parkland City includes a cluster of centres within the Western District and provides land uses to support the delivery and operation of the Airport and Aerotropolis, supporting a range of jobs within the Parkland City.

2.3.3 Future Transport 2056 and Supporting Plans

Future Transport 2056 along with the suite of supporting plans establishes the 40-year vision, directions and principles for mobility in NSW, guiding transport investment over the longer term. It was first released in 2018 and prepared collaboratively by Transport for NSW, Greater Sydney Commission, Infrastructure NSW and the DPHI to ensure NSW's overarching strategies for transport and land use planning align and deliver an integrated vision for the State. Since its initial release, the strategy has been updated and is no longer a static document, it has shifted to a new, dynamic planning approach, designed to guide future transport planning in a more fluid environment.

The strategy emphasises the key role transport has in supporting new economic and social opportunities, particularly supporting the development of the Western Parkland City, the Aerotropolis and surrounding employment lands, which is the location of the subject site. To support the new economic and social opportunities for the Western Sydney Airport, Aerotropolis and surrounding employment lands, Future Transport 2056 have planned and are committed to delivering the following transport corridors:

- **North South Rail Line** – provides a passenger rail connecting St Marys and Macarthur via the Western Sydney Airport, Oran Park and Narellan. In 2020, the NSW Government announced the corridor between St Marys and the Western Sydney Airport will be used for the Sydney Metro – Western Sydney Airport Line.
- **South West Rail Link Extension** – provides a passenger rail connecting Leppington Station and the Aerotropolis for connections to the North South Rail Line corridor.
- **Western Sydney Freight Line (Stage 1)** – provides a dedicated freight rail connection to the future Outer Sydney Orbital near Luddenham. An intermodal terminal (IMT) site will also be delivered for the MRP, located to the north of the site, which will effectively leverage the surrounding industrial development in the area and dedicated freight line.

The Future Transport 2056 strategy and supporting plans will help shape development within Western Sydney particularly the new Western Sydney Airport and surrounding employment land, such as the subject site, through planned future transport corridors for passengers and freight. The future transport network reaffirms the Proposal's strategic need, as its vision to be a highly connected industrial employment precinct is consistent

with broader GSRP objective of a 30-minute city by creating employment areas that are accessible within 30 minutes from major metropolitan and strategic centres.

2.3.4 Mamre Road Precinct Structure Plan

The MRP is a major industrial precinct located within the Western Sydney Employment Area, which was rezoned in June 2020 to deliver approximately 850 hectares of industrial land, as well as complementary areas for environmental conservation, open space and the potential for a Western Sydney freight intermodal terminal. The rezoning of the MRP was fast-tracked due to the shortfall in availability of industrial land within the greater Sydney region. The rezoning was accompanied by the MRP Structure Plan which set in place land use, infrastructure and open space parameters for the precinct. Clause 35 of the EP&A Regulation requires an assessment of the consistency of the development within the MRP with the Structure Plan.

The proposed development for an industrial development accords with the Structure Plan which envisages that the site be developed for industrial purposes. The site's position within the Structure Plan is illustrated in **Figure 13**. The Structure Plan identifies the future Southern Link Road Corridor traversing along the northern boundary of the site with road intersections to provide access to the site and the proposed future Intermodal Terminal to the north of the site. These Structure Plan requirements have generally been incorporated into the proposed Concept Masterplan.

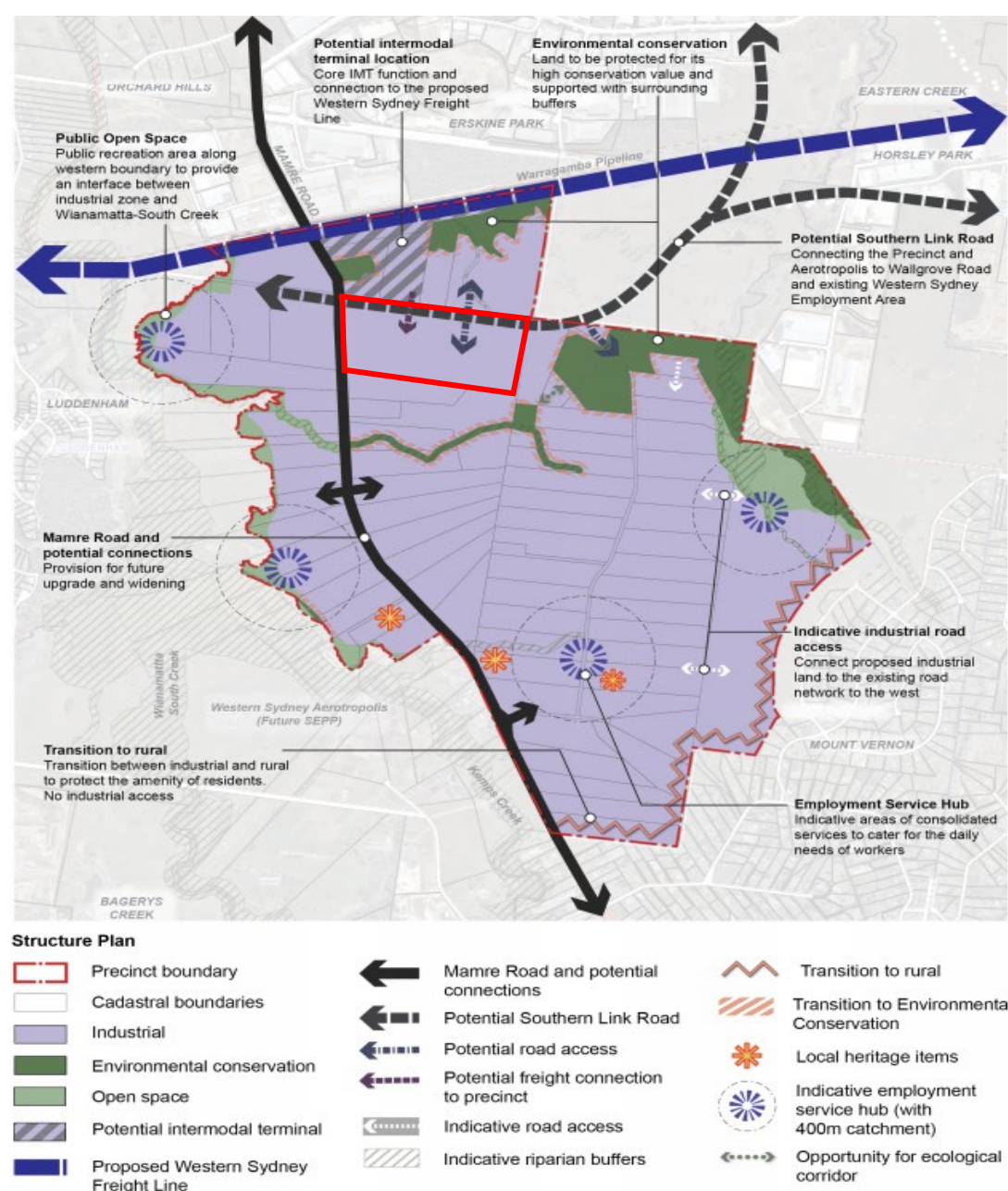


Figure 13 Location of the site in relation to the Mamre Road Precinct Structure Plan

Source: Department of Planning, Housing and Infrastructure, edits by Ethos Urban

As part of the MRP, the MRP DCP was adopted in November 2021 and provides specific development controls for the site. This is considered further in this EIS and in detail in the MRP DCP Compliance Table at **Appendix N**.

2.3.5 Western Sydney Aerotropolis Plan

The Western Sydney Aerotropolis Plan (the Plan) was finalised in September 2020 and aims to set the vision for the Western Sydney Aerotropolis as 'Australia's next global gateway', built around the world-class Western Sydney International (Nancy-Bird Walton) Airport.

The Plan will be implemented through the Western Parkland City SEPP and the Western Sydney Aerotropolis DCP. The Aerotropolis contains 10 precincts with 6 being the focus of the initial precinct planning. The site, which is located in the MRP is identified as an initial precinct but has been rezoned under the Industry and Employment SEPP. The location of the site within the Plan is shown in **Figure 14** on the following page.

Under the Plan, the MRP will be an industrial warehousing and logistics precinct given its connection to the proposed Western Sydney Freight Line and proximity to future Western Sydney Airport flightpaths and associated aircraft noise. The Plan identifies the following for the MRP:

- Desirable land uses including warehousing and logistics, high technology industry, manufacturing, intermodal facilities, circular economy uses; and
- Strategic outcomes including in particular:
 - Opportunities for logistics and distribution, connecting Western Sydney to the broader freight network;
 - Support the future operations of the Airport through enabling export freight and logistics; and
 - Zoning to prioritise warehousing and distribution to support freight and logistics movements.

The proposed development provides a land use that is consistent with this vision, the desirable land uses, and the strategic outcomes intended for the MRP.

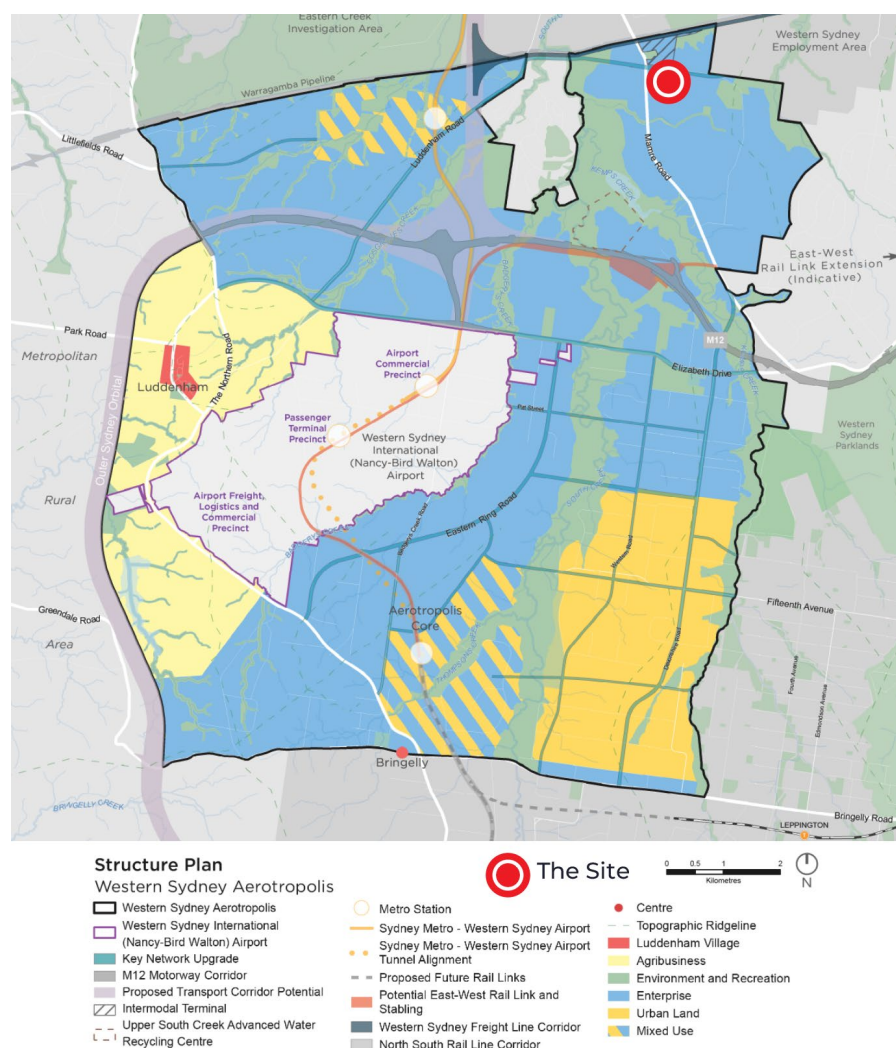


Figure 14 Location of the Site within the Western Sydney Aerotropolis Structure Plan

Source: Department of Planning, Housing and Infrastructure, edits by Ethos Urban

2.3.6 Freight and Ports Plan 2018-2023

The Freight and Ports Plan 2018-2023 has been prepared to guide the delivery and establish clear targets and initiatives for the NSW freight system. The Plan supports Future Transport 2056 and includes over 70 initiatives to be delivered by 2023, ranging from infrastructure investment to trials of new technologies.

The proposed development aligns with the objectives of the Plan as it will increase the land dedicated to industry and facilitate the development of such land in proximity to critical freight infrastructure such as the Western Sydney Airport and the Western Sydney intermodal terminal. Therefore, the development will ensure the delivery of industrial and urban services land in proximity to a key freight corridor.

2.3.7 Sydney Water Scheme Plan for Mamre Road Precinct

In December 2022, Sydney Water released the MRP Stormwater Scheme Plan (SSP), as provided in **Figure 15**, along with a document titled Stormwater Management Framework for Aerotropolis and MRP. The SSP presents indicative regional trunk drainage infrastructure proposed by Sydney Water in the MRP. The SSP was developed in line with NSW Government planning requirements and includes measures that would ensure development in the precinct complies with the waterway health targets outlined in the MRP DCP.

The MRP SSP incorporates the following components:

- Naturalised channels and rehabilitated streams for stormwater flow conveyance;
- Wetlands and storage ponds for harvesting and treatment of stormwater;
- Gross pollutant traps (GPTs) to protect the treatment infrastructure from major litter and other pollutant loads; and
- A recycled water distribution network that will include gravity and pressure mains as well as pumps, a treatment plant and a reservoir for reticulation.

The MRP SSP shows a 25-metre-wide naturalised channel along a portion of the northern boundary of the site, nominally within the extent of proposed Lot 1. This channel would drain from east to west towards the low point at Bakers Lane and ultimately through the unnamed tributary of South Creek.

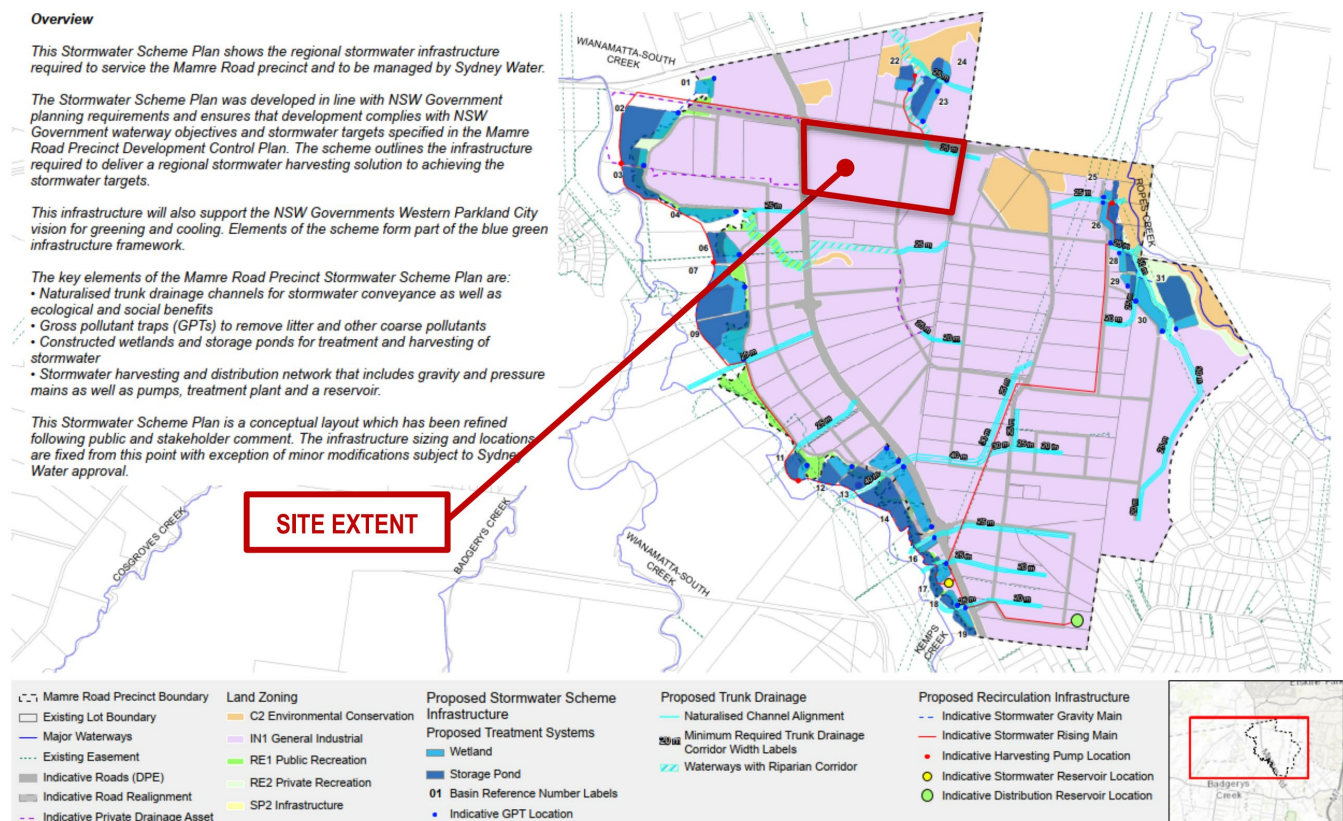


Figure 15 Mamre Road Precinct Stormwater Scheme Plan (December 2022)

Source: Sydney Water, AT&L

2.4 Cumulative Impacts

The site is in the vicinity of numerous other major developments within the MRP that are primarily for industrial estates. The site's future surrounding developments are identified in **Figure 16** and **Table 3** following. The key potential cumulative impacts include noise impacts from the accumulation of industrial developments, as well as traffic impacts and visual impact associated with the transformation of the MRP from rural to industrial.

Notwithstanding this, the proposed development aligns with the MRP vision, as it includes eight (8) industrial warehouses that will contribute to the ongoing development of the MRP into a world-class industrial area. Further, it provides a corridor to the east of the site that accommodates the potential future dedicated freight network, enabling better connectivity throughout the precinct and the broader Western Sydney Employment Area.

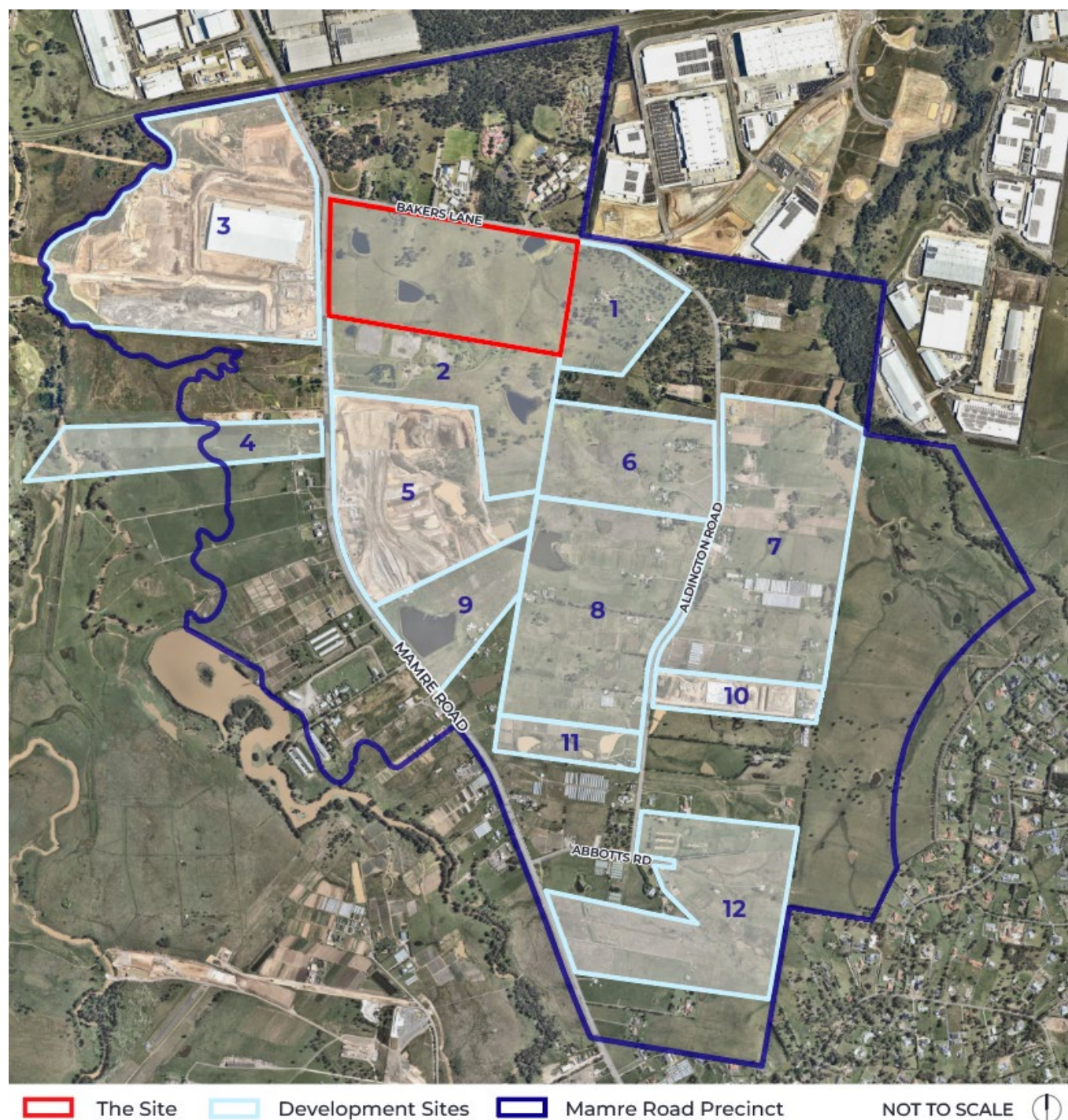


Figure 16 Mamre Road Precinct Development Map

Source: Nearmap, Ethos Urban

Table 3 *Future Surrounding Development*

No.	Development	Description	Status
1	1-51 Aldington Road Estate (SSD-22595032) 1-51 Aldington Road, Kemps Creek	Site preparation works including demolition of all existing structures and bulk earthworks in development areas, subdivision of the site into three development lots and an environmental conservation lot, construction of three (3) industrial warehouse buildings across Lots 1 to 3 respectively ranging from approximately 15,000m ² to 21,000m ² , with associated office floorspace, vehicle loading and parking areas, operating 24 hours a day, 7 days a week.	Prepare EIS
2	Yiribana Industrial Estate (SSD-10272349) 754-770, 784-786 Mamre Road, Kemps Creek	Concept plan and stage 1 DA for an industrial estate. Stage 1 comprises two warehouses, site-wide bulk earthworks and retaining walls, an internal road network, storm water works, car parking, signage and landscaping.	Approved
3	Kemps Creek Warehouse, Logistics and Industrial Facilities Hub (SSD-9522) 657-769 Mamre Road, Kemps Creek	Development of a warehouse, logistics and industrial facilities hub including construction and operation of eight warehouses comprising 162,355m ² of floor space, 744 parking spaces and 21-lot Torrens Title Subdivision (over two stages).	Approved
4	805 Mamre Road Kemps Creek Logistics (SSD-30871587) 799-817 Mamre Road, Kemps Creek	Construction of an industrial logistics and distribution warehouse facility with 25,310m ² of floor space, with associated office space (970m ²), vehicle loading and parking areas, road access and internal roads for use by a single operator.	Response to Submissions
5	Aspect Industrial Estate (SSD-10448) 788-882 Mamre Road Kemps Creek	Development seeks approval for earthworks, infrastructure and roads across the entire site, and the staged construction of warehouse and logistics facilities with associated car parking across 11 developable lots.	Approved
6	Dexus Kemps Creek – 113-153 Aldington Road (SSD-32722834) 113-153 Aldington Road, Kemps Creek	Concept proposal for an industrial estate comprising five (5) warehouse buildings and a stage 1 development comprising the construction of two (2) warehouses, demolition, bulk earthworks, internal roads, signage, stormwater infrastructure and subdivision.	Prepare EIS
7	200 Aldington Road Estate (SSD-10479) 106-228 Aldington Road, Kemps Creek	Staged development including a concept proposal and stage 1 development Application comprising estate-wide earthworks, infrastructure and services, construction, fit-out and operation of the stage 1 warehouse building.	Approved
8	The Edge Estate (SSD-17552047) 155-251 & 141-153 Aldington Road, Kemps Creek	Site preparation works, site servicing and infrastructure works and Construction of eight warehouse and distribution centres with a total gross floor area of 153,343m ² .	Response to Submissions
9	Access Logistic Park (SSD-17647189) 884-928 Mamre Road, Kemps Creek	Demolition and bulk earthworks, 13-lot Torrens Title subdivision, construction of internal roads, infrastructure and utilities, construction and operation of warehouse 1 (27,800m ²) with associated offices, car parks, hardstands, and landscaping.	Approved
10	Hindu Temple (DA17/1247)	Construction of a Place of Public Worship including Hindu Temple (Mandir), assembly hall, community kitchen & dining hall, monks	Approved

No.	Development	Description	Status
	230-242 Aldington Rd, Kemps Creek	residence, landscaped areas, internal roads, car parking & associated site works	
11	Westgate, 253-267 Aldington Road (SSD-23480429) 253-267 Aldington Road, Kemps Creek	Construction and operation of four (4) warehouse buildings with a total floor area of 44,600m ² . Site preparation works, including demolition, bulk earthworks, road construction, site servicing, on-site detention, landscaping and subdivision.	Prepare EIS
12	Westlink Industrial Estate – Stage 1 290-308 Aldington Road, 59-63 Abbotts Road, 1030-1064 Mamre Road, Kemps Creek	Staged construction of two (2) warehouse buildings with ancillary office space with a total floor area of approximately 81,642m ² , demolition, bulk earthworks, road construction, site servicing and stormwater works, landscaping and subdivision.	Approved
	Westlink Industrial Estate – Stage 2 290-308 Aldington Road, 59-63 Abbotts Road, 1030-1064 Mamre Road, Kemps Creek	Site preparatory works, subdivision of the site into five individual lots with two being residual lots for future development, Construction of a new industrial estate at the site comprising two industrial allotments and a total gross floor area of approximately 40,720m ² , including two new industrial warehousing buildings with ancillary offices across the two allotments.	Prepare EIS

The cumulative impacts associated with the above projects are considered under the relevant issue in **Section 6.0** and within the appropriate technical report appended to this EIS.

2.5 Project Agreements

LOG-N (which includes ISPT) propose to enter into agreements with Penrith City Council and the Minister for Planning and Public Spaces for works-in-kind through a Voluntary Planning Agreement (VPA) with respect to the SLR and Aldington Road upgrades.

In addition, ISPT propose to enter into an agreement with Penrith City Council for works-in-kind through a VPA with respect to construction of an Industrial Collector Road traversing north-south through the site. These agreements are proposed to be progressed in parallel with the assessment of the SSDA.

2.6 Analysis of Alternatives

Development options for the site are primarily limited by the Industry and Employment SEPP which zones the site as IN1 General Industrial and therefore confines the permissible development types to industrial uses and prohibits uses such as retail (apart from food and drink premises) or office premises. The type of industrial premises proposed is directly in accordance with the demand and intended outcome for the site under its recent rezoning.

During the design process of the proposed development, alternative development options for the site were explored. This included the following:

- Do nothing;
- Use of the site for an alternate purpose;
- Alternative designs; and
- Use of the site as an industrial warehousing estate (the proposed development).

2.6.1 'Do nothing' Alternative

Doing nothing (and retaining the current rural-residential usage of land at the site) would represent a significant missed opportunity that is contrary to the envisioned usage of the site under the Industry and Employment SEPP, the Aerotropolis SEPP and the broader Mamre Road Structure Plan future outcomes. Doing nothing would fail to support the orderly development of industrial land at the site and fail to contribute towards the provision of jobs within the MRP and Western Sydney more broadly.

Doing nothing would therefore be an inappropriate course of action that would prevent the development of the site for its highest and best use. It would also be inconsistent with surrounding land uses, given recent trends in the area with numerous applications for industrial development within the MRP and broader Western Sydney employment area. The site remaining as rural-residential would also potentially restrict the development and operation of adjoining industrial development due to noise and visual impacts, undermining the IN1 zoning.

2.6.2 Use of the Site for an Alternate Purpose

Use of the site for an alternate purpose (outside of industrial uses) is generally not appropriate given the IN1 General Industrial zoning of the site. Using the site for non-industrial uses would also be inconsistent with the desired outcomes of the Industry and Employment SEPP and therefore would be an inappropriate course of action.

2.6.3 Alternative Designs

Alternative designs to the estate design and layout as well as the proposed buildings pad levels were considered throughout the development of the Proposal.

The proposed building pad heights have been thoroughly considered due to the significant existing topography on the site. In addition, the following required consideration:

- The need to achieve a balanced cut and fill and retaining walls compliant with the MRP DCP;
- Accommodate necessary stormwater management;
- The Southern Link Road (SLR) and requirement to connect the internal road network to it; and
- Connect to the potential future dedicated freight network at grade.

As such, alternative pad heights and estate layouts were considered in determining the proposed development.

In regard to site layout, an alternative design that was considered is illustrated in **Figure 17** below. It included seven warehouses opposed to eight, with the seventh warehouse being larger in size, occupying the western edge of the site, without any break in the building form. As such, Warehouse 7 presented significant visual impact along Mamre Road. Further, this alternative design required the loading dock to be located on the warehouses northern elevation, without any built form components to mitigate the related noise impacts on sensitive land uses to the north. Consequently, this alternative design of the proposed development was not considered appropriate in the context of the site.

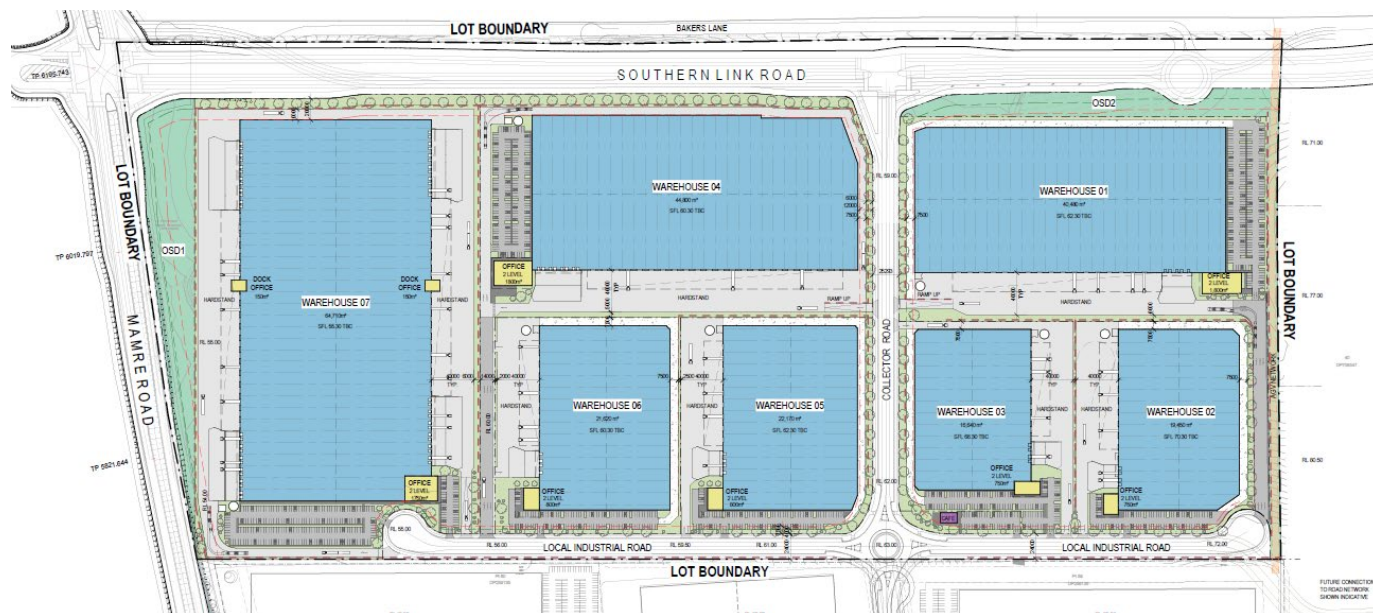


Figure 17 Alternative Design

Source: Watson Young Architects

2.6.4 The Proposed Development

Given the aforementioned factors and unique opportunities offered by the site, the use of the site as an industrial warehousing estate (the chosen option) in its proposed form represents the highest and best use of the site, as well as most consistent with the desired future character of the area.

The proposed building pad levels outlined in **Figure 18**, with the proposed site layout and design illustrated in **Figure 19** below have been informed by a detailed analysis of site-specific opportunities and constraints. Consequently, the proposed pad level, site layout and built form represents the optimal outcome for the site. It also provides an appropriate and workable redevelopment scenario which meets the objectives of the Proposal as set out in **Section 1.2**, while mitigating adverse impacts on the surrounding environment and sensitive receivers. It is commensurate with the Mamre Road Structure Plan and MRP DCP and maximises potential for employment generating floorspace, which is the key objective of the WSEA, whilst maintaining a high standard of amenity.

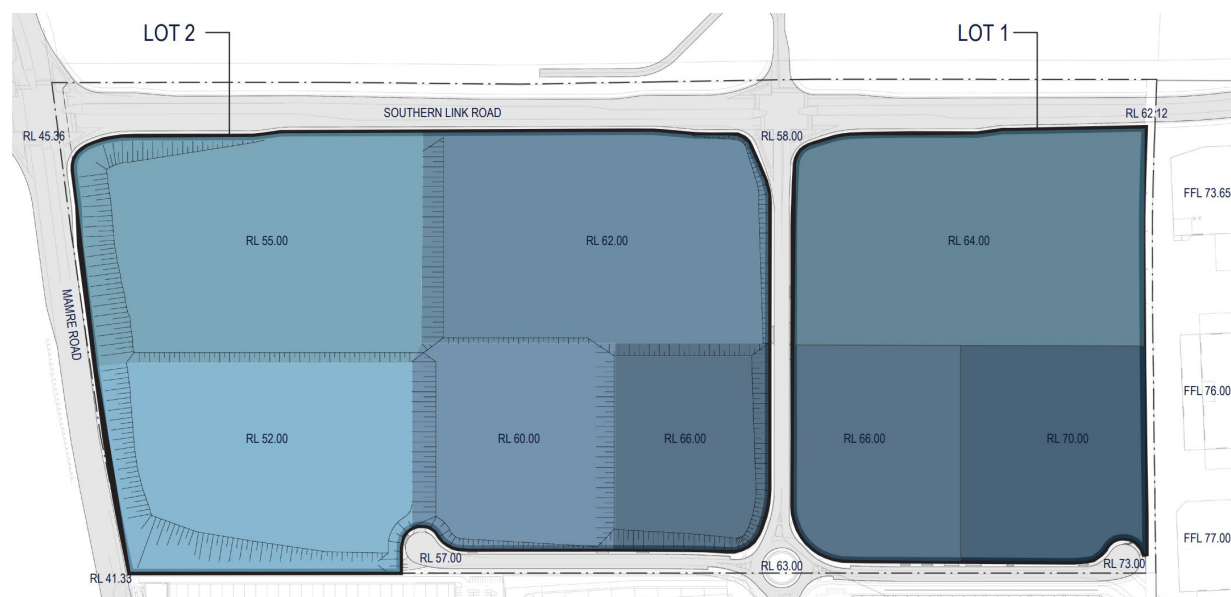


Figure 18 Proposed Building Pads

Source: Watson Young Architects

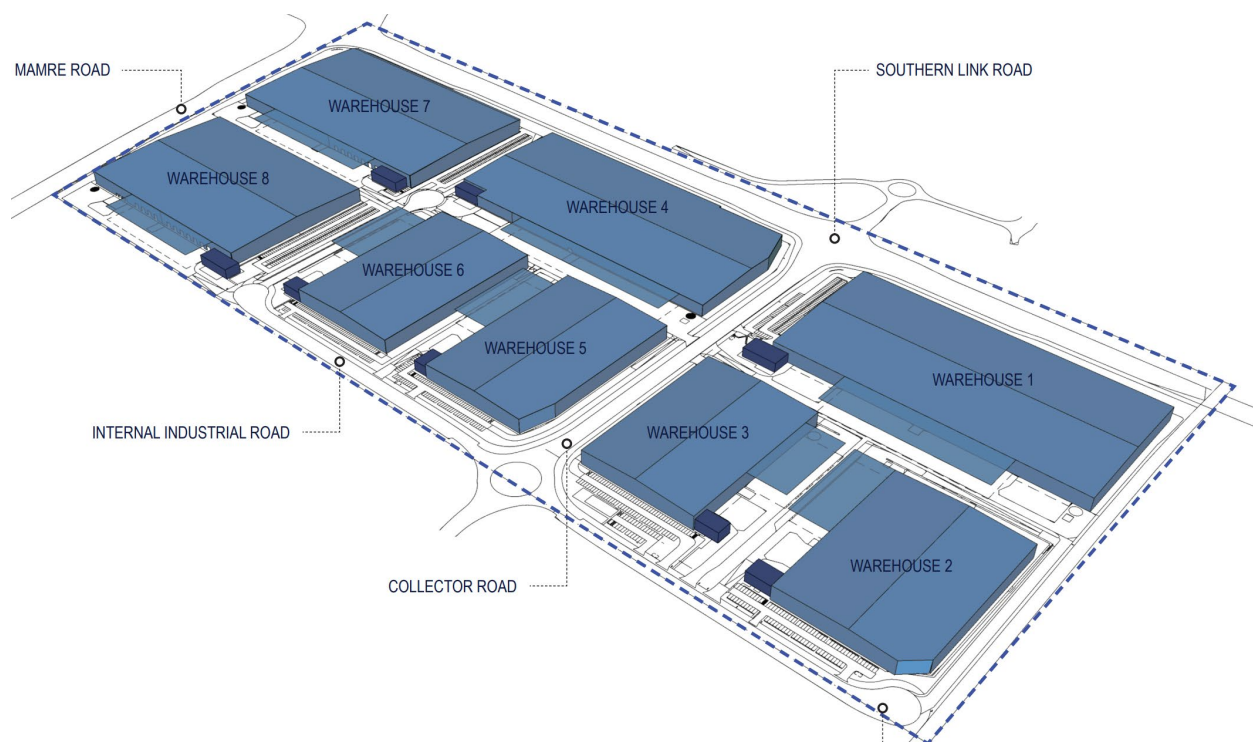


Figure 19 Proposed Site Layout and Design

Source: Watson Young Architects

3.0 Project Description

3.1 Overview

The SSDA seeks approval for a concept masterplan for an industrial estate comprising eight (8) buildings for at 706-752 Mamre Road, Kemps Creek (the site). In addition, approval is sought for the subdivision of the site into three (3) lots and Stage 1 Development is sought for site preparation, earthworks, infrastructure works and construction of Warehouses 1-3, and the associated site road network and access infrastructure. Specifically, the SSDA seeks approval for the following:

Concept Masterplan

A Concept Masterplan for the site is proposed, comprising eight (8) industrial warehouse buildings including ancillary office space and a café, including:

- Proposed use of the land for *Warehouse or distribution centre, General industrial, Food and drink premises* and ancillary *Office premises* development;
- An indicative total Gross Floor Area (GFA) of 244,413m², comprising;
 - Warehouse 1 – 40,422m²;
 - Warehouse 2 – 21,220m²;
 - Warehouse 3 – 17,621m²;
 - Warehouse 4 – 44,491m²;
 - Warehouse 5 – 20,544m²;
 - Warehouse 6 – 20,561m²;
 - Warehouse 7 – 42,922m²;
 - Warehouse 8 – 36,390m²; and
 - Café – 242m².
- Road layout including high order roads with external connections, and internal estate local industrial roads;
- Conceptual building locations, hardstand areas, car parking arrangements, building heights, setbacks, built form parameters and site landscaping; and
- Provision of land for the potential future dedicated freight corridor.

Stage 1 Development

The delivery of the Concept Masterplan is proposed to be staged, under this application Stage 1 Development works are proposed, that comprise:

- Site preparation works, including:
 - Demolition and clearing of all existing built form structures;
 - Clearing of all existing vegetation and farm dam decommissioning;
 - Site wide bulk earthworks including 'cut and fill' to create flat development platforms for the proposed built form (Warehouses 1-3) and future built form (Warehouse 4-8); and
 - Construction of inter-allotment, road and boundary retaining walls.
- Site servicing and infrastructure works, including:
 - Construction of an internal road network, comprising:
 - One (1) Collector Road; and
 - Two (2) Local Industrial Roads;
 - Construction of stormwater and servicing infrastructure; and
- Subdivision of the site into three (3) lots is proposed to facilitate the delivery of the Concept Masterplan, the three (3) lots comprise:
 - 1 super lot comprising Warehouses 1-3;
 - 1 residue super lot to comprise the future Warehouses 4-8; and
 - 1 lot dedicated for the proposed road network.
- Construction of three (3) warehouse buildings with ancillary offices comprising a total GFA of 79,263m², including:

- Warehouse 1 with a total GFA of 40,422m², comprising:
 - 39,037m² of warehouse GFA; and
 - 1,385m² of office and dock office GFA.
- Warehouse 2 with a total GFA of 21,220m², comprising:
 - 20,352m² of warehouse GFA; and
 - 868m² of office and dock office GFA; and
- Warehouse 3 with a total GFA of 17,621m², comprising:
 - 16,859m² of warehouse GFA; and
 - 762m² of office and dock office GFA.
- Hardstand area for loading and vehicle manoeuvring;
- Car parking and landscaping;
- Estate signage and external façade signage; and
- Hours of operation of 24 hours a day, 7 days a week.

Architectural Drawings have been prepared by Watson Young Architects and included at **Appendix B**. A Design Statement has also been prepared by Watson Young Architects and included at **Appendix H**.

The layout of the proposed Concept Masterplan is provided in **Figure 20** on the following page, with an aerial perspective render view provided in **Figure 21** following. The layout of the proposed Stage 1 Development is provided in **Figure 22**.

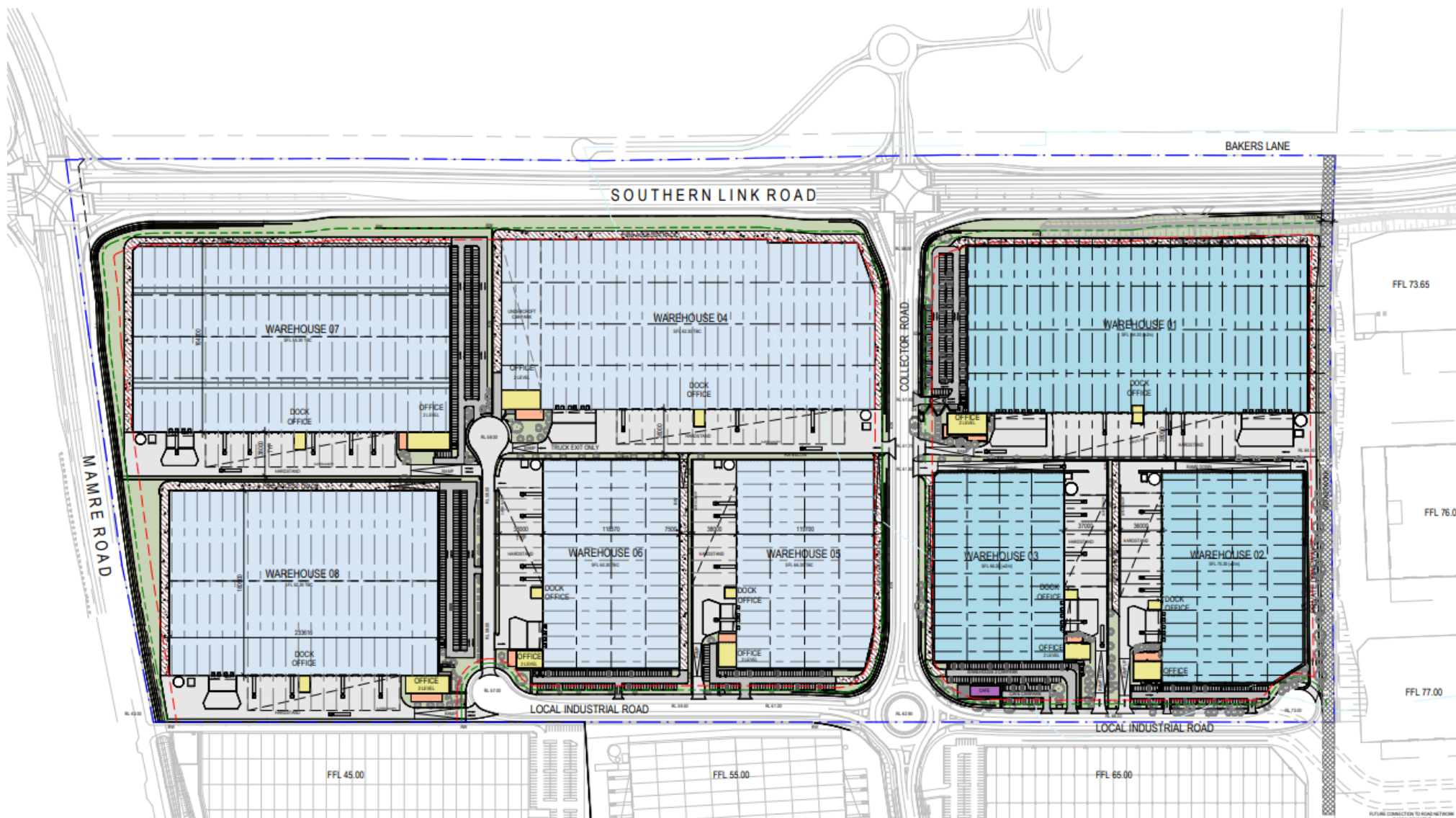


Figure 20 Concept Masterplan

Source: Watson Young Architects



Figure 21 *Concept Masterplan – Aerial View*

Source: Watson Young Architects

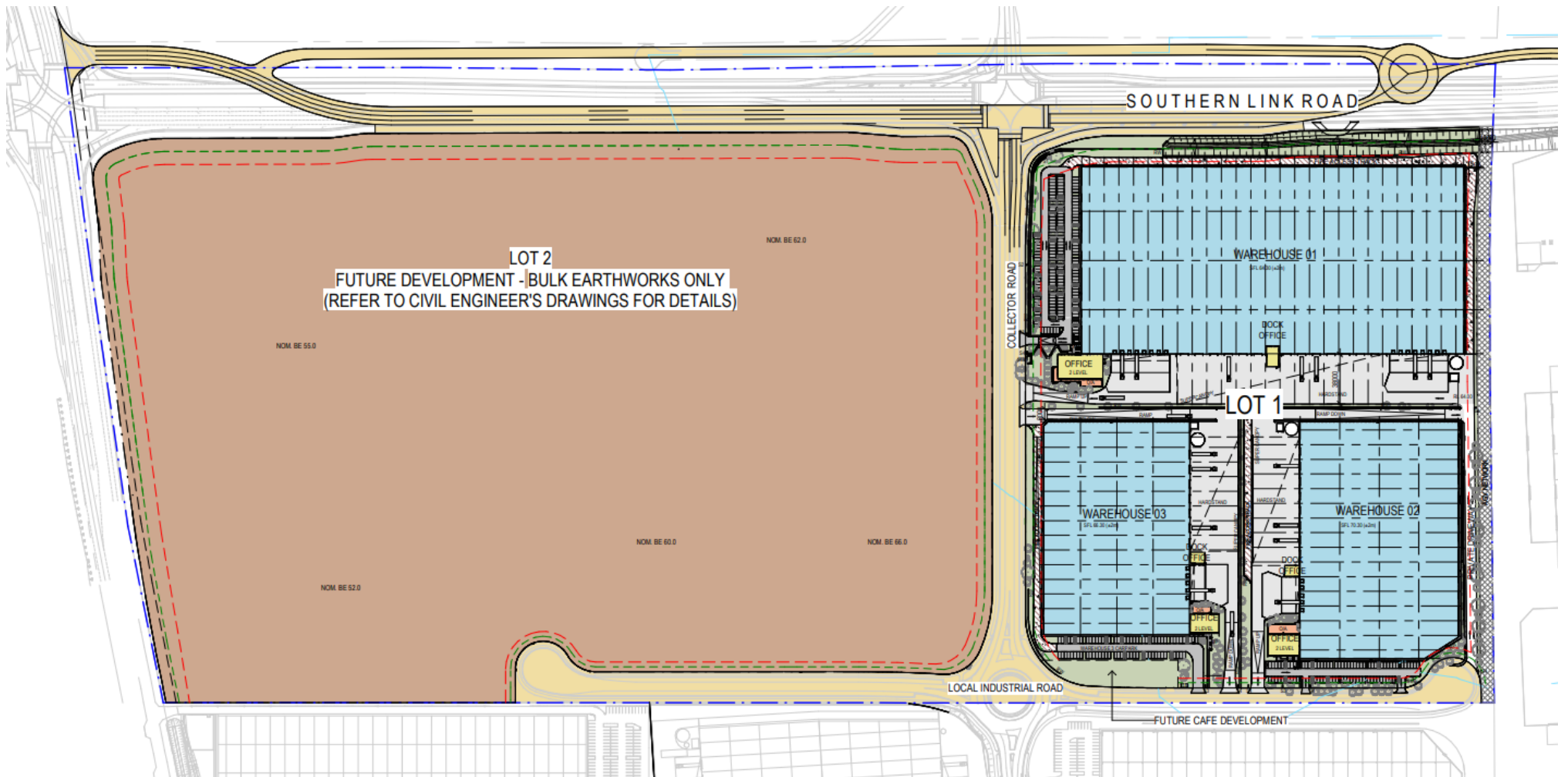


Figure 22 Stage 1 Development

Source: Watson Young Architects

3.2 Key Project Information

3.2.1 Project Area

The project area constitutes the entire site as described in **Section 2.2** and Illustrated in **Figure 7**.

3.2.2 Project Details

A summary of the key details relating to the Concept Masterplan is provided in **Table 4** below, with separate table provided for the Stage 1 Development provided in **Table 5** following.

Table 4 Key Development Information – Concept Masterplan

Component	Concept Masterplan Proposal			
Land Use	Warehouse or distribution centre, General industrial, Food and drink premises and ancillary Office premises uses.			
Site Area	522,477m ²			
Developable Area	Internal Road Reserve	25,010m ²		
	External Road Reserves	63,308m ²		
	Dedicated Freight Network Corridor (10m Reserve)	4,439m ²		
	Total	429,720m²		
Indicative Gross Floor Area	Building	Warehouse Area	Office/Dock Office Area	Total
	Warehouse 1	39,037m ²	1,385m ²	40,422m ²
	Warehouse 2	20,352m ²	868m ²	21,220m ²
	Warehouse 3	16,859m ²	762m ²	17,621m ²
	Warehouse 4	43,241m ²	1,250m ²	44,491m ²
	Warehouse 5	19,817m ²	727m ²	20,544m ²
	Warehouse 6	19,796m ²	765m ²	20,561m ²
	Warehouse 7	41,703m ²	1,219m ²	42,922m ²
	Warehouse 8	35,082m ²	1,308m ²	36,390m ²
	Cafe	242m ²	-	242m ²
	Total	236,129m²	8,284m²	244,413m²
Indicative Building Height	14.6m			
Indicative Car Parking Spaces	1011			
Permeable Area	Landscaping (100% permeable) = 49,868m ² Paving and Fire Access (50% permeable) = 14,872m ²			
Landscaped Area	15% (of developable area)			
Canopy Cover	46,021.2m ² , 10% of developable area (459,269m ² – including the internal road reserve area).			
Operation Hours	24 hours, 7 days a week			
Construction Jobs	1,670			
Operational Jobs	1,450			

Table 5 **Key Development Information – Stage 1**

Component	Stage 1 Proposal			
Land Use	Warehouse or distribution centre, General industrial with ancillary Office premises uses			
Site Area	522,477m ²			
Gross Floor Area	Building	Warehouse Area	Office/Dock Office Area	Total
	Warehouse 1	39,037m ²	1,385m ²	40,422m ²
	Warehouse 2	20,352m ²	868m ²	21,220m ²
	Warehouse 3	16,859m ²	762m ²	17,621m ²
	Total	76,248m ²	3,015m ²	79,263m ²
Maximum Building Height	14.6m			
Car Parking Spaces	Warehouse 1	165		
	Warehouse 2	81		
	Warehouse 3	76		
	Total	322		
Construction Hours	- Monday to Friday 7:00am to 6:00pm; - Saturday 8:00am to 1:00pm; and - No work on Sundays or public holidays.			
Operation Hours	24 hours, 7 days a week			

3.3 Site Preparation Works

The site preparation works form part of the Stage 1 Development (unless otherwise stated) and include demolition of all existing structures and vegetation removal, farm dam decommissioning, remediation, bulk earthworks and construction of retaining walls across the site. These works will enable the delivery of the proposed built form under Stage 1 (Warehouse 1-3), as well as the concept built form (Warehouse 4-8) to be proposed to be constructed under future applications.

3.3.1 Demolition and Vegetation Removal

To enable the redevelopment of the site, all existing structures are proposed to be demolished. A detailed Construction Environmental Management Plan (CEMP) will be prepared by the appointed contractor prior to demolition works commencing and submitted to the certifying authority. The CEMP will outline the extent of demolition works and the process and techniques to ensure the appropriate disposal of materials. Existing vegetation, which includes exotic grasslands, is proposed to be removed from the site to facilitate the proposed development. There are no native plant species identified within the site.

3.3.2 Farm Dam Decommissioning

As part of the site preparation works, the eleven farm dams on the site will be required to be dewatered, in accordance with a Dam Decommissioning Plan. The Dam Decommissioning Plan is to provide guidelines for the dewatering of dams and the translocation of aquatic fauna species. This plan will need to be in place prior to the commencement of the decommissioning works.

3.3.3 Remediation

The remediation of the site is required to remove contamination with the Remediation Action Plan (**Appendix HH**) outlining a preferred remediation strategy, which is described as follows:

- Excavation and off-site disposal of Asbestos Fines/Fibrous Asbestos impacted fill at RZ10 (located along the northern frontage of the site).

- Excavation of material identified to contain bonded Asbestos Containing Material (ACM) below the health criteria and relocation to a designated portion of the site where it will be inaccessible to future site users (where it will be subject to an AMP to meet WHS requirements).
- Inspection and removal of ACM from surface building rubble identified adjacent to retention pond embankments across the site.
- Removal of surface and sub-surface anthropogenic material considered to pose an aesthetic issue and considered not suitable for on-site retention to a landfill/licensed waste facility and/or relocation and retention on site at depth/in inaccessible areas, where appropriate.
- Excavation of stained/odorous soils at TP130 (located along the northern frontage of the site) and management of the material (re-location) to a designated portion of the site such that the material does not pose an aesthetic issue under the development scenario.

3.3.4 Bulk Earthworks

Following the removal of existing structures and vegetation, bulk earthworks ('cut and fill') is proposed across the site as part of the Stage 1 Development in order to facilitate the creation of building pads. The proposed bulk earthworks is expected to achieve a balanced cut and fill with the import of only 6,386m³ expected to be required as outlined in **Table 6**. The locational depth of cut and fill activities across the site is identified in **Figure 23**.

Table 6 Bulk Earthworks Cut and Fill Balance

Item	Volume (approximate only)
Stripping of topsoil	- 101,319m ³
Excavation of existing farm dams	- 34,093m ³
Net cut (excluding topsoil stripping)	- 1,422,581m ³
Net fill	+ 1,564,379m ³
Balance	6,386m ³ (Import)

It is noted that the exact volumes are subject to change through the detailed design and do not take into account activities such as removal of existing building slabs/pavements or removal and/or remediation of any existing uncontrolled fill as well as proposed landscaping and utility trenching

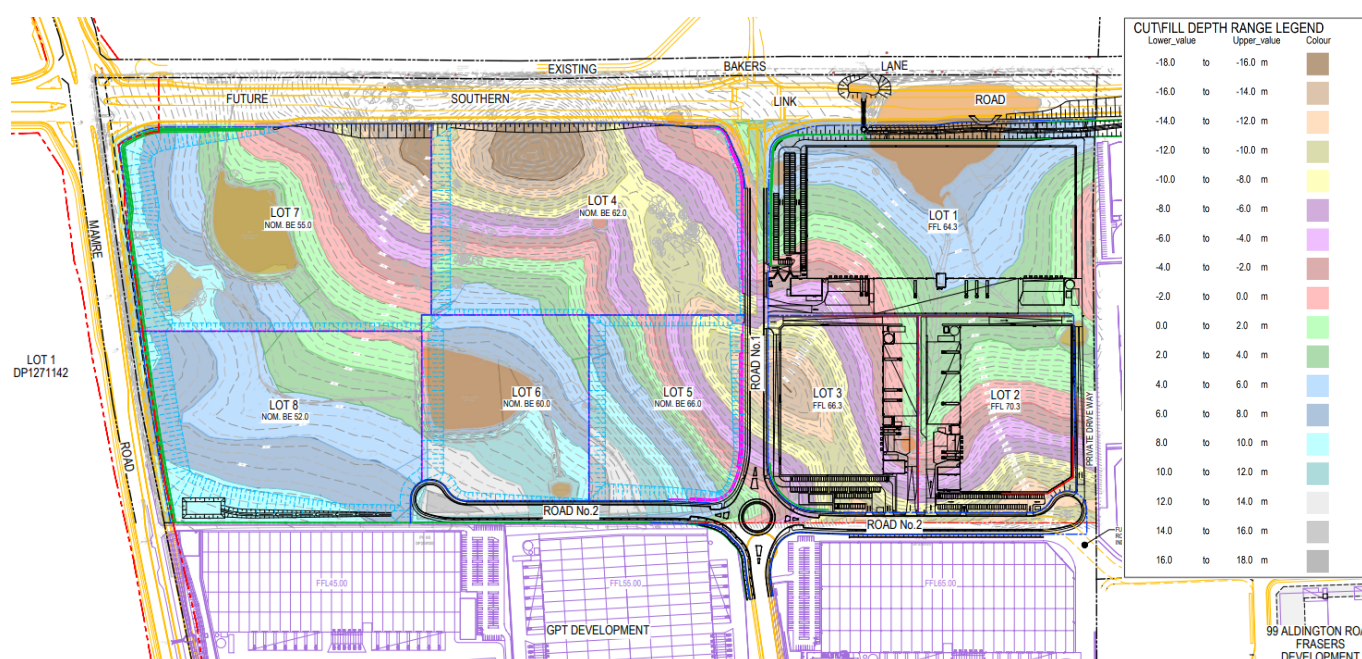


Figure 23 Bulk Earthworks Plan

Source: AT&L

3.3.5 Retaining Walls

In order to manage the sloping topography across the site, retaining walls are proposed to create suitable level transitions between the proposed building pads and public domain. The proposed retaining walls will be constructed on a stage basis with only the retaining walls at the site boundary and Lot 1, 2 and 3 proposed as part of the Stage 1 Development Works. The proposed retaining walls across the site are illustrated on the General Arrangement Plan provided in **Figure 24**.

These retaining walls will enable the bulk earthworks across the site and construction of Warehouse 1, 2 and 3. The remaining retaining walls on Lot 4-8 will be constructed as part of future detailed DAs. Where walls are not constructed, a batter of 1 in 4 will be maintained for stability purposes with any batter steeper than 1 in 5 to be vegetated.

Retaining walls will be designed and constructed using standard industry practices, standards and guidelines. All retaining walls will have pedestrian and vehicular safety barriers (if required) in accordance with Austroads Guidelines as required. The retaining walls will comprise a keystone product or other similar block will be adopted for all retaining walls. Where retaining wall heights exceed 2 metres, a tiered retaining wall will be adopted, in accordance with Section 4.4 of the MRP DCP.

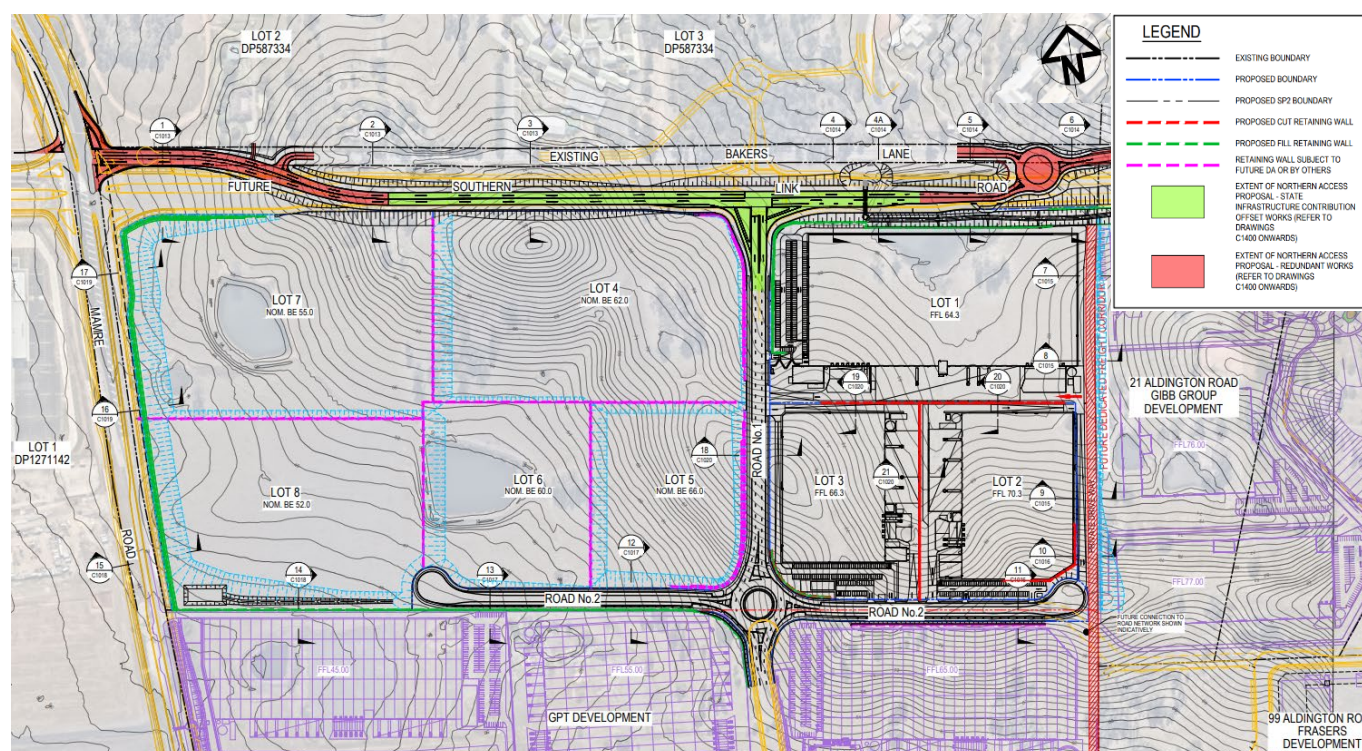


Figure 24 General Arrangement Plan

Source: AT&L

3.4 Site Servicing and Infrastructure Works

The site servicing and utility works form part of the Stage 1 Development (unless otherwise stated) and will enable the provision of adequate infrastructure to support the Proposal.

3.4.1 Road Works

Internal Road Network

The proposed Stage 1 Development involves the construction of the internal road network as illustrated on the General Arrangement Plan (**Figure 24**), it includes:

- The construction of a north-south Collector Road (Road No.1) that connects from the future SLR to the proposed future Yiribana Estate to the south.
- The construction of two (2) east-west Local Industrial Roads (Road No. 2) that provide access to the Stage 1 Development (Warehouse 1-3) and future concept built form (Warehouse 4-8).

It is noted that the eastern Road No. 2 is wholly within the site and will be constructed by the Proponent. While the western Road No. 2 is located on the southern site boundary and is proposed to be constructed in collaboration with The GPT Group (Yiribana Estate) (refer to **Appendix MM**).

The proposed internal road network includes a Collector Road (Road No. 1) and Industrial Road (Road No.2), both are illustrated in **Figure 25** and **Figure 26** on the following page, they will be designed with the criteria outlined in **Table 7** below.

Table 7 General Road Design Criteria

Component	Collector Road (25.6m)	Local Industrial Road (24m)
Roads within the estate	Road No. 1	Road No. 2
Design speed	60 km/h (signposted 50 km/h)	60 km/h (signposted 50 km/h)
Design vehicle	30m long Performance Based Standards (PBS) Level 2 Type B vehicle (Type 2B).	30m long Performance Based Standards (PBS) Level 2 Type B vehicle (Type 2B).
Check vehicle	36.5m long Performance Based Standards (PBS) Level 3 Type A vehicle (Type 3A).	36.5m long Performance Based Standards (PBS) Level 3 Type A vehicle (Type 3A).
Pedestrian and cycle path (within verge width)	Verge 1 – 1.5m Verge 2 – 2.5m	Verge 1 – 1.5m Verge 2 – 2.5m
Through traffic lanes	2 x 3.5m	2 x 3.5m
Kerbside lanes	2 x 4.2m (No Parking)	2 x 4.0m
Median width	Required only at key signalised intersections and locations to separate opposing movements which may cause conflicts.	N/A
Road carriageway width (kerb to kerb)	15.4m (mid-block no median)	15.0m
Verge width	Verge 1 – 4.6m Verge 2 – 5.6m	Verge 1 – 4.0m Verge 2 – 5.0m
Road reserve	25.6m	24.0m

Source: AT&L

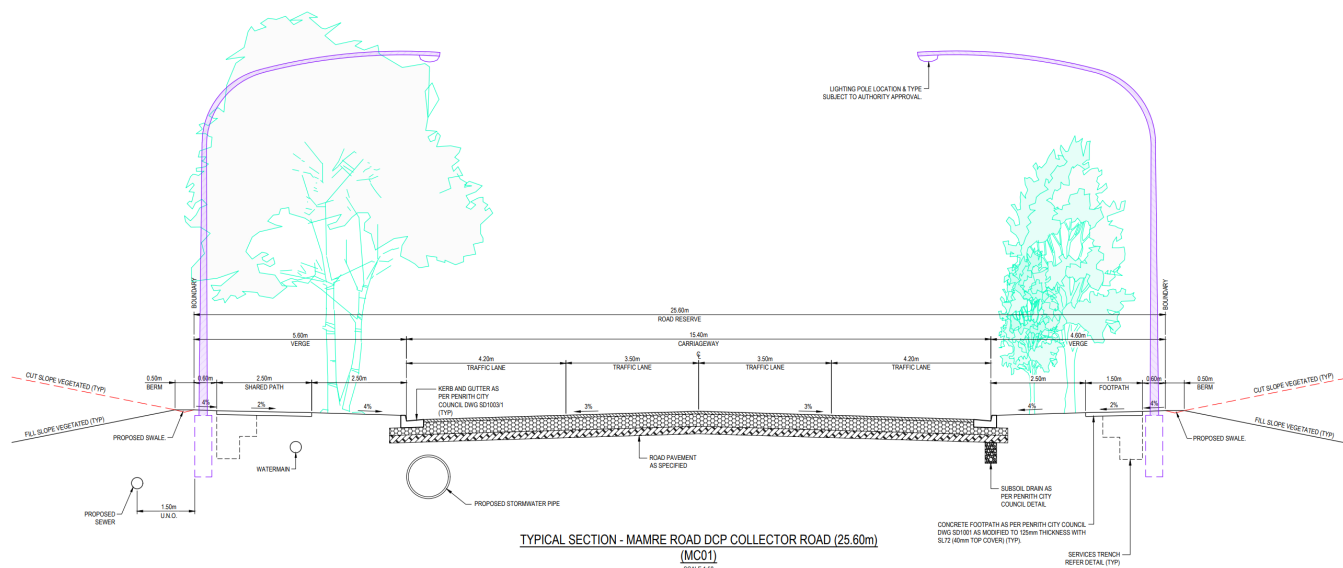


Figure 25 Typical section – Proposed Road No. 1

Source: AT&L

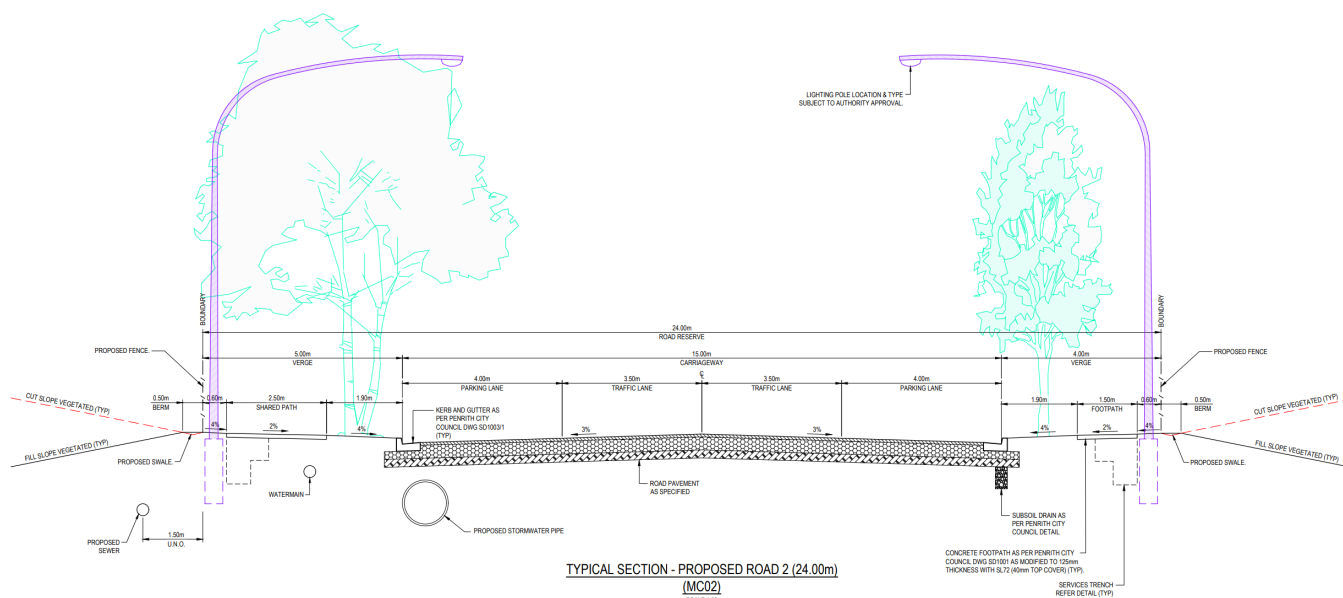


Figure 26 Typical section – Proposed Road No. 2

Source: AT&L

Connection of Road No. 1 to Yiribana Estate

As part of the interim traffic arrangements, it is proposed that Industrial Collector Road No.1 is not initially connected through to the Yiribana Estate (GPT) to the south. The traffic model by LOG-North does not support this connection in the interim, however the connection would be opened in the future when further stages of the SLR and precinct road network are implemented.

It is important to note that, the Yiribana Estate development (SSD 10272349), proposes a temporary cul-de-sac at the boundary with the Summit development. Traffic modelling undertaken for the Yiribana Estate EIS confirms that this connection is not required to support the Yiribana Estate traffic.

In the absence of approval for the Proposal and implementation of the proposed LOG-North interim road upgrade arrangements, the connection through the site from Yiribana Estate (GPT) will not be used. Therefore, maintaining the cul-de-sac arrangement at the boundary of the two developments in the interim does not in any way affect the proposed traffic arrangements for the Yiribana Estate as articulated in SSD-10272349.

In accordance with Control 7 of Section 3.4.1 of the MRP DCP LOG-North has consulted with and secured the agreement with The GPT Group for the connection to the site to remain closed until such time as future SLR upgrades are in place which is provided at **Appendix MM**.

Dedicated Freight Corridor

In accordance with Section 2.35(2)(b) of the Industry and Employment SEPP and the MRP DCP, the Proposal includes the dedication of a 10m freight corridor along the sites eastern boundary to potentially connect to the future Intermodal Terminal to the north of the site.

The dedicated freight corridor, also referred to as an automated guided vehicle (AGV) freight network has been designed in accordance with the MRP DCP, which includes an indicative access point to the site. The pad levels proposed for Estate have been designed as such to not preclude access to the dedicated freight network.

The location of the dedicated freight network is illustrated on the General Arrangement Plan above (**Figure 24**). The proposed detailed freight corridor layout is provided in **Figure 27** below.

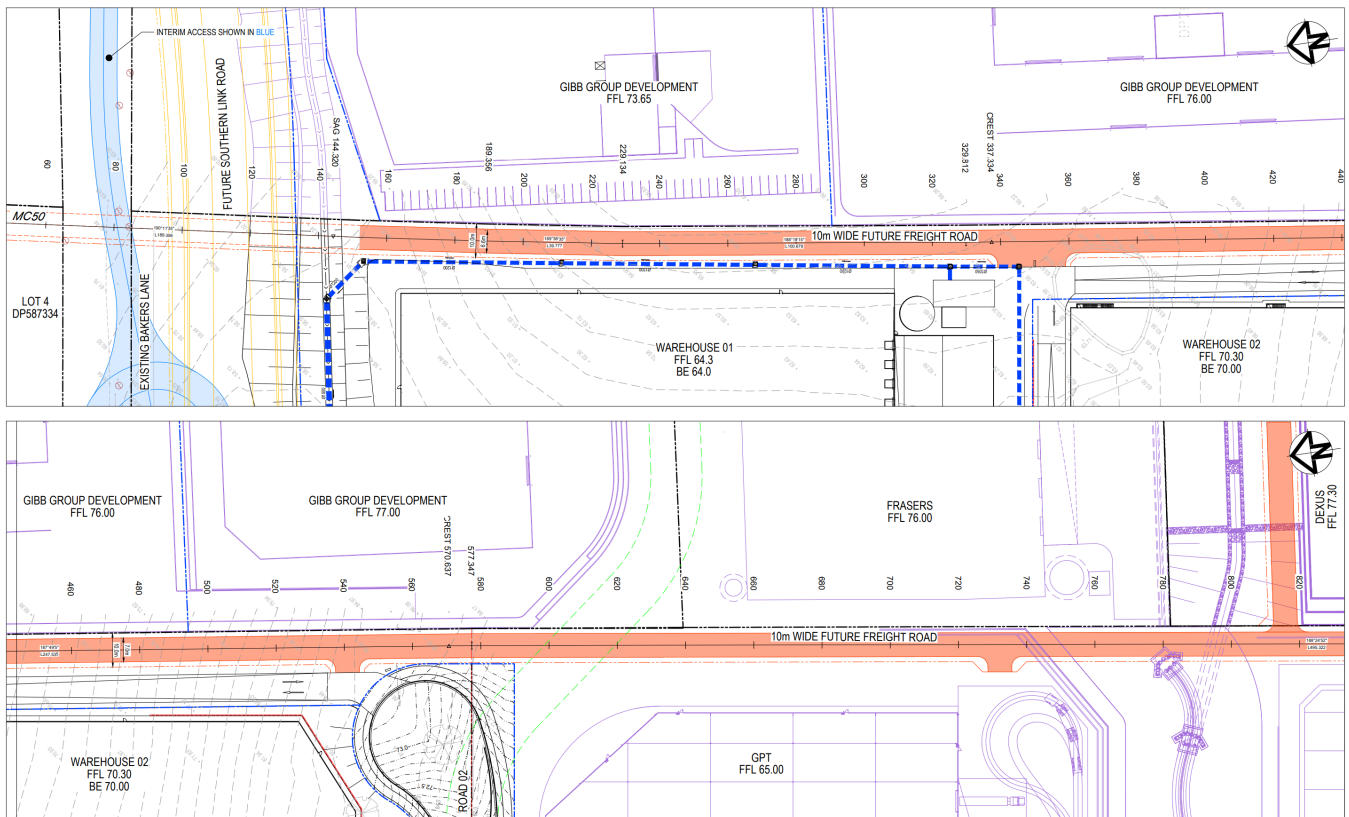


Figure 27 Dedicated Freight Layout Plan

Source: AT&L

External Road Network

In order to facilitate the Stage 1 Development of the Proposal without the reliance on uncommitted public road infrastructure, LOG-N are to construct an interim SLR and intersection arrangement. It is important to note that the planning approval pathway for the interim arrangement is still subject to ongoing consultation with LOG-N, the DPHI and TfNSW to determine if the works will be approved under Part 4 (by way of an amendment to this SSDA) or Part 5, Division 5.1 of the EP&A Act. Until a point at which the planning pathway is agreed to the relevant parties, this SSDA does not seek consent for construction and operation of the interim access arrangement.

In accordance with the Industry and Employment SEPP and MRP DCP, the SLR will be located parallel to Bakers Lane, and will provide the primary point of access to the site, as well as an east-west arterial link between Mamre Road and Wallgrove Road. The interim SLR and intersection design is provided at **Appendix K** with an overview provided in **Figure 28**.

The interim SLR and intersection design will connect the site to Mamre Road and Aldington Road. It will also utilise the existing Bakers Lane with intersections directly off the interim SLR in order to appropriately segregate vehicles access the schools and retirement village to the immediate north. Specifically, the interim design is described as follows:

- Construction of a section of the southern carriageway of SLR, and configuration to provide four traffic lanes (two in either direction);
- Construction of an intersection at the SLR and proposed internal Road 01. This intersection would likely be signalised (pending liaison with Penrith City Council and TfNSW);
- Transition works between the interim SLR and Bakers Lane near Mamre Road, including a left-in only for eastbound traffic to maintain access for properties on the northern side of Bakers Lane; and
- Transition works between the interim SLR and Bakers Lane at the eastern end of the site, including a roundabout connection to Bakers Land and a connection the existing alignment of Aldington Road.

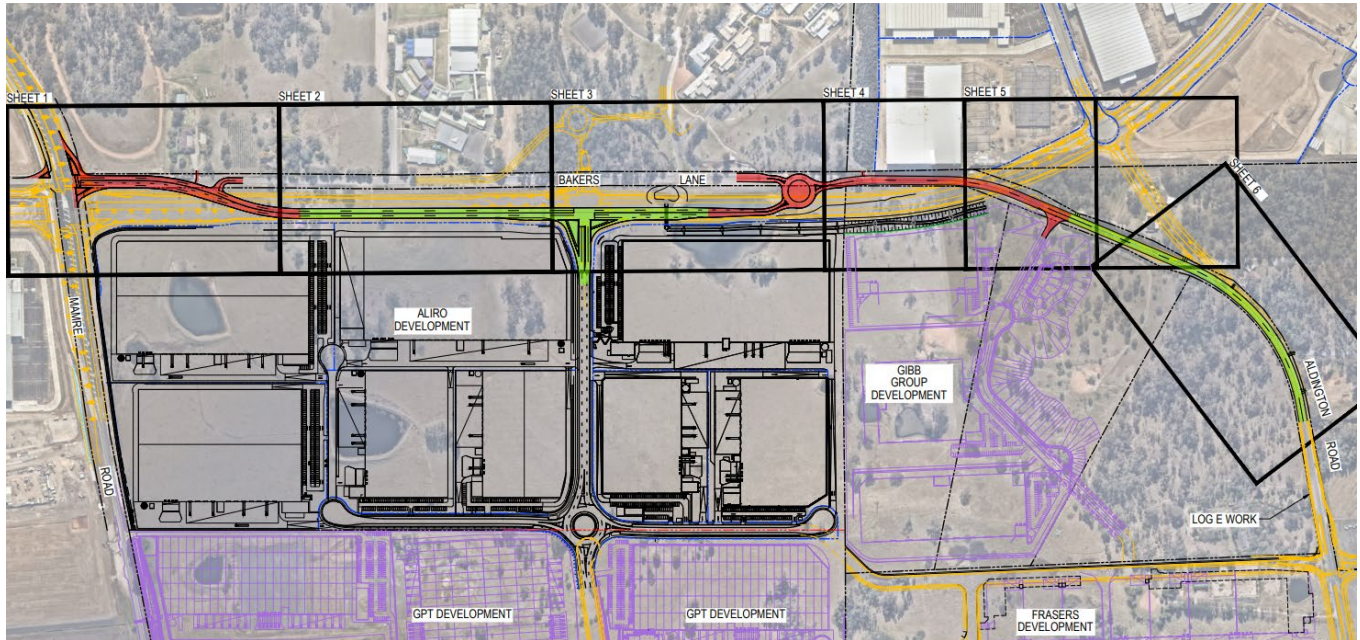


Figure 28 Southern Link Road – Interim Arrangement

Source: AT&L

As outlined in **Section 2.5**, LOG-N propose to enter into agreements with Penrith City Council and the Minister for Planning (State Government) with respect to works-in-kind for the construction of components of the proposed SLR. The sections outlined in 'green' are works that will form part of the ultimate SLR arrangement and as such are proposed to be offset by the Special Infrastructure Contributions (SIC) for the SLR and by the MRP Contributions Plan prepared by Penrith City Council (under Section 7.11 of the EP&A Act) for the Aldington Road arrangement. The sections outlined in 'red' are referred to as redundant works that will be demolished following the delivery of the ultimate arrangement and as such will not be SIC nor Section 7.11 offset.

3.4.2 Stormwater Management

Interim Arrangement

As part of the proposed Stage 1 Development is an interim Stormwater Management Plan that has been prepared in the absence of regional stormwater management measures. This arrangement has been presented to demonstrate a solution that could be implemented to satisfy stormwater quality, quantity and flow controls.

The interim Stormwater Management Plan includes:

- Rainwater tanks for non-potable reuse;
- Gross pollutant traps;
- Proprietary bio-retention;
- Detention tanks;
- Sediment basins; and
- A pond for stormwater harvesting and reuse for irrigation.

The Stormwater Management Plan – Interim Arrangement is provided in **Figure 29** below.

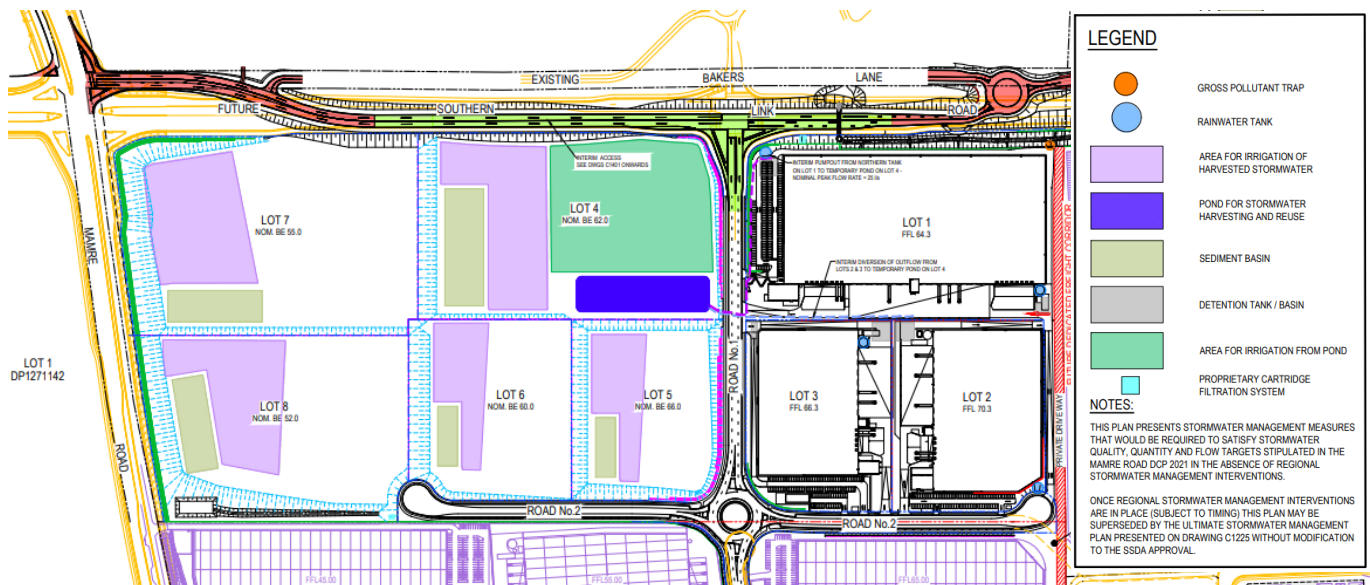


Figure 29 Stormwater Management Plan – Interim Arrangement

Source: AT&L

Ultimate Arrangement

Also proposed as part of the Stage 1 Development is an ultimate Stormwater Management Plan which incorporates measures to address stormwater quantity controls within the site. This arrangement is presented on the basis that measures adopted in the MRP Stormwater Scheme Plan are in place (or will be in place) to satisfy stormwater quality and flow controls for the site. The Ultimate Arrangement is proposed to supersede the interim arrangement, without modification to any development approval in place, once formal confirmation has been received by the DPHI and/or Sydney Water that regional stormwater management measures will be delivered (by others) to service the estate.

The proposed ultimate Stormwater Management Plan includes:

- Gross pollutant traps; and
- Detention tanks.

The Stormwater Management Plan – Ultimate Arrangement is provided in **Figure 30** below.

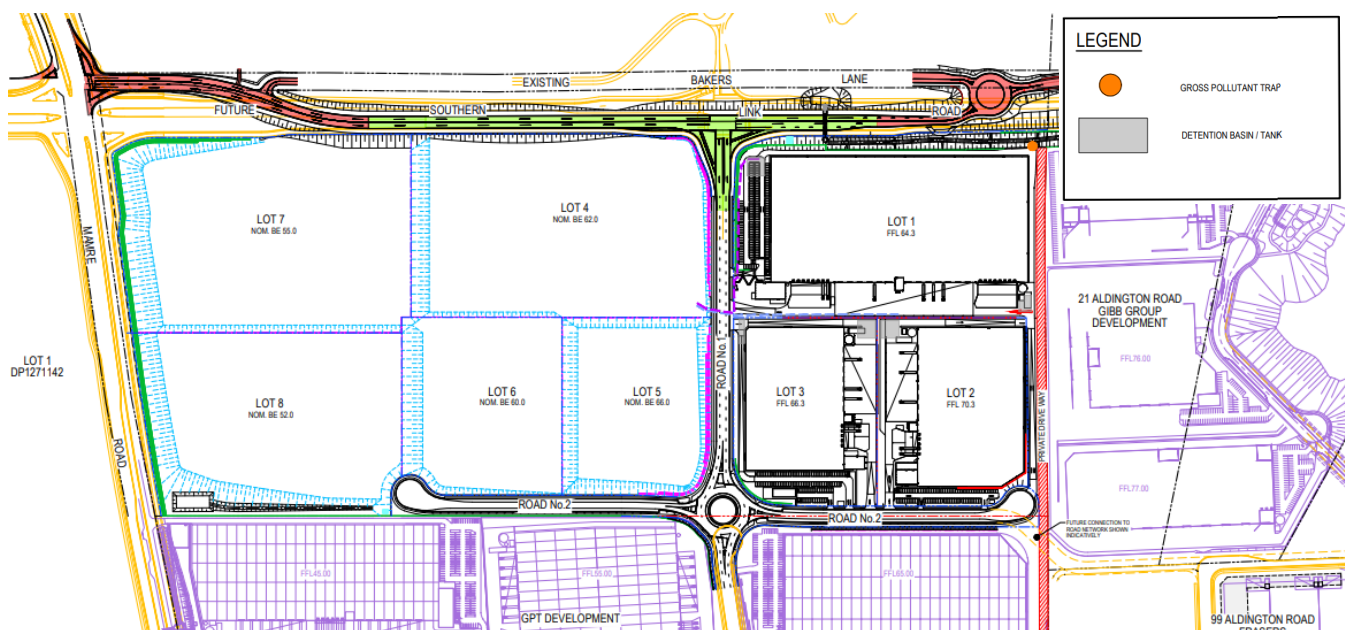


Figure 30 Stormwater Management Plan – Ultimate Arrangement

Source: AT&L

3.5 Subdivision

To rationalise the layout of the site and to reflect the two stages of the Proposal, it is proposed to subdivide the site into two (2) separate super lots with a separate lot will be created for the road network.

The proposed subdivision forms part of the Stage 1 Development works and is as follows:

- **Lot 1** – A super lot comprising Warehouses 1 – 3;
- **Lot 2** – A residue super lot comprising the future Warehouses 4 – 8; and
- **Proposed Roads** – A lot dedicated for the proposed road network.

Internal roads and drainage channels are also to be provided within the proposed allotments. The proposed subdivision works will be undertaken in accordance with the Plan of Subdivision prepared by Land Partners at **Appendix M**, an excerpt of which is shown in **Figure 31** below.

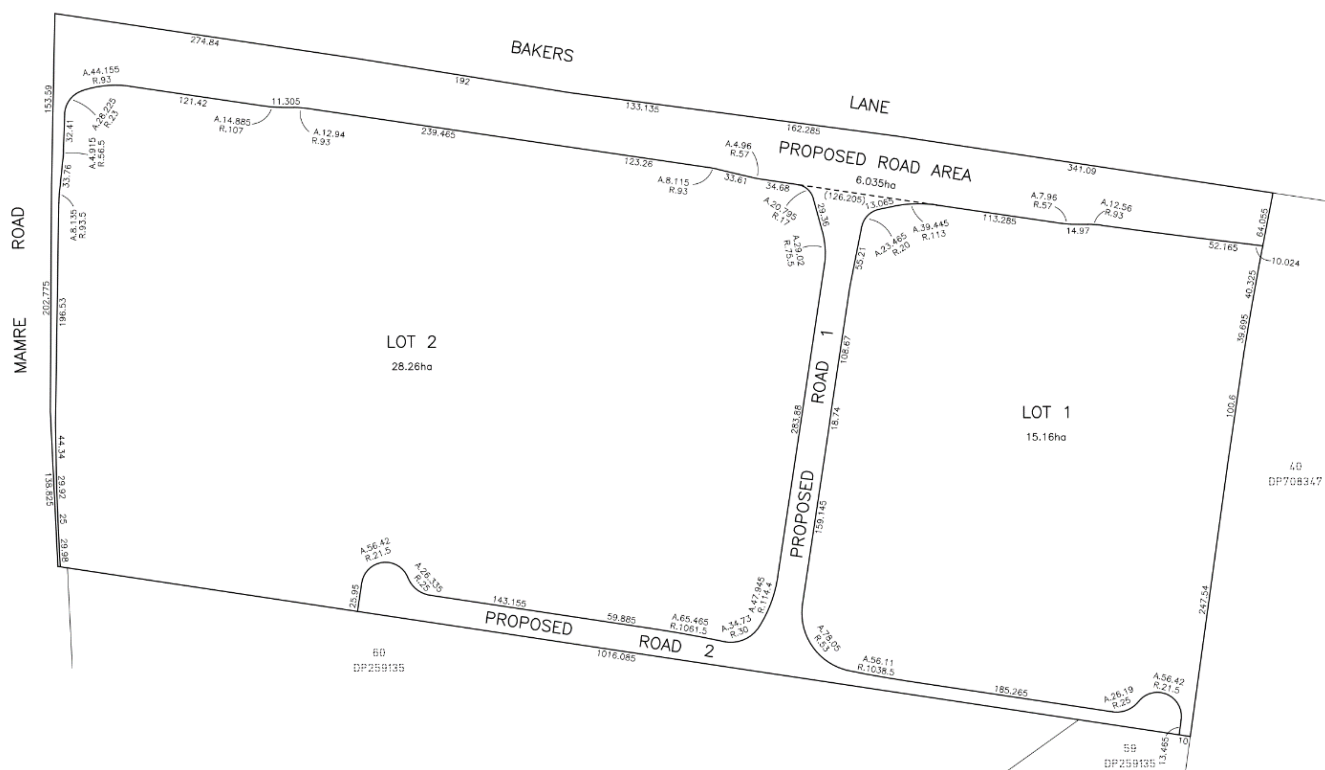


Figure 31 Proposed Plan of Subdivision

Source: Land Partners

3.6 Built Form and Staging

3.6.1 Concept Masterplan

The Concept Masterplan comprises eight (8) warehouse buildings and a café. The Stage 1 Development involves the development of Warehouse 1-3 with Warehouse 4-8 and the café forming the concept development under this SSDA. The concept development (Warehouse 4-8) is illustrated in **Figure 20** below and comprises a building height of 14.6m. The components of the concept development not included in the Stage 1 Development and will be subject to future detailed DAs.



Figure 32 Concept Masterplan – Aerial View

Source: Watson Young Architects

3.6.2 Stage 1 Development

The indicative staging of the Concept Masterplan has been developed to allow for the progressive delivery of the industrial estate with necessary surrounding infrastructure. This SSDA includes Stage 1 Development that comprises site preparation, and servicing and infrastructure works across the site to facilitate the delivery of the proposed built form (Warehouses 1-3) as well as the future (Warehouses 4-8) under a future detailed development application.

Specially, the proposed Stage 1 Development involve the following:

- Site preparation works;
- Site servicing and infrastructure works;
- Subdivision of the site into three (3) lots is proposed to facilitate the delivery of the Concept Masterplan;
- Construction of three (3) warehouse buildings with ancillary offices comprising a total GFA of 79,263m², including:
 - Warehouse 1 with a total GFA of 40,422m², comprising:
 - 39,037m² of warehouse GFA; and
 - 1,385m² of office and dock office GFA.
 - Warehouse 2 with a total GFA of 21,220m², comprising:
 - 20,352m² of warehouse GFA; and
 - 868m² of office and dock office GFA; and
 - Warehouse 3 with a total GFA of 17,621m², comprising:
 - 16,859m² of warehouse GFA; and

- 762m² of office and dock office GFA.
- Hardstand area for loading and vehicle manoeuvring;
- Car parking and landscaping;
- Estate signage and external façade signage; and
- Hours of operation of 24 hours a day, 7 days a week.

The proposed Stage 1 Development is illustrated in **Figure 33** on the following page, with perspective of the proposed development provided in **Figure 34** and **Figure 35** following.

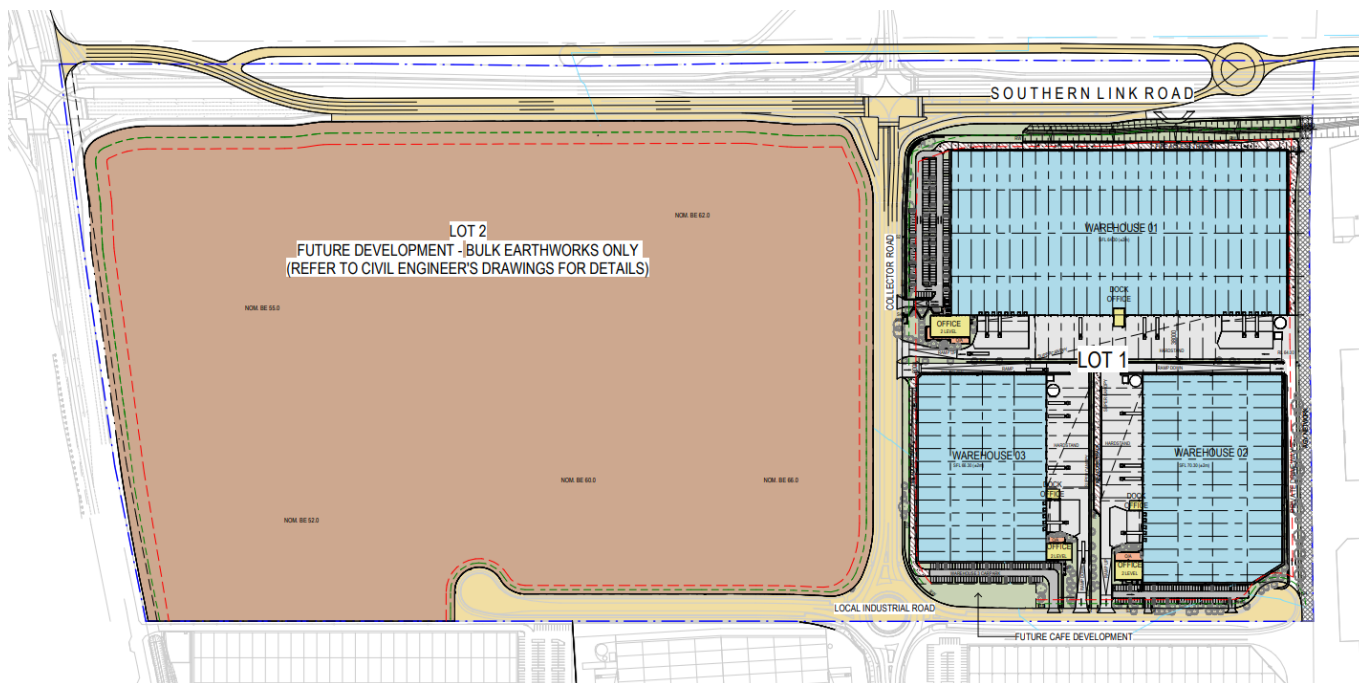


Figure 33 Proposed Stage 1 Development

Source: Watson Young Architects



Figure 34 Warehouse 3 – Office Photomontage

Source: Watson Young Architects



Figure 35 Warehouse 2 and 3 – Street Frontage Photomontage

Source: Watson Young Architects

Warehouse 1

Warehouse 1 comprises a warehouse building with a total GFA of 40,422m² featuring the following:

- Warehouse building with a total GFA of 39,037m²;
- Ancillary two storey office with a total GFA of 1,242m², comprising office space, a lobby, staff amenities, breakout space, and an outdoor area;
- Landscaping works adjacent to the main office and interspersed throughout the car parking area;
- A dock office with a GFA of 143m² comprising male and female amenities;
- Hardstand concrete areas circumventing the warehouse building for truck movements;
- A fire appliance bay to the south-east of the warehouse, and a fire access track around the northern and eastern edges of the warehouse;
- 29 loading docks (16 recessed and 13 on-grade) totalling 3,550m² in area, situated along the southern side of the warehouse building;
- 165 at-grade vehicle parking spaces to the west of the warehouse building, with separated car and truck access to the site;
- Inclusion of a retaining wall along the southern side, northern side, north-western corner and the western side of the site; and
- Palisade fencing around the northern and western sides of the warehouse, with chain wire fencing to the east and south of the warehouse.

The Warehouse 1 Site Plan is provided in **Figure 36** below.

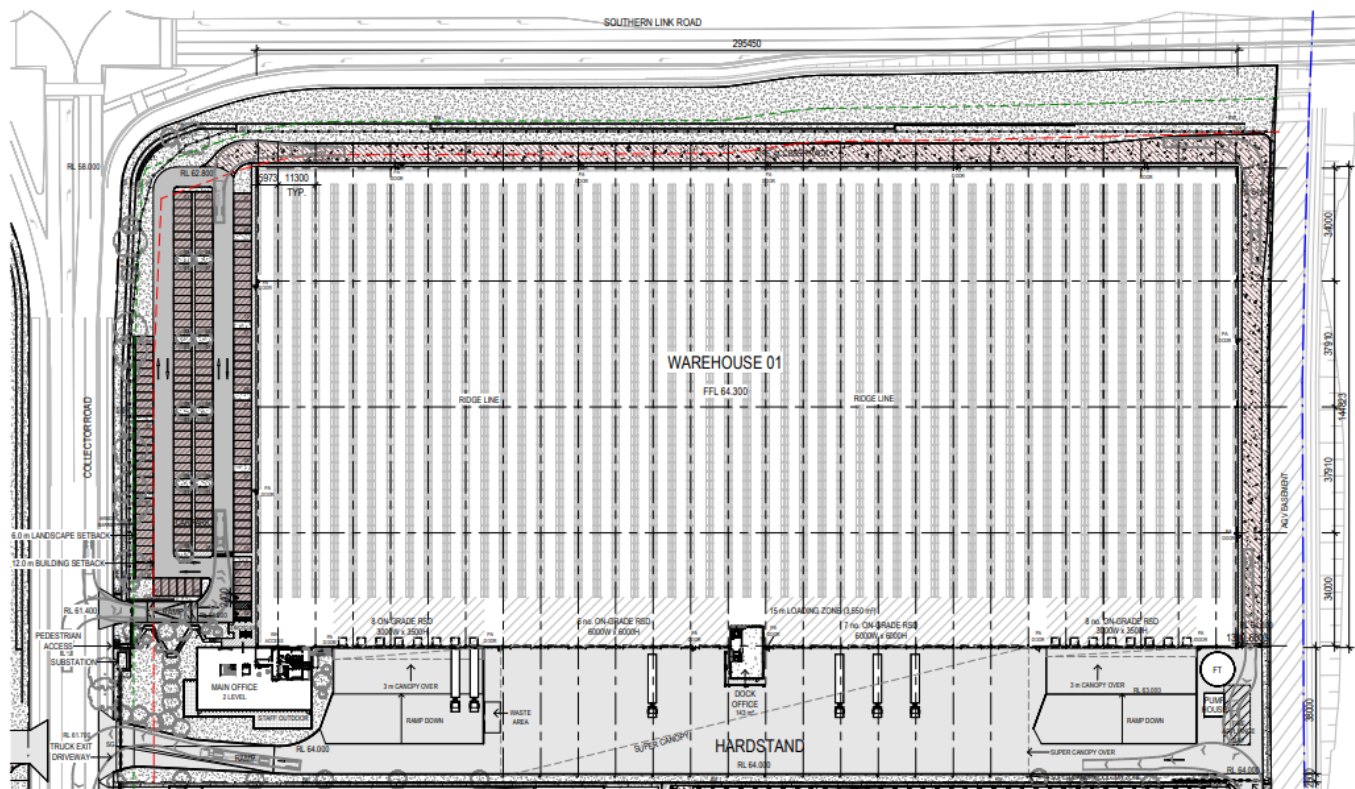


Figure 36 Warehouse 1 Site Plan

Source: Watson Young Architects

Warehouse 2

Warehouse 2 comprises a warehouse building with a total GFA of 21,220m² featuring the following:

- Warehouse building with a total GFA of 20,352m²;
- Ancillary two storey office building with a GFA of 777m², comprising office space, a lobby, staff amenities, a breakout area, and an outdoor area;
- Landscaping works adjacent to the main office, along the western edge of the warehouse site, as well as interspersed throughout the car parking area;
- A dock office with a GFA of 91m² comprising male and female amenities;
- Hardstand concrete areas circumventing the warehouse building for truck movements;
- A fire appliance bay near the north-west corner of the warehouse, and a fire access track to the west of the warehouse site;
- 13 loading docks (5 recessed and 8 on-grade) totalling 1,785m² in area, situated along the western side of the warehouse building;
- 81 at-grade vehicle parking spaces to the south of the warehouse building, with separated car and truck access to the site;
- Inclusion of a retaining wall around the southern side, northern side, eastern side and part of the western side of the warehouse site.
- Palisade fencing around the southern side and the south-western edge of the warehouse site, and chain wire fencing around the remaining perimeter of the warehouse site.

The Warehouse 2 Site Plan is provided in **Figure 37** below.

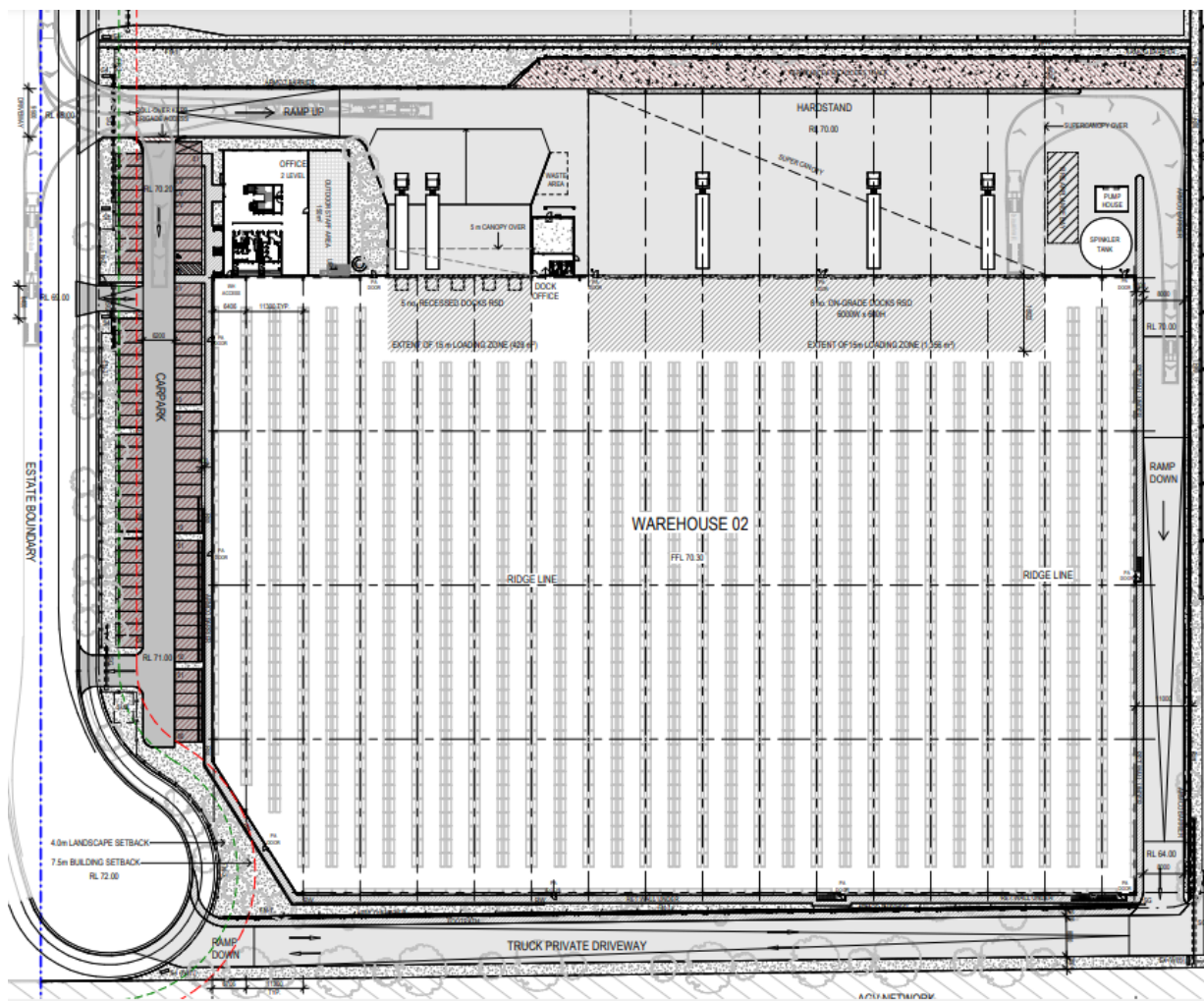


Figure 37 Warehouse 2 Site Plan

Source: Watson Young Architects

Warehouse 3

Warehouse 3 comprises a warehouse building with a total GFA of 17,621m² featuring the following:

- Warehouse building with a total GFA of 16,859m²;
- Ancillary two storey office building with a GFA of 670m², comprising office space, a lobby, staff amenities, a breakout area, and an outdoor area;
- Landscaping works to the west of the warehouse building, adjacent to the main office, and interspersed throughout the car parking area;
- A dock office with a GFA of 92m² comprising male and female amenities;
- Hardstand concrete areas circumventing the warehouse building for truck movements;
- A fire appliance bay near the north-east corner of the warehouse, and a fire access track to the west of the warehouse site;
- 12 loading docks (5 recessed and 7 on-grade) totalling 1,613m² in area, situated along the eastern side of the warehouse building;
- 76 at-grade vehicle parking spaces to the south of the warehouse building, with separated car and truck access to the site;
- Inclusion of a retaining wall along the south-western edge and southern boundary of the warehouse site; and
- Palisade fencing around the western side, southern side and the south-eastern edge of the warehouse site, and chain wire fencing around the remaining perimeter of the warehouse site.
- Aboriginal artwork on the western and northern elevations of the building as recommended by the Aboriginal Cultural Heritage Assessment Report.

The Warehouse 3 Site Plan is provided at **Figure 38** below.

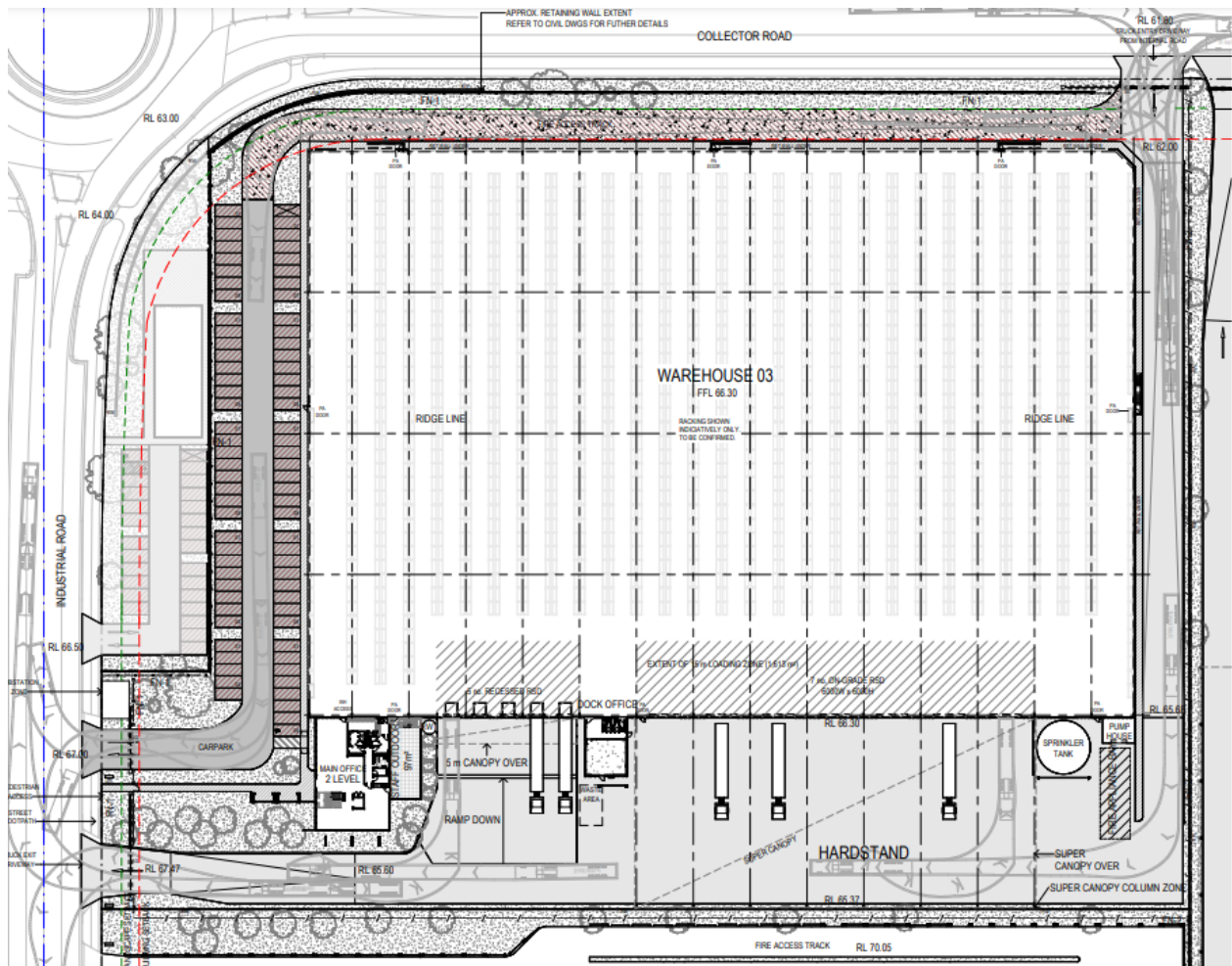


Figure 38 Warehouse 3 Site Plan

Source: Watson Young Architects

3.7 Landscaping and Public Domain

3.7.1 Overview

Landscape Drawings have been prepared by Geoscapes and are included at **Appendix L**. The proposed Landscape Masterplan is provided at **Figure 39**, which consist of the following:

- Planting of native trees species used as screening to the northern boundary;
- Shade trees in the car parks;
- Structured mass planting to internal lots with a minimum of 3 metre distances between the groups;
- Smaller canopy trees at the bottom of retaining walls;
- Ornamental trees to shade outdoor areas underplanted with flowering groundcovers;
- Ornamental planting such as feature trees to provide visual interest & way finding to the café; and
- Landscaped setbacks along the Southern Link Road and Mamre Road frontages, which have been provided without affecting the OSD basins on the site, as demonstrated in the Landscape Drawings at **Appendix L**.



Figure 39 Landscape Masterplan

Source: Geoscapes

3.7.2 Tree Canopy Cover

The proposed development includes a total of 1,063 trees with a canopy cover of 46,001m² (10%), as set-out in **Table 8**, and illustrated in **Figure 40** following.

Table 8 Tree Canopy Cover

Stage	Canopy Cover
Stage 1 Development	14,019m ²
Concept Masterplan	31,982m ²
Total	46,001m ² (10% of developable area)

Source: Geoscapes

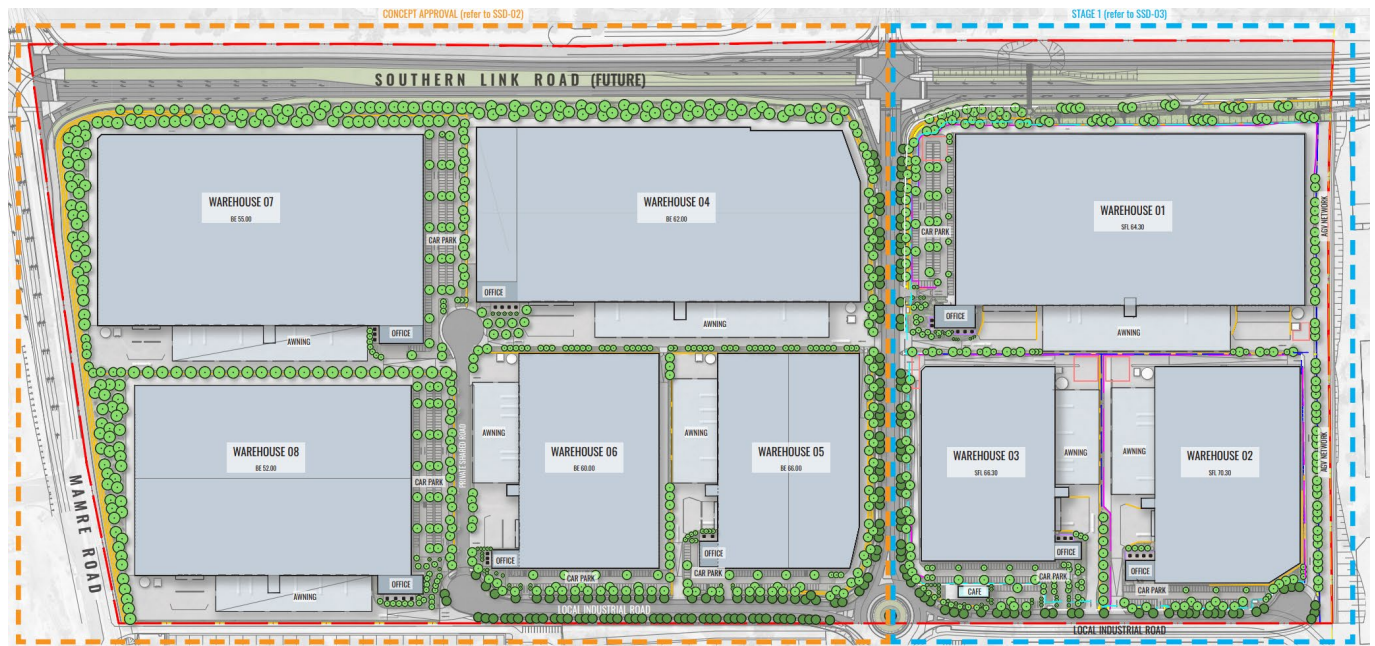


Figure 40 Tree Canopy Cover

Source: Geoscapes

3.7.3 Stage 1 Development Landscaping

The landscaping proposed as part of the Stage 1 development works is illustrated in **Figure 41** below.



Figure 41 Stage 1 Development Landscaping

Source: Geoscapes

3.8 Signage

The Proposal comprises signage zones as part of the Stage 1 development, including:

- 15 estate signs consisting of 1 Main Estate Entry Sign (S1) and 14 Free Standing Double Sided Signs (S2, S3 and S4), of which 6 are illuminated and 5 include signage zones.
- 7 external façade signage zones across Warehouses 1, 2 and 3.

The proposed six illuminated estate signs are to be back-lit signs that enable identification of the estate and future tenants 24/7. The proposed estate signage and their location is illustrated in **Figure 42** with a detailed description included in **Table 9** below.

The external façade signage zones are located on the individual warehouse and office elevations for Warehouse 1, 2 and 3, as shown within the Architectural Drawings (**Appendix B**). A summary of the external façade signage zones is included in **Table 10** below.



Figure 42 Proposed Estate Signage and Access Plan

Source: Watson Young Architects

Table 9 Detailed Estate Signage Description

Description	Location	Size (Height x Width)	Illumination
S1 Main estate entry signage	North-west corner of the site	4.4m (H) x Approx. 23m (W)	Yes
S2 Freestanding double sided sign	Western site frontage	8.8m (H) x Approx. 2m (W)	Yes
S4 Freestanding double sided sign	Western site frontage	2.8m (H) x Approx. 1m (W)	No
S3 Freestanding double sided sign	Western site frontage	6m (H) x Approx. 1.8m (W)	Yes
S4 Freestanding double sided sign	Western site frontage	2.8m (H) x Approx. 1m (W)	No

Description	Location	Size (Height x Width)	Illumination
S3 Freestanding double sided sign	Southern site frontage	6m (H) x Approx. 1.8m (W)	Yes
S4 Freestanding double sided sign	Southern site frontage	2.8m (H) x Approx. 1m (W)	No
S3 Freestanding double sided sign	Southern site frontage	6m (H) x Approx. 1.8m (W)	Yes
S4 Freestanding double sided sign	Southern site frontage	2.8m (H) x Approx. 1m (W)	No
S4 Freestanding double sided sign	Southern site frontage	2.8m (H) x Approx. 1m (W)	No
S3 Freestanding double sided sign	Southern site frontage	6m (H) x Approx. 1.8m (W)	Yes
S4 Freestanding double sided sign	Southern site frontage	2.8m (H) x Approx. 1m (W)	No
S4 Freestanding double sided sign	Southern site frontage	2.8m (H) x Approx. 1m (W)	No
S4 Freestanding double sided sign	Eastern site frontage	2.8m (H) x Approx. 1m (W)	No
S4 Freestanding double sided sign	Eastern site frontage	2.8m (H) x Approx. 1m (W)	No

Table 10 Detailed External Façade Signage Zone Description

Drawing Reference	Location	Size
DA150 – Elevations – Warehouse 1	North Elevation	Approx. 25m ²
DA250 – Elevations – Warehouse 2	East Elevation	Approx. 15m ²
DA250 – Elevations – Warehouse 2	South Elevation	Approx. 25m ²
DA260 – Elevations – Office 2	South Elevation	Approx. 3m ²
DA350 – Elevations – Warehouse 3	West Elevation	Approx. 15m ²
DA350 – Elevations – Warehouse 3	North Elevation	Approx. 15m ²
DA350 – Elevations – Warehouse 3	South Elevation	Approx. 15m ²

3.9 Vehicular Access

3.9.1 Interim Access Arrangement

External Access

As part of the interim access arrangement, the main external access to the site is proposed to be delivered from the north through an interim Southern Link Road (SLR). As aforementioned, access to and from Yiribana Industrial Estate to the south will be restricted in the interim in order to prevent traffic from the south utilising the interim SLR and intersection arrangement until further SLR works have been implemented in the future to accommodate these traffic movements.

As outlined and described in **Section 3.4.1**, an interim SLR arrangement is proposed to facilitate appropriate access to the site prior to the delivery of the complete SLR and intersection arrangement. This involves the delivery of four lanes (two in each direction) directly along the sites northern frontage that will form part of the final SLR design, with interim connections to Mamre Road, the existing Bakers Lane and Aldington Road. Access from the SLR to the Proposal is proposed to be via an intersection (likely to be signalised) with the proposed internal north-south Collector Road (Road No. 1).

Internal Access

Under the Stage 1 Development, it is proposed to construct the complete internal road network. The proposed internal road network (as outlined in **Section 3.4.1**) includes one (1) north-south Collector Road (Road No.1) and two (2) east-west Local Industrial Roads (Road No. 2) connect via a roundabout as the southern end of the Estate. Access to the Stage 1 built form (Warehouse 1-3) is proposed via the Collector Road and east Local Industrial Road

as illustrated above in the Proposed Estate Signage and Access Plan (**Figure 42**). It is noted that car and truck access to each lot is separated.

3.9.2 Ultimate Access Arrangement

The ultimate access arrangement will include a fully delivered SLR (ultimate) arrangement and with access between Yiribana Logistics Estate to the south provided. The site's proposed ultimate access arrangement in the context of the MRP is illustrated in detail in **Figure 43** below.

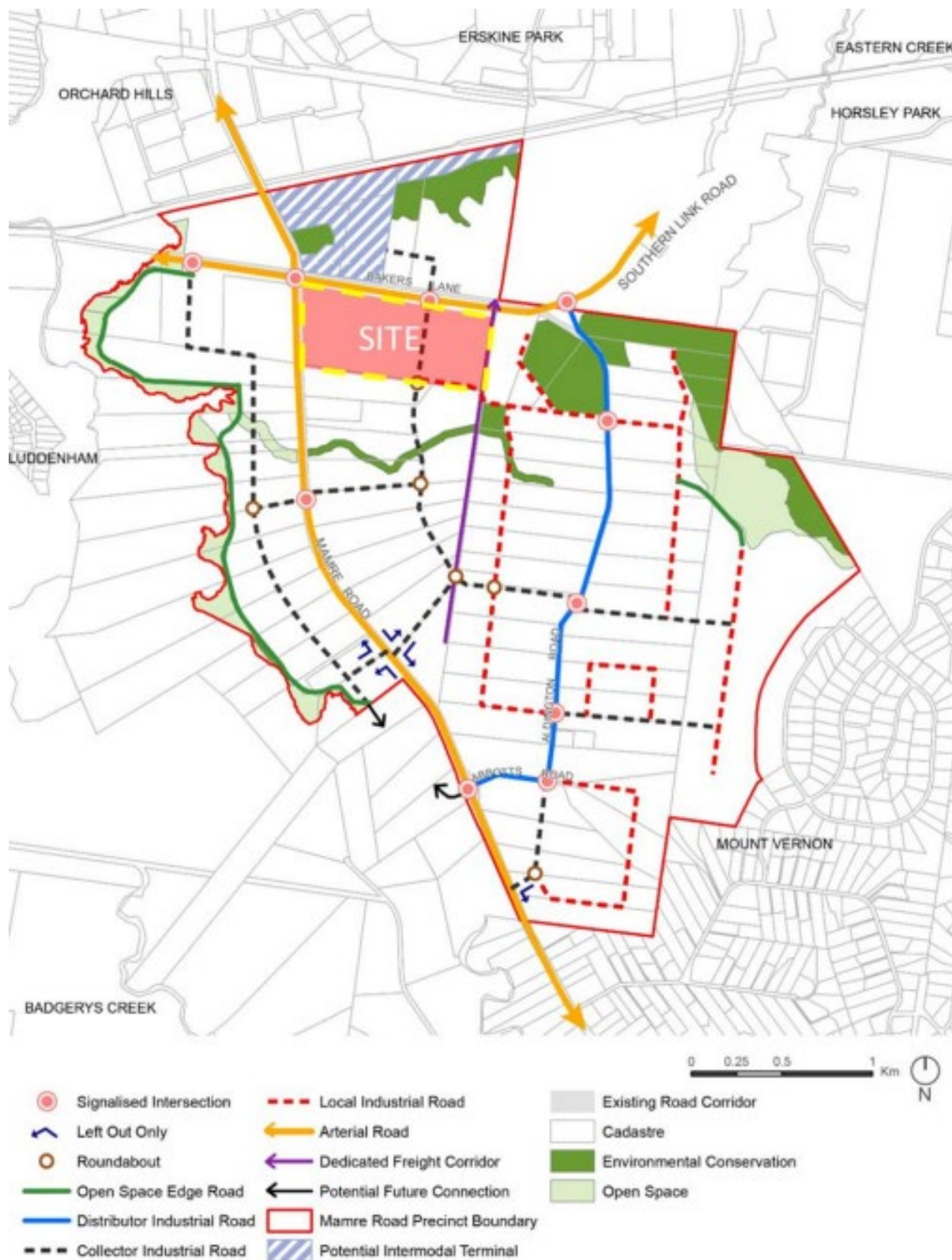


Figure 43 Mamre Road Precinct Road Network and Access Plan

Source: Mamre Road Precinct Development Control Plan, edits by Ason Group

4.0 Statutory Context

Development approval is sought for the Proposal under the State Significant Development provision of Part 4 of the EP&A Act. This section outlines the Proposal's key statutory requirements and is complemented by a Statutory Compliance Table at **Appendix C** that identifies all statutory requirements and where those requirements have been addressed in the EIS.

4.1 Power to Grant Approval

Development consent will be sought under 'Division 4.7 - Stage Significant Development' of the EP&A Act. Section 4.36(2) of the EP&A Act states that:

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

Schedule 1 of the Planning Systems SEPP lists development that is declared State significant development. Schedule 1, Clause 12 states:

Warehouses or distribution centres

- (1) Development that has a capital investment value of more than the relevant amount for the purpose of warehouses or distribution centres (including container storage facilities) at one location and related to the same operation.
- (2) This section does not apply to development for the purposes of warehouses or distribution centres to which section 18 or 19 applies.
- (3) In this section—
relevant amount means—
 - (a) for development in relation to which the relevant environmental assessment requirements are notified under the Act on or before 31 May 2023—\$30 million, or
 - (b) for any other development—\$50 million.

As the SSDA was notified under the Act prior to 31 May 2023 and the Stage 1 Development includes a *warehouse or distribution centre* with a CIV in excess of \$30 million, it is declared SSD. Before a SSDA can be determined, it is subject to a comprehensive assessment under the EP&A Act.

4.2 Permissibility

The proposed uses comprise, *Warehouse or distribution centre, General industrial, Food and drink premises* and ancillary *Office premises* uses. The uses are all permissible with consent within the IN1 General Industrial zone under the Industry and Employment SEPP.

In addition, the proposed roads also permissible with consent within the IN1 General Industrial zone under the Industry and Employment SEPP.

4.3 Other Approvals

The other legislative approvals required for the Proposal in addition to a development consent under Division 4.7 of the EP&A Act are outlined in **Table 11** below.

Table 11 Other Approvals

Matter	Assessment
Consistent Approvals	Section 4.42 of the EP&A Act stipulates that certain authorisations cannot be refused if they are necessary for carrying out State significant development. The legislative approvals that are required for the Proposal and cannot be refused if the Proposal is approved include: An approval under Section 138 of the <i>Roads Act 1993</i> is required for the construction of the roads that are included as part of the Proposal.
Environmental Protection and Biodiversity Conservation Act 1999 (Commonwealth)	The <i>Environmental Protection and Biodiversity Act 1999 Act</i> (EPBC Act) provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities, and heritage places. These are known as matters of National Environmental Significance. If the proposed development will, or is likely, to impact a matter of National Environmental Significance, then it is required to be referred to the Federal Department of the

Matter	Assessment
	Environment for assessment to determine if it constitutes a 'controlled action' requiring EPBC approval. Presently, a bilateral agreement allows the Commonwealth Minister for the Environment to rely on the NSW environmental assessment process when assessing a controlled action under the EPBC Act. The Proposal is not likely to impact a matter of National Environmental Significance. Therefore, the Proposal is not required to be referred to the Federal Department of the Environment to determine if it constitutes a controlled action and the bilateral agreement applies.

4.4 Pre-conditions to exercising the Power to Grant Consent

The pre-conditions to be fulfilled by the consent authority before exercising their power to grant development consent are outlined in **Table 12** below.

Table 12 Pre-conditions

Legislation	Comment
Biodiversity Conservation Act 2016	Section 7.9 requires a development application for State Significant Development to be accompanied by a Biodiversity Development Assessment Report (BDAR). Section 7.14 requires the consent authority to take into consideration the likely impact of the proposed development on biodiversity values as assessed in the Biodiversity Development Assessment Report. A BDAR has been prepared and is included at Appendix Z.
State Environmental Planning Policy (Transport and Infrastructure) 2021	Section 2.121 requires the consent authority to provide Transport for NSW with written notice of the development application for developments considered a 'traffic generating activity'. The Proposal is a 'traffic generating activity' as it is for a warehouse or distribution centre with a site area of more than 8,000sqm. Section 2.48 requires the consent authority to give written notice to the electricity supply authority for the area and take into consideration any response to that notice before granting consent to a development likely to affect an electricity transmission or distribution network. The Proposal does not impact on any electricity transmission or distribution network.
State Environmental Planning (Resilience and Hazards) 2021	Section 4.6 stipulates that a consent authority must not consent to the carrying out of development unless: • It has considered whether the land is contaminated, and • If the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and • If the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose. A Remedial Action Plan has been prepared by JBS&G and included at Appendix HH, which confirms that the site can be made suitable for the proposed industrial development of the site.

4.5 Mandatory Matters for Consideration

The matters that the consent authority is required to consider in deciding whether to grant consent to any development application are identified in **Table 13** below.

Table 13 Mandatory matters for consideration

Legislation	Assessment
Environmental Planning and Assessment Act 1979	Development in NSW is regulated pursuant to the EP&A Act, which sets out the procedures and objects for all development. Clause 1.3 of the EP&A Act sets out the objects of the Act, which are as follows: (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, (b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment, (c) to promote the orderly and economic use and development of land, (d) to promote the delivery and maintenance of affordable housing, (e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats, (f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage), (g) to promote good design and amenity of the built environment, (h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants, (i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State, (j) to provide increased opportunity for community participation in environmental planning and assessment. The Proposal seeks to develop an industry leading and connected employment precinct focused on quality, technology, flexibility and sustainability which complements the development of the MRP and nearby Aerotropolis. The Proposal involves the development of warehouse, distribution and general industrial development that is strategically aligned to the desired outcomes and use for the site and is consistent with the IN1 General Industrial zoning of the site, which are appropriately managed and responded to through the proposed built form design. Therefore, the proposed development promotes the orderly and economic use of the site. The development has been evaluated and assessed against the relevant heads of consideration under Section 4.15(1) of the EP&A Act as addressed in this section and throughout the EIS.
Environmental Planning and Assessment Regulation 2021	Part 8, Divisions 2 and 5 of the EP&A Regulation sets out procedures which relate to the preparation and submission of Environmental Impact Statements. This EIS has been prepared in accordance with Clauses 190 and 192 of Division 5 which relate to the form and content of the EIS. Similarly, the EIS has addressed the principles of ecologically sustainable development through the precautionary principle (and other considerations), which assesses the threats of any serious irreversible environmental damage.
State Environmental Planning Policy (Industry and Employment) 2021	Chapter 2 – Western Sydney Employment Area The Industry and Employment SEPP provides consistent zoning and development control provisions to facilitate development of the area known as the Western Sydney Employment Area (WSEA) for the purposes of employment and industry. By virtue of this, the Industry and Employment SEPP is the primary Environmental Planning Instrument applicable to the site. An assessment of the proposed development's consistency with the provisions of the Industry and Employment SEPP relating to the Western Sydney Employment Area is provided in Appendix C. The Industry and Employment SEPP governs land use across a wide range of areas, including the MRP which includes the site. As previously discussed, the Industry and Employment SEPP primarily zones the subject land as IN1 General Industrial. The site also includes a small portion of the site as SP2 Infrastructure to facilitate the future road network, with the northern edge of the site identified as Transport Investigation Area B. The site's zoning is illustrated in the Land Use Map provided at Figure 44 below.

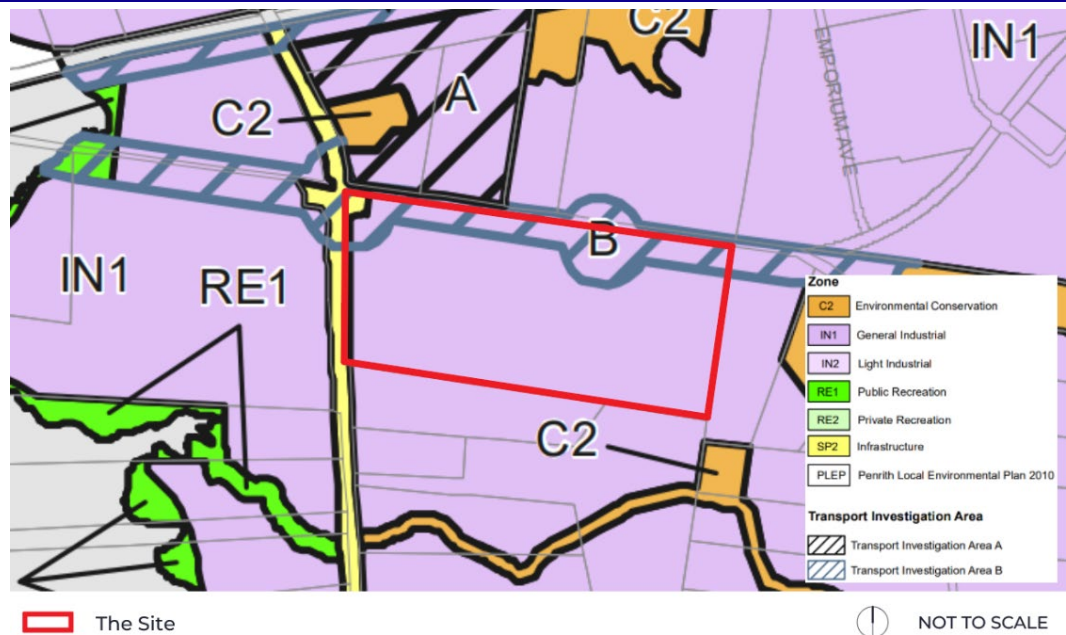


Figure 44 Land Use Map

Source: Department of Planning, Housing and Infrastructure, edits by Ethos Urban

As aforementioned, the proposed uses of 'Warehouse or distribution centre' and 'General industry' are permissible and consistent with the respective IN1 General Industrial zoning objectives. It is also noted that the café and roads are permissible with consent and the impacts are considered in this EIS.

As the northern edge of the site is marked 'Transport Investigation Area B', Clause 2.34 of the Industry and Employment SEPP requires the concurrence of Transport for NSW (TfNSW) with regard to the compatibility of the proposed development with the delivery and operation of an integrated freight network in the Precinct. The Proponent has undertaken concurrence with TfNSW as identified in the Community and Stakeholder Participation Outcomes Report (**Appendix P**) and in **Section 5.0**.

The Industry and Employment SEPP also requires that the EIS address potential impacts on the operation of the Western Sydney Airport with regard to aircraft noise, airspace operations and potential bird or wildlife attraction. An assessment against the relevant matters is address within the Aeronautical Impact Assessment (**Appendix KK**) and **Section 6.17**.

Chapter 3 – Advertising and Signage

Schedule 5 of the Industry and Employment SEPP includes signage provisions that are required to be considered as part of applications that propose to include signage. The proposed signage as outlined in **Section 3.8** includes Estate Signage and external façade signage zones. Pursuant to Clause 3.6 of the Industry and Employment SEPP:

A consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied–

- that the signage is consistent with the objectives of this Chapter as set out in section 3.1(1)(a), and*
- that the signage the subject of the application satisfies the assessment criteria specified in Schedule 5.*

An assessment against Schedule 5 of the Industry and Employment SEPP is provided at **Appendix C**. It is noted that content within the proposed signage zones would be subject to future tenant requirements. The proposed signage is also consistent with the requirements of the MRP DCP, as demonstrated in **Appendix N**.

State Environmental Planning Policy (Biodiversity and Conservation) 2021

Chapter 9 – Hawkesbury-Nepean River of *State Environmental Planning Policy (Biodiversity and Conservation) 2021* (Biodiversity and Conservation SEPP) seeks to ensure that the potential impact to Hawkesbury-Nepean River as caused by development is considered in a regional context. Chapter 9 applies to the site and the general planning considerations prescribed in the chapter have been assessed against the proposed development as part of the design development. Part 9.4 of the Biodiversity and Conservation SEPP specifies planning policies and recommended strategies. Part 9.7 outlines specific development controls – it is noted that warehouse and distribution centres are not identified.

Legislation	Assessment
State Environmental Planning Policy (Precinct – Western Parkland City) 2021	Although the site is subject to the provisions of the Industry and Employment SEPP, it is located in proximity to the Western Sydney Airport, and therefore is also subject to relevant provisions of <i>State Environmental Planning Policy (Precincts – Western Parkland City) 2021</i> (Parkland City SEPP). Specifically, part 3 of the Parkland City SEPP relating to development controls for Airport safeguards applies to the development. Further details on these provisions and the proposed development's corresponding compliance is provided in Section 6.18.
State Environmental Planning Policy (Resilience and Hazards) 2021	Section 3.12 of the <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> (Resilience and Hazards SEPP) provides a systematic approach to planning and assessing proposals for potentially hazardous and offensive development for the purpose of industry or storage. Chapter 3 applies to any proposals which fall under the policy's definition of 'potentially hazardous industry' or 'potentially offensive industry'. The works are not considered to fall within these definitions.
Mamre Road Precinct Development Control Plan 2021	The site is located within the area identified within the MRP DCP, which sits under the Industry and Employment SEPP. As aforementioned, a detailed analysis of the Proposal's compliance with the MRP DCP is provided at Appendix N. The Proposal is generally consistency with the Structure Plan and applicable controls stipulated within the MRP DCP. However, the Proposal seeks variation under Clause 1.5.2 of MRP DCP for the Section 4.2.1, Control 2. Assessment and justification against the matters outlined in Section 1.5.2 of MRP DCP is undertaken at Appendix N. In addition, Section 4.2.9 'Safety and Surveillance' of the MRP DCP stipulates the requirement of a Crime Risk Assessment Report for the development of new buildings. A Crime Prevention Through Environmental Design (CPTED) Report has been prepared by Ethos Urban and included at Appendix O, the development has considered the principles of CPTED throughout its design.

5.0 Stakeholder Engagement

This chapter describes community consultation undertaken to date, outlines initial community views and describes the proposed community engagement strategy to be undertaken following the lodgement of the EIS. The Applicant's approach to community engagement is informed by the DPHI's *Undertaking Engagement Guidelines for State Significant Development* (2021). This includes adopting the following community participation objectives provided in the Guideline.

A Community and Stakeholder Participation Outcomes Report has been prepared by Urbis and included at **Appendix P**. It includes a comprehensive list of community members and stakeholders to consult with during the preparation of the EIS process was develop through collaboration with ISPT to engage with various stakeholder groups for the Proposal.

5.1 Engagement Carried Out

A range of consultation methods were used throughout the EIA process to engage community members and stakeholders. This includes ongoing meetings and liaison with stakeholders via electronic means. The stakeholders identified for consultation and the engagement carried out are identified in **Table 14** and **Table 15** outlines the feedback received and how the issue has been addressed.

Table 14 Identified Stakeholders and Engagement Carried Out

Identified Stakeholder	Engagement Carried Out
Government Authorities	
Penrith City Council	- A pre-DA lodgement meeting with PCC on 30th June 2022. - Comments provided by PCC on 9 November 2021 (prior to release of SEARs) have been outlined in this report.
Department of Planning, Housing and Infrastructure	Meetings were held on the following dates: 18 February 2022; 11 May 2022 (with TfNSW); and 6 July 2022 (with TfNSW). The Applicant has had ongoing consultation with the DPHI up to the lodgement of the SSDA regarding the key matters of external road network upgrades, regional stormwater infrastructure, earthworks and consultation.
DPHI – Central (Western) team, Place Design and Public Spaces Group	ISPT consulted with the Central (Western) team, Place Design and Public Spaces Group via an on 14 April 2022. The email included an overview of the master plan, an opportunity to provide feedback / ask questions and an invite to attend a meeting with the Proposal team.
Environment, Energy and Science Group	ISPT consulted with the Environment, Energy and Science Group via an email to on 14 April 2022. The email included an overview of the master plan, an opportunity to provide feedback / ask questions and an invite to attend a meeting with the Proposal team. As no response was received, ISPT sent a follow up email on 29 April 2022. Response yet to be received as of 15 September 2022.
Water Group (including the Natural Resources Access Regulator).	ISPT consulted with the Water Group (including the Natural Resources Access Regulator) via email on 14 April 2022. The email included an overview of the master plan, an opportunity to provide feedback / ask questions and an invite to attend a meeting with the Proposal team.
Service Providers	
Transport for NSW (TfNSW)	Meetings were held on the following dates: 27 March 2021; 31 March 2021; 18 June 2021; 3 August 2021; 9 November 2021; 11 May 2022 (as part of meeting with the DPHI);

Identified Stakeholder	Engagement Carried Out
	6 July 2022 (as part of meeting with the DPHI); 14 December 2022 (email regarding dedicated Freight Road); and 22 December 2022 (email regarding Northern Access Strategy). Since December 2022, LOG-N (including the Applicant) has had ongoing consultation with TfNSW in relation to the delivery of the external road network required to facilitate the Proposal.
NSW Rural Fire Service	ISPT consulted with NSW Rural Fire Service via an email to Records (recommended by RFS planning line) on 14 April 2022. The email included an overview of the master plan, an opportunity to provide feedback / ask questions and an invite to attend a meeting with the Proposal team. As no response was received, ISPT sent a follow up email on 29 April 2022.
Sydney Water	Meetings were held on the following dates: 4 June 2021; 14 August 2021; 25 March 2022; 5 April 2022; 5 May 2022; 10 June 2022 – Virtual community meeting with all developers and Sydney Water; 10 November 2022 – Meeting with Regional Scheme Plan Planners; and 22 December 2022 – Regional Scheme Plan Publication. Since December 2022, the Applicant has had ongoing consultation with Sydney Water in relation to the MRP SSP and the proposed trunk drainage channel in the north-west portion of the site.
Water NSW	ISPT consulted with Water NSW via an email on 14 April 2022. The email included an overview of the master plan, an opportunity to provide feedback / ask questions and an invite to attend a meeting with the Proposal team.
Western Sydney Airport Corporation	ISPT consulted with the Western Sydney Airport Corporation via an email on 14 April 2022. The email included an overview of the master plan, an opportunity to provide feedback / ask questions and an invite to attend a meeting with the Proposal team. As no response was received, ISPT followed up with a phone call and email on 29 April 2022.
Western Sydney Planning Partnership	ISPT consulted with Western Sydney Planning Partnership via an email on 11 May 2022. The email included an overview of the master plan, an opportunity to provide feedback/ask questions and an invite to attend a meeting with the Proposal team. As no response was received, ISPT followed up with an email on 18 May 2022. An alternate email was provided to the WSPP office on 16 June 2022. The WSPP responded via email on 20 June 2022.
Surrounding Land Owners and Community	
The GPT Group (Yiribana Logistics Estate - 754-770 and 784-786 Mamre Road, Kemps Creek)	On 20 October 2022 ISPT met with GPT regarding Shared Industrial Road.
Surrounding local landowners, businesses and stakeholders Residents located on Aldington Road, Bakers Lane and Mamre Road Catholic Healthcare Emmaus Retirement Village. Catholic Healthcare Emmaus Residential Aged Care Home. Little Smarties Learning Centre.	A community newsletter was sent on Wednesday 30 March 2022 to 476 residents and business located nearby the proposed site. The newsletter outlined key features of the Proposal and invited feedback. It included details of the project email and phone number managed by Urbis Engagement to answer questions and collect feedback.
Schools Emmaus Catholic College Trinity Catholic Primary School	A community newsletter was sent on Wednesday 30 March 2022 to 476 all residents and businesses located nearby the proposed site. The newsletter outlined key features of the Proposal and invited feedback. It included details of the project

Identified Stakeholder	Engagement Carried Out
Mamre Anglican School Catholic Education Office, Diocese of Parramatta.	email and phone number managed by Urbis Engagement to answer questions and collect feedback. On 7 June 2022, ISPT met with these school groups to discuss the potential impacts of the Proposal to the local road network and proposed mitigations. Further, LOG-N (including the Applicant) met with the schools on 21 November 2023. During this meeting, LOG-N provided schools with an update on the proposed road network and invited feedback on the Proposal. During this meeting, LOG-N provided schools with an update on the proposed road network and invited feedback on the proposal.

5.2 Stakeholder Feedback

The key issues and matters raised by community members and stakeholders during the preparation of the Scoping Report, SEARs and EIS are outlined in **Table 15** below.

Table 15 *Summary of Stakeholder Views*

Stakeholder	Issues and Feedback Discussed	Project Response
Government Authorities		
Penrith City Council	- Insufficient design widths of distributor and collector roads. - Better consideration for traffic and roads – internal, battle-axe and proposed warehouse lots. - Traffic and Roads – limited detail on sections, levels and setbacks. - Café location should be better considered. - Carparking calculations. - No consideration for dedicated freight network and connections. - Inclusion of end of trip facilities. - Landscaping should be better considered. - Traffic on Bakers Lane not supported. - Environmental Management Considerations. - Biodiversity Considerations. - Waterways Considerations.	ISPT carefully reviewed PCC's comments on the early plans included in the scoping report to the DPHI. All comments have been addressed as part of the EIS preparation. - The EIS provides detail on the following: - Revised layout of the estate with greater consideration of traffic and road safety through separation of light and heavy vehicles. - The Café has been carefully located in a safe location and in the best possible location to service the Estate and wider precinct. - Dedication for freight network on eastern boundary as per Mamre Road DCP requirements.
	Additional comments raised in the Pre-DA lodgement meeting includes: - Measures to be in place to ensure Bakers Lane not used for industrial related traffic. - Considerations have to resolution of southwest corner connections to other estates. - Interim and ultimate designs to be included with submissions. - Visual amenity on streetscape is encourage to variety to design in landscaping and buildings.	Proposed interim solution to allow Bakers Lane to remain as a dedicated road for schools and retirement villages only.
Department of Planning, Housing and Infrastructure	Key discussion points addressed with the DPHI included: - Proposed solution for Southern Link Road. - Community Consultation. - Proposed interim solution for Southern Link Road. - SIC Contributions will not be allocated to redundant works. - Follow up consultation with community stakeholders required. - Interim solution as a good outcome that provides a dedicated road for sensitive users (Bakers Lane)	The Southern Link Road (SLR) Proposal was submitted 3 September 2022 for TfNSW and the DPHI for consideration.

Stakeholder	Issues and Feedback Discussed	Project Response
	and delivers the land required for proposed Southern Link Road to TfNSW. • Further assessment required on SLR solution. • Community stakeholders are to continue to be informed throughout process.	
DPHI Central (Western) team, Place Design and Public Spaces Group	Response from Central (Western) team, Place Design and Public Spaces Group received on 14 April noting no additional consultation required as part of the EIS preparation process.	ISPT will continue to consult with Central (Western) team, Place Design and Public Spaces Group and offer the opportunity to comment / provide feedback on plans.
Environment, Energy and Science Group	Stakeholder has raised no issues or feedback at this time.	ISPT will continue to consult with Environment, Energy and Science Group and offer the opportunity to comment / provide feedback on plans.
Water Group (including the Natural Resources Access Regulator).	Response from Water Group (including the Natural Resources Access Regulator) received on 20 April noting no additional requirements to address than the Proposal's SEARs.	ISPT will continue to consult with Water Group (including the Natural Resources Access Regulator) and offer the opportunity to comment / provide feedback on plans.
Service Providers		
Transport for NSW (TfNSW)	Key discussion points with TfNSW included: • AGV network: – TfNSW acknowledged the dedicated freight road on the eastern boundary of the site has been suitably accommodated and current proposals do not preclude the ability to deliver the infrastructure in the future. • Northern access solution (Southern Link Road (SLR)): – TfNSW considered the modelling provided for the Proposed SLR Northern Access Strategy demonstrates the intersection and upgrade performance is poor and congested with an inability to respond to the Proposal's traffic volumes. Associated intersection design and upgrades based off the provided model is not considered fit for purpose by TfNSW.	In relation to the AGV, ISPT will continue to consult with TfNSW and offer the opportunity to comment and provide feedback on plans. In respect to the northern access solution, ISPT will continue engagement with LOG-N, TfNSW and the DPHI regarding the outstanding matters requiring resolution.
NSW Rural Fire Service	The following items were raised for the bushfire consultant to consider: • Construction requirements depend on potential for flame contact.	ISPT will continue to consult with NSW Rural Fire Service and offer the opportunity to comment and provide feedback on plans. Response to feedback on construction requirements around potential for flame contact has been addressed in the Bushfire Assessment Report (Appendix II).
Sydney Water	Key discussion points with Sydney Water included: • Trunk drainage regional solution and relocation of potential basins; and • Wastewater infrastructure. Sydney Water have reviewed the proposed trunk drainage channel design and provided in principle endorsement of the design (refer to Appendix NN).	The Applicant will continue to consult and collaborate with Sydney Water in regard to the design and delivery of the regional stormwater infrastructure on the site.
Water NSW	Response from Water NSW received noting no additional consultation required as part of the EIS preparation process.	ISPT will continue to consult with Water NSW and offer the opportunity to comment / provide feedback on plans.

Stakeholder	Issues and Feedback Discussed	Project Response
Western Sydney Airport Corporation	Response from Western Sydney Airport Corporation was received noting no additional consultation required as part of the EIS preparation process.	ISPT will continue to consult with Western Sydney Airport Corporation and offer the opportunity to comment / provide feedback on plans.
Western Sydney Planning Partnership	WSPP noted no further comments on the Proposal at this stage except to reiterate the advice previously provided to the SEARs request. WSPP will review and provide comment if needed on the EIS when that is prepared.	ISPT will continue to consult with Western Sydney Planning Partnership and offer the opportunity to comment / provide feedback on plans as required.
Surrounding Land Owners and Community		
The GPT Group (Yiribana Logistics Estate – 754-770 and 784-786 Mamre Road, Kemps Creek)	- Process agreed on the delivery of the shared Local industrial road on the south eastern boundary of the Estate. - GPT to propose condition of consent for inclusion in their own approvals outlining submission of agreement between GPT and ISPT on staging plan and arrangement on timing of works. - AT&L to prepare plans with Costin Roe to review. - ISPT to deliver (GPT do not require road for operation of Estate) with costs to be shared equally. - Agreement and detailed design attached to separate WIKAs with PCC.	9th January 2023: An agreed letter has been drafted detailing the agreed arrangement for submission to DPHI.
Surrounding local landowners, businesses and stakeholders	At the time of writing this report, one enquiry email has been received from a near neighbour following the letterbox drop. Enquiry details: - Objection to the 150m² cafe GFA in the Proposal (the enquiry noted the DCP nominated a specific area for a commercial hub to service the industry in the Mamre Rd precinct, and that therefore the Proposal is not in line with the DCP vision. - The email also enquired about the cut and fill. Specifically, if the cut and fill is going to require fill to be brought into the site. And if so, where does ISPT intend on sourcing the fill.	ISPT provided an email response within five working days of receiving this email. The response informed the community member that the feedback will be included in the report as part of the Environment Impact Statement (EIS). Specific responses included: - The café is an important component of the Proposal. It will be located onsite and service workers in the estate. Without this café, workers would need to walk 2km to access the nearest food outlet. - The Proposal is targeting a balanced cut to fill meaning existing dirt will be used and no import will be required.
Schools	Key points raised by Emmaus Catholic College, Trinity Primary School and Mamre Anglican School around the current traffic challenges: - Significant traffic congestion occurring along Bakers Lane causing issues for school users. Feedback from schools on proposed interim solution: - Generally satisfied that the interim solution will be able to disperse traffic during drop off and pick up time. - Concerned that an upgrade of the Mamre Road and Bakers Lane intersection would be required to enable the interim solution. AT&L stated the upgrade should be sufficient and would be able to provide copies of Frasers and Altis plans to review; - Access to Bakers Lane would need to be maintained throughout construction of the interim solution and SLR as the schools each only have one entry and exit on Bakers Lane; - All heavy vehicle traffic before and during construction of the interim solution will need to	ISPT is working with other developers in the area to agree proposed approach to traffic solutions as part of the Proposal. Key points on Southern Link Road and the interim solution: - The proposed Southern Link Road (SLR) is a key link from Wallgrove Road to Mamre Road. It will run roughly parallel to Bakers Lane between Mamre Road and Aldington Road. Once constructed, it will take heavy vehicle traffic off Bakers Lane. - Timing for the full construction of the SLR is being determined by Transport for NSW. In the meantime, developers along Bakers Lane (ISPT, Gibb Group and Dexus) are proposing to construct part of the SLR to provide an interim solution to allow access to developments. - All users of Bakers Lane will continue to be consulted throughout the planning and construction process.

Stakeholder	Issues and Feedback Discussed	Project Response
	be via Aldington Road as there can be no construction access from Bakers Lane; and The schools would be required to communicate any changes to the school community.	LOG-N will continue working with schools on the detailed design of the proposed external roadworks.

5.3 Engagement Carried Out

The Applicant is committed to ongoing community consultation following the submission of the EIS. This includes during the exhibition and assessment of the Proposal, and if approved, following a determination.

5.3.1 Exhibition and assessment

ISPT will continue to keep stakeholders and the community informed of the Proposal approval process through the exhibition and determination phases by:

- Providing information through a letterbox drop on how the community's views have been addressed; and
- Enabling the community to seek clarification about the Proposal through the two-way communication channels.

5.3.2 Post approval

The Applicant will implement post-approval stakeholder consultation strategies in addition to the Conditions of Consent requirements. This will include continual liaison with, and advisement of, construction activities to adjoining landowners as required.

6.0 Assessment of Impacts

The following subsections of the report assess and respond to the environmental impacts of the proposed development. They address the matters for consideration set out in the SEARs, the Consolidated Mitigation Measures at **Appendix E** complement the findings of these sections.

6.1 Traffic and Transport

The traffic and transport impacts of the Proposal have been reviewed by Ason Group and a Transport Management and Accessibility Plan has been prepared which is included at **Appendix Q**. The key findings of the study are summarised below.

6.1.1 Traffic Impact Assessment

Trip Rates

The road layout detailed within the MRP DCP network has been informed by the MRP modelling assessment. Accordingly, the traffic generation impact assessment for the Proposal has considered the following separately:

- The wider MRP modelling assessment in relation to the Ultimate MRP DCP road network, of which development of the site was considered; and
- The MRP DCP does not provide for a staging strategy. As such, the operation of the road network in 2026 (i.e. the “interim” scenario”) has been considered more closely for the Site. The modelling assessment for 2026 was undertaken, in consultation with DPHI and TfNSW, on behalf of Land Owners Group North (LOG-N). Commentary was received from TfNSW on 22 December 2022 on this assessment, which has been updated and resubmitted to TfNSW accordingly. The below sections summarise the results of this assessment, with the detailed modelling and technical documentation submitted separately.

As part of the modelling assessment for the MRP, TfNSW provided Ason Group with trip rates for adoption, which are shown in **Table 16**.

The purpose of these trip rates was to provide consideration to a range of uses that permissible under the current IN1 General Industrial land zoning. Ason Group also conducted a number of surveys of industrial warehouses in the Western Sydney employment area. The average trip generation rates found through Ason Group’s surveys are also summarised within **Table 17** and are considered appropriate for use in assessing the traffic generation impacts.

Table 16 Trip Generation Rates

Time Period	TfNSW rate per 100m ²	Ason Group survey rate per 100m ²
Daily Trips	2.91	2.31
Local Road AM Peak (7am – 8am)	0.23	0.17
Local Road PM Peak (4pm – 5pm)	0.24	0.15
Site Maximum Generation Rate (All Vehicles)	0.26	-
Site Maximum Generation Rate (Heavy Vehicles)	0.07	-

Source: Ason Group

In accordance with the above rates, the daily traffic generation of the proposed Stage 1 Development, as well as the traffic generation during the AM and PM peaks is detailed in **Table 17** below. Similarly, this traffic generation is summarised for the proposed Concept Masterplan in **Table 18** below.

Table 17 *Stage 1 Development Traffic Generation*

Stage	GFA	TfNSW rate per 100m ²	Trips	Surveyed rate per 100m ²	Trips
Daily	79,263m ²	2.91	2,307	2.31	1,831
AM		0.23	182	0.17	143
PM		0.24	190	0.15	127

Source: Ason Group

Table 18 *Concept Masterplan Traffic Generation*

Stage	GFA	TfNSW rate per 100m ²	Trips	Surveyed rate per 100m ²	Trips
Daily	244,171m ²	2.91	7,105	2.31	5,640
AM		0.23	562	0.17	440
PM		0.24	586	0.15	391

Source: Ason Group

Traffic Assessment – Ultimate Road Network (2036)

In regard to the ultimate road layout and intersection configuration, it is notable that development of the site was considered within the MRP modelling assessment. It is understood that the assumptions that underpinned this modelling assessment were as follows:

- The majority of land use will take the form of a large format industrial warehousing;
- The land was separated into smaller land parcels for the purposes of identifying any constraints which will impact the developable GFA;
- The sub-precinct in which the site lies was assumed to be able to accommodate a GFA which represented 55% of the total site area. The site has an area of 522,478m², this would equate to an assumed GFA of 287,363m²; and
- Trip rates adopted, included a level of conservatism to allow for more intensive uses that may be located in the MRP, which are permissible under the land use zoning.

An indicative total GFA of 244,413m² is expected to be achieved on the site, for the Concept Masterplan. This equates to 49% of the total site area. Therefore, it is clear that the Proposal is not only consistent with the MRP modelling assessment, but it actually represents a slightly less intensive development than was previously assumed. As such, the traffic impact of the site will be less than previously considered for the MRP modelling assessment.

Traffic Assessment – Interim Road Network (2026)

In the absence of a staging strategy for the construction of the ultimate road network being formulated by Government agencies, an interim road network is to be delivered by LOG-N (interim SLR) and LOG-E (Aldington Road upgrades). In order to assess the interim road network, Ason Group have completed an MRP-wide modelling assessment for 2026. The 2026 Interim Road Network assessed is illustrated in **Figure 45**, and identifies the interim external road network to be complete by LOG-N.

In the assessment of the LOG-N interim road network, an additional minimum of 250,000m² of GFA is assumed for the staged development for the LOG-N sites (including 125,000m² GFA for the Proposal). This is in addition to the 990,215m² GFA assessed for the baseline LOG-E interim road network. It is noted that the 250,000m² of GFA assessed is a baseline, with the opportunity for the interim road network to be reassessed and increased.

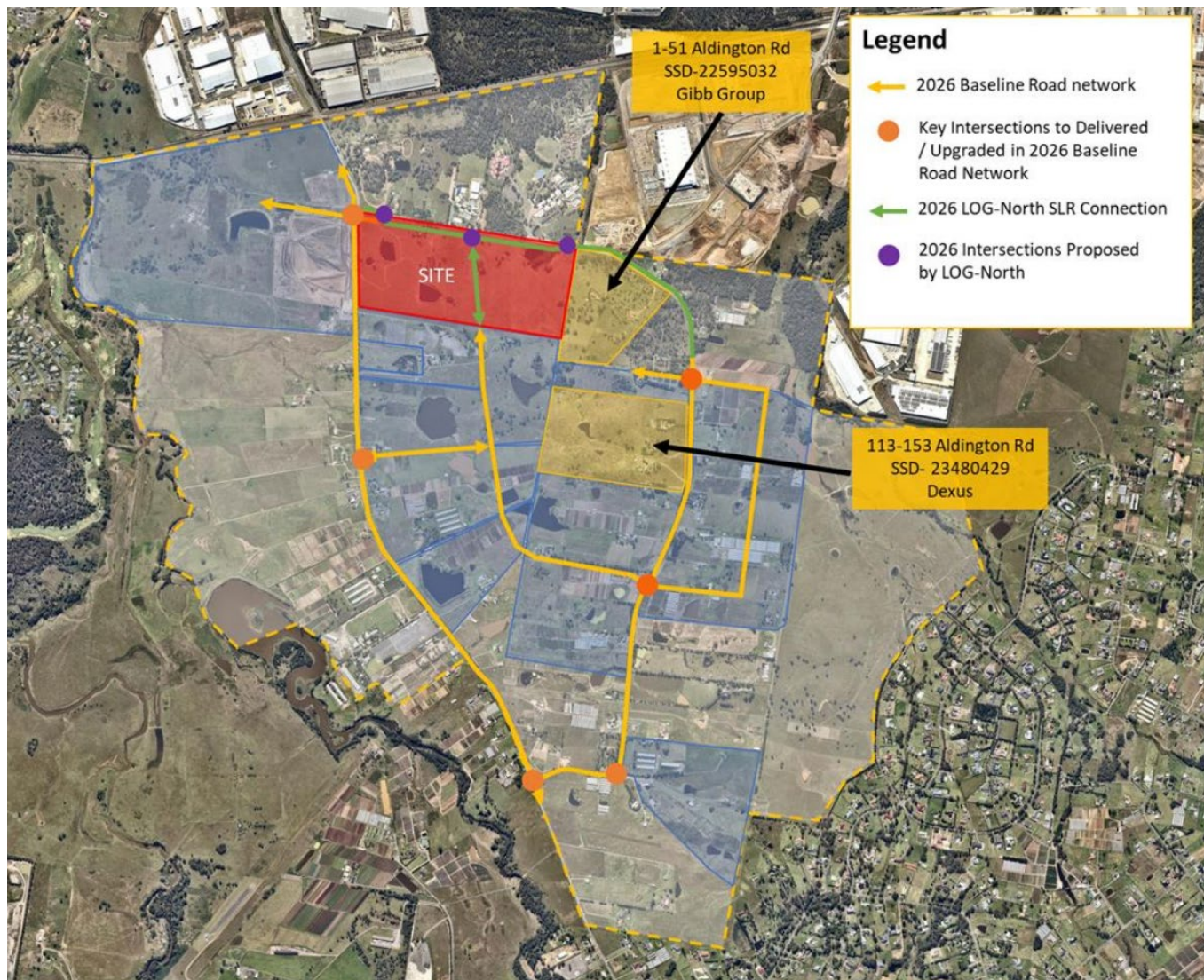


Figure 45 2026 with LOG-N Development Road Network

Source: Ason Group

The performance of the key intersections has been analysed using the SIDRA Intersection 9.0 model. The SIDRA modelling assessment for the MRP interim access arrangement (including LOG-N) is provided in **Table 19** below.

Table 19 Key Intersection Performance – Interim Road Network (2026)

Intersection	Control	AM		PM	
		DOS	LOS	DOS	LOS
Mamre Road / Bakers Lane (SLR)	Signal	0.81	B	0.86	B
Mamre Road / Mirvac Access	Signal	0.75	B	0.70	B
Mamre Road / Abbotts Road	Signal	0.47	A	0.57	A
SLR / ISPT Access	Signal	0.24	B	0.29	B
SLR / Bakers Lane	Roundabout	0.3	A	0.37	A

Source: Ason Group

The modelling demonstrates that, subject to the delivery of the identified infrastructure, including the partial delivery of internal road networks and the upgrades as proposed to the Mamre Road corridor (including those currently under construction), the network can accommodate the Proposal.

It is noted that the modelling assumes a higher number of trips for the site than what has been assessed for the Stage 1 Development. Specifically, the model assumes a traffic generation for the site of:

- 288 vehicle trips per hour during the AM peak period (versus 182 vehicle trips per hour as assessed in this report for the Stage 1 Development); and
- 300 vehicle trips per hour during the PM peak period (versus 190 vehicle trips per hour as assessed in this report for the Stage 1 Development).

When based on the surveyed trip rates, the differences in the additional number of modelled trips would be even more pronounced.

6.1.2 Vehicle Parking and Loading

Vehicle Parking

The MRP DCP sets out the applicable minimum parking rates for different land uses that are situated within the MRP. A summary of the required minimum car spaces, as well as the proposed provision of car spaces is provided in **Table 21** below.

It demonstrates that the Stage 1 Development slightly varies the minimum parking rate by seven car spaces, while the Concept Masterplan is compliant with the applicable parking rate. However, it is noted that the proposed car parking for the Stage 1 development is consistent with the relevant objectives of the MRP DCP as it:

- Will provide an appropriate number of vehicular spaces, notwithstanding the slight variation to the car parking control for the Stage 1 Development;
- Will support the complementary use and benefit of public and active transport; and
- Will contribute to car parking being provided in a manner that minimises any visual impact of on-site parking.

Table 20 Car Parking Requirement and Proposed Provision

Stage	Land use	GFA	Requirements	Currently Proposed
Stage 1	Warehouse	76,248m ²	254 spaces	322
	Office	3,015m ²	75 spaces	
	Sub Total	79,263m²	329 spaces	
Concept Masterplan	Warehouse	235,887m ²	786 spaces	1,011
	Office	8,284m ²	207 spaces	
	Café	242m ²	6 spaces	
	Sub Total	244,413m²	999 spaces	
Total			1,328	1,333

Source: Ason Group

In addition to the car parking identified in **Table 20** above, it is proposed that 25 car parking spaces are provided to service the café which has a GFA of 242m². While there is no applicable rate in the MRP DCP, it is noted that neighbourhood shops are required to provide 1 space per 40m² of GFA, which would equate to a total requirement of at least 7 spaces. Further, the Penrith DCP and recently approved Aspect Industrial Estate adopts a rate of 1 space per 10m² GFA for retail premises. This equates to a requirement of 25 spaces. As such, provision of 25 spaces is deemed to be a suitable level of car parking for the café use that is included as part of the Concept Masterplan.

Further, the MRP DCP sets out that accessible parking should be in accordance with Access to Premises Standards, BCA and AS2890. It is noted that the Proposal provides two accessible car spaces per every 100 spaces, which complies with the Disability (Access to Premises – Buildings) Standards 2010 from the BCA, as well as the accessible parking requirements provided in Appendix B of AS 2890.6.

Section 4.6.1(8) of the MRP DCP also notes that parking areas should incorporate dedicated parking bays for electric vehicle charging. Accordingly, the Transport Management and Accessibility Plan sets out that 5% of the parking provision be designated as electric vehicle charging bays.

Loading and Servicing

All service areas will be designed with reference to AS 2890.2 and provide for the movement of vehicles up to and including a 30m long PBS Level 2 vehicle.

Swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site are included at Appendix D of the Transport Management & Accessibility Plan (**Appendix Q**). Swept path diagrams of the proposed internal roads which include a roundabout and cul-de-sacs are included within the Civil Drawings (**Appendix K**).

For the Stage 1 development, each warehouse provides for queuing prior to entering the hardstand. All access points have been designed in accordance with the MRPDGP, AS2890.1:2004 and AS2890.2:2018. The proposed Stage 1 access plan is provided below in **Figure 33** below.



Figure 46 Stage 1 Access Plan

Source: Watson Young Architects

Pedestrian and Cyclist Access Facilities

The MRPDGP sets out minimum bicycle parking rates, which would necessitate the provision of at least 78 bicycle spaces for the Stage 1 development (Warehouses 1-3), and 177 bicycle spaces for the Concept Masterplan (Warehouses 4-8). Additionally, the MRPDGP identifies a need for three end of trip facilities for the Stage 1 development and five for the masterplan, equating to eight end of trip facilities in total. It is supported for the provision of this number of bicycle parking spaces and end of trip facilities to be conditioned as part of the development consent to ensure their provision.

6.1.3 Integration with Mamre Road Precinct Freight Corridor

As outlined in **Section 3.4.1**, proposed development includes a 10m provision for the potential future dedicated freight corridor along the sites eastern boundary that will link to the potential Intermodal Terminal to the north of the site. As discussed within the Transport Management and Accessibility Plan prepared by Ason Group (**Appendix Q**), recent discussions undertaken with TfNSW suggest that there is no detailed strategy for how access would occur for the relevant automated guided vehicle network.

Further, it is noted that Figure 17 of the MRP DCP provides indicative access locations. In relation to the Estate, it has been designed as such that the indicative access location, which is between Warehouse 1 and 2 could be provided for. Finally, the pad levels proposed for Estate have been designed as such to not preclude access to the dedicated freight network.

As such, the proposed dedicated freight corridor has been appropriately accommodated by the Proposal.

6.1.4 Preliminary Construction Traffic Management Plan

Construction Traffic Generation

A Preliminary Construction Traffic Management Plan (PCTMP) has been prepared by Ason Group and is included as part of Transport Management and Accessibility Plan at **Appendix Q**. The PCTMP identifies the traffic generation expected during different stages of the construction process, which are summarised in **Table 21** below.

Table 21 Summary of Construction Traffic Generation

Stage	Demolition	Excavation	General Construction
Maximum on-site at any one time	50 - 100	50 - 200	50 - 400
Truck frequency (maximum movements per day)	100 (50 in / 50 out)	600 (300 in / 300 out)	600 (300 in / 300 out)
Peak hour heavy vehicle movements	50 (25 in / 25 out)	120 (60 in / 60 out)	120 (60 in / 60 out)
Largest vehicle size	Truck and dog	Truck and dog	Truck and dog

Source: Ason Group

Of the construction traffic generated, it is expected that light vehicle traffic generation would generally be associated with construction staff movements to and from the site, including project managers, trade and general employees. With respect to the potential impacts of light vehicle traffic, the overwhelming majority of trips would occur in the short workforce arrival and departure periods, being (based on the proposed construction hours) 6:30am – 7:00am and 6:00pm – 6:30pm, respectively.

Additionally, with regard to heavy vehicle movements construction works are estimated to generate a peak demand for up to 600 truck movements per day (300 vehicles arriving / 300 vehicles departing). To provide a conservative assessment of intersection operations, a peak hour truck generation of up to 120 movements (60 vehicles arriving / 60 vehicles departing) has been assigned. On average it is expected there would be approximately 60 truck movements per hour (30 vehicles arriving / 30 vehicles departing).

Vehicle movements into the site will be unfettered to ensure no queuing onto Bakers Lane.

Access Routes

All construction vehicles will enter and exit the site via Abbots Road and Mamre Road. It is anticipated that all heavy vehicles will access the site via the following routes:

- Arrival trips:
 - Route 1: From M4 Western Motorway, southbound along Mamre Road, then left into Bakers Lane.
 - Route 2: From Westlink M7, westbound on Old Wallgrove Road, Lenore Drive and Erskine Park Road, then south along Mamre Road, then left into Bakers Lane.
 - Route 3: From Westlink M7, westbound on Elizabeth Drive, then north along Mamre Road, and right into Bakers Lane
- Departure Trips:
 - Route 1: From the Site, onto Bakers Lane, then left into Mamre Road to Elizabeth Drive and left to the M7 Motorway and sub-regional routes to the east.
 - Route 2: From the Site, onto Bakers Lane, then left into Mamre Road to Elizabeth Drive and right to Badgerys Creek and The Northern Road to the west.

These routes are shown in **Figure 47** below, with the arrival trips identified in red and the departure trips shown in green.

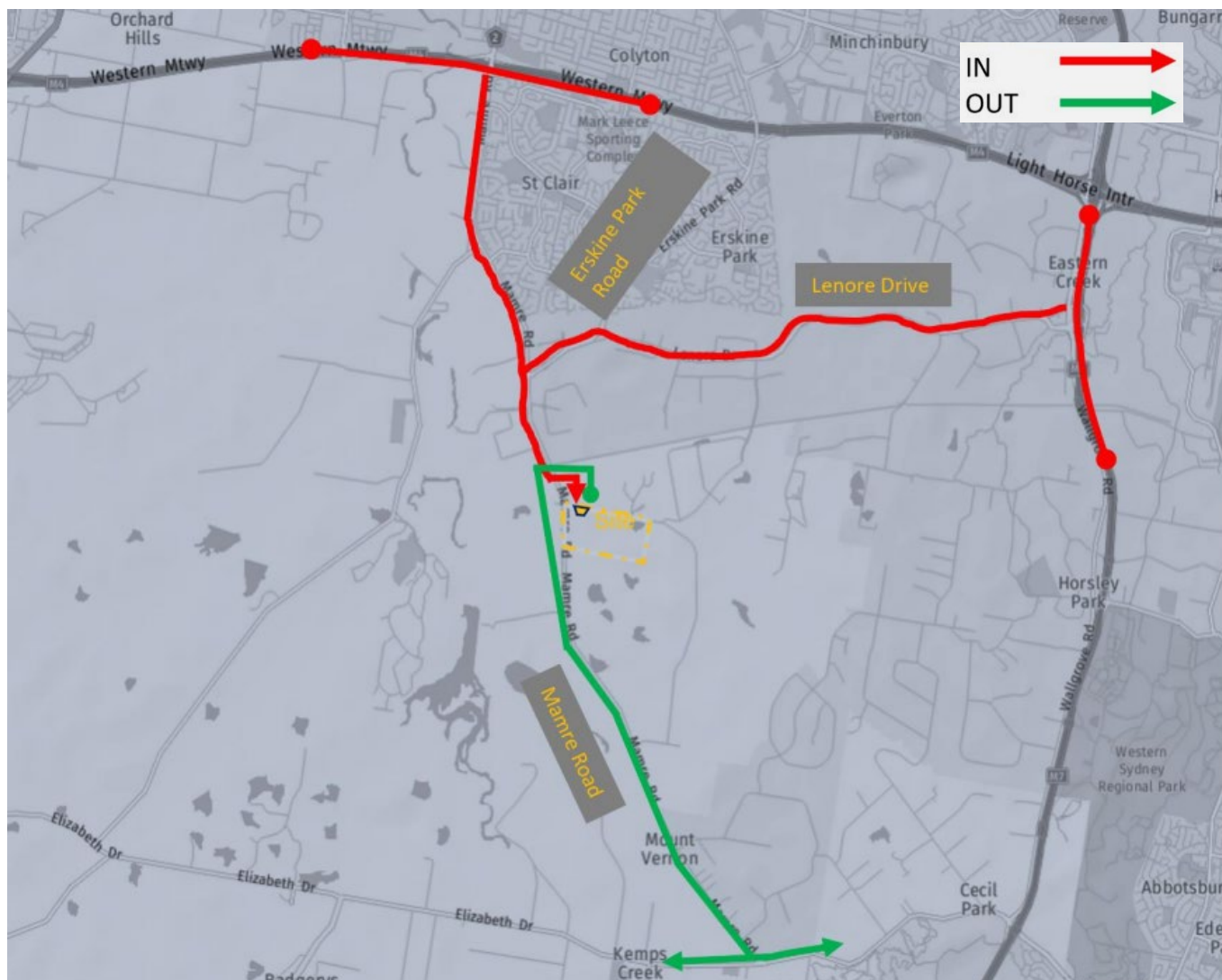


Figure 47 Construction Vehicle Routes

Source: Ason Group

6.2 Soils and Water

An assessment of the proposed development with regards to soils and water is supported by:

- Detailed Geotechnical Investigation prepared by PSM (**Appendix R**);
- Salinity Management Plan prepared by PSM (**Appendix S**);
- Civil Infrastructure Report prepared by AT&L (**Appendix I**);
- Water and Stormwater Management Plan prepared by AT&L (**Appendix J**);
- Civil Drawings prepared by AT&L (**Appendix K**); and
- Flood Impact Assessment prepared by J. Wyndham Prince (**Appendix T**).

6.2.1 Salinity and Acid Sulfate Soil Impacts

The Salinity Management Plan (SMP) outlines recommendations in regard to the relevant components of the proposed development, they include:

- Earthworks;
- Imported soils;
- Garden and landscaped areas;
- Roads, footpath and hardstand areas;
- Surface water, stormwater and drainage;
- Durability of concrete structures in contact with the ground; and
- Durability of steel structures in contact with the ground.

In order to ensure recommendations are followed, the designer(s) and contractor(s) responsible for the construction of the various development components be required to sign-off their design and the as built, certifying that:

“The works have been designed/constructed having given appropriate consideration to the recommendations in the SMP (Ref. PSM4252-009L)”.

In relation to acid sulfate soils, the Detailed Geotechnical Investigation prepared by PSM (**Appendix R**) outlines that the location and elevation of the site are such that there is a very low likelihood of acid sulfate soils within the study area.

6.2.2 Potential Surface and Groundwater Impacts

Existing Conditions

The MRP Waterway Assessment (CTEnvironmental, April 2020), contained in the Mamre Road Flood, Riparian Corridor, and Integrated Water Cycle Management Strategy (Sydney Water, October 2020) presents the extents of waterways in the MRP.

A desktop review and field assessment were undertaken to confirm the presence of mapped and unmapped waterways, the results are summarised below:

- Field inspection validated the presence of a 1st order watercourse within the site.
- The section of the watercourse within the site has been modified to a series of farm dams with overland flow paths providing links across a broad and shallow drainage depression.
- Fringing and emerging wetland vegetation and large native trees were present around all farm dams.

The extent of the field validated top of bank and ground-truthed flow path is shown in **Figure 48** below. It is noted that the top of bank and the vegetated riparian buffer zone is limited to the section of watercourse downstream (north) of the site.

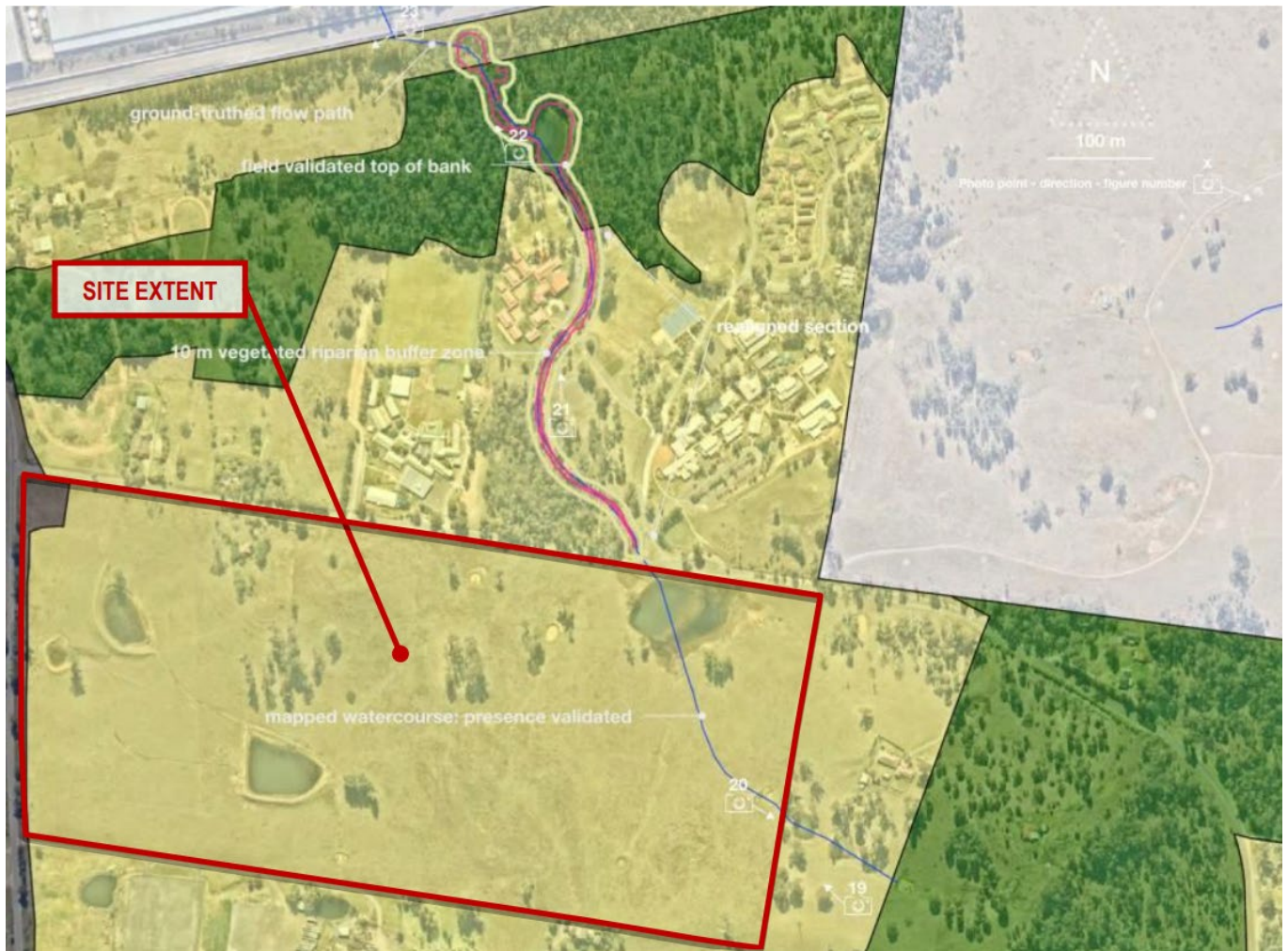


Figure 48 Field Validated Flow Paths and Watercourses within and Downstream of the Site Context

Source: AT&L

With relation to groundwater impacts, the Detailed Geotechnical Investigation prepared by PSM (**Appendix R**) found water seepage at one of the boreholes at a depth of 5.7m. No groundwater was observed within any of the other boreholes during the geotechnical investigation.

Potential Impacts

The main potential impacts on waterway health relate to erosion of distributed areas or stockpiles and sediment transportation. Potential adverse impacts from erosion and sediment transportation can include:

- Loss of topsoil;
- Increased water turbidity;
- Decreased levels of dissolved oxygen;
- Changed salinity levels;
- Changed pH levels;
- Smothering of stream beds and aquatic vegetation;
- Reduction in aquatic habitat diversity;
- Increased maintenance costs; and
- Decrease in waterway capacity leading to increased flood levels and durations.

6.2.3 Topographic Assessment of Earthworks

Topography

The site in its existing condition is characterised by undulating topography. A ridgeline runs across the site, generally aligned from south-east to north-west. The ground slope either side of the ridgeline is generally between 6% and 15%. Elsewhere across the site the ground slope is generally 2-3%. A slope analysis of the existing topography is illustrated in **Figure 49** below.

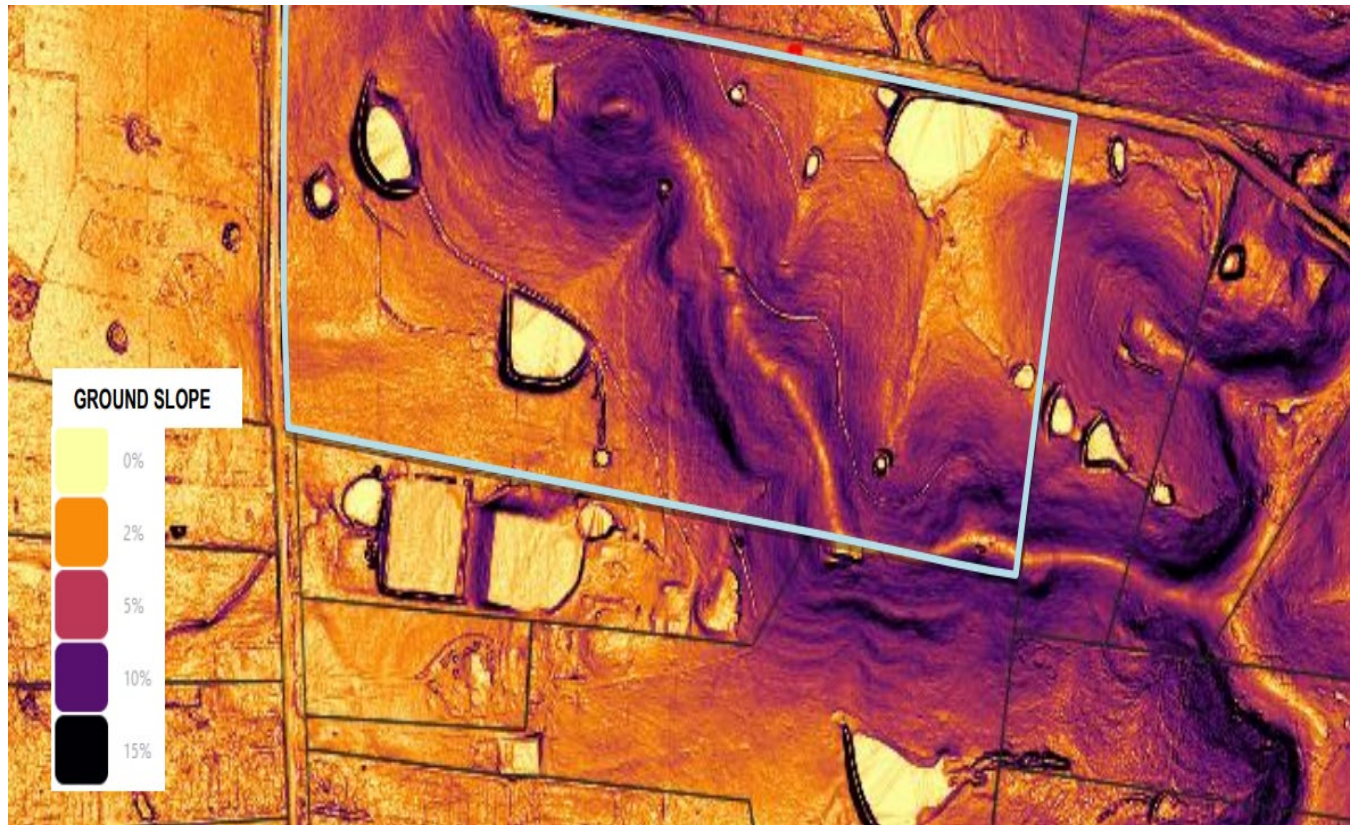


Figure 49 Slope Analysis of Existing Site Topography

Source: AT&L

Proposed Earthworks

The cut and fill requirements within the site have been defined through multiple design iterations and careful consideration of the following:

- Undulating topography within the MRP, resulting in the requirement of extensive cut and fill to allow ISPT to facilitate economic development and provide flexibility to cater for a wide range of industrial customer requirements.
- Provision for connectivity to and interfaces with adjoining lands, including the following adjacent sites:
 - 1-51 Aldington Road (SSD-22595032, 'Prepare EIS' status as of 30 June 2022);
 - 754-770 and 784-786 Mamre Road (SSD-10272349, 'Response to Submissions' status as of 9 September 2022); and
 - 99-111 Aldington Road (Fraser's Property site, at initial stages of planning and design for DA).
- Provision for connectivity to Bakers Lane and an interim arrangement for the Southern Link Road.
- Provision for connectivity to the adjacent development sites to the south and east.
- Minimising the height and extent of retaining walls fronting the Southern Link Road, Mamre Road and internal estate roads as much as possible.
- Avoiding extensive cut in bedrock sub-surface units.
- Meeting the requirements for the end-use of the site, being that it will cater for IN1 – General Industrial end use which requires large flexible allotments.
- Achieving as close as possible to a balance of cut to fill to minimise the volume of material that needs to be imported or exported, allowing for management of topsoil and over-excavation (desilting) required within existing farm dams.

- Provision of a final design solution that addresses water management requirements, including stormwater quantity and quality management, external catchments, stormwater drainage (major and minor system), flooding and discharges.

Accordingly, the proposed earthworks design outlined in **Section 3.3.3** and included within the Civil Drawings (**Appendix K**) provide a contextually appropriate design in accordance with the above design considerations.

6.2.4 Erosion and Sediment Control

An Erosion and Sediment Control Plan has been prepared by AT&L, which is detail in the Civil Infrastructure Report (**Appendix I**) and Civil Drawings (**Appendix K**). It will manage erosion and sediment control as part of the construction process.

Methodology

An Erosion and Sediment Control Plan (ESCP) has been prepared in accordance with the guideline document titled Managing Urban Stormwater – Soils and Construction (Landcom, 2004). The key objectives of the ESCP are:

- Acknowledging the activities on a construction site that may contribute to erosion, sedimentation and water quality impacts;
- The implementation of industry best management practices to minimise adverse water quality and sedimentation impacts brought about through construction activities on waterbodies surrounding the work; and
- Establishment of processes that effectively manage erosion, sedimentation and water quality practices during the life of the development.

The Erosion and Sediment Control Plan is required to consider the potential for soil erosion and sedimentation through all stages of the Proposal. The Civil Infrastructure Report (**Appendix I**) list the activities that can contribute to pollution, which include:

- Earthworks undertaken immediately prior to rainfall periods;
- Work areas that have not been stabilised;
- Extraction of construction water from waterways during low rainfall periods;
- Clearing of vegetation and the methods adopted, particularly in advance of construction works;
- Stripping of topsoil, particularly in advance of construction works;
- Bulk earthworks and construction of pavements;
- Works within drainage paths, including depressions and waterways;
- Stockpiling of excavated materials;
- Storage and transfer of oils, fuels, fertilisers and chemicals;
- Maintenance of plant and equipment;
- Ineffective implementation of erosion and sediment control measures;
- Inadequate maintenance of environmental control measures; and
- Time taken for the rehabilitation / revegetation of disturbed areas.

Erosion and Sediment Control Plan

With the proposed site being larger than 2,500m² in disturbed area, sediment basins are required to be incorporated into the Sediment and Erosion Control Plan. The proposed stormwater detention basin is proposed to be used temporarily as sitewide sediment basin during the bulk earthworks construction. For this approval it has been assumed that the on-lot works will be completed simultaneously, negating the need for individual sediment basins. Ultimately, the final temporary sediment basin locations and sizes will be provided to suit development staging requirements and will be sized and maintained in accordance with the requirements of the above-mentioned authority documents.

The proposed Erosion and Sediment Control design is illustrated in **Figure 50** below.

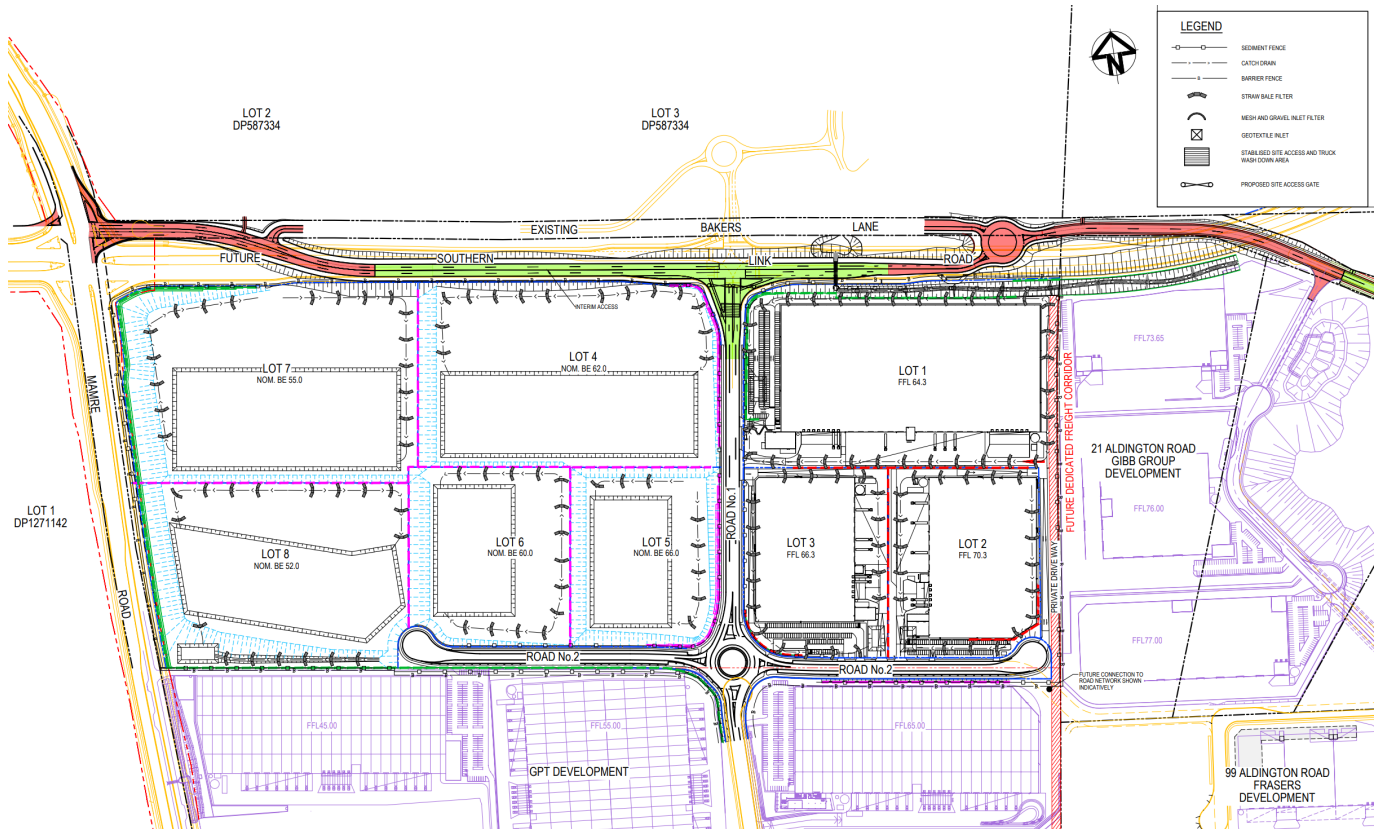


Figure 50 Erosion and Sediment Control Plan

Source: AT&L

The following construction methodology will be followed to minimise the impact of sedimentation due to construction works:

- Diversion of “clean” water away from the disturbed areas and discharge via suitable scour protection;
- Provision of hay bale type flow diverters to catch drainage and divert to “clean” water drains;
- Diversion of sediment-laden water into temporary sediment control basins to capture the design storm volume and undertake flocculation (if required);
- Provision of construction traffic shaker grids and wash-down to prevent vehicles carrying soils beyond the site;
- Provision of catch drains to carry sediment-laden water to sediment basins;
- Provision of silt fences to filter and retain sediments at source;
- Rapid stabilisation of disturbed and exposed ground surfaces with hydro-seeding areas where future construction and building works are not currently proposed;
- All temporary sediment basins will be located clear of the 1% AEP flood extent from catchments upstream of the site; and
- The proposed detention basin will be utilised as temporary sediment control basins.

In order to ensure the effective operation of the Erosion and Sediment Control Plan, inspection and maintenance requirements, outlined in **Section 6.2.9**, must be carried out while either earthworks or quarrying is being conducted, and all areas re-established.

The erosion and sediment control measures proposed for the site will comply with the requirements of Penrith City Council Engineering Guidelines and the (DPHI). The proposed ESCP will ensure that the best management practice is applied to the development site in controlling and minimising the negative impacts of soil erosion.

6.2.5 Water Sources and Demands

Water requirements within the Summit at Kemps Creek site will be typical of large format warehouses and distribution centres. Sources of demand for water within the proposed allotments and public domain will include:

- Office amenities (kitchen, bathrooms);

- Landscape irrigation; and
- Dust suppression (depending on end user requirements).

The primary source of water to the site will be Sydney Water's potable water reticulation network. There is no existing recycled (non-potable) water infrastructure within or in the vicinity of the site. A "third-pipe" reticulated recycled water network will supply non-potable water throughout the MRP. Non-potable water will be supplied from two sources:

- Stormwater harvested within precinct-wide wetlands / ponds, to be delivered and operated by Sydney Water as part of a regional stormwater management scheme; and
- Recycled water from the planned Upper South Creek Advanced Recycled Water Centre.

The following water minimisation strategies are proposed by AT&L in the Civil Infrastructure and Water Management Strategy (**Appendix J**):

- Avoid using water where possible, such as sweeping hard surfaces instead of washing them;
- Reduce water use by installing water-efficient appliances and equipment (e.g., toilets, urinals, shower heads); and
- Reuse water from manufacturing or cooling processes to toilet flushing, landscape irrigation and dust suppression.

6.2.6 Water Sensitivity Urban Design Strategy

Mamre Road Precinct Stormwater Scheme Plan

As outlined in **Section 2.3.7**, Sydney Water released the MRP SSP in December 2022. The SSP shows a 25-metre-wide naturalised channel along a portion of the northern boundary of the Site, nominally within the extent of proposed Lot 1. This channel would drain from east to west towards the low point at Bakers Lane and ultimately through the unnamed tributary of South Creek (refer to Section 2.2 for further details)

Further design coordination will be required with Sydney Water and the developer of the adjacent Gibb Group Site to establish channel design parameters. In particular, hydrological and hydraulic modelling of channel flow will need to be undertaken to simulate post-development conditions for a range of design storm events, noting the proposed final landform and catchment delineation will be significantly different to the existing landform.

Ultimately, the Site would discharge to planned stormwater management measures presented on the SSP, namely:

- Wetlands / Storage Ponds 22 and 23 to the north of the site; and
- Wetland / Storage Pond 04 to the west of the site.

Strategy Overview

The proposed Water Management Strategy has been developed for two scenarios:

- An Interim Arrangement (**Figure 29**), for which approval is being sought under SSD30628110. This Arrangement has been presented to demonstrate a solution that could be implemented to satisfy stormwater quality, quantity and flow controls in the absence of regional stormwater management measures.
- An Ultimate Arrangement (**Figure 30**), which incorporates measures to address stormwater quantity controls within the Site. This Arrangement is presented on the basis that measures adopted in the MRP SSP (refer to Figure 9) are in place (or will be in place) to satisfy stormwater quality and flow controls for the Site. The Ultimate Arrangement is proposed to supersede the Interim Arrangement, without modification to any development approval in place, once formal confirmation has been received by DPHI and/or Sydney Water that regional stormwater management measures will be delivered (by others) to service the estate.

Stormwater management interventions within the western catchment would be limited to interim measures required to satisfy the stormwater quality, quantity and flow controls for the Site. Final stormwater management measures would be required at subsequent stages of development within Summit at Kemps Creek, which will be subject to separate development applications. A summary of the proposed stormwater management measures that would be required to satisfy stormwater quality, quantity and flow controls under both the Interim and Ultimate Arrangements is outlined in **Table 22** below.

Table 22 Proposed Water Management Measures – Interim and Ultimate Arrangements

Water Management Measures	Interim Arrangement	Ultimate Arrangement
Rainwater tanks for non-potable reuse	Yes. Assumed to be required for proposed Lots 1, 2 and 3 to comply with the following DCP control: <i>“Where development is not serviced by a recycled water scheme, at least 80% of its nonpotable demand is to be supplied through allotment rainwater tanks”.</i>	No. Rainwater tanks would not be required under the Ultimate Arrangement, on the basis that a reticulated recycled water scheme is in place and is deemed to be a more commercially viable solution than rainwater tanks for the supply of non-potable water throughout the estate.
Gross pollutant traps	Yes. GPTs with capacity for hydrocarbon and sediment removal (SPEL Stormceptor® or equivalent) to be installed upstream of the proposed detention basin / tank as a pretreatment measure for the regional stormwater management scheme. GPTs to capture and treat road runoff prior to discharge from the site.	Yes. GPTs with capacity for hydrocarbon and sediment removal (SPEL Stormceptor® or equivalent) to be installed upstream of the proposed detention basin as a pretreatment measure for the regional stormwater management scheme.
Proprietary bio-retention	Yes. Required to satisfy stormwater quality controls until the regional stormwater management scheme is in place.	No. Will not be required on the basis that stormwater quality controls will be incorporated into the regional stormwater management scheme.
Detention tanks	Yes. Required to satisfy stormwater quantity controls.	Yes. Required to satisfy stormwater quantity controls.
Sediment basins	Yes. Required on proposed lots 4 to 8 inclusive to satisfy stormwater flow controls (as well as construction phase stormwater quality controls).	No. Will not be required on the basis that stormwater flow controls will be incorporated into the regional stormwater management scheme.
Pond for stormwater harvesting and reuse for irrigation	Yes. Required to satisfy stormwater flow controls.	No. Will not be required on the basis that stormwater flow controls will be incorporated into the regional stormwater management scheme.

Rainwater Tanks

Rainwater tanks retain a significant proportion of stormwater that falls on roof areas. Given the large-scale industrial development proposed on the site, rainwater tanks can provide a significant contribution to the objective of minimising the total volume of runoff discharging from the site.

A MUSIC model was developed to estimate the rainwater tank volume required to satisfy the MRP DCP stormwater quality and flow targets. To determine the tank volume required to meet these targets, the following assumptions have been made:

- Non-potable demand of 0.1 kL/toilet/day has been adopted. The number of toilets within each lot has been estimated based on the floor area of warehouses and offices. Fixed daily demands have been pro-rated based on the warehouses and offices being occupied six days per week (Monday to Saturday).
- Non-potable demand of 600 mm per year across 50% of the on-lot landscape areas has been adopted to estimate the annual irrigation demand on lots 1, 2 and 3; and
- At least 50% of the total warehouse roof area would drain to the rainwater tanks.

A summary of the rainwater tanks for non-potable reuse and roof irrigation is presented in **Table 23** below.

Table 23 Summary of rainwater tank parameters

Parameters	Lot 1 (north)	Lot 1 (south)	Lot 2	Lot 3
Total lot area (ha)	3.78	3.78	3.68	3.50
Warehouse roof area to tank (ha)	1.10	1.10	2.26	1.86
Carpark and hardstand area to tank (ha)	0.81	0.81	0.84	1.07

Parameters	Lot 1 (north)	Lot 1 (south)	Lot 2	Lot 3
Adopted roof misting tank volume (KL)	120	120	100	120
Non-potable demand				
Toilets (KL/day)	1.37	1.37	1.63	1.37
Landscape irrigation (ML/yr)	1.30	1.30	1.10	1.05
Tank Water Balance				
Inflow (ML/yr)	6.78	6.78	6.79	5.58
Overflow (ML/yr)	5.28	5.28	5.40	4.25
% reuse demand met (including roof evaporation)	83.9	83.9	82.3	86.6
% flow reduction	22.1	22.1	20.4	23.8

Source: AT&L

Gross Pollutant Traps

The proposed stormwater treatment train under both the Interim and Ultimate Arrangements will consist of gross pollutant traps (GPTs) just upstream of the point of discharges from proposed lots 1, 2 and 3 to the estate road network drainage. GPTs will capture litter, debris and coarse sediment, as well as some oils and greases. A high-flow bypass for the GPTs would nominally be equivalent to the 4 EY (3-month ARI) peak flow rate discharging to the GPT. Design flows for the GPTs and their final configuration will be confirmed at the detailed design phase.

Proprietary Filtration

Two proprietary bio-retention systems (Filterra® or equivalent) have been adopted in the Interim Arrangement to satisfy stormwater quality controls:

- A 50 square metre system to capture and treat surface water runoff from Road 1; and
- A 25 square metre system to capture and treat surface water runoff from the portion of Road 2 west of Road 1.

On-Site Stormwater Detention

Surface water runoff from the proposed Lots 1 to 3 inclusive is proposed to be collected via an on-lot stormwater network, which will connect to on-lot on-site stormwater detention (OSD) tanks. For the post development scenario, the design intent is to demonstrate a solution where post-development peak flow rates at the point of discharge at Bakers Lane are no greater than pre-development peak flow rates. A summary of the key OSD tank parameters is presented in **Table 24** below.

Table 24 Key OSD tank parameters

OSD Tank	Contributing Catchment Area (ha)	Peak 1% AEP Inflow (m ³ /s) (A)	Peak 1% AEP Outflow (m ³ /s) (A)	Peak 1% AEP Storage Volume (m ³)
Lot 1 West (Tank 1A)	3.71	2.26	1.16	1110
Lot 1 East (Tank 1B)	3.71	2.26	1.20	1060
Lot 2 (Tank 2)	3.43	2.09	0.87	1070
Lot 3 East (Tank 3A)	2.91	1.77	0.73	950
Lot 3 West (Tank 3B)	0.57	0.35	0.24	140

Source: AT&L

Sediment Basins

Under the Interim Arrangement, oversized sediments basins on proposed lots 4 to 8 inclusive are proposed to provide capacity to capture, store and reuse water for irrigation of the undeveloped lots. Apart from being required to satisfy construction phase water quality targets, the enlarged sediment basins would also satisfy the following water management objectives:

- Provide attenuation of discharge towards Mamre Road, thereby mitigating potential flood impacts west of the site; and
- Contributing to the capacity to satisfy the stormwater flow volume targets adopted within the MRP.

The broad parameters for the proposed oversized sediment basins are as follows:

- 8% of the total area of proposed lots 4 to 8 inclusive would be dedicated to a temporary sediment basin as an interim measure;
- The sediment basins would capture and store surface water runoff from the respective lot only, and stored water would be used to irrigate up to 20% of the lots; and
- The average depth of the sediment basins would be 1.5 metres.

Pond for Stormwater Harvesting and Reuse for Irrigation

To satisfy the stormwater flow controls under the Interim Arrangement, a pond on undeveloped lot 4 is proposed to capture and store surface water runoff from proposed lots 2 and 3 and approximately half of lot 1. The pond will store water for irrigation across approximately 2.5 hectares of undeveloped lot 4. This harvesting and reuse system will satisfy the stormwater flow controls under the Interim Arrangement. To discharge water to the pond, the following interim stormwater drainage infrastructure will be required:

- A stormwater line (nominal diameter 1050mm) that will drain outflow from lots 2 and 3 through and adjacent to the southern boundary of lot 1. The line will cross Road 1 and discharge into the temporary pond on lot 4; and
- A pump (nominal flow rate 25 l/s) and pressure main to transfer stormwater from proposed detention tank 1A into the temporary pond on lot 4.

The general parameters of the adopted interim pond are outlined in **Table 25** below.

Table 25 Adopted Interim Pond Parameters

Parameter	Pond 4
Location	Lot 4
Inflow from	Lots 2 and 3 and part of lot 1 Southern portion of Road 1 Eastern portion of Road 2
Outflow to	Catch drain on lot 4
Surface Area	5,800m ²
Permanent pool volume	5,800m ³
Irrigation Area	2.5 ha
Annual irrigation demand	15,000 kL/yr (assuming application to 2.5 hectares of lot 4 at a rate of 600 mm/year)

Source: AT&L

The pond and its associated irrigation system is intended to be an interim measure and would be superseded by Sydney Water's planned regional scheme infrastructure. The irrigation system would need to incorporate a series of measures to demonstrate ongoing compliance with the stormwater flow controls and to mitigate potential risks associated with stormwater harvesting and reuse.

As a minimum it is expected that the system will incorporate the following:

- A pump system to transfer water from the pond to the irrigation area, and potentially a small holding tank to store water upstream of irrigation infrastructure; and
- Stormwater treatment, including filtration and UV disinfection.

6.2.7 Performance Assessment

The Water and Stormwater Management Plan (**Appendix J**) addresses operational phase targets. For the operational phase targets there are two options available for stormwater quality, they are:

- **Option 1** – Annual load reduction; and
- **Option 2** – Allowable loads.

Further, for operational phase targets there are two options available for stormwater flow:

- **Option 1** – Mean annual runoff volume; and
- **Option 2** – Flow percentiles.

An assessment of stormwater quality, quantity and flow volume is provided in the following sections.

Stormwater Quality

The MUSIC model results presented as mean annual loads are provide in **Table 26** below and are separated into the following areas:

- **Eastern catchment** (including developed Lots 1-3, Road 1 and eastern part of Road 2);
- **Western catchment** (including undeveloped Lots 4-8 and western part of Road 2); and
- **Total Site** (Stage 1 development conditions).

Table 26 Summary of Music Modelling Results against Stormwater Quality Targets

Parameter	Target Option 1	Reduction (%)			Target Option 2	Residual Load per Unit Area (kg/ha/yr)		
		Eastern Catchment	Western Catchment	Total Site		Eastern Catchment	Western Catchment	Total Site
Total Suspended Solids	90%	81.2	93.1	88.1	< 80kg/ha/yr	37	61.8	45.7
Total Phosphorus	80%	61.6	81.6	71.8	< 0.3kg/ha/yr	0.12	0.27	0.17
Total Nitrogen	65%	42.1	69.5	50.9	< 3.5kg/ha/yr	1.84	3.72	2.51
Gross Pollutants	90%	98.3	100	99.2	< 16kg/ha/yr	0.70	0	0.46

Source: AT&L

The MUSIC model results presenting above demonstrate that:

- For the proposed development of the eastern catchment, the proposed on-lot and interim estate-wide stormwater management measures would satisfy the targets for either Option 1 (annual load reduction) or Option 2 (allowable mean annual load).
- Across the estate, the proposed stormwater management measures would generally satisfy the Option 2 water quality targets (allowable mean annual load).

Stormwater Quantity

The pre-development and post development flow rates, generated by hydrologic and hydraulic modelling in DRAINS, for a range of events between and including the 50% AEP and 1% AEP design storm events at the Bakers Lane and Mamre Road discharge point from the site are outlined in **Table 27** below.

Table 27 Pre- and Post-Development Peak Flow Rate Summary

Design Storm Event	Eastern Catchment towards Bakers Lane		Western Catchment towards Mamre Road	
	Pre-Development Peak Flow Rate	Post-Development Peak Flow Rate	Pre-Development Peak Flow Rate	Post-Development Peak Flow Rate
50% AEP	1.43 m ³ /s	0.78 m ³ /s	0.83 m ³ /s	0.56 m ³ /s
20% AEP	3.07 m ³ /s	1.32 m ³ /s	1.72 m ³ /s	0.90 m ³ /s
10% AEP	4.17 m ³ /s	2.01 m ³ /s	2.04 m ³ /s	1.30 m ³ /s
5% AEP	5.22 m ³ /s	2.88 m ³ /s	3.19 m ³ /s	1.57 m ³ /s
2% AEP	6.86 m ³ /s	3.53 m ³ /s	4.36 m ³ /s	2.34 m ³ /s
1% AEP	8.02 m ³ /s	4.30 m ³ /s	5.70 m ³ /s	3.20 m ³ /s

Source: AT&L

In summary, the results for the Bakers Lane and Mamre Road discharge point are as follows:

- **Bakers Lane** – The DRAINS model results demonstrate that the post-development peak flow rates would be less than or equal to pre-development peak flow rates for a range of storm events between (and including) the 50% AEP and 1% AEP design events. Therefore, the stormwater drainage system and detention basins as proposed would satisfy the development controls relating to stormwater quantity management.
- **Mamre Road** – The results presented above demonstrate that, under the Stage 1 development scenario, the proposed stormwater management measures will satisfy the stormwater quantity management objectives for the site. Under the ultimate development scenario, additional OSD will be required for future development of the western catchments (Lots 4 to 8 inclusive), the design of which will be subject to assessment under a future development application.

Stormwater Flow Volume

MUSIC model results demonstrating performance of the proposed stormwater management measures across the Site against the stormwater flow targets are provide in **Table 28** below.

Table 28 Summary of MUSIC Model Results against Stormwater Flow Targets

Parameter	Result	DCP Target	Complies with DCP Target	
			Option 1	Option 2
Mean annual runoff volume (ML/ha/yr)	1.47	2	Yes	N/A
95%ile flow (L/ha/day)	27073	3000 to 15000	N/A	No
90%ile flow (L/ha/day)	7625	1000 to 5000	No	No
75%ile flow (L/ha/day)	44	100 to 1000	N/A	No
50%ile flow (L/ha/day)	5.7	5 to 100	Yes	Yes
10%ile flow (L/ha/day)	0.006	0	No	N/A
Cease to flow	9.7%	10% to 30%	N/A	No

Source: AT&L

The results presented in **Table 28** above demonstrate the proposed stormwater management measures that will be implemented across the site satisfy the Option 1 DCP stormwater flow targets for the site, with the exception of the 90-percentile and 10-percentile flow. Further discussion of these results is presented below:

- While the 90-percentile flow for the combined site exceeds the flow target, as shown in Figure 11 the 90-percentile flow is within the target for the eastern catchment (4974 L/ha/day) and the western catchment (4790 L/ha/day).
- The 10-percentile value of 0.006 litres per hectare per day equates to a total runoff from the site (excluding the portion of the Site dedicated to future upgrades of Mamre Road and the Southern Link Road) of approximately 0.27 litres per day (equivalent to 11 millilitres per hour). Whilst it is acknowledged the values

- that generate the flow duration curve represent a statistical probability of the exceedance of a particular flow value, in reality the calculated 10-percentile flow from the site represents a value too small to practically measure.
- The MUSIC model does not take into account some parameters that may contribute to a further reduction in runoff volumes across the site, such as transmission losses in the section of proposed open drainage channel adjacent to Lot 1.
 - The flow duration curve presented in Figure 11 represents the site under Stage 1 developed conditions, without regional stormwater management measures in place. Based on the proposed Draft Scheme Plan recently exhibited by Sydney Water, future wetlands and harvesting ponds north of Bakers Lane will provide additional capacity for stormwater quality and flow volume management.
 - Ultimately, the combination of on-lot, estate-wide and regional measures will satisfy the waterway health objectives and controls adopted in the MRP DCP.

6.2.8 Flooding

To assess the impact of flooding on the proposed development a Flood Impact Assessment (FIA) has been prepared by J. Wyndham Prince and included at **Appendix T**. The Flood Impact Assessment provides an assessment of the impacts of the development on downstream flood behaviour.

Methodology

- The flood modelling for this assessment was based on the lumped hydrograph approach applying the inflow hydrograph from the DRAINS model. The approach to the flood assessment was:
- Create existing and developed condition DRAINS models to determine sub-catchment flows;
 - Create an existing conditions TUFLOW model to inform the current conditions of the site; and
 - Augment the existing condition TUFLOW model to reflect the proposed conditions.

Existing Environment

- The 50% AEP and 1% AEP flood depth and level have been prepared for existing conditions, these can be viewed at Appendix B of the Flood Impact Assessment (**Appendix T**). The 1% AEP result suggests that the site has five (5) discharge locations in existing condition and overtops Mamre Road and Bakers Lane. The existing discharge location from the site are:
- At the existing culvert under Bakers Lane towards the northern boundary of the site;
 - At a low point adjacent to the western site boundary and northwest corner of Bakers Lane;
 - At the western boundary of the site, towards two existing culverts under Mamre Road; and
 - At the southwest corner of the site, towards Mamre Road.

Assessment of Impacts

- The flood depth and level results have been prepared for 50% AEP and 1% AEP developed conditions and are provided in Figures 5-3 and 5-4 in Appendix B of the FIA (**Appendix T**). The result shows that site discharges at three (3) locations which are from:
- Existing culvert at Bakers Lane;
 - Western boundary of the site; and
 - Southwest corner of the site.

The 1% AEP flood level and velocity difference map were prepared by comparing the developed condition flow with the existing condition. In addition, the existing and developed condition peak discharge for 1% AEP from the DRAINS model at the existing culvert at Bakers Lane and the southwest corner of the site is provided in **Table 29**.

Table 29 DRAINS Flow Comparison

Location	1% AEP		
	Existing	Developed	Existing/Developed
Baker Lane (Rpt1)	10.96	4.99	0.46
South-west corner of the site (Rpt2)	11.65	14.29	1.23

Source: J. Wyndham Prince

The DRAINS result shows that there is a significant decrease in flow downstream of Bakers Lane (Rpt1) which aligns with the 1% AEP flood level difference development minus existing map (**Figure 51**) showing that there is a decrease in flood level downstream of the Baker Lane along the unnamed tributary of Kemps Creek. This confirms that the OSD designed as a part of WMS will ensure that the developed condition flow from the site will be no greater than the existing condition flow.

An increase in flood level is seen towards the southwest corner of the site and downstream in **Figure 51** below. The DRAINS result also shows that there is an increase in flow by nearly 20% at the southwest corner of the site (Rpt2) in a 1% AEP event. The increase in flow and flood level at this location is the result of the proposed bulk earthworks within the site at Lots 4 to 8 which increases the sub-catchment area by 34% compared to the existing condition. As such the flood impact external to the site towards the southwest portion of the site is anticipated given that no OSD is proposed to manage the increased amount of flow arriving at this southwest corner in developed condition.

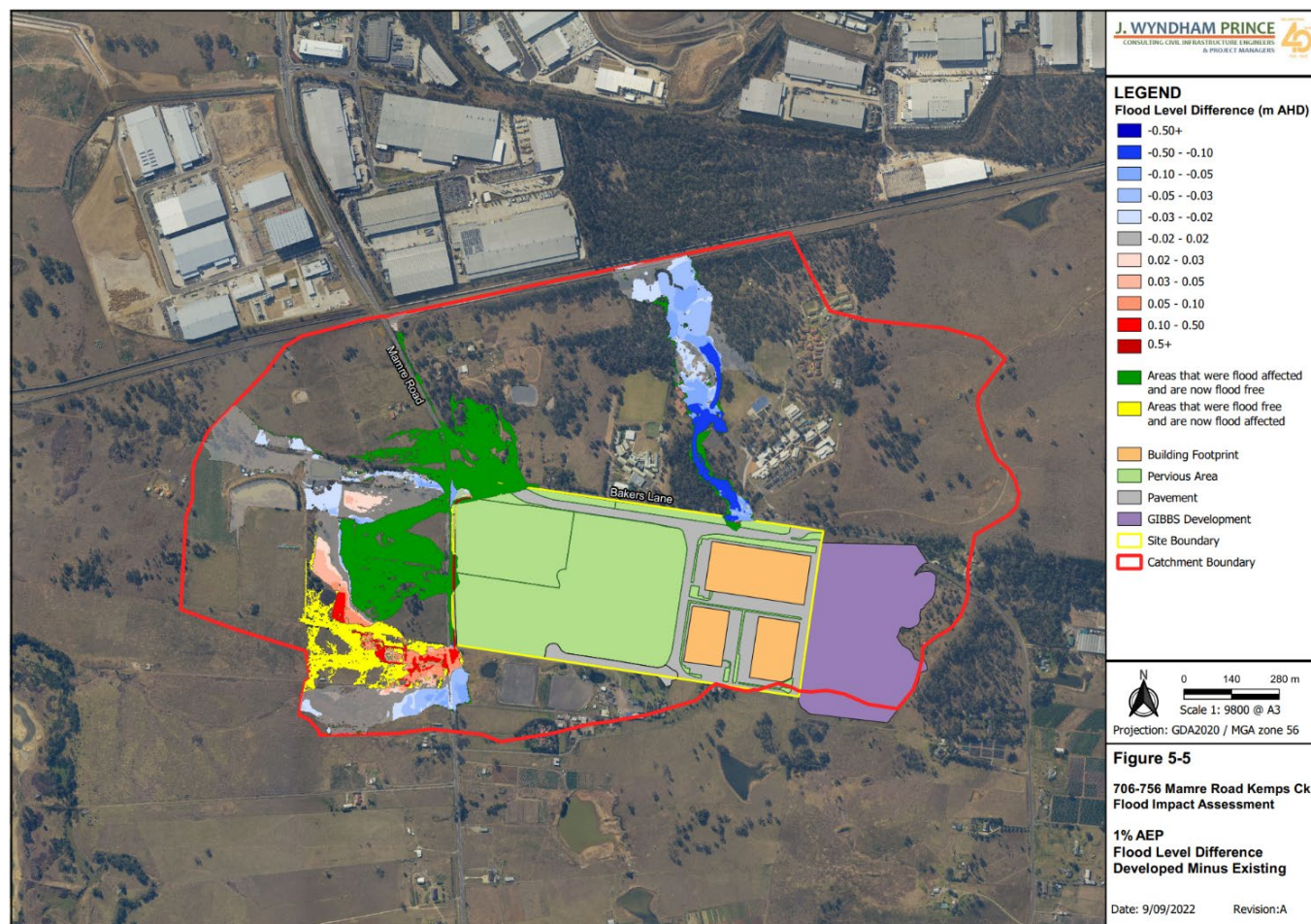


Figure 51 1% AEP Flood Level Difference Developed minus Existing Map

Source: J. Wyndham Prince

As such, OSD will be required for future development of the western catchments (Lots 4 to 8 inclusive), the design of which will be subject to assessment under a future development application. Final stormwater management measures would be required at subsequent stages of development within Summit at Kemps Creek, which will be subject to separate development applications.

As such, the Flood Impact Assessment confirmed that the Water and Stormwater Management Plan prepared by AT&L (**Appendix J**) will ensure the peak flows do not exceed the existing conditions flow for the Stage 1 development. It is demonstrated that in developed conditions there is no increase in flood level downstream of the Stage 1 development (Lots 1, 2 and 3) development that drains north from Bakers Lane.

In regard to the future development of Lots 4-8, the Water and Stormwater Management Plan (**Appendix J**) has proposed oversized sediments basins to provide capacity to capture, attenuate and reuse stormwater within the site. Apart from being required to satisfy construction phase water quality targets, the increased sediment basins would also satisfy the following stormwater management objectives as required by the DPHI for Lots 4-8:

- Provide attenuation of discharge towards Mamre Road, thereby mitigating potential flood impacts west of the site; and
- Contributing to the capacity to satisfy the stormwater flow volume targets adopted within the MRP.

The Water and Stormwater Management Plan (**Appendix J**) states that DRAINS modelling has been undertaken to size the temporary sediments basin to ensure flow discharge towards Mamre Road is no greater than existing condition flow up to 1% AEP event. Further, it provides the summary of the pre-development and post-development flow rates generated from DRAINS assessment for a range of events up to 1% AEP at the Mamre Road discharge point from the site (provided in **Section 6.2.7** above). The result shows that the 1% AEP developed condition flow of 3.20 m³/s from the site towards Mamre Road is approximately 44% less than the existing condition flow of 5.70 m³/s.

It is noted that the FIA modelled the developed condition flow out of Stage 1 upstream of Bakers Lane from the DRAINS model to understand the flood impact downstream of the proposed development. As noted in Section 5.3 of the FIA, the developed condition flow discharging from Stage 1 (Lot 1-3) downstream of the Bakers Lane assessed in DRAINS was approximately 46% less than the existing condition flow. The 1% AEP flood impact assessment result provided in Figure 5-5 of FIA, shows a decrease in flood level of up to 0.5 m downstream of Bakers Lane along the unnamed tributary of Kemps Creek which aligns significant decrease in flow downstream of Bakers Lane (Rpt1). The FIA has confirmed that the OSD designed as a part of WMS ensured the Stage 1 (Lots 1-3) developed condition flow from the site will be no greater than the existing condition flow.

Similarly, the Water and Stormwater Management Plan (**Appendix J**) has ensured the temporary basins will discharge 44% less flow in 1% AEP event compared to existing condition flow from Lots 4 to 8, downstream of the site towards the Mamre Road as such it is anticipated that there will be no increase in flood level at 757-769 Mamre Road and 771-781 Mamre Road as a result of the stormwater management strategy. Contemplating the flood assessment result of Stage 1 (Lot 1-3), it is deemed that no additional flood assessment is required to demonstrate no flood impact at and downstream of Mamre Road.

6.2.9 Mitigation Measures

Mitigation measures relating to Soil and Water are outlined in **Table 30** below.

Table 30 *Soil and Water Mitigation Measures*

Impact/Issue	Mitigation Measures
Erosion and Sediment Control	
Site Inspection and Maintenance	The Contractor will be required to inspect the site after every rainfall event and at least weekly, and will: • Inspect and assess the effectiveness of the SWMP and identify any inadequacies that may arise during normal work activities or from a revised construction methodology. • Construct additional erosion and sediment control works as necessary to ensure the desired protection is given to downstream lands and waterways. • Ensure that drains operate properly and to affect any repairs. • Remove spilled sand or other materials from hazard areas, including lands closer than 5 metres from areas of likely concentrated or high velocity flows especially waterways and paved areas. • Remove trapped sediment whenever less than design capacity remains within the structure. • Ensure rehabilitated lands have affectively reduced the erosion hazard and to initiate upgrading or repair as appropriate. • Maintain erosion and sediment control measures in a fully functioning condition until all construction activity is completed and the site has been rehabilitated. • Remove temporary soil conservation structures as the last activity in the rehabilitation. • Inspect the sediment basin during the following periods: – During construction to determine whether machinery, falling trees, or construction activity has damaged and components of the sediment basin. If damage has occurred, repair it. – After each runoff event, inspect the erosion damage at flow entry and exit points. If damage has occurred, make the necessary repairs. – At least weekly during the nominated wet season (if any), otherwise at least fortnightly; and

Impact/Issue	Mitigation Measures
	– Prior to, and immediately after, periods of 'stop work' or site shutdown. • Clean out accumulated sediment when it reaches the marker board/post and restore the original volume. Place sediment in a disposal area or, if appropriate, mix with dry soil on the site. • Do not dispose of sediment in a manner that will create an erosion or pollution hazard. • Check all visible pipe connections for leaks, and repair as necessary. • Check all embankments for excessive settlement, slumping of the slopes or piping between the conduit and the embankment, make all necessary repairs. • Remove the trash and other debris from the basin and riser; and • Submerged inflow pipes must be inspected and de-silted (as required) after each inflow event.
Stormwater Management	
Maintenance and Operations	• An Inspection and Maintenance Plan will be prepared and lodged with the construction certificate for the subdivision works once final design details and the extent and layout of all proposed water management measures is confirmed. It is anticipated that the Inspection and Maintenance Plan would be prepared using current best practice guidance such as Water sensitive urban design inspection and maintenance guidelines (Blacktown City Council, 2019) and would describe: – Each of the functional components of each water management measure; – Expertise required to inspect, maintain and (where necessary) repair or replace components; – Minimum required frequency of inspection, repair or replacement activities; and – Inspection and maintenance forms that list all necessary activities and contain a record of activities completed. • Estate-based and on-lot measures such as rainwater tanks and GPTs will be managed and maintained by the Proponent, with inspection and maintenance requirements consistent with those described above.

6.3 Urban Design and Visual Impact

6.3.1 Design Excellence

The proposed development has been designed to accord with the objectives for good design in Better Placed prepared by the NSW Government Architect. The consistency of the Proposal with the Better Placed objectives is apparent as follows:

- **Better fit** – The proposed industrial development is consistent with the envisaged character of the MRP within which it is situated. Its proposed building height is informed by the surrounding context of the site, thereby ensuring that the design corresponds with existing and prospective developments in the vicinity of the Proposal, while also not detracting from the amenity of surrounding residential land uses.
- **Better performance** – The Proposal is designed with ecologically sustainable development principles in mind to achieve optimal environmental performance, as detailed in the Ecologically Sustainable Development Report prepared by Northrop included at **Appendix DD**.
- **Better for community** – The Proposal will increase access to jobs and economic opportunities in Western Sydney, as well as help in delivering the Southern Link Road. This will appropriately establish a separate road for industrial vehicular traffic, in the form of the Southern Link Road and will leave the existing Bakers Lane for the schools and other developments to the north.
- **Better for people** – The proposed development includes a pedestrian and cyclist shared path, as well as bicycle parking zones that help to encourage active travel, and is also designed with CPTED principles in mind to achieve a safe environment.
- **Better working** – The building design is appropriately configured to accommodate the proposed warehouse, distribution and general industrial development.
- **Better value** – The design of the development ensures that the Proposal will deliver world-class industrial tenancies that will be commensurate with the intent for the MRP, and increase its value.
- **Better look and feel** – The design of the Proposal is aesthetically pleasing and seamlessly integrates with both the existing and prospective development in its vicinity.

6.3.2 Visual Impact

A Visual Impact Assessment (VIA) of the proposed development has been prepared by Geoscapes and is provided at **Appendix U**. A summary of the related assessment and proposed mitigation measures is provided below.

Methodology

The VIA does not follow prescribed methods or criteria, with the assessment undertaken on the basis of the principles established and broad approaches recommended in the following documents:

- Guidelines for Landscape and Visual Impact Assessment (GLVIA) – Third Edition (LI/IEMA 2013); and
- The Landscape Institute Advice Note 01 (2011) Photography and Photomontage in Landscape and Visual assessment.

As part of this process Geoscapes firstly established a baseline, drawing on background documents and investigations of the site, to document the existing landscape character and visual environment of the site and its visual catchment. This allowed for the determination of the most significant views and vistas currently enjoyed within the surrounding area, thereby assisting in the identification of the key viewpoints to be analysed. The significance of the visual impacts emanating from the Proposal were then explored, and related mitigation measures to reduce potential visual impacts are provided.

Viewpoints

Eight viewpoints have been selected as key locations from which the proposed development would be potentially visible to the general public, which are identified as follows:

- **Viewpoint 1** – Opposite 833 Mamre Road, Kemps Creek;
- **Viewpoint 2** – Mamre Road approach from South, Kemps Creek;
- **Viewpoint 3** – Mamre Road and Bakers Lane intersection, Kemps Creek;
- **Viewpoint 4** – 1 Bakers Lane, Kemps Creek;
- **Viewpoint 5** – Mamre Anglican School, Kemps Creek;

- **Viewpoint 6** – Emmaus Catholic College, Kemps Creek;
- **Viewpoint 7** – Bakers Lane approach from east; and
- **Viewpoint 8** – 139 Aldington Road, Kemps Creek.

The location of each of these viewpoints is identified in **Figure 52** below.

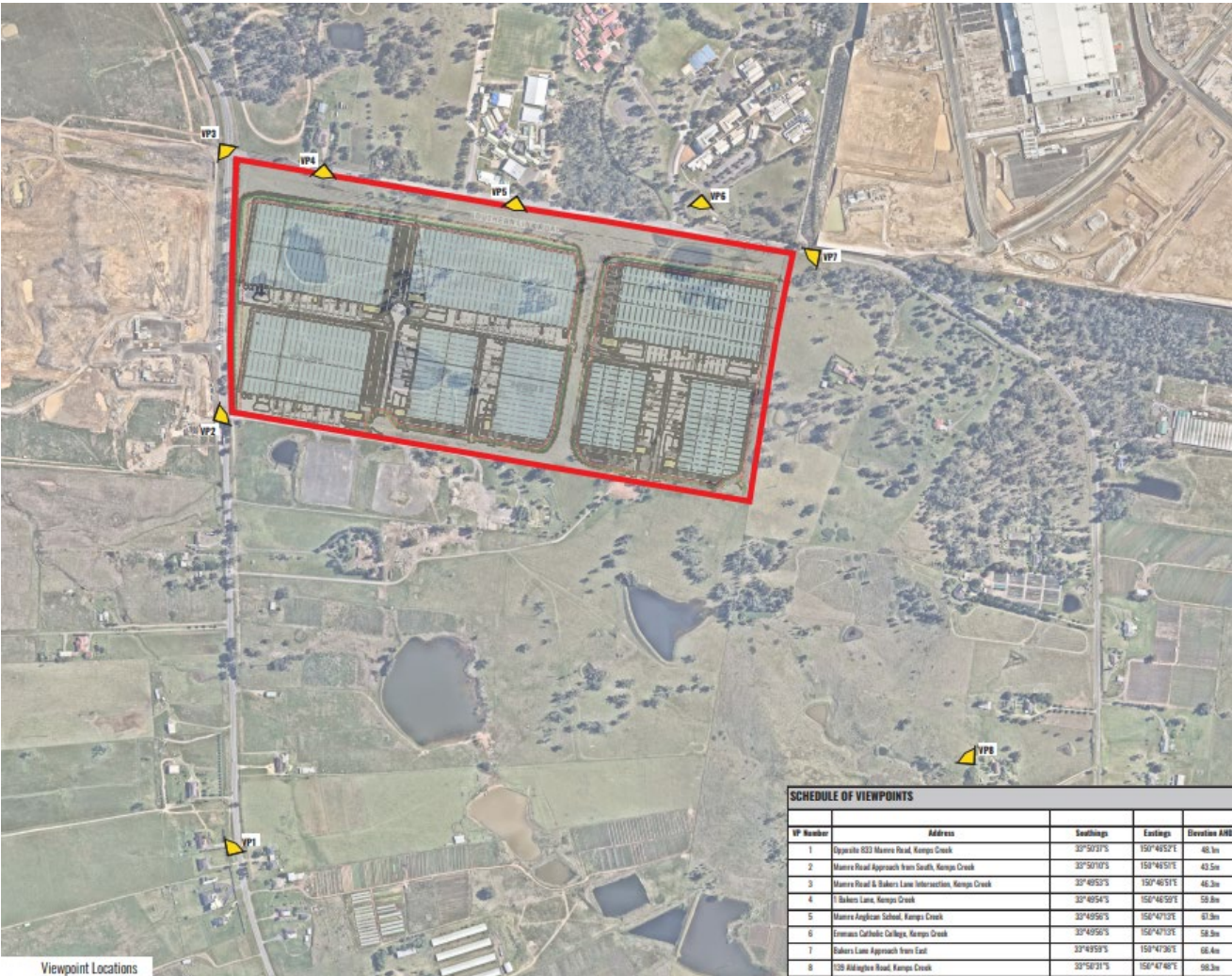


Figure 52 Location of Viewpoints

Source: Geoscapes

Visual Impact Assessment

The VIA identifies that in certain instances the proposed development would be well screened either by existing bushland or natural topography. Additionally, since the wider precinct has been rezoned for predominantly industrial purposes, the sensitivity of the visual receptors to any change in the natural landscape is significantly reduced.

Accordingly, a visual impact significance rating for each selected viewpoint has been determined from a detailed assessment of both the receptor sensitivity as well as the magnitude of visual change to the landscape. The assessment ultimately concludes that the visual impacts from each viewpoint will vary from moderate to minor negligible, although are all deemed to be only short to medium term given the rezoning of the precinct to predominantly industrial land uses.

A summary of the VIA’s assessment for each of the key viewpoints is provided in **Table 31** below.

Table 31 Visual Impact Assessment Summary

Viewpoint 1 – Opposite 833 Mamre Road, Kemps Creek	
Approximate Extent of Development Baseline Photo Photomontage - Year 0 Photomontage - Year 15	
Existing View	This viewpoint was selected following analysis of potential views from residential receptors up to the development site and is identified when looking south in the drone photography. A number of properties on this same side of Mamre Road would experience a similar type of view to that of the baseline image.
Visual Receptor Sensitivity	The view from this location contains scenic qualities with long distant views over a rural and undulating topography. As a result the owners would likely value the surrounding views of the landscape and rising topography up to Aldington Road. Therefore, at present the sensitivity has been judged to be High .
Magnitude of Change	The Proposed Development will form a new and recognisable element within the view which is likely to be recognised by the receptor. Future warehousing to Lot 8 is likely to be most visible, while warehousing along the southern boundary is likely to be screened by proposed landscaping, following maturity this is expected to sit the development more comfortably in surrounding context. It is judged that the residual magnitude of change is Low .
Significance of Visual Impact	Moderate/minor.

Viewpoint 2 – Mamre Road approach from South, Kemps Creek



Existing View

This viewpoint was selected following analysis of potential views from Mamre Road up to the development site and is identified within Figure 14 & 17 of the drone photography. Motorists heading north along Mamre Road will experience this view when approaching the site and looking northeast. The view is fairly typical of this presently undeveloped section of the MRP, it has a rural character of farm lands and rural residential properties dotted throughout the landscape. Scattered trees within the landscape filter views up to higher land in the east.

Visual Receptor Sensitivity

This viewpoint is taken at a close proximity to the site boundary, the vast majority of people experiencing this view would be motorists approaching the Bakers Lane / Southern Link Road / Mamre Road intersection. Views would be transient and experienced for a short length of time only. The view is likely to change depending on the exact location a motorist would be along Mamre Road and it is likely that positions from further south would be prevented by the presence of other industrial development. Out of shot and to the left work has begun on the Altis/Frasers industrial estate SSD-9522. It is judged that the sensitivity of this visual receptor is **Medium**.

Magnitude of Change

The proposed built form will be clearly noticeable and would be recognisable as an industrial development to the receptor. There would be noticeable changes over a horizontal and vertical extent within the view. Landscape planting along the eastern setback will help to screen retaining walls and building facades facing Mamre Road. Therefore, it is judged that the residual magnitude of change is **High**.

Significance of Visual Impact

Moderate.

Viewpoint 3 – Mamre Road and Bakers Lane intersection, Kemps Creek



Existing View

This viewpoint was selected to demonstrate views of the development when traveling south by vehicle and waiting at the future Southern Link Road intersection, pedestrians would also experience this same view when crossing the road. As is evident within the baseline image the corner of the development will likely form a focal point for the new intersection. The photograph was taken on the northwest side of the Mamre Road/Bakers lane junction on the same side as the Altis/Frasers development.

Visual Receptor Sensitivity

This viewpoint is taken at a close proximity to the site boundary, however the vast majority of people experiencing this view would likely be motorists approaching the junction. Views would be transient and experienced for a short length of time only. The view is likely to change depending on the exact location a motorist would be along Mamre Road and it is likely that positions from further north would be prevented by the presence of other industrial development. However, the view presently is absent of significant development and is likely to become a focal point and node at the intersection, therefore, it is judged that the sensitivity of this visual receptor is **Medium**.

Magnitude of Change

The proposed built form will be clearly noticeable and would be recognisable as an industrial development to the receptor. There would be noticeable changes over a horizontal and vertical extent within the view. Transitions to the public domain from elevated pad levels will be achieved by the use of tiered walling, landscape planting along the eastern and northern boundary will help to screen building facades facing Mamre Road. It is judged that the residual magnitude of change is **High**.

Significance of Visual Impact

Moderate.

Viewpoint 4 – 1 Bakers Lane, Kemps Creek

Approximate Extent of Development



Baseline Photo



Photomontage - Year 0



Photomontage - Year 15

Existing View

This view was taken immediately outside the driveway gates to 1 Bakers Lane a residential property at close proximity to the development site on the northern side of Bakers Lane. It is probable that views of the proposed development would be possible from within the property and when existing the driveway. Views become more open to the southwest as Bakers lane drops in elevation down towards Mamre Road which provides longer distant views of the wider landscape. Views are more enclosed to the road corridor when looking southeast due to the increase in elevation.

Visual Receptor Sensitivity

Due to the fact the view is presently unaffected by significant development residential receptors at this location are likely to value their existing view. This value is likely to be based on perceptual aspects such as wildness, tranquillity, land use and green open space. Longer distance views are possible south over Kemps Creek and therefore, it is judged that the sensitivity of this visual receptor is **High**.

Magnitude of Change

Proposed landscape planting is intended to screen the built form and soften the appearance of the industrial estate, views are direct and at close range with the baseline changing from a rural character to one that is more dominated by industrial. Therefore, it is judged that the magnitude of change is **High**.

Significance of Visual Impact

Major/moderate.

Viewpoint 5 – Mamre Anglican School, Kemps Creek



Existing View

This view was taken close to the Bakers Lane entry to Mamre Anglican School. It would likely be experienced by staff, parents and children entering or leaving the school. As can be seen in the drone photography and is evident in aerial mapping there is a presence of dense bushland to the east of the school which would prevent open views of the site from the main campus.

Visual Receptor Sensitivity

The baseline image looks east down Bakers Lane towards Aldington road and the site. The view consists of rolling hillsides with pastoral lands, scattered trees and bushland and presently has a rural character that is typical of those experienced along Aldington Road. Although the view does contain some scenic quality it is contained by rising topography and would only be experienced for a short period of time while entering or exiting the school. Therefore, It is judged that the sensitivity of this visual receptor is **Medium**.

Magnitude of Change

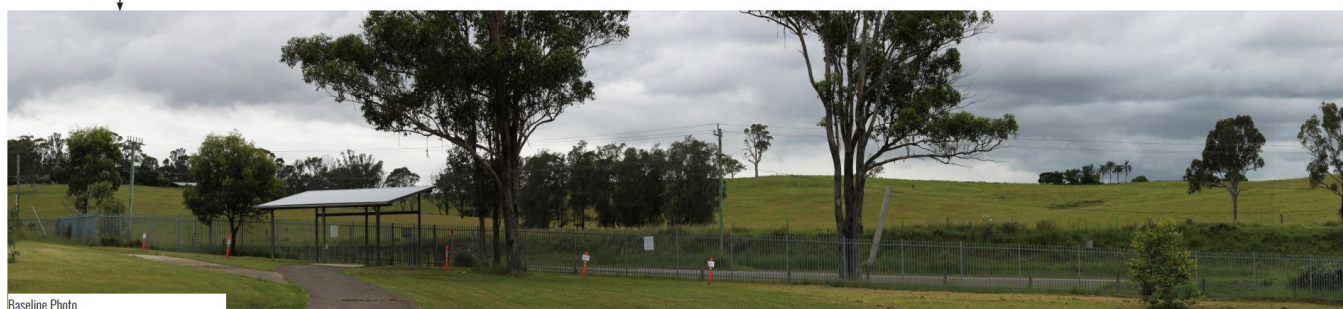
Following maturity proposed landscaping is intended to screen and visually mitigate the development however, the industrial estate will be clearly visible and the view would be noticeably altered by its presence. Views are at close range with a large horizontal and vertical extent of the view affected. Therefore, it is judged that the residual magnitude of change is **High**.

Significance of Visual Impact

Moderate.

Viewpoint 6 – Emmaus Catholic College, Kemps Creek

Approximate Extent of Development



Baseline Photo



Photomontage - Year 0



Photomontage - Year 15

Existing View

Following drone analysis it is clear that parts of the Emmaus College Campus would potentially experience views of the Proposed Development and this is evident in Figures 3 and 7. This viewpoint was taken close to the southern car park area on a footpath leading to the drop off entry point on Bakers Lane. As is shown in the baseline photograph the development site is seen within the center of the view rising up to higher ground. Parents and children would experience this view while walking towards the drop off area.

Visual Receptor Sensitivity

This viewpoint is taken at a close distance to the site boundary and the baseline is presently unaffected by industrial development. A local value may be held by the College regarding their existing views towards the site, this is likely to be based on perceptual aspects such as wildness, tranquillity, land use and green open space. However, the College is only operated during limited hours of the day and as is evident within the drone photography images, views of the development are limited to only certain areas of the campus. This is due to a number of existing scattered trees between the campus and the site and therefore, it is judged that the sensitivity of this visual receptor is **Medium**.

Magnitude of Change

The proposed built form will be noticeable and would be highly recognisable as an industrial development to the receptor at Year 0. However, following the maturity of proposed landscape planting the Proposed Development is expected to blend more easily with the present surrounding rural context and be less visible behind vegetation. Landscape planting along the northern boundary will help to screen prominent facades facing Bakers Lane. It is judged that the residual magnitude of change is **High**.

Significance of Visual Impact

Moderate.

Viewpoint 7 – Bakers Lane approach from east



Existing View

This viewpoint is in close proximity to the northeast site boundary and is intended to be representative of the type of view that would be experienced by motorists traveling along Aldington Road predominately in an east to west direction. When approaching from the east, views of the site are hidden behind natural landforms on 1-51 Aldington Road and vegetation in the form of the E2 land. Upon reaching the position of VP7, views then become more open towards the development. The baseline photograph was taken from the northern grass verge of Aldington Road looking southwest across the site. In the foreground scattered trees and shrubs are seen on undulating pastoral lands. To the right Aldington Road continues to the east and will eventually form the future Southern Link Road. In the background the long distance views are contained by rising land.

Visual Receptor Sensitivity

The type of receptor at this location would be predominately motorists where views are transient, are only experienced for a short time only and are typical of many locations along this route. However, with the exception of the Oakdale development to the north the view is presently unaffected by industrial development and does not contain any other significant landscape detractors. Therefore, the sensitivity has been judged to be **Medium**.

Magnitude of Change

The proposed built form will be clearly visible and would be recognisable as an industrial development to the receptor. There would be noticeable changes over a horizontal and vertical extent within the view. Landscape planting along the northern and eastern boundary will help to screen building facades facing the road. Therefore, it is judged that the residual magnitude of change is **Medium**.

Significance of Visual Impact

Moderate/minor.

Viewpoint 8 – 139 Aldington Road, Kemps Creek

Approximate Extent of Development



Baseline Photo



Photomontage - Year 0



Photomontage - Year 15

Existing View

This view was taken from one of several residential visual receptors southeast of the site located on higher ground. No. 139, is situated at approximately 97m AHD which is approximately 27m above the proposed SFL of Warehouse 1. Due to the elevation views extend over the landscape to the north and west with the Blue Mountains visible in the far distance. In the foreground the view is typical of the area with undulating topography containing pastoral and agricultural land. Since this photograph was taken an application from Dexu for an industrial warehouse estate has been submitted to the DPHI to be located at 113-153 Aldington Road.

Visual Receptor Sensitivity

As mentioned above this visual receptor is no longer residential in type due to the purchase of the land by Dexu for industrial use. The view from this location contains scenic qualities with long distant views over a rural and undulating topography. Workers and visitors to the estate may experience surrounding views of the landscape and further beyond towards the Blue Mountains. Present industrial development to the north is well screened by existing vegetation and therefore, the sensitivity has been judged to be **Medium**.

Magnitude of Change

The proposed built form will be clearly noticeable and would be recognisable as an industrial development to the receptor. There would be noticeable changes over a horizontal extent within the view, however longer distant views of the Blue Mountains would be maintained. Landscape planting will help to screen the southern building facades therefore, it is judged that the residual magnitude of change is **Low**.

Significance of Visual Impact

Minor.

6.4 Noise and Vibration

A Noise Impact Assessment (NIA) has been prepared by SLR Consulting and is provided at **Appendix V**. It details the Proposal's noise and vibration impacts on the surrounding locality during both construction and operation.

6.4.1 Methodology

Noise from the operation of the proposed development has been assessed in accordance with the NSW Noise Policy for Industry (NPfI), NSW EPA, 2017. A noise model of the study area has been used to predict noise levels from the proposed construction work to all surrounding receivers, the model used ISO 9613 algorithms in SoundPLAN software. The potential operational noise levels from the Proposal have been predicted to the surrounding receivers using the CONCAWE industrial noise algorithm in SoundPLAN.

6.4.2 Noise Catchment Areas and Sensitive Receivers

The location of the Noise Catchment Areas (NCA's) and Noise Sensitive Receivers is illustrated in **Figure 53** below.

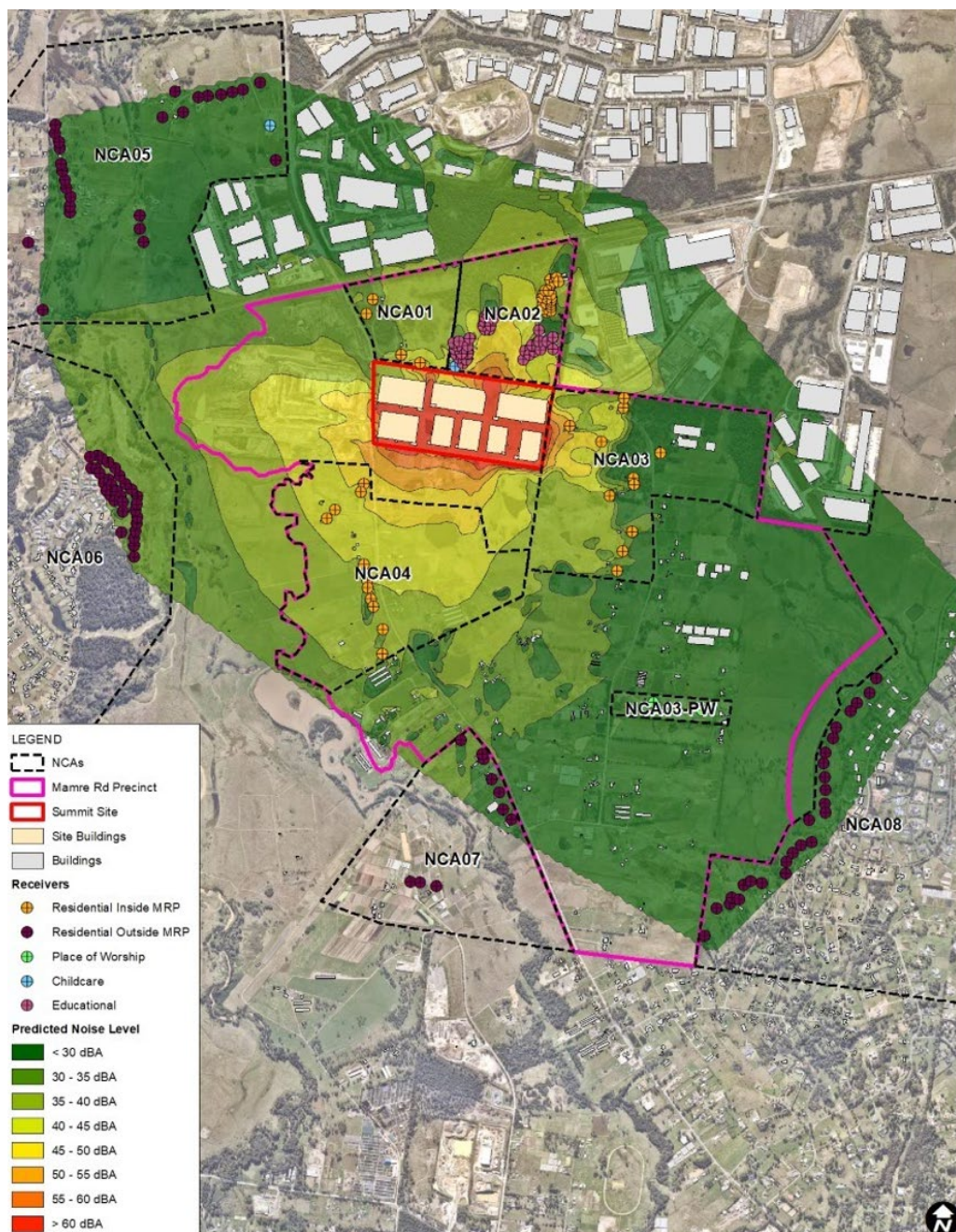


Figure 53 Operational Noise Contours – Masterplan development – Day (standard weather) context

Source: SLR Consulting

6.4.3 Construction Noise Impact Assessment

Methodology

The NSW Interim Construction Noise Guideline (ICNG) is used to assess and manage impacts from construction noise on residences and other sensitive land uses in NSW.

The ICNG contains procedures for determining project specific Noise Management Levels (NMLs) for sensitive receivers based on the existing background noise in the area. The 'worst-case' noise levels from construction of the Proposal are predicted and then compared to the NMLs in a 15-minute assessment period to determine the likely impact of the Proposal.

The NMLs are not mandatory limits, however, where construction noise levels are predicted or measured to be above the NMLs, feasible and reasonable work practices to minimise noise emissions are to be investigated.

Assessment

The predicted construction noise levels at the most-affected sensitive receivers surrounding the site and the NML exceedances are summarised in **Table 32** below.

Table 32 Predicted Construction Noise Levels and NML Exceedances at nearest Receivers

NCA	Type	NML	Predicted Noise Levels – Laeq(15minute) (dBA)								
			Estate Works						SLR Works		
			Vegetation Clearing	Earthworks	Hard Rock Excavation	Roads	Hardstands	Structures	Earthworks	Hard Rock Excavation	Roads
NCA01	Residential	54	74	69	71	64	60	57	70	72	65
NCA02	Residential	49	55	50	52	45	41	38	51	53	46
	Childcare	50	71	66	68	61	57	54	67	69	62
	Educational	55	69	64	66	59	55	52	65	67	60
NCA03	Residential	45	66	61	63	56	52	49	57	59	52
NCA03-PW	Place of Worship	55	41	36	38	31	<30	<30	33	35	<30
NCA04	Residential	49	62	57	59	52	48	45	48	50	43
NCA05	Residential	51	43	38	40	33	<30	<30	38	40	33
	Childcare	50	41	36	38	31	<30	<30	37	39	32
NCA06	Residential	47	42	37	39	32	<30	<30	36	38	31
NCA07	Residential	56	42	37	39	32	<30	<30	34	36	<30
NCA08	Residential	45	36	31	33	<30	<30	<30	30	32	<30
Legend (NML exceedances)			= Minor to marginal (1-10 dB exceedances)			= Moderate (11-20 dB exceedances)			= High (>20 dB exceedances)		

Source: SLR Consulting

The predicted construction noise levels and NML exceedances show the following:

- Noise levels during construction are expected to exceed the NMLs at the nearest receivers during certain stages of the work.
- The highest exceedances are seen during work which uses noise intensive equipment, such as wood chippers or rock-breakers. Exceedances of around 20 dB are predicted when these items of equipment are being used

in areas of the site near to receivers in NCA02 and NCA03 during activities such as vegetation clearing or hard rock excavation. Noise intensive equipment is likely to only be required for relatively short durations.

- Noise levels during less noisy activities or in NCAs that are further from the site are predicted to result in lower impacts or be compliant with the goals.
- No receivers are predicted to be highly noise affected (ie ≥ 75 dBA) during any of the construction work.
- It is noted that all work is expected to be completed during standard daytime construction hours.

The presented worst-case impacts would only be expected to occur when noisy work is being completed close to the most-affected receivers. When work is in other areas of the site, or when less noise intensive equipment is being used, the noise levels and impacts are expected to reduce accordingly. Feasible and reasonable construction noise mitigation measures are recommended to be applied where exceedances of the NMLs are predicted. Construction noise mitigation and management measures are discussed in **Section 6.4.6** below.

6.4.4 Construction Vibration Impact Assessment

The major potential sources of vibration from the proposed construction activities would likely be during 'earthworks' and 'construction of roads' when vibratory rollers are being used, and 'excavation of hard rock' when rockbreakers are being used.

Vibration offset distances have been determined from the *Construction Noise and Vibration Guideline* (CNVG) minimum working distances for cosmetic damage and human comfort with the distances illustrated in **Figure 54** for estate works and in **Figure 55** for the SLR works below.



Figure 54 Construction Vibration – Estate Works

Source: SLR Consulting



Figure 55 Construction Vibration – SLR Works

Source: SLR Consulting

An assessment accordance with the minimum working distances for cosmetic damage and human comfort set out in the CNVG is provided in **Table 33** below.

Table 33 Construction Vibration Assessment

Matter	Vibration Assessment
Cosmetic Damage	The above figures show that the distance between the construction work and the nearest sensitive receivers is likely to be sufficient for receiver buildings to be outside of the cosmetic damage minimum working distance for vibration intensive equipment. Offset distances from specific vibration intensive plant to the nearest receivers should be confirmed before commencing vibration intensive works during construction.
Human Comfort	The above figures indicate that two residences in NCA01, and one childcare and one school building in NCA02, are within the human comfort minimum working distance and occupants of these buildings may be able to perceive vibration impacts at times when vibratory rollers or rockbreakers are in use nearby. Where impacts are perceptible, they would likely only be apparent for relatively short durations when vibration intensive equipment is in use. Feasible and reasonable construction vibration mitigation measures should be applied where vibration intensive works are required within the minimum working distances. Construction vibration mitigation and management measures are outlined in Section 6.4.6 .

Source: SLR Consulting

6.4.5 Operational Noise Impact Assessment

Methodology

The NfPI was used to develop trigger levels to provide for the two assessment components – intrusiveness and amenity. Furthermore, sources of noise of short duration and high level may cause sleep disturbance, which requires an initial screening of noise levels to be undertaken. These screening noise levels apply outside bedroom windows during the night period – however do not apply to receivers within an industrial zone.

Based on this, the following Project Noise Trigger Levels (PTNL's) were identified based on the amenity and intrusiveness noise levels, inclusive of the sleep disturbance (screening) levels. The operational project noise trigger levels are outlined in the NIA (**Appendix V**).

Assessment

A summary of the worst-case noise assessment for the Concept Masterplan and Stage 1 development at the receivers surrounding the development is provided in **Table 34** below.

Table 34 Operational Noise Assessment

NCA	Receiver Type	Time of Day	Noise Criteria	LAeq(15 minutes) Noise Level (dBA)			
				Concept Masterplan		Stage 1	
				Predicted	Exceedance	Predicted	Exceedance
Receivers within the Mamre Road Precinct							
NCA01	Residential	Daytime (standard)	45	49	4	42	-
		Evening (standard)	40	49	9	42	2
		Night (standard)	35	48	13	41	6
		Night-time (noise-enhancing)	35	53	18	47	12
NCA02	Residential	Daytime (standard)	44	40	-	35	-
		Evening (standard)	40	40	-	35	-
		Night (standard)	35	38	3	33	-
		Night-time (noise-enhancing)	35	44	9	39	4
	Childcare	When in use (standard)	45	46	1	46	1
	Educational	When in use (standard)	40	48	8	48	8
NCA03	Residential	Daytime (standard)	40	53	13	52	12
		Evening (standard)	38	53	15	52	14
		Night (standard)	34	52	18	51	17
		Night-time (noise-enhancing)	34	56	22	55	21
NCA03-PW	Place of Worship	When in use (standard)	43	<20	-	<20	-
NCA04	Residential	Daytime (standard)	44	49	5	36	-
		Evening (standard)	39	49	10	36	-
		Night (standard)	34	48	14	35	1
		Night-time (noise-enhancing)	34	53	19	41	7
Receivers outside the Mamre Road Precinct							
NCA05	Residential	Daytime (standard)	45	<20	-	<20	-
		Evening (standard)	40	<20	-	<20	-
		Night (standard)	35	<20	-	<20	-
		Night-time (noise-enhancing)	35	25	-	<20	-
	Childcare	When in use (standard)	45	<20	-	<20	-
NCA06	Residential	Daytime (standard)	42	22	-	<20	-

		Evening (standard)	39	22	-	<20	-
		Night (standard)	34	21	-	<20	-
		Night-time (noise-enhancing)	34	28	-	<20	-
NCA07	Residential	Daytime (standard)	43	23	-	<20	-
		Evening (standard)	38	23	-	<20	-
		Night (standard)	33	22	-	<20	-
		Night-time (noise-enhancing)	33	29	-	20	-
NCA08	Residential	Daytime (standard)	40	<20	-	<20	-
		Evening (standard)	38	<20	-	<20	-
		Night (standard)	33	<20	-	<20	-
		Night-time (noise-enhancing)	33	<20	-	<20	-

Source: SLR Consulting

The operational noise assessment provided in **Table 34** above outlines that the Proposal is compliant in regard to the relevant noise criteria for all sensitive receivers outside the MRP as part of the Stage 1 development and Concept Masterplan. However, the Proposal results in exceedances to the relevant noise criteria within the MRP for both the Stage 1 development and Concept Masterplan.

This is considered appropriate as the MRP was rezoned in 2020 with the site and surrounding land zoned IN1 General Industrial to meet the shortfall in availability of industrial land within the greater Sydney region. As such, a number of development applications have been filed with the MRP and it is understood that ultimately, all existing receivers within the MRP will be redeveloped into future industrial land uses.

This includes the schools and childcare which has been rezoned with the provision for a potential future intermodal terminal. Further, the Southern Link Road (SLR) is proposed to the north of the site, which is required to be constructed to provide appropriate traffic management to the proposed industrial estates outlined in **Section 2.4**.

SLR Consulting has considered feasible and reasonable mitigation that can be applied to the Proposal to reduce its operational noise impact and are outlined in **Section 6.4.6** below.

Sleep Disturbance

An assessment of the potential for sleep disturbance from maximum noise level events during the night-time period from the Proposal has been considered. The NPfI defines the sleep disturbance screening level as 52 dBA LAFmax or the prevailing background level plus 15 dB, whichever is greater.

The typical potential sleep disturbance activities as a result of the Proposal include truck airbrakes, trucks reversing and acceleration and truck movements. The predicted maximum noise levels at the nearest residential receivers during the night-time for standard and noise-enhancing weather are outlined in **Appendix V**.

Exceedances of the sleep disturbance screening level are predicted at a small number of the nearest receivers within the MRP which are zoned industrial. The exceedances are generally due to truck airbrakes, truck/forklift reversing alarms, and truck acceleration. It is noted that the sound power levels used for reversing alarms are considered conservative and represent a worst-case scenario. In practice, where appropriate broadband and/or ambient sensing reversing alarms are used the noise emissions are likely to be lower and result in less impacts. Compliance with the sleep disturbance screening level is predicted at all residential receivers outside the MRP.

6.4.6 Mitigation Measures

The proposed mitigation measures are outlined in **Table 35** below.

Table 35 *Mitigation Measures – Noise and Vibration*

Impact/Issue	Mitigation Measures
Construction	
Noise and Vibration Management	• A Construction Noise and Vibration Management Plan (CNVMP) would be prepared before any work begins. This would identify all potentially impacted receivers, assess the potential noise and vibration impacts from the Proposal and provide details regarding how the impacts would be minimised through the use of all feasible and reasonable mitigation measures. The CNVMP would also contain procedures for handling complaints, should they occur, and detail any compliance monitoring requirements.
Operation	
Source Control	• Use of quieter mobile plant and equipment options, such as electric forklifts instead of gas forklifts. • Reduce potential for annoying noise emissions during the night-time from forklifts and trucks. • If noise impacts from mechanical plant are identified during detailed design, quieter plant could be selected, or the plant could be relocated to a location screened from view of the nearest receivers, where appropriate. • Appropriate warehouse materials to minimise noise break-out from internal activities would be selected during detailed design. Where it is identified that noisier equipment is required to be used within the warehouse buildings than currently assumed (eg manufacturing equipment instead of standard warehousing and distribution equipment), facade and roof construction can use materials that provide a greater acoustic benefit. • Use of roller doors to minimise internal noise breakout. Roller doors should be kept closed when not in use for loading/unloading trucks. • Production of an Operational Noise Management Plan that details the measures that could be used by the various tenants to minimise general noise emissions from the site.
Noise Monitoring	• Verify post-construction operational noise levels are in-line with predictions and the mitigation is working as intended.

6.5 Infrastructure Requirements

An assessment of the proposed development with regards to infrastructure requirements is supported by:

- Civil Infrastructure Report prepared by AT&L (**Appendix I**); and
- Civil Drawings prepared by AT&L (**Appendix K**).

These appendices discuss the infrastructure requirements of the proposed development as well as a variety of proposed interim and permanent strategies to connect the site to all relevant services.

6.5.1 Methodology

Investigations of the site were undertaken by AT&L based on the following information:

- Site inspection;
- Dial Before You Dig (DBYD) search;
- Sydney Water Hydra System;
- LIDAR Survey information; and
- Sydney Water South West Growth Servicing Plan 2017-2022.

The findings of the investigations and detail surrounding the existing services and the proposed services that are required to service the proposed development are summarised in the following subsection.

6.5.2 Potable Water

Existing

Dial Before You Dig (DBYD) indicates the following water services within the area:

- 200mm diameter DICL / PVC-U potable watermain on the western side of Mamre Road along the full frontage of Summit at Kemps Creek;
- 300mm diameter PVC-O potable watermain on the northern side of Bakers Lane, approximately 200 metres east of Summit at Kemps Creek. This main runs along Compass Drive within the Oakdale West Estate; and
- 100mm diameter DICL main on the eastern side of Aldington Road, which connects to the 300mm main on the northern side of Bakers Lane.

Proposed

A Local Area Servicing Plan was prepared and endorsed by Sydney Water as part of the Oakdale West Development to the north of the site which will provide additional trunk water infrastructure for the area. Included within these works is an extension of a 300mm diameter main from Lenore Drive through to Bakers Lane.

Subject to Sydney Water approval and further modelling, it is proposed to extend the above-mentioned 300mm main along Bakers Lane to service the Site. The main will be cross connected to the existing water mains and through connected to the existing 2 x 150mm diameter main within Mamre Road. This main will be fully reimbursable subject to Sydney Water approval. The internal reticulation will consist of either a DN200 or DN250 main within Summit at Kemps Creek.

6.5.3 Wastewater

Existing

Dial Before You Dig indicated that there is no existing sewer infrastructure located at or adjacent to the site.

Proposed

The site is located within the western catchment of the MRP that drains to a proposed wastewater pumping station via proposed trunk wastewater carriers. The pumping station will be required to transfer flows to St Marys wastewater network for interim servicing to 2026 and after this time it is intended for the pumping station to transfer flows south to the proposed Upper South Creek Advanced Water Recycling Centre.

Sydney Water met with ISPT in June 2021 to present preliminary design of proposed gravity and pressure sewer mains on the eastern side of Mamre Road and the southern side of Bakers Lane along the frontage of Summit at Kemps Creek.

The delivery date for servicing the western catchment is planned for 2023/24 and will be subject to funding approval. If the site is developed in advanced of Sydney Water's proposed works and sufficient infrastructure is not available, an Interim Operating Procedure (IOP) will need to be developed to allow for wastewater to be constructed to service the site. The IOP will need to be raised and will be subject to approval from Sydney Water.

6.5.4 Recycled Water

Existing

There is no existing recycled (non-potable) water infrastructure within or in the vicinity of the site.

Proposed

The MRP Flood, Riparian Corridor and Integrated Water Cycle Management Strategy (2020) documents Sydney Water's commitment to the provision of recycled water to the MRP from the Upper South Creek AWRC.

In their submission to SSD-9138102 dated 6 August 2021, Sydney Water confirmed that recycled water for nondrinking purposes will be provided in the MRP. The Integrated Water Servicing Options analysis is currently underway and will determine the extent to which recycled stormwater is integrated with recycled wastewater. Sydney Water is currently preparing a Development Servicing Plan (DSP) for the MRP. This will include Developer Charges for the provision of recycled water services to the Precinct.

Sydney Water's draft recycled water scheme plan for the MRP is subject to change depending on the outcome of the Integrated Water Servicing options analysis. Sydney Water will confirm the requirement for recycled water connections on finalisation of the scheme plan for the Precinct. It is likely that the requirements will be a combination of the following:

- Each lot in the subdivision must have a frontage to a recycled water main that is the right size and can be used for connection of the lot to the recycled water main; and
- The proponent must construct a recycled water main extension to serve the lots appropriately. The extension must comply with the standards for Dual Water Reticulation Systems.

6.5.5 Electrical

Existing

Recent site inspection indicates that there is an overhead power line (11kV and 240v) on the southern side of Bakers Lane reserve parallel to the boundary. Dial Before You Dig (DBYD) indicates that there are no underground services within the vicinity of the site.

Proposed

Endeavour Energy has noted the following in the Scoping / Request for SEARs Request Report:

The MRP within the Western Sydney Employment Area is initially being supplied from the existing Mamre Zone Substation located at 8 John Morphett Place, Erskine Park (Lot 9 DP 1097134) which has limited spare capacity but is enabling some development to progress ahead of the timeline for upstream utility and civil infrastructure. The establishment of the proposed South Erskine Park Zone Substation (Lot 99 DP 1266383) within the Oakdale West Estate (currently expected to be available in the fourth quarter of 2022) together with the associated the installation of multiple 22,000 volt 22 kV high voltage feeders will be required to service any significant development along Mamre Road and Aldington Road.

In regard to electricity distribution within the Precinct, the availability of electricity supply to a site is based on a wide range of factors, e.g., the age and design of the network; other development in the locality utilising previously spare capacity within the local network; the progress of nearby / surrounding sites including electricity infrastructure works, e.g., a smaller and isolated development that may not of its own accord require a distribution substation may require a substation to facilitate the development and from which the spare capacity is made available to subsequent nearby development.

6.5.6 Gas

Existing

The nearest gas main to the site is a 110mm main (210 kPa) that runs along the northern side of Bakers Lane across the full frontage of the site.

Proposed

No contact has been made with Jemena to determine if there are plans to service the area in future. Any possible future upgrades would need to be assessed for capacity and commercial viability.

6.5.7 Telecommunications

Existing

Dial Before You Dig indicates that Telstra below-ground conduits are located within the Bakers Lane road reserve parallel to the boundary. Site inspection has identified there are aboveground assets along the northern side of Bakers Lane.

Proposed

It is expected connection could be made from the existing infrastructure located within Bakers Lane or Mamre Road. Subject to the requirements of the relevant telecommunications authority, new pit and pipe may need to be installed from Bakers Lane or Mamre Road to the site. NBN requires an application for connection to be made with appropriate lead times to ensure the network can be delivered to the site.

6.6 Aboriginal Cultural Heritage

An Aboriginal Cultural Heritage Assessment Report (ACHAR) and Archaeological Report has been prepared by Biosis and included at **Appendix W**. The ACHAR identifies the impacts of the proposed development on the Aboriginal cultural heritage values that exist in the area.

6.6.1 Consultation

Biosis have undertaken consultation with the Aboriginal community as per the process outlined in the Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (DECCW 2010a) (consultation requirements). The appropriate government bodies were notified and advertisements were placed in the Western Weekender newspaper (4 June 2021).

Environment and Heritage Group provided a list of Aboriginal stakeholders for the region, which were invited to register an interest in the Proposal. Twenty-one (21) Aboriginal organisations registered their interest, the registered Aboriginal parties (RAPs) were invited to provide their knowledge on the study area.

The responses identify the study area as significant due to the continued occupation and the complex sites located within close proximity, the responses from the RAPs can be found in **Appendix W**. The outcome of the consultation process was that the RAPs considered the study area to have a high level of cultural significance, although that significance was not clearly defined. The consultation process contributed to the development of the management recommendations outlined in **Section 6.6.4**.

6.6.2 Existing Environment

A search of the Aboriginal Heritage Information Management System (AHIMS) register was conducted on 3 June 2021. It identified 102 Aboriginal archaeological sites within a 1.7 by 1.7 kilometre search area centred on the site. Of the registered sites, 9 are recorded to be located within the study area, however:

- Background research conducted as part of this assessment determined two of these sites were located approximately 1 kilometre north of the site and have been included in a Consent to Destroy Permit (#2188). These sites were also inspected in the subsequent survey which confirmed the GPS locations listed in the AHIMS database did not match the descriptions of the sites listed in the site cards or associated reports.
- An archaeological survey of the study area was conducted on 11 June 2021. The overall effectiveness of the survey for examining the ground for Aboriginal sites was hampered by poor ground surface visibility due to extensive grass coverage. This limited the potential of Aboriginal sites to be identified on the surface.

As a result, no Aboriginal sites were identified during the survey however areas of minimal disturbance were assessed as containing Potential Archaeological Deposit (PAD). Following this, Biosis undertook subsurface test excavations from 5-29 of October 2021 which identified an additional five Aboriginal heritage sites within the study area.

6.6.3 Assessment of Impacts

In order to determine the significance of impacts to Aboriginal Cultural heritage, it is first necessary to ascertain the cultural heritage significance of the item or place in question. As such, the ACHAR identifies four key criterion that enable an assessment of the significance of the site of the proposed development, in accordance with the Burra Charter.

Social

It is acknowledged that Aboriginal people are the primary determiners of the cultural significance of Aboriginal cultural heritage. During consultation limited information was provided by RAPs in regard to the cultural values of the study area, it was however indicated that the study area has cultural significance to the RAPs.

Historic

Historic significance refers to associations a place or object may have with a historically important person, event, phase or activity to the Aboriginal and other communities. The study area is not known to have any historic associations.

Scientific

An archaeological scientific assessment was undertaken for the study area and is presented in detail in Appendix 5 of the ACHAR (**Appendix W**). Four sites had been disturbed by the creation of a dam. The 10 others were

relatively undisturbed with the only disturbance in the past 50 years in those areas identified as land clearing and cattle grazing. Five sites contained sub-surface artefact scatters while the other nine were surface artefacts or scatters. It was determined that four sites have low scientific significance and nine have moderate scientific significance.

Aesthetic

The study area has been disturbed through land clearance of the native vegetation. However, the overall landscape is a typical example of sloping landforms of the Bringelly Shale geological unit. The landscape of the study area is linked with Aboriginal cultural values and provides context for Aboriginal sites that gives a strong sense of place. The vegetation clearance and other development surrounding the study area indicates that the aesthetic values have been altered from the original landscape before European settlement, and therefore has moderate aesthetic values.

The current proposed works within the study area include activities which could impact Aboriginal heritage sites or objects. If not mitigated the impact may include:

- Bulk earthworks of the entire site, which will involve the removal of topsoil and subsoil.
- Construction of warehouses and associated services and infrastructure, which would involve subsurface excavations for foundations and services.

Left unmitigated, these activities have potential to completely remove or disturb archaeological deposits and Aboriginal objects. A summary of the potential archaeological impacts is provided in **Table 36** below.

Table 36 Summary of Potential Archaeological Impact

Site Name	Significance	Type of harm before mitigated	Consequence of unmitigated harm	Site-specific Recommendations
AHIMS 45-5-5570	Moderate	Direct	Total loss of value	Avoidance is not possible as part of the development. This site should be managed under a Cultural Heritage Management Plan following SSD approval.
AHIMS 45-5- 5569	Moderate	Direct	Total loss of value	
AHIMS 45-5- 5565	Moderate	Direct	Total loss of value	
AHIMS 45-5-5566	Moderate	Direct	Total loss of value	
AHIMS 45-5-5567	Moderate	Direct	Total loss of value	
AHIMS 45-5-4102	Moderate	Direct	Total loss of value	
AHIMS 45-5-4103	Low	Direct	Total loss of value	
AHIMS 45-5-4105	Low	Direct	Total loss of value	Should be avoided. If unavoidable community collection should take place and RAPs consulted as to its final resting place.
AHIMS 45-5-5268	Moderate	Direct	Total loss of value	
AHIMS 45-5-5268	Low	Direct	Total loss of value	
AHIMS 45-5-5269	Low	Direct	Total loss of value	
AHIMS 45-5-5274	Moderate	Direct	Total loss of value	

Source: Biosis

6.6.4 Mitigation Measures

A series of management recommendations have been created as mitigation measure for the proposed development. They are to be undertaken prior to any development impacts occurring within the study area with the responsibility of the proponent to undertake the recommendations. The proposed mitigation measures are outlined in **Table 37** below.

Table 37 Mitigation Measures – Aboriginal Cultural Heritage

Impact/Issue	Mitigation measures
Development of a Cultural Heritage Management Plan	• It is recommended a Cultural Heritage Management Plan (CHMP) be developed in order to appropriately manage Aboriginal cultural heritage identified within the study area. This will identify how to properly manage Aboriginal heritage for the project and would include

Impact/Issue	Mitigation measures
	unanticipated finds protocols and a heritage inductions to be undertaken by the site personnel prior to works. The CHMP must be prepared by a suitably qualified archaeologist in consultation with the Registered Aboriginal Parties (RAPs) for the project.
Community collection of surface artefacts	- There are seven AHIMS sites which consist of artefact scatters and isolated artefacts within the study area. - Community collection with the RAPs for the project should be undertaken prior to development in accordance with the CHMP developed for the project.
Updates to AHIMS site cards	This assessment has found that AHIMS 45-5-3036/EP-I 3 and AHIMS 45-5-3030/EPTA5 are not located within the study area and therefore will not be impacted by the proposed works. It is recommended that the site cards should be updated to reflect the correct location of these sites.
Long term care agreement	- The establishment of a long term care agreement in consultation with RAPs should be developed in order to ensure the artefacts identified as part of this assessment are adequately cared for. Several management options are possible depending on the wishes of RAPs. Artefacts recovered from the excavations can be given back to the Aboriginal community through a care and control agreement where they can then be used to teach subsequent generations about Aboriginal culture or can be reburied in a culturally appropriate place. - This approach considers the principles of Ecologically Sustainable Development (ESD) and intergenerational equity and more importantly ensures that recovered artefacts are managed according to the wishes of RAPs.
Continued consultation with the RAPs	As per the consultation guidelines it is recommended that the proponent provides a copy of this draft report to the RAPs and considers all comments received. The proponent should continue to inform these groups about the management of Aboriginal cultural heritage sites within the study area throughout the life of the project. The RAPs should be consulted in regard to the resting place of the artefacts.
Aboriginal interpretation of the study area	Kemps Creek has a rich Aboriginal history and it is recommended that opportunities for heritage interpretation are explored and implemented in the project with input from the Aboriginal community. Examples of interpretation that could be considered include creating native gardens, integrating Aboriginal artwork, artefacts, digital displays and designs that express the connection to country.
Discovery of Unanticipated Aboriginal Objects	Should any Aboriginal objects be encountered during works associated with this Proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist. If the find is determined to be an Aboriginal object the archaeologist will provide further recommendations. These may include notifying the Heritage NSW and RAPs.
Discovery of Unanticipated Historical Relics	Should unanticipated relics be discovered during the course of the project, work in the vicinity must cease and an archaeologist contacted to make a preliminary assessment of the find. The Heritage Council will require notification if the find is assessed as a relic.
Discovery of Human Remains	- If any suspected human remains are discovered during any activity, you must: - Immediately cease all work at that location and not further move or disturb the remains. - Notify the NSW Police and the Environmental Line on 131 555 as soon as practicable and provide details of the remains and their location. - Not recommence work at that location unless authorised in writing by Heritage NSW and/or NSW Police.

6.7 Non-Aboriginal Cultural Heritage

A Historical Heritage Impact Assessment (HHIA) has been prepared by Biosis and included at **Appendix Y**. A summary of the assessment and proposed mitigation measures is provided below.

6.7.1 Methodology

Biosis have reviewed the following statutory framework to determine the surrounding heritage items context, and by extension, any associated heritage amenity with the site.

- Environment Protection and Biodiversity Conservation Act 1999
- State Heritage Register
- Section 139 Archaeological relics
- Section 170 Registers
- Penrith Local Environmental Plan 2010
- State Environmental Planning Policy (Western Sydney Employment Area) 2009
- Penrith Development Control Plan 2014
- MRP DCP 2021

A physical inspection of the study area was undertaken on 18 January 2022, attended by Maggie Butcher (Consultant Archaeologist) and Crystal Garabedian (Research Assistant). The principal aims of the survey were to identify heritage values associated with the study area.

An archaeological survey of the study area was undertaken on 11 June 2021 by Mathew Smith (Biosis, Consultant Archaeologist). Test excavations were undertaken from 5 to 29 October 2021, a total of 197 test pits were excavated across the study area.

6.7.2 Existing Environment

The study area was found to contain three structures of potential historical value, these include:

- **Trigonometric Station** – Constructed in 1972 by the NSW Department of Lands and is located on the highest peak of the study area, with an elevation of 85 metres. The top component of the trigonometric station had broken and was lain next to the concrete pillar, with the entire study area can be viewed from the trigonometric station.
- **Brick Culvert** – Located on the northern side of the large man-made dam in the southern portion of the study area. It comprised machine-made bricks and was in a good condition, being almost completely intact. A closer inspection of the culvert could not be made as it was surrounded by water.
- **Residential Building** – Positioned in the north-western portion of the study area with the exterior comprised fibro cladding. The structural integrity of the building was highly compromised, with several of its support structures and wooden features being deteriorated.

6.7.3 Assessment of Impacts

The residential building, trigonometric station and brick culvert can be considered common during this time in the local area and NSW. The construction materials and methods are well known and understood, and based on the field investigation, no features that could render the residential building, trigonometric station or brick culvert exceptional were identified. Based on the historical research, these features did not have a special association with any person or groups. The residential building, trigonometric station or brick culvert are unlikely to have the potential to yield information not available in existing archaeological research.

The historical research and the archaeological survey did not indicate that any potential archaeological remains within the study area possessed any importance to local or NSW's cultural or natural history, nor was it identified as having a special association with a significant person or group of persons. The data collected in this assessment suggests that there is little significance regarding the research potential, aesthetic, technical or social aspects of any potential archaeological remains. The potential archaeological remains are considered common resources that are typical in form and nature to similar resources throughout the local region and NSW during this time. The items within the study area, and the study area itself, are unlikely to be able to provide information not already available in the existing literature. As such, any potential archaeological remains are unlikely to possess any historical heritage significance.

As such, no items of heritage significance or areas of historical archaeological potential have been identified within the study area. The proposed development will not result in any direct or indirect impact on heritage items within the vicinity of the study area.

6.7.4 Mitigation Measures

If any unexpected finds are discovered during the construction phase the contractor should follow the following mitigation measure in **Table 38** below. The mitigation measures for Aboriginal cultural heritage identified in **Section 6.6.4** also apply for Non-Aboriginal cultural heritage. They are to be undertaken prior to any development impacts occurring within the study area with the responsibility of the proponent to undertake the recommendations.

Table 38 Mitigation Measures – Non-Aboriginal Cultural Heritage

Impact/Issue	Mitigation measures
Implementation of an unexpected finds protocol	Relics are historical archaeological resources of local or State significance and are protected in NSW under the Heritage Act 1977 (Heritage Act). Relics cannot be disturbed except with a permit or exception/exemption notification. Should unanticipated relics be discovered during the course of the project, work in the vicinity must cease and an archaeologist contacted to make a preliminary assessment of the find. The Heritage Council of NSW will require notification if the find is assessed as a relic.

6.8 Biodiversity

A Biodiversity Development Assessment Report (BDAR) has been prepared by Cumberland Ecology and is included at **Appendix Z**. A summary of the assessment and proposed mitigation measures is provided below.

6.8.1 Urban Capable Land

The majority of the site has been identified as 'urban capable', which is identified as area shaded 'red' in **Figure 56**. As such, the majority of the site does not require further biodiversity assessment with the BDAR (**Appendix Z**) only applying to the areas of 'excluded land' within the study area, which is identified as the 'subject land' in **Figure 56**. An assessment of the subject land is carried out in the following sections.

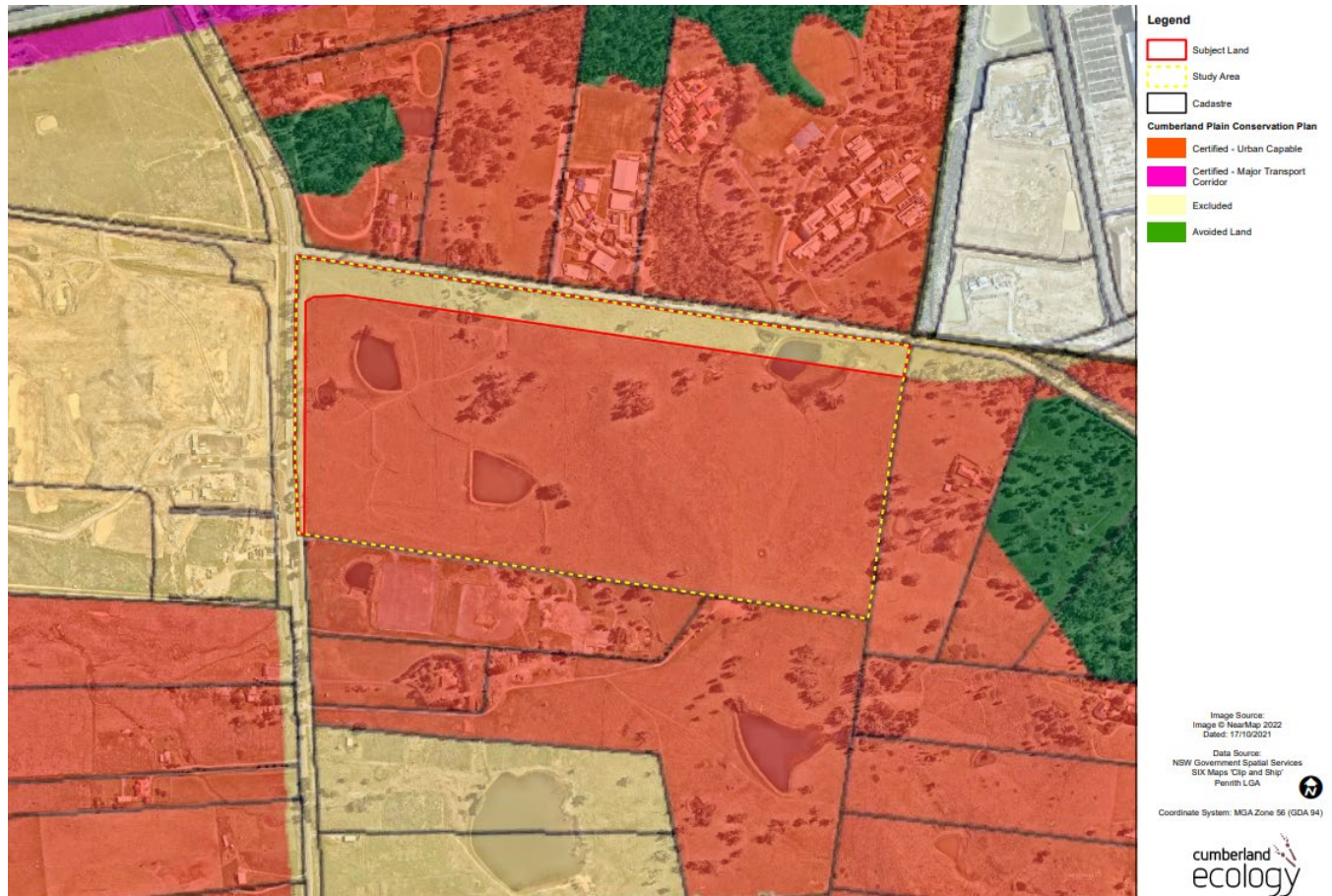


Figure 56 Cumberland Plain Conservation Plan Zoning

Source: Cumberland Ecology

6.8.2 Methodology

Existing information on biodiversity values within the assessment area was reviewed and included where appropriate, in the survey design, vegetation mapping and reporting. The existing information included:

- Survey data that is held in EES databases, including:
 - Threatened Biodiversity Data Collection (TBDC); and
 - BioNet Vegetation Classification.
- Existing vegetation mapping, being:
 - Remnant Vegetation of the western Cumberland subregion, 2013 Update. VIS_ID 4207 (OEH 2013).

Cumberland Ecology undertook the following site visits and studies:

- The landscape features requiring consideration were initially determined via a desktop assessment before a field survey were undertaken on 13 January 2022.
- Vegetation mapping was conducted with the initial mapping based on the previous broad-scale vegetation mapping that was conducted by the former Office of Environment and Heritage (2013). The native vegetation extent within the subject land was determined through aerial photograph interpretation and field surveys.

Cumberland Ecology conducted further vegetation surveys on 13 January 2022 and 28 February 2022 to revise and update the vegetation mapping.

- Desktop assessments and field surveys within the subject land included assessment of habitat constraints and microhabitats for predicted species credit flora species. Targeted threatened flora surveys were undertaken for species credits species that were assessed as candidate species credit species for further assessment.

6.8.3 Existing Environment

The subject land is approximately 7.05 ha in size. A summary of the existing landscape features, native vegetation and threaten species is provided below:

- The subject land and assessment area occur within the Hawkesbury Nepean catchment. One mapped first order watercourse occurs within the subject land. Within the subject land and wider study area the watercourse is considered to form a drainage channel.
- The native vegetation extent within the subject land is approximately 0.22 ha, which represents approximately 3% of the subject land. The remaining land within the subject land comprises exotic vegetation (6.07 ha), farm dams (0.76 ha) and cleared land (0.01 ha), totalling an area of approximately 7.05 ha.
- The subject land includes one (1) Plant Community Type (PCT) identified as Grey Box – Forest Red Gum grassy woodland on shale of the southern Cumberland Plain, Sydney Basin Bioregion which occupies 0.22 ha.
- The majority of the subject land and wider study area consists of large areas of grassland heavily dominated by exotic grass species. Exotic woody vegetation is also present surrounding the old residential building in the form of trees in lawns or as trees, shrubs, and herbaceous species in old garden beds.



Figure 57 Native Vegetation within the 'Subject Land'

Source: Cumberland Ecology

6.8.4 Assessment of Impacts

Prescribed Impacts

Prescribed impacts are identified in Clause 6.1 of the *Biodiversity Conservation Regulation 2017* (BC Regulation) and are additional to the clearing of native vegetation and associated habitat. The relevant prescribed impacts and their avoidance and minimisation measures are summarised in **Table 39** below.

Table 39 Prescribed Impacts

Prescribed Impacts	Relevance	Avoidance and Minimisation
Human-made Structures	The Proposal includes the demolition of one derelict building within the 'subject land'. This building provides potential roosting habitat for microchiropteran bats (microbats). Direct impacts to human made structures will occur during the construction phase of the project.	Due to the current condition of the human-made structure and extent of earthworks required to make the site compatible with an industrial development, impacts to human-made structures are not able to be avoided as part of the Proposal. However, potential impacts on biodiversity resulting from the demolition of the humanmade structures will be minimised through the implementation of a suite of mitigation measures, refer to Section 6.8.5 below.
Non-native Vegetation	Non-native vegetation occurring within the subject land comprises areas of woody garden plants and agricultural grasslands. This vegetation may provide some low-value habitat for native fauna species, including threatened birds and bats, on occasion. Impacts to non-native vegetation would occur during the construction phase of the project and result in a long-term impact.	Although the non-native vegetation may provide some habitat value for native fauna in terms of shelter and foraging resources, these areas are unlikely to be favoured over adjoining forest and woodland habitats outside of the subject land. Nevertheless, due to the extent of earthworks required to make the site compatible with an industrial development, impacts to the areas of non-native vegetation are not able to be avoided as part of the Proposal.
Habitat Connectivity	The subject landforms part of a patch of vegetation that largely exists as canopy trees above a highly modified understorey. Due to the historical clearing of the site, most of the subject land has low function as a corridor or connecting link. Nevertheless, the woody vegetation within the subject landforms stepping-stone habitat between larger patches of vegetation to the north and east within the assessment area. Additionally, the two dams located along the mapped watercourse within the subject land provide connectivity for the movement of aquatic species.	When considering the requirements associated with the IN1 zoning and the extent of earthworks required for the site to be compatible with an industrial development, in combination with the scattered nature of the native vegetation in the subject land and proposed works within the adjacent bio-certified land, opportunities to avoid impacts native vegetation are limited. Hence, impacts on habitat connectivity are not able to be avoided. Nevertheless, revegetation within the subject land is proposed as part of the Proposals landscaping plan in order to replant native species that are characteristic of the native vegetation communities occurring within the subject land. This will improve habitat connectivity across the subject land and to areas of native vegetation on adjacent land.
Waterbodies, Water Quality and Hydrological Processes	The subject land contains a mapped first order stream and three farm dams. These waterbodies may provide habitat for aquatic flora and fauna species and the Proposal will result in altered hydrological characteristics of the subject land.	The Proposal has been designed with suitable stormwater controls to manage stormwater runoff and minimise impacts on biodiversity. The decommissioning of the three farm dams within the subject land is also not able to be avoided, due to the extent of earthworks required for the site to be compatible with an industrial development. To minimise impacts on biodiversity associated with the decommissioning of the dams, a Dam Decommissioning Plan will be prepared and implemented. The Dam Decommissioning Plan will also apply to the decommissioning of farm dams within the wider study area to minimise impacts on native fauna.

Prescribed Impacts	Relevance	Avoidance and Minimisation
Vehicle Strikes	The proposed development will result in the creation of access roads and private driveways, thereby increasing future vehicle traffic within the subject land and thereby increase the potential of vehicle strike.	There is likely to be an increase in vehicle traffic within the subject land and thereby increasing the potential of vehicle strikes. The implementation of traffic control measures, primarily speed limits along access roads and driveways will reduce the potential for vehicle strikes on native fauna species.

Source: Cumberland Ecology

Direct Impacts

The direct impacts resulting from the Proposal is the loss of native vegetation and associated habitat within the 'subject land'. The extent of impact to vegetation and threatened species habitat within the 'subject land' are outlined in **Table 40** and **Table 41** below.

Table 40 *Extent of direct impacts to Vegetation within the 'Subject Land'*

Vegetation zone	PCT No.	PCT Name	BC Act Status	Area in the subject land
Zone 1	850 – Low	Grey Box - Forest Red Gum grassy woodland on shale of the southern Cumberland Plain, Sydney Basin Bioregion	CEEC	0.22 ha
-	-	Exotic Vegetation	-	6.07 ha
-	-	Dams	-	0.76 ha
-	-	Cleared Land	-	0.01 ha

Source: Cumberland Ecology

Table 41 *Extent of Threatened Species Impacts with the 'Subject Land'*

Scientific Name	Common Name	BC Act Status	Area
Myotis Macropus	Southern Myotis	V	0.22 ha

Source: Cumberland Ecology

Indirect Impacts

Due to the existing highly modified nature of the vegetation both within and adjacent to the 'subject land', the indirect impacts of the Proposal are not considered to be significant. The construction and operation associated with the proposed development may result in both short term and potential long term indirect biodiversity impacts:

- Inadvertent impacts on adjacent habitat or vegetation, as a result of:
 - Construction activities may result in inadvertent impacts on vegetation on Lots adjacent to the subject land, such as increase sedimentation.
- Reduced viability of adjacent habitat due to edge effects, as a result of:
 - Modification of vegetation extent within the subject land may increase edge effects.
- Reduced viability of adjacent habitat due to noise, dust or light spill, as a result of:
 - The construction activities associated with the Proposal are likely to increase the noise, dust and light above current levels within the subject land.
- Transport of weeds and pathogens from the site to adjacent vegetation, as a result of:
 - A number of high threat exotic weeds are known to occur within the subject land and may be inadvertently spread to vegetation adjacent to the subject land.
- Loss of breeding habitats, as a result of:
 - Hollow-bearing trees will be removed during construction activities.

Cumberland Ecology confirms that the above indirect impacts are either negligible in the context of the proposed development, or can be simultaneously addressed alongside the direct impacts in accordance with the proposed mitigation measures outlined in **Section 6.8.5** below.

6.8.5 Mitigation Measures

A Weed Eradication and Management Plan (WEMP) and Construction Environmental Management Plan (CEMP) have been prepared by Cumberland Ecology, which have been included at **Appendix AA** and **BB** respectively. Both the WEMP and CEMP prepared in order to minimise impacts of the Proposal on biodiversity values. A list of the proposed mitigation measures relating to biodiversity impacts are below in **Table 42** below.

Table 42 Mitigation Measures – Biodiversity

Impact/Issue	Mitigation Measures
Construction Environmental Management	• Clearing limits marked either by high visibility tape on trees or metal/wooden pickets, fencing or an equivalent boundary marker; • Disturbance, including stockpiling, restricted to clearing limits; • Pre-clearance surveys will be conducted in all areas of vegetation that are required to be cleared; • Pre-clearing surveys will be undertaken within one week of clearing; • Habitat features will be marked during the pre-clearing survey; • Vegetation clearing will be conducted using a two-stage clearing process; and • Animals disturbed or dislodged during the clearance but not injured will be assisted to move to adjacent bushland or other specified locations.
Weed Control	• A WEMP will be prepared to outline appropriate weed control activities required within the subject land. Weed management is to be undertaken in accordance with the Greater Sydney Regional Strategic Weed Management Plan 2017 – 2022 (LLS: Greater Sydney 2017) • Vegetation clearing will be conducted using a two-stage clearing process. • Animals disturbed or dislodged during the clearance but not injured will be assisted to move to adjacent bushland or other specified locations. • If animals are injured during the vegetation clearance, appropriate steps will be taken to humanely treat the animal (either taken to the nearest veterinary clinic for treatment, or if the animal is unlikely to survive, it will be humanely euthanized).
Dam Decommissioning	• Prior to dam decommissioning activities a Dam Decommissioning Plan is to be prepared that includes a strategy for decommissioning of the eleven dams within the subject land and a relocation site for any fauna captured.
Erosion, sedimentation and pollution	• Construction activities will be undertaken in accordance with “The Blue Book” (Landcom 2004). These include implementation of the following measures: - Installation of sediment control fences; - Covering soil stockpiles; and - Avoiding soil disturbance prior to heavy rainfall.

6.9 Social and Economic Impact

A Social and Economic Impact Assessment (SEIA) has been prepared by Ethos Urban and is included at **Appendix CC**. The assessment finds that there are no significant or detrimental social or economic impacts anticipated to arise as a result of the proposed development that cannot be effectively mitigated and managed.

6.9.1 Methodology

The Social and Economic Impact Assessment has been undertaken in accordance with the SEARs dated 22 November 2021, as well as the Social Impact Assessment Guideline for State Significant Projects (NSW DPE 2021). The SIA Guideline is considered by NSW Government to represent best practice in social impact assessment processes and provides a consistent framework and approach to the assessment of social impacts associated with all state-significant projects and developments in NSW.

In the absence of formal guidelines available from the DPHI for economic impact analysis, the methodology for this economic assessment has been developed with consideration of typical socio-economic assessment practices. Key steps in undertaking the economic assessment have included: analysis of the existing locality and the community, including its economic profile; identification and assessment of potential impacts (both direct and indirect) as a result of the proposed development, and recommendations for mitigation or enhancement measures if necessary.

The baseline profile for current businesses and the economy within the defined study area was developed using published data sources, including the Australian Bureau of Statistics (ABS), with this data supplemented by additional information where available.

6.9.2 Existing Environment

For the purposes of the social and economic assessment, a study area has been defined to assess the local social and economic context. The Study Area has been defined using Australian Bureau of Statistics (ABS) Statistical Area 1 (SA1) boundaries that best align with the overall MRP. The MRP is considered of most relevance to the proposed project in informing the socio-economic context of the local area and objectives for the precinct. A map outlining the MRP and Study Area for this analysis is shown **Figure 58** below.

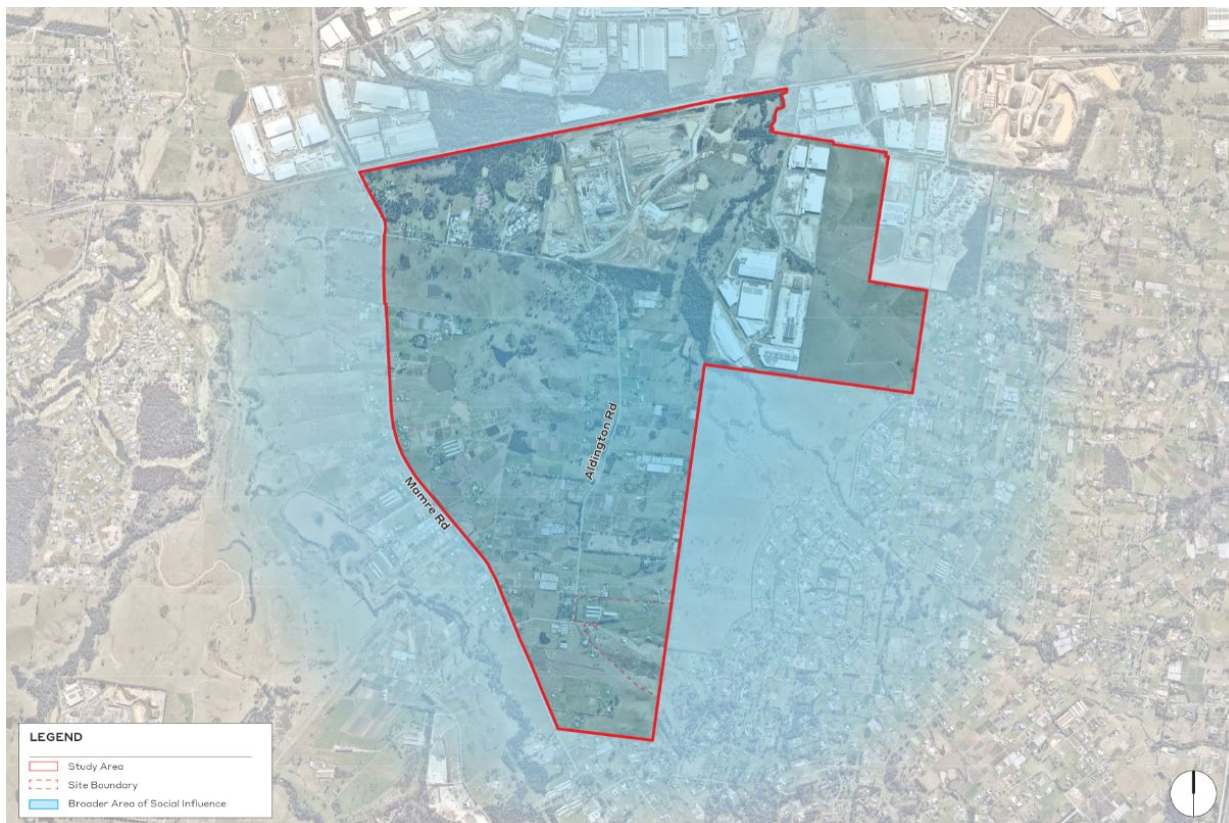


Figure 58 Social and Economic Study Area

Source: Ethos Urban

6.9.3 Social Impact Assessment

A summary of the Social Impact Assessment is provided in **Table 43** below.

Table 43 Social Impact Assessment Summary

Surroundings – Access to and use of built and natural environment, public safety, amenity	
Overall Social Impact Rating	Social impact ratings associated with the change to amenity and surroundings is considered Medium with following overall ratings: • Construction: High (Likely Moderate) – Negative. • Operation: Medium (Likely Minor) – Negative.
Duration	Construction impacts are temporary. Potential for ongoing impacts with the operation of the development.
Extent	Impacts are likely to be experienced predominantly by existing residents and workers within the precinct, and users of Mamre Road and Abbotts Road both during construction and operational phases.
Severity/ sensitivity	Moderate due to proximity of sensitive receivers (less than 100 metres).
Potential to mitigate/ enhance	High potential to mitigate negative social impacts through Construction Management Plans, Operational Management Plans and the design and landscaping of the development.
Health and wellbeing – Physical, mental, social and spiritual	
Overall Social Impact Rating	Social impact ratings associated with the change to health and wellbeing of local community is considered Low to Medium with following overall ratings: • Construction: Medium (Likely Moderate) – Negative. • Operation: Low (Possible Minimal) – Negative.
Duration	Construction impacts are temporary, however, care should be given to ensure that construction impacts do not deteriorate the health and wellbeing of those in the immediate vicinity of the site.
Severity/ sensitivity	A cluster of sensitive receivers are located adjacent the site, with Mamre Anglican School located less than 100 metres from the closest building on the site. There is a high Aboriginal cultural association, moderate scientific and aesthetic significance, and some historical significance in relation to the site.
Extent	Impacts are predicted to be felt by users of local area during construction phase and workers and users of this site during the operational phase.
Potential to mitigate/ enhance	High potential to mitigate impacts and enhance benefits through implementation of Construction Management Plans and Operational Management Plans.
Community – Including its composition, cohesion and character	
Overall Social Impact Rating	Social impact ratings associated with the change to the size and composition of the local community is considered High to Very High with following overall ratings: • Construction: High (Likely Moderate); and • Operation: Very High (Almost Certain Transformational), noting cumulative impacts. Whilst the change would be High to Very High (and would be perceived either negative or positive depending on particular receiver), the change would involve a significant socioeconomic benefit in the contribution to significant employment opportunities within the local community, if the change is well mitigated and communicated.
Duration	Changes to the local community composition would be permanent
Severity/ sensitivity	The change from the existing degree will be substantial but the broader sensitivity low given that the land has already been zoned for employment purposes and the impact considered. A cluster of sensitive receivers are located adjacent the site, with Mamre Anglican School located less than 50 metres from the closest building on the site.
Extent	MRP and the broader WSEA

Potential to mitigate/enhance	Potential to mitigate impacts by implementing a strategy to source local goods and employment, and ensuring effective communications channels are available to residents to voice concerns, and information on the progress of the development is shared.
Culture – Share beliefs, customs, values and stories, and connections to land, places, buildings	
Overall Social Impact Rating	Social impact ratings associated with the change to the local culture is considered High with following overall ratings: • Construction: Medium (Possible Moderate) – Negative. • Operation: High (Likely Moderate) – Negative, noting cumulative impacts.
Duration	Permanent impact
Severity/ sensitivity	The change from the existing will be substantial but the sensitivity low given that the land has already been zoned for employment purposes and the impact already considered and the community already aware. There is a high Aboriginal cultural association, moderate scientific and aesthetic significance, and some historical significance in relation to the site
Extent	The site, MRP and the broader WSEA
Potential to mitigate/enhance	Low - ongoing communication with existing residents and the community to minimise disturbance during the transition period.
Access to and use of infrastructure, services, and facilities	
Overall Social Impact Rating	Social impact ratings associated with changes related to access and use of infrastructure is considered Medium with following overall ratings: • Construction: Medium (Possible Moderate) – Negative. • Operation: Medium (Possible Minor) – Negative.
Duration	Increased traffic and potential need for access to daily needs in the local area are long term.
Severity/ sensitivity	Severity and sensitivity is considered to be moderate in relation to the Proposal. A cluster of sensitive receivers (schools, childcare, aged care) are located adjacent the site, who may be impacted by the increased traffic in the area.
Extent	Impacts would extend to users of the local road network from the MRP and beyond.
Potential to mitigate/enhance	Construction impacts can be managed through construction traffic management plan. Operational impacts can be mitigated by collaborating with relevant stakeholders to ensure sufficient infrastructure provision within the broader precinct.
Way of life – How people live, get around, work, play and interact with one another each day	
Overall Social Impact Rating	Social impact ratings associated with changes to way of life is considered Low to Medium with following overall ratings: • Construction: Medium (Possible Moderate) – Negative. • Operation: High (Likely Moderate) – Changes could be perceived either as Negative or Positive, depending on the receiver.
Duration	Most potential negative impacts will occur during the construction phase. Most potential positive social benefits will occur during the operational phase.
Severity/ sensitivity	Severity and sensitivity is considered to be moderate in relation to the Proposal. A cluster of sensitive receivers (schools, childcare, aged care) are located adjacent the site, who may be impacted by the increased traffic in the area.
Extent	Construction phase impacts would extend to the locality; operational benefits would extend to Penrith LGA and beyond.
Potential to mitigate/enhance	High – construction impacts can be managed through environmental management plan and construction traffic management plan. Operational benefits can be enhanced by implementing a strategy to source local goods and employment, and ensuring effective communications channels are available to residents to voice concerns, and information on the progress of the development is shared.
Livelihoods – People's capacity to sustain themselves	

Overall Social Impact Rating	The proposed development will have Medium to High positive benefits in respect to livelihoods, associated with the delivery of new employment opportunities in the Precinct: • Construction: Medium (Likely Minor) – Positive. • Operation: High (Likely Moderate) – Positive.
Duration	Construction impacts are short term, operational impacts are long term.
Severity/ sensitivity	Severity and sensitivity is considered to be moderate in relation to the Proposal. A cluster of sensitive receivers (schools, childcare, aged care) are located adjacent the site, who may be impacted by the increased traffic in the area.
Extent	Both construction and operational phase are likely to draw workers from Penrith LGA and beyond.
Potential to mitigate/ enhance	High – benefits to the local community are likely if local and social procurement and staffing principles are applied.

Source: Ethos Urban

6.9.4 Economic Impact Assessment

It is anticipated that the proposed development will result in significant positive economic benefits, including the provision of employment opportunities at the site, while also benefitting from its location within a strategically planned employment precinct, and in close proximity to major infrastructure projects.

Principally, economic benefits will stem from the location of the proposed development within the MRP. By providing additional industrial and employment floorspace that will support demand for warehousing and industrial facilities in this part of Sydney, the Proposal will align with the needs of modern tenant and business requirements, supporting the long term potential and objectives of the locality. A summary of the Economic Impact Assessment is provided in **Table 44** below.

Table 44 Economic Impact Assessment Summary

Operational Impacts

Any impact from the proposed development is anticipated to be limited, and will not impact on the viability or continued operation of any facility within the area. The proposed development will result in a redevelopment of the site, consistent with existing government plans and strategic objectives for the precinct.

The precinct has been planned to allow for adequate distance and buffers to surrounding facilities and uses, including residential. Furthermore, modern industrial developments are increasingly efficient, with stricter environmental controls and standards, together with technological advancements in building materials and operations. This is leading to facilities and services that are better designed, quieter, cleaner and have a reduced impact on the surrounding area.

Given the location of the proposed development within a planned industrial precinct, and the provision of sophisticated and modern warehouse facilities, impacts on surrounding operations or uses are anticipated to be limited.

Construction Employment

Based on a construction cost of \$323 million, the construction phase is expected to directly support employment of 390 job-years and deliver a direct value-add to the economy of \$70.5 million. When the multipliers are taken into account, total state economy-wide effects over the construction program are forecast to be:

- Employment of 1,830 job-years and a total direct value-add to the economy of \$261.1 million.

Ongoing Employment

The total ongoing economy-wide effects are estimated at:

- FTE employment of 3,390 jobs supported and a total direct value-add to the economy of \$625.8 million per annum.
- Taking into account the above, the proposed development could ultimately account for around 8.5% of total jobs provided within the MRP (of 17,000 total workers) based on direct FTE jobs of 1,450. Of the estimated 1,450 direct FTE jobs, this includes an estimated 526 office-based workers and 8 retail jobs. Accordingly, the Proposal would also align with government objectives to increase the provision of knowledge-based workers in Western Sydney by accommodating over 500 office based workers within the development.

Other Economic Benefits

The proposed development at 706-752 Mamre Road, Kemps Creek will deliver an array of economic benefits. In particular, the site will deliver an industrial precinct that will respond to the growing need for modern industrial and employment uses that align with modern tenant requirements and the strategic objectives for Western Sydney. Other benefits associated with the development include:

Operational Impacts

- The Proposal will support the role of the MRP as a key industry and employment precinct serving the local area as well as the broader region;
- Contribute to attracting and securing investment and high value tenants and businesses within Western Sydney, by providing a critical mass of modern facilities in an integrated precinct; and
- Support Government objectives of delivering higher order employment opportunities associated with more advanced warehousing and manufacturing facilities across Western Sydney, specifically within the WSEA and Western Sydney Aerotropolis.

The site provides a unique opportunity to deliver a range of benefits through the development of a modern, integrated industrial precinct, within a strategic industrial employment zone. The proposed development will support significant employment benefits as well as broader benefits to the local and regional community.

Source: Ethos Urban

6.9.5 Mitigation Measures

The proposed mitigation measures in relation to social and economic impact are summarised in **Table 45** below.

Table 45 *Mitigation Measures – Social and Economic Impact*

Impact/Issue	Mitigation Measures
Monitoring and Measurement Framework	To monitor and measure the ongoing impact of the proposed development on relevant stakeholders and the surrounding community, the following framework is to be put in place: • During construction: - Development of a Construction Management Plan that includes a complaint handling procedure for identifying and responding to community issues related to construction impacts. - Ongoing consultation with relevant stakeholders, including local residents and workers in the emerging Mamre Road Precinct to identify and manage impacts promptly. • During operation: - Continued consultation with relevant stakeholders, including future tenants of the site. - Development and implementation of an operational plan of management that mandates data collection (e.g. complaints register) to enable ongoing monitoring of the performance of the 706-752 Mamre Road development over time.

6.10 Ecologically Sustainable Development

An Ecologically Sustainable Development (ESD) Report has been prepared by Northrop and provided at **Appendix DD**. A summary of the proposed development's response to Ecologically Sustainable Development (ESD) principles is provided below.

6.10.1 Cool Roofs

In considering the changing of climates, especially the trajectory towards a warmer and drier weather the Proposal is recommended to use green walls and green roofs / cool roofs with light-coloured materials to reduce the urban heat effect. Products such as Colorbond "Coolmax" could be utilised to achieve these objectives. It is noted that this material selection would be conducted at the detailed design stage of the proposed development.

6.10.2 Water and Energy Efficiency

The energy conservation strategies considered for the Proposal are included below:

- Energy reduction has been considered in the design of the building, through passive and active energy efficiency measures. Key features include:
 - Passive solar design;
 - Heating, Cooling and Ventilation Air Conditioning (HVAC) System;
 - Lighting; and
 - Energy Sources.
- Water reduction has been considered in the design of the building, through passive and active water efficiency measures. Key features include:
 - Water-Efficient Fixtures and Appliances;
 - Use of Treated Rainwater for Non-Potable Uses; and
 - Outdoor Water Usage.

6.10.3 Ecologically Sustainable Strategies

The following sustainable design principles have been proposed for the development:

- **Ecosystems** – Opportunities to integrate ecological systems into the landscape will be investigated;
- **Health, comfort and wellbeing** – Measures to improve air quality and thermal comfort to be considered;
- **Water** – Building services, excluding industrial plant and operations will reduce potable water demand and retain the quality of stormwater runoff;
- **Energy** – Measures to improve energy efficiency and resilience against grid disruptions to be considered;
- **Materials** – Reduced supply chain impacts of materials;
- **Transportation** – To promote the use of "green transportation" and relieve any traffic pressures on nearby roads and local communities; and
- **Climate adaption** – Consideration of changing climates, especially the trajectory towards a warmer and drier weather.

Summit at Kemps Creek will incorporate the set of ESD strategies which minimise the impact and, where feasible, enhance the ecological, social and economic outcomes for construction workers, future tenants, the wider community and ecosystem ecologies both local, regional and global.

6.11 Air Quality

An Air Quality Impact Assessment has been prepared by SLR and is provided at **Appendix EE**, which includes a qualitative assessment of the air quality, dust and odour impacts arising from the Proposal, as well as associated mitigation measures. Further detail regarding this assessment is provided in the following subsections.

6.11.1 Methodology

The air quality impacts as a result of the construction (including remediation) of the Proposal are addressed via application of the *IAQM Guidance on the Assessment of Dust from Demolition and Construction* (IAQM) developed in the United Kingdom by the Institute of Air Quality Management.

Currently, information on the site-specific operations (e.g., tenant operations, vehicle numbers and types etc) is unknown. It is anticipated that should the activities of a proposed tenant have potential to contribute to adverse air quality in the vicinity of the Site that a detailed air quality impact assessment would be required prior to approval to operate. As a result, a general 'risk based' assessment of air emissions associated with warehousing operations has been prepared for this application.

As it is not currently known what tenants or industries will be located within the site, nor the type and quantity of air emissions, it is not possible to complete a quantitative assessment of air quality. As such a memorandum was submitted to the EPA (dated 24 January 2022) outlining information to support a qualitative impact assessment in contrast to the quantitative assessment approach prescribed by the SEARs.

A desktop review was undertaken to identify existing and future air emission sources in the vicinity of the site with potential to give rise to cumulative impacts on air quality. The review included:

- A review of aerial imagery of the region surrounding the site location;
- A search of the National Pollutant Inventory to identify facilities located within 2 km of the site boundary; and
- A search of current and future projects listed on the NSW Major Projects Portal.

6.11.2 Existing Environment

Based on the desktop review undertaken by SLR, the types of existing and future sources of air pollution have been identified as:

- Products of fuel combustion (including particulates) from local road and air traffic, as well as a number of existing industrial sites within the industrial park to the north;
- Nuisance dust from other construction projects in the area; and
- Dust from the existing Elizabeth Drive Landfill.

Relevant environmental factors relating to the air quality of the site are outlined below.

Topography

The topography of the immediate area surrounding the site is relatively flat, with an uphill gradient towards the residential areas of Kembla (height difference 20-50m). Illawarra escarpment (750 m height) is located approximately 12 km to the West.

The area around the site is open and is comprised of unused land, laydown yards and warehouse buildings. The local area is predominately cleared of natural vegetation, with some isolated clusters of trees to the southwest and east. This would facilitate dispersion of air emissions and prevent 'pooling' of air pollutants.

Local Meteorological Conditions

The closest weather station to the site is the Horsley Park Equestrian Centre AWS located approximately 600 metres to the southeast of the site. Data from 2017 to 2021 indicates the predominant wind directions in the area are from the southwest. Calm wind conditions (wind speed less than 0.5 m/s) were recorded 7.8% of the time throughout the five-year period.

Ambient Air Quality Monitoring Data

The nearest air quality monitoring stations (AQMS) is located at St Marys, approximately 8 km to the north of the site. Data from 2017 to 2021. Data shows exceedances of the 24-hour average PM₁₀ criterion were recorded by the St Marys AQMS in 2018 to 2021. Available compliance monitoring reports indicate that the exceedances recorded

by the St Marys AQMS were primarily due to exceptional events, such as bushfire emergencies, dust storms and hazard reduction burns.

However, there were no exceedances of the annual average PM₁₀ criterion and the monitoring data for NO₂ indicate that the respective air quality criteria (short term and long term) for this pollutant are easily achieved at the St Marys AQMS site.

6.11.3 Assessment of Impacts

SLR have undertaken a qualitative modelling assessment of potential air emissions associated with the existing sources in the vicinity of the Proposal, those caused by the operation of the Proposal, and assessment of the Proposal’s construction emissions.

Construction Dust Emissions Assessment

In line with Step 2 of the IAQM Model, a risk assessment of the dust effects from the activities based on the scale and nature of the works, which determines the potential dust emission magnitude and the sensitivity of the area surrounding dust-generating activities. The results of the risk assessment are outlined in **Table 46** below.

Table 46 Preliminary Risk of Air Quality Impacts from Construction Activities (uncontrolled)

Impact	Sensitivity of area	Dust emission magnitude				Preliminary risk			
		Demolition	Earthworks	Construction	Trackout	Demolition	Earthworks	Construction	Trackout
Dust Soiling	High	Small	Large	Large	Large	Medium risk	High risk	High risk	High risk
Human Health	Medium					Low risk	Medium risk	Medium risk	Medium risk

Source: SLR

The results indicate that there is a high-medium risk of adverse dust soiling and human health impacts occurring at the off-site sensitive receptor locations if no mitigation measures were to be applied to control emissions during the earthworks, construction and trackout phases of the works.

Operational Assessment

The risk-based assessment takes account of a range of impact descriptors, including the following:

- Nature of Impact: does the impact result in an adverse, neutral or beneficial environment?
 - The nature of impact is anticipated to be neutral to the environment.
- Receptor Sensitivity: how sensitive is the receiving environment to the anticipated impacts?
 - The nearest sensitive receptors to the Proposal Site include schools within 100 m of the boundary. The sensitivity of the surrounding residential areas to emissions from the Proposal Site should be considered high.
- Magnitude: what is the anticipated scale of the impact?
 - Based on the relatively small amount of traffic movements on site, the magnitude of these emissions considered to be negligible.

Given the above considerations, and the scale of operations, the potential impact of the Proposal on the local sensitive receptors is concluded to be neutral for all receptors.

It is noted that this assessment is based on warehousing operations only. If at the development stage, other industrial uses are proposed with potential to generate air quality emissions, then site specific air quality impact assessment should be prepared.

6.11.4 Mitigation Measures

The recommended Air Quality mitigation measures are outlined in **Table 47** below.

Table 47 Mitigation Measures – Air Quality

Impact/Issue	Mitigation measures
Communications	- Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environment manager/engineer or the site manager. - Display the head or regional office contact information. - Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the Local Authority.
Site Management	- Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken. - Make the complaints log available to the local authority when asked. - Record any exceptional incidents that cause dust and/or air emissions, either on- or offsite, and the action taken to resolve the situation in the log book.
Monitoring	- Carry out regular site inspections to monitor compliance with the DMP, record inspection results, and make an inspection log available to the local authority, when asked. - Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.
Preparing and Maintaining the Site	- Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible. - Erect solid screens or barriers around dusty activities or the site boundary that is at least as high as any stockpiles on site. - Keep site fencing, barriers and scaffolding clean using wet methods. - Cover, seed or fence stockpiles to prevent wind erosion.
Operating Vehicle/Machinery and Sustainable Travel	- Ensure all on-road vehicles comply with relevant vehicle emission standards, where applicable. - Ensure all vehicles switch off engines when stationary - no idling vehicles. - Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable.
Operations	- Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate. - Use enclosed chutes and conveyors and covered skips. - Minimise drop heights from loading shovels and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.
Waste Management	Avoid bonfires and burning of waste materials.
Construction	- Avoid scabbling (roughening of concrete surfaces) if possible. - Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.
Trackout	- Use water-assisted dust sweeper(s) on the access and local roads to remove, as necessary, any material tracked out of the site. - Avoid dry sweeping of large areas. - Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport. - Record all inspections of haul routes and any subsequent action in a site log book. - Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).
Operation	- Minimising the time waste materials are stored on site by maintaining a first in – first out policy for transfers into and out of the Proposal site. - Checking loads prior to unloading to ensure they are suitable for unloading at the site.

Impact/Issue	Mitigation measures
	• Maintaining good housekeeping on all areas of the Proposal Site, including regular cleaning of all internal areas of the Proposal site. • Limiting truck engine operating times to a minimum. It is recommended that vehicles engines be turned off if the vehicle is going to be stopped for more than 5 consecutive minutes. • Cleaning up spills immediately and disposing of waste in accordance with relevant state and federal requirements. • Investigating any complaint as soon as possible so that effective appraisal of the complaint can be carried out by subjective assessment. • Conducting staff awareness training to increase staff awareness of potential air quality and odour impacts which may be caused by the site activities during normal and abnormal circumstances.

6.12 Waste

A Waste and Resource Recovery Management Plan (WRRMP) has been prepared by Sustainable Development Consultants and included at **Appendix FF**.

6.12.1 Methodology

The WRRMP has assessed the procedures to be undertaken to manage waste, quantities and classifications of waste, storage, handling and disposals as well as the measures to be implemented to ensure that the development is consistent with the Waste Regulatory Framework.

6.12.2 Demolition Waste And Construction Waste

During demolition and construction, measures will be adopted to maximize resource recovery and to minimize waste from the Proposal, also ensuring that all materials suitable for either reuse or recycling are separated and do not end up in landfill. Before demolition and construction commences, all likely waste will be identified and strategies put in place to ensure appropriate separation, storage, signage and collection of each waste stream in order to maximize what waste can be either reused or recycled. In addition to this, strategies will also be put in place to minimize what waste is generated.

For the demolition of existing structures on site, including fencing, ‘deconstruction’ is to be adopted, so all materials are carefully dismantled and sorted in order to maximise the opportunity of salvaging materials for either reuse or recycling. During construction, a multi-bin approach is to be adopted, so for each identified waste stream there will be individual bins or locations for the storage of each separate waste stream, so waste can be separated and sorted for recycling and/or reuse. This will include appropriate signage on the bins or at each location, to identify each waste stream to be sorted.

6.12.3 Operational Waste – Stage 1

The estimated weekly operational waste quantities for Stage 1 are summarised in **Table 48** below.

Table 48 Total Estimated Weekly Waste Generation – Stage 1

Outlet Type	General waste		Commingled recyclables (40%)	Recycling	
	Garbage (70%)	Food organics (30%)		Glass (10%)	Paper & cardboard (50%)
Warehouse 1	30,499L	294L	12,320L	3,080L	15,400L
Warehouse 2	15,925L	189L	6,447L	1,617L	8,057L
Warehouse 3	13,314L	161L	5,390L	1,351L	6,741L
Total	59,738L	644L	24,157L	6,048L	30,198L

Source: Sustainable Development Consultants

6.12.4 Operational Waste – Concept Masterplan

The estimated weekly operational waste quantities for the Concept Masterplan are summarised in **Table 49** below.

Table 49 Total Estimated Weekly Waste Generation – Concept Masterplan

Outlet Type	General waste		Commingled recyclables (40%)	Recycling	
	Garbage (70%)	Food organics (30%)		Glass (10%)	Paper & cardboard (50%)
Warehouse 1	30,499L	294L	12,320L	3,080L	15,400L
Warehouse 2	15,925L	189L	6,447L	1,617L	8,057L
Warehouse 3	13,314L	161L	5,390L	1,351L	6,741L
Warehouse 4	33,236L	266L	13,398L	3,353L	16,751L

Outlet Type	General waste		Recycling		
	Garbage (70%)	Food organics (30%)	Commingled recyclables (40%)	Glass (10%)	Paper & cardboard (50%)
Warehouse 5	15,407L	154L	890L	1,561L	7,784L
Warehouse 6	15,407L	154L	890L	1,561L	7,784L
Warehouse 7	33,236L	266L	13,398L	3,353L	16,751L
Warehouse 8	26,831L	280L	10,850L	2,723L	13,559L
Café	4,578L	511L	1,358L	343L	1,694L
Total	188,433 L/Week	2,275 L/Week	64,941 L/Week	18,942 L/Week	94,521 L/Week

Source: Sustainable Development Consultants

6.12.5 Mitigation Measures

The proposed mitigation measures in relation to waste are outlined in **Table 50** below.

Table 50 Mitigation Measures – Waste

Impact/Issue	Mitigation Measures
Construction	
Demolition and Construction Waste	- Before demolition and construction commences, all likely waste will be identified and strategies put in place to ensure appropriate separation, storage, signage and collection of each waste stream in order to maximize what waste can be either reused or recycled. In addition to this, strategies will also be put in place to minimize what waste is generated. - For the demolition of existing structures on site, including fencing, 'deconstruction' is to be adopted, so all materials are carefully dismantled and sorted in order to maximise the opportunity of salvaging materials for either reuse or recycling. - During construction, a multi-bin approach is to be adopted, so for each identified waste stream there will be individual bins or locations for the storage of each separate waste stream, so waste can be separated and sorted for recycling and/or reuse. This will include appropriate signage on the bins or at each location, to identify each waste stream to be sorted.
Operation	
Waste Storage and Collection	- The waste collection bins for the Warehouses within this development are proposed to be stored inside of each warehouse, in locations accessible to the loading bays and waste collection is to be undertaken within each loading bay. - For each tenancy, the waste collection vehicles are able to drive up to the loading bays and utilize the driveway and hardstand areas to manoeuvre and turn, so that they can enter and exit this property in a forward direction. - The waste collection bins for the Café are proposed to be stored inside a dedicated bin enclosure, in a location where bins are easily accessible to the internal road, where waste vehicles will be able to park and access the bins at collection times. This bin enclosure will be roofed and fully enclosed. - For the Cafe, the waste vehicles will be able to drive in a forward direction up to and park close to the bin enclosure without reversing, and then collect and empty the collection bins and then return the empty bins to the bin enclosure, and then utilizing the road network within this development, exit this property in a forward direction.
Maintenance	Each warehouse facility and the café will be responsible for the upkeep and cleaning of their own bins as well as maintaining the location where the collection bins are stored within their warehouse unit, including installing and maintaining vermin traps within these areas. A tap will be provided under the canopy for each warehouse facility, including a floor waste connected to sewer, to enable each warehouse facility to clean their bins. The private waste contractor will undertake maintenance and repairs on the bins as and when necessary.

Impact/Issue	Mitigation Measures
Additional Waste Streams	• Although bin sizes have been selected to provide additional capacity, each warehouse and the café has space for either additional bins or to provide larger bins, should this be determined to be necessary for either additional waste streams or if more waste is generated to that estimated based on industry generation rates. • Although a significant portion of products are expected to arrive on rented timber pallets which are collected and reused, there is a proportion of deliveries which may arrive on non-returnable or re-usable timber pallets. These non-reusable timber pallets are to be stored/stockpiled within each warehouse facility and then collected as and when required and taken away to be either recycled or mulched. • Where any warehouse facility generates expanded polystyrene (EPS) packaging sheets often utilised within containers as packing, this will be collected as a separate waste stream and stored on pallets within their warehouse and then collected as and when required and taken away to be recycled. • Within each Warehouse, an area will also be provided for hard waste items such as broken furniture and equipment as well as e-waste. Also, within the office printing and utility areas of each warehouse, recycling centres will be created which will include specialist collection bins for printer ink cartridges as well as e-waste and batteries etc. The level of hard waste and e-waste will need to be managed by each facility and collection and disposal at an appropriate facility by a private contractor arranged as required. • In addition to other waste streams listed above, a private specialist waste contractor will also be engaged to undertake removal of sharps containers and a clinical waste bin located within any first aid room within any facility. The clinical waste bin will be clearly distinguishable by colour and signage to other bins within this facility. There will also be information on the safe and proper use of sharp containers and clinical bin, within the first aid room. The sharps containers and clinical waste bin will be collected on an arrangement directly with a specialist private waste contractor, directly from the first aid room, via a direct exchange according to a 'no touch' policy. • Private maintenance contractors will be employed to regularly attend to and maintain all garden areas at this property and they will be responsible for the removal and disposal of all garden waste as part of their contract. It will be a requirement that removed garden waste is to be disposed of as garden organics for compost or mulching.
Internal Bins	• Within the office areas, there are to be no under desk single bins provided. Instead, bin stations are to be created in convenient locations, which enable the separation and collection of each waste stream being: - Garbage; - Food organics; - Commingled recyclables; - Glass; and - Clean paper and cardboard. • Within printing and utility areas, recycling centres are to be created to maximise collection of clean paper and cardboard and in addition to this, there are to be specialist collection bins for printer ink cartridges as well as e-waste, batteries or other recycling items regularly needing to be disposed of. • The need for the monitoring of bins, and the identification and reporting of incorrect bin use, will need to be assigned. Possible reporting on improved waste outcomes could also be included as part of the general waste reporting provided by private waste contractors. • Appropriate signage will be placed where the collection bins are stored and where internal bins are distributed throughout this project. Visual prompts stuck to the collection bins and posters will assist in the proper disposal of the different types of waste.

6.13 Contamination

A Remedial Action Plan (RAP) and Detailed Site Investigation (DSI) has been prepared by JBS&G and included at **Appendix GG** and **HH** respectively. A summary of the assessment and proposed mitigation measures is provided below.

6.13.1 Methodology

A number of previously completed assessment reports have contributed to inform the RAP, they include both historical and information relating to investigations conducted at that time. The assessment report include:

- Combined Preliminary Environmental Site Assessment and Salinity Assessment prepared by Pells Sullivan Meynink Pty Ltd (2010);
- Due Diligence, 706-752 Mamre Road, Kemps Creek prepared by JBS&G (2020); and
- Detailed Site Investigation, 706-752 Mamre Road, Kemps Creek prepared by JBS&G (2020).

The RAP has been prepared with reference to relevant guidelines made or endorsed by the NSW Environment Protection Authority (EPA) inclusive of National Environment Protection Council (NEPC 2013), and the requirements of Chapter 4 Remediation of Land of State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP).

6.13.2 Existing Environment

The extent of contamination at the site is summarised as follows:

- Identified and potentially contaminated media are principally associated with the historic light agricultural and rural residential land use, including the presence of hazardous building materials (asbestos/lead paint) within site structures (current/former) which have impacted shallow surface soils. In isolated areas, the breakage/weathering of bonded Asbestos Contaminated Materials (ACM) has resulted in friable asbestos impacted surface soils (RZ10). Potential contamination has also been identified in shallow and subsurface soils adjacent to site infrastructure, including a single septic tank and maintenance bore.
- Uncontrolled fill at the site was limited, with embankments of dams generally comprising natural/reworked natural soils. Building and demolition material was noted to have been applied to the upgradient banks of several dams (as surficial stabilising media), with a single bonded ACM conduit fragment identified at one location. Uncontrolled fill of unknown origin (potentially associated with demolition of some site structures) was also identified in the southern portion of the site (elongated embankment) which was impacted with bonded ACM and waste material considered to pose an aesthetic issue.
- Levels of soil, sediment, surface water and groundwater constituents otherwise have not been reported at a level that pose a potential risk to site receptors under the proposed commercial/industrial land use.

The locations of the aforementioned contamination and aesthetic impacts and the location of infrastructure are shown in **Figure 59** below.

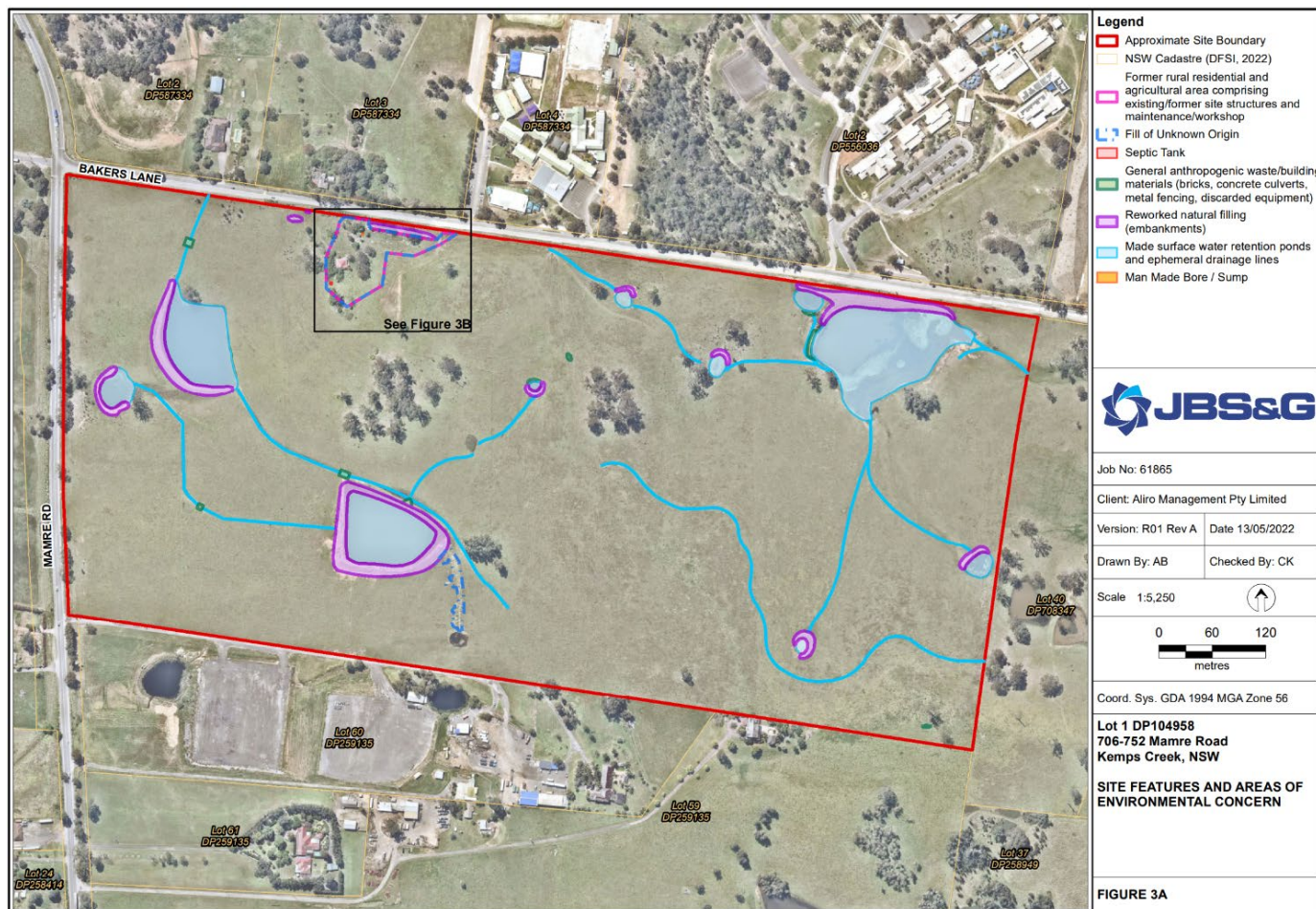


Figure 59 Site Features and Areas of Environmental Concern

Source: JBS&G

6.13.3 Assessment of Impacts

Preferred Remediation Strategy

A number of potential remedial options were considered by JBS&G, following consideration a preferred remedial strategy was identified, it includes:

- Excavation and off-site disposal of AF/FA impacted fill at RZ10;
- Excavation of material identified to contain bonded ACM below the health criteria and relocation to a designated portion of the site where it will be inaccessible to future site users (where it will be subject to an AMP to meet WHS requirements);
- Inspection and removal of ACM from surface building rubble identified adjacent to retention pond embankments across the site;
- Removal of surface and sub-surface anthropogenic material considered to pose an aesthetic issue (as defined in Section 4.1) and considered not suitable for on-site retention to a landfill/licensed waste facility and/or relocation and retention on site at depth/in inaccessible areas, where appropriate;
- Excavation of stained/odorous soils at TP130 and management of the material (re-location) to a designated portion of the site such that the material does not pose an aesthetic issue under the development scenario.

The inferred extent and location of the above issues requiring remediation and, or management are illustrated in **Figure 60** below.

6.14 Bush Fire

A Bush Fire Assessment Report has been prepared by Bushfire Consulting Services and included at **Appendix II**. A summary of the assessment and proposed mitigation measures is provided below.

6.14.1 Methodology

Section 8.3 of Planning for Bushfire Protection 2019 (PBP) prescribes the assessment methodology and bushfire protection measures for land uses that do not involve a habitable dwelling or Special Fire Protection Purpose (SFPP) development, which is what the proposed development is categorised as. As stated within Section 8.3.1 of PBP, the National Construction Code (NCC) does not provide for any bushfire specific performance requirements for these types of uses and therefore the Asset Protection Zones (APZ) and Bushfire Attack Levels (BAL) do not apply as deemed-to-satisfy provisions for bushfire protection.

As such, an assessment against four key objectives has been applied in the case of the proposed development, comprising the following:

- Provide safe access to/from the public road system for firefighters providing property protection during a bush fire and for occupant egress for evacuation;
- Provide suitable emergency and evacuation (and relocation) arrangements for occupants of the development;
- Provide adequate services of water for the protection of buildings during and after the passage of bush fire, and to locate gas and electricity so as not to contribute to the risk of fire to a building; and
- Provide for the storage of hazardous materials away from the hazard wherever possible.

Bushfire Consulting Services undertook a site visit on 10 December 2021.

6.14.2 Bushfire Prone Land

In accordance with the Penrith City Council Bushfire Prone Land Map, the site is classified as bushfire prone land due to the presence of bushfire-prone Vegetation Category 2, and also the proximity of the Proposal site to bushfire-prone Vegetation categories 1 and 2 on surrounding land. A Bush Fire Prone Land Map is provided in **Figure 61** below.



Figure 61 Bush Fire Prone Land Map

Source: Bushfire Consulting Services

6.14.3 Bushfire Fire Attack Assessment

Vegetation Formations

The hazardous vegetation formations for each aspect of the development within 140m of the asset have been identified according to ‘Ocean Shores to Desert Dunes’ by David Keith (Keith 2004). The bushfire threat emanates from vegetation located to the north, east and south of the proposed development. This vegetation is external to the subject site boundaries. To the north of the subject site there is an area of Grassland Vegetation >50m from the Proposal, which is not assessed further.

Based on a site visit and determination of vegetation formation using the Keith (2004) Identification Key, the primary bushland vegetation having the potential to affect the subject building is most representative of Forest to the north and Grassland to the east and south. The grassland to east and south is highly likely to be removed upon commencement of construction of neighbouring industrial estates and associated infrastructure.

The hazardous vegetation affecting the subject buildings are illustrated in **Figure 62** below.

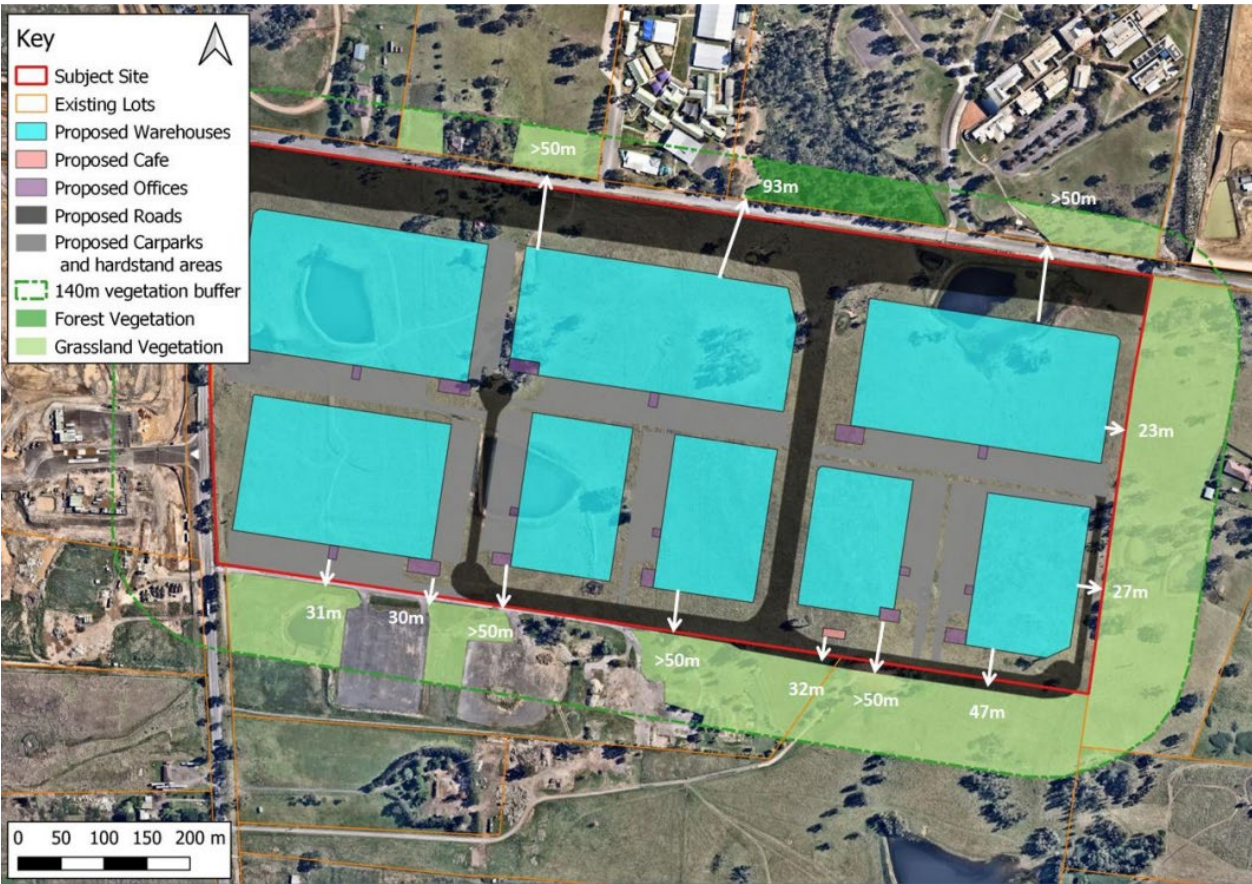


Figure 62 Hazardous Vegetation affecting the Subject Buildings

Source: Bushfire Consulting Services

Effective Slope

The slope of the land under the classified vegetation has a direct influence on the rate of fire spread, the intensity of the fire and the level of radiant heat flux. The effective slope of the land from the new building for a distance of 100m is derived from a site assessment combined with the most detailed contour data available. The slope is then categorised into classes relative to the location of the hazard.

The effective slope has been measured manually on site over a distance of 100m from the proposed development where accessible, under the classified vegetation community constituting the hazard. The slope was found to be consistent with the topographical information from NSW Spatial Services LiDAR data.

The effective slope surrounding the Proposal is identified in **Figure 63** and **Table 52** below.

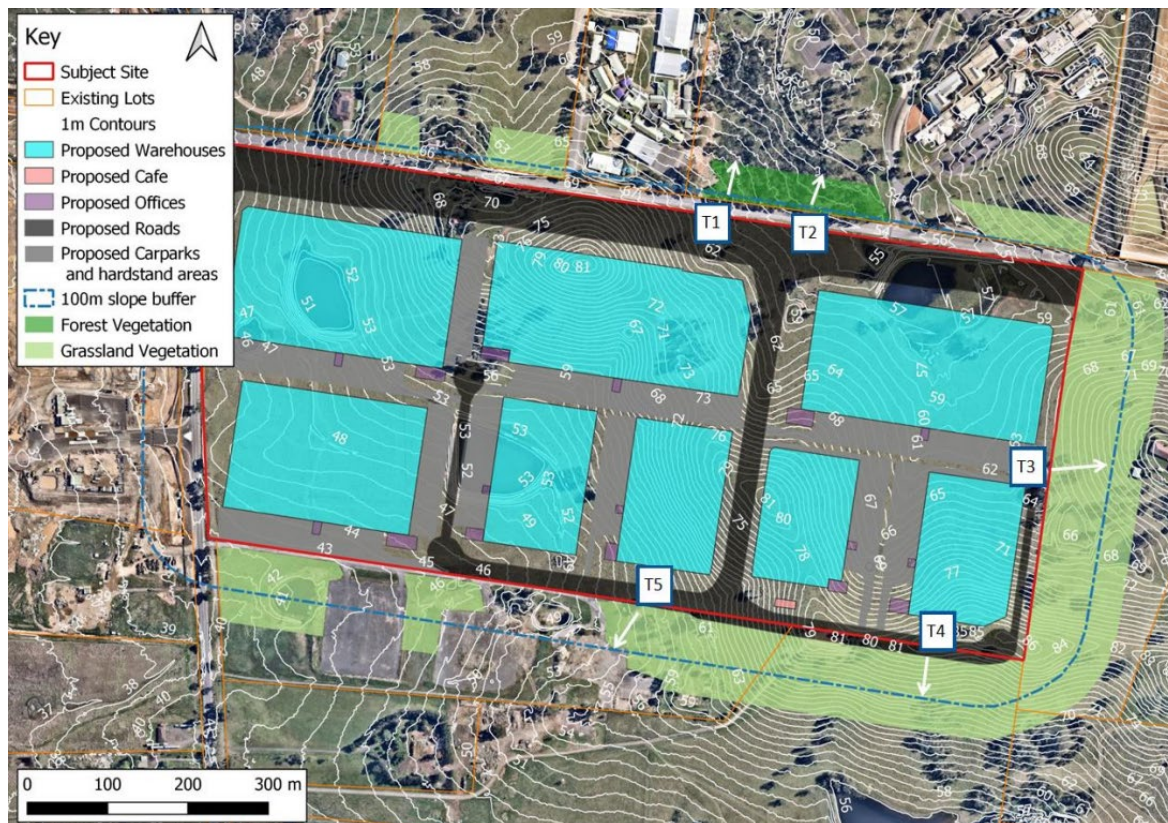


Figure 63 Effective Slope Diagram

Source: Bushfire Consulting Services

Table 52 Effective Slope

Label	Slope Description
T1	3.34° downslope
T2	2.54° downslope
T3	All upslopes and flat land (0°)
T4	9.68° downslope
T5	1.95° downslope

Source: Bushfire Consulting Services

Fire Weather

The development is located in the Penrith City Local Government Area, a part of the Greater Sydney Region, which has a Fire Danger Index of 100. To ensure that flame contact is not anticipated, the relevant FFDI, vegetation formation and effective slope are matched using Table A1.12.2 of PBP and is provided in **Table 53** below.

Table 53 Minimum Distance for Asset Protection Zones

Aspect	Distance from hazard	Vegetation Classification	Slope Under Classified Vegetation	APZ Required
North	93m	Forest	Downslope >0- 5°	29m
East	23-27m	Grassland	All upslopes and flat land (0°)	10m
South	47m	Grassland	Downslope >5- 10°	13m
	>30m		Downslope >0- 5°	12m
West	>100m	N/A	N/A	N/A

Source: Bushfire Consulting Services

Construction Requirements

The NCC does not provide for any bush fire specific performance requirements for these particular classes of buildings. The general fire safety construction provisions of the NCC are taken as acceptable solutions, and AS 3959 and the NASH Standard are not considered as a set of Deemed to Satisfy provisions for this non-residential Proposal.

PBP recommends that bushfire construction standards for Classes 5-8 buildings should be considered on a case-by-case basis. Bushfire construction recommendations are dependent on the level of bushfire risk, the provision of adequate access opportunities and the proposed building use.

Bushfire Consultant Services outline that adequate setbacks are provided to prevent BAL 40 and BAL FZ impact on the development. Proposed Warehouse 1, 2, 4, 8 and the Café are located within 50m of grassland or within 100m of forest vegetation, as shown in **Figure 64** below. It is noted that the bushfire risk will be reduced further following construction of the proposed industrial development to the south and east which will remove the grassland hazard.

Based on the low bushfire risk and the provision of adequate access around the perimeter of the development it is recommended that ember protection measures are provided and limited to the portions of the warehouses within 50m of grassland and within 100m of forest vegetation and/or building elevations that are not shielded from the direct threat of bushfire as depicted in **Figure 64** below.

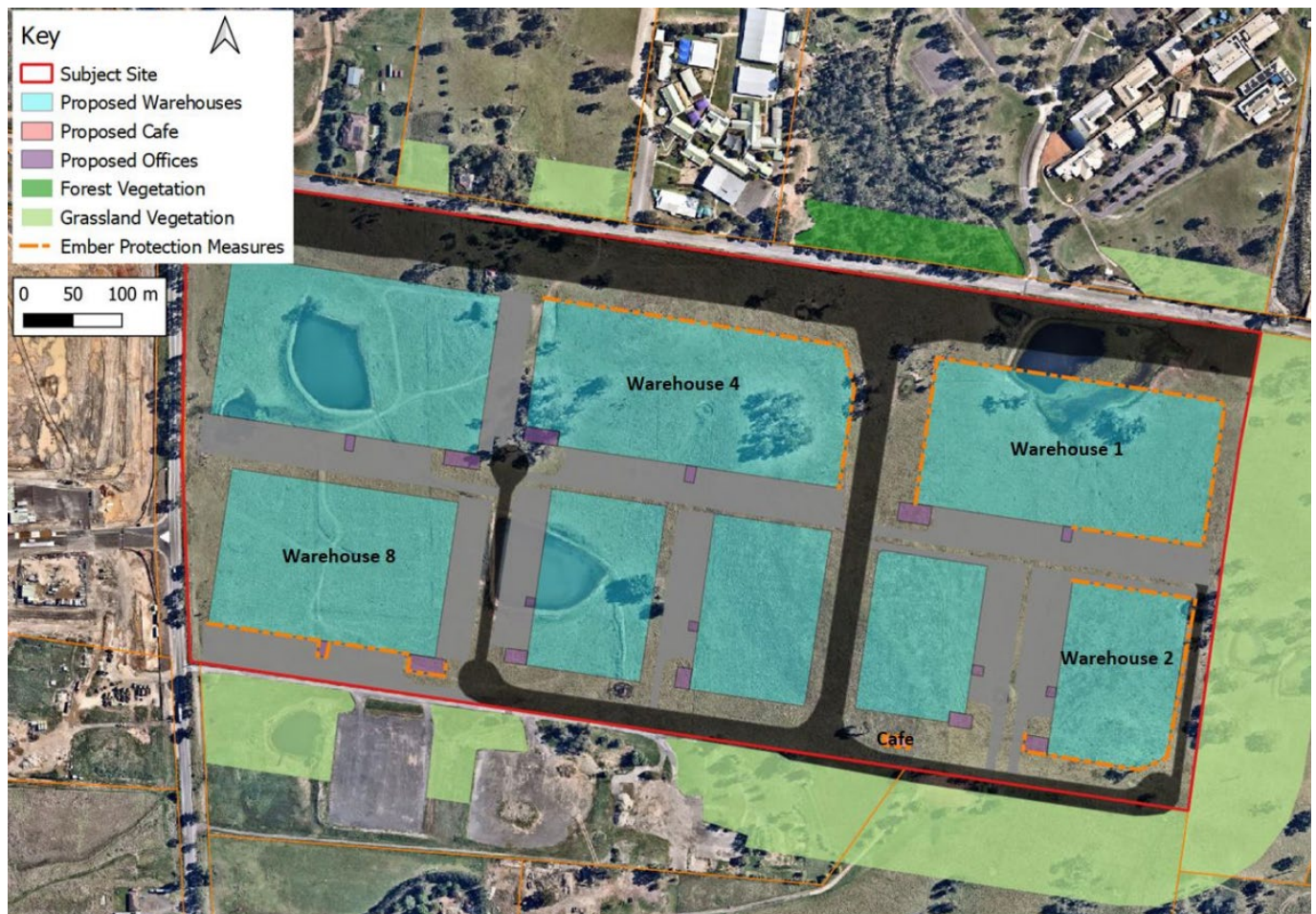


Figure 64 BAL Diagram

Source: Bushfire Consulting Services

Based on the low bushfire risk and adequate access opportunities the following ember protection measures are recommended for the elevations for Warehouse 1, 2, 4, 8 and the café:

- All windows are to be completely covered by a tightly fitting, metal-framed screen with a mesh or perforated sheet with a maximum aperture of 2mm made from corrosion-resistant steel, bronze or aluminium;
- All external side-hung doors are to be fitted with a draft excluder at the base. External screen doors shall be fitted with a mesh or perforated sheet with a maximum aperture of 2mm made from corrosion-resistant steel, bronze or aluminium;

- Roller doors are non-combustible and are to have guide tracks with a maximum gap of 3mm and be fitted with a nylon brush that is in contact with the door (to prevent the entry of embers). No ventilation slots are permitted;
- All gaps, vents or weepholes shall be covered with a mesh or perforated sheet with a maximum aperture of 2mm made from corrosion-resistant steel, bronze or aluminium. The intent is to stop embers reaching combustible flooring and support elements;
- All joints in external wall surfaces shall be covered, sealed, overlapped or butt-jointed to prevent gaps greater than 3mm;
- Roof/wall junctions must be sealed to prevent gaps greater than 3mm; and
- Any roof ventilation openings or penetrations shall be fitted with non-combustible aluminium ember guards with maximum apertures of 2mm.

6.14.4 Relevant Objectives of PBP

Whilst bush fire is not captured in the NCC for Class 5-8 buildings, a number of objectives are applied under section 8.3.1 of PBP in relation to access, water supply and services, and emergency and evacuation planning. The proposed performance solutions and compliance with the specific objectives for buildings of Class 5-8 are outlined in **Table 54** below.

Table 54 Relevant Objectives of PBP

Objective	Comment
Chapter 8.3.1	
<i>Provide safe access to/from the public road system for firefighters providing property protection during a bush fire and for occupant egress for evacuation.</i>	• The Proposal includes the partial construction of the Southern Link Road which runs parallel to the northern site boundary to link with Mamre Road in the west. This is an interim solution until TfNSW complete construction of the remainder of the link road. • Internal access will be provided via the construction of local industrial roads, a collector road as well as a number of hardstand and internal roads with a minimum width of 10m. These roads are sufficient for fire trucks and other emergency vehicles to enter and egress the site in a forwards direction. Suitable access for fire-fighting vehicles and evacuation is available. <i>Complies.</i>
<i>Provide suitable emergency and evacuation (and relocation) arrangements for occupants of the development.</i>	• The need to formulate an emergency evacuation plan is suggested. <i>Complies.</i>
<i>Provide adequate services of water for the protection of buildings during and after the passage of bush fire, and to locate gas and electricity so as not to contribute to the risk of fire to a building.</i>	• The development will include provision of a reticulated water supply, which can meet PBP requirements for a firefighting water supply. <i>Can Comply.</i>
<i>Provide for the storage of hazardous materials away from the hazard wherever possible.</i>	• As wherever possible, the storage of hazardous materials will be away from the hazard. <i>Can comply.</i>
Chapter 1	
<i>Afford buildings and their occupants protection from exposure to a bush fire.</i>	• Proposed elevations of Warehouse 1, 2, 4, 8 and the Café are to be provided with ember protection measures to ensure the buildings and their occupants are protected from exposure to a bush fire. <i>Can comply.</i>

Objective	Comment
<i>Provide for a defensible space to be located around buildings.</i>	A defensible space of more than 23m is proposed around the buildings, which exceeds the requirements of PBP. <i>Complies.</i>
<i>Provide appropriate separation between a hazard and buildings which, in combination with other measures, prevent the likely fire spread to buildings.</i>	The relevant FFDI (100), vegetation formation (Forest & Grassland) and effective slope have been matched using Table A1.12.2 of PBP, and the available separation distance between the buildings and the hazard, exceeds the minimum distance for APZs, indicating that direct flame contact on the buildings is not anticipated. <i>Complies.</i>
<i>Ensure that appropriate operational access and egress for emergency service personnel and occupants is available</i>	Road widths, curvatures and grades and swept paths will enable appropriate operational access and egress for emergency service personnel and occupants. <i>Can comply.</i>
<i>Provide for ongoing management and maintenance of BPMs.</i>	Normal property maintenance will ensure that BPMs are maintained. <i>Can comply.</i>
<i>Ensure that utility services are adequate to meet the needs of firefighters.</i>	Utilities to support firefighters have been outlined in Appendix II. <i>Complies.</i>

Source: Bushfire Consulting Services

Compliance with APZ standards

Bushfire Consulting Services has undertaken a review of the Landscape Documentation prepared by Geoscapes as well as the NSW RFS 'Asset protection zone standards' (PBP Appendix 4).

The standards state that canopy cover should be less than 15%. In this circumstance the canopy cover within the site is calculated to be 18% to satisfy the DCP requirements. The majority of tree planting is proposed along the boundaries of the site in narrow strips of land approximately 20m (or less) in width. They are bound by existing and proposed roads to the north, east, south and west and by hardstand areas between the proposed buildings.

As a result, and based on the external low risk posed by the grassland threat the proposed planting of trees (to an overall canopy cover of 18%) within the property will not support a canopy fire and therefore complies with the requirements of an APZ.

6.14.5 Mitigation Measures

The proposed mitigation measures in relation to bush fire are identified in **Table 55** below, which are based upon the relevant provisions of the NSW Rural Fire Service Guideline entitled *Planning for Bush Fire Protection 2019*.

Table 55 Mitigation Measures – Bush Fire

Impact/Issue	Mitigation Measures
Asset Protection Zones	At the commencement of the development, and in perpetuity, the entire site shall be managed as an Inner Protection Area (IPA) Asset Protection Zone.
Water Supply	Adequate water supply is provided for firefighting purposes, located at regular intervals, accessible and reliable for firefighting operations. Fire hydrant spacing, design, sizing, flows and pressure complies with AS2419.1:2005 and hydrants are not located within any road carriageway. All above ground water service pipes are metal, including and up to any taps and any above ground water storage tanks are metal or concrete.
Electricity and Gas Services	- Where practicable, electrical transmission lines are underground. - Where applicable, reticulated or bottled gas is installed and maintained in accordance with AS/NZS 1596:2014 and the requirements of relevant authorities, and metal piping is used. All fixed gas cylinders are kept clear of all flammable materials to a distance of 10m and shielded on the hazard side, connections to and from gas cylinders are metal. - Polymer-sheathed flexible gas supply lines are not used, and above-ground gas service pipes are metal, including and up to any outlets.

Impact/Issue	Mitigation Measures
Storage of Hazardous Materials	Wherever possible, the storage of hazardous materials will be away from the hazard.
Landscaping	Any new landscaping within the APZ is to comply with the NSW RFS 'Asset protection zone standards'.
Emergency and Evacuation Planning	The need to formulate an emergency evacuation plan is suggested. To do so, occupants can complete a Bush Fire Safety Plan on the NSW RFS Website http://www.rfs.nsw.gov.au/ under publications / bushfire safety.

6.15 Hazards and Risks

A Hazard and Risk Assessment has been prepared by Riskcon Engineering (**Appendix JJ**), which provides an assessment of the proposed quantities of dangerous goods for Warehouses 1, 2 and 3 and the associated vehicle movements, namely in relation to the threshold quantities outlined in the DPHI's Guideline 'Applying SEPP 33 – Hazardous and Offensive Developments', as is required for industrial developments under Chapter 3 of *State Environmental Planning Policy (Resilience and Hazards) 2021* (formerly SEPP 33).

6.15.1 Methodology

The purpose of the initial risk screening is to determine if more detailed assessment is required given a certain quality of each type of dangerous good. If storage and transportation of dangerous goods is below these risk screening thresholds then, under Chapter 3 of the Resilience and Hazards SEPP, the facility is not considered to be potentially offensive development and a Preliminary Hazards Analysis is not required.

6.15.2 Assessment

Storage

Despite existing in a single industrial estate, each warehouse can be considered a standalone site for the purpose of assessment against Chapter 3 of the SEPP. None of Warehouse 1, 2 or 3 have been allocated to a tenant yet; hence, it would be a speculative development and so the storage commodities are unknown at this stage. Therefore, to provide some flexibility in terms of potential tenants, an assessment has been conducted to provide an allowance for storage of DG commodities as part of the initial Development Application (DA).

Threshold limits for the application of Chapter 3 of the SEPP are outlined in **Table 56** below, indicating the maximum quantity that can be stored within Warehouse 1, 2 and 3 for each class.

Table 56 Quantities Stored and Thresholds

Class	Description	Maximum Quantity (kg)	Threshold (kg)	Does the SEPP Apply?		
				Warehouse 1	Warehouse 2	Warehouse 3
2.1	Flammable gases (i.e. aerosols and LPG)	9,608	10,000	N	N	N
3 (II & III)	Flammable liquids (e.g. hand sanitisers)	400,000	19m to site boundary	N	N	N
4.1	Flammable solids (e.g. ethanol wipes)	4,000	5,000	N	N	N
5.1	Oxidising substances, excl. ammonium nitrate		5,000	N	N	N
8 (II)	Corrosive substances (e.g. cleaning chemicals)	20,000	25,000	N	N	N
8 (III)	Corrosive substances (e.g. cleaning chemicals)	40,000	25,000	N	N	N

Source: Riskcon Engineering

Transport

A review of the warehouses within the industrial estate indicates that even if the sites were all operating with the expected limits of DG storage proposed for each site, the potential to exceed the transport movements of DGs would require a substantial turnover of product which is not considered credible. Therefore, the cumulative assessment of all sites operating would not be considered to exceed the transport thresholds.

6.15.3 Conclusion

A review of the quantities of DGs proposed to be stored at Warehouse 1, 2 and 3 at 706-752 Mamre Road, Kemps Creek NSW and the associated vehicle movements was conducted and compared to the threshold quantities outlined in "Applying SEPP 33". The results of this analysis indicates the threshold quantities for the DGs to be stored and transported are not exceeded; hence, Chapter 3 of the SEPP does not apply to the Proposal. As the

facility is not classified as potentially hazardous, it is not necessary to prepare a Preliminary Hazard Analysis for the facility as Chapter 3 of the SEPP does not apply.

6.15.4 Mitigation Measures

The proposed mitigation measures in relation to hazard and risk are outlined in **Table 57** below.

Table 57 Mitigation Measures – Hazard and Risk

Impact / Issue	Mitigation Measure
Storage of Dangerous Goods	• The DGs shall be stored in a manner which complies with the applicable storage standards (i.e. AS/NZS 3833:2007 or Class specific standards such as AS 1940:2017). • The documentation required by the Work Health and Safety (WHS) Regulation 2017 shall be prepared to demonstrate the risks have been assessed and minimised So Far As Is Reasonably Practicable (SFARP) as required by the WHS Regulations. • Where flammable gases or liquids are stored, a hazardous area classification in accordance with AS/NZS 60079.10.1:2009 shall be prepared to ensure that an ignition source does not enter a hazardous atmosphere as required by the WHS Regulations.

6.16 Greenhouse Gas and Energy Efficiency

A Greenhouse Gas Emissions and Energy Efficiency Assessment has been undertaken within the Ecologically Sustainable Development (ESD) Report prepared by Northrop (Appendix DD). A summary of the assessment and proposed mitigation measures is provided below.

6.16.1 Assessment of Greenhouse Gas Impacts

A high-level greenhouse gas emissions analysis of integrating the energy efficiency measures into a dual tenancy office/warehouse facility was completed, and the comparison between a Reference and Proposed case can be depicted in Figure 65 below. The analysis highlighted a 44% reduction in GHG emissions when compared against an NCC 2019 DTS compliant build (reference project).

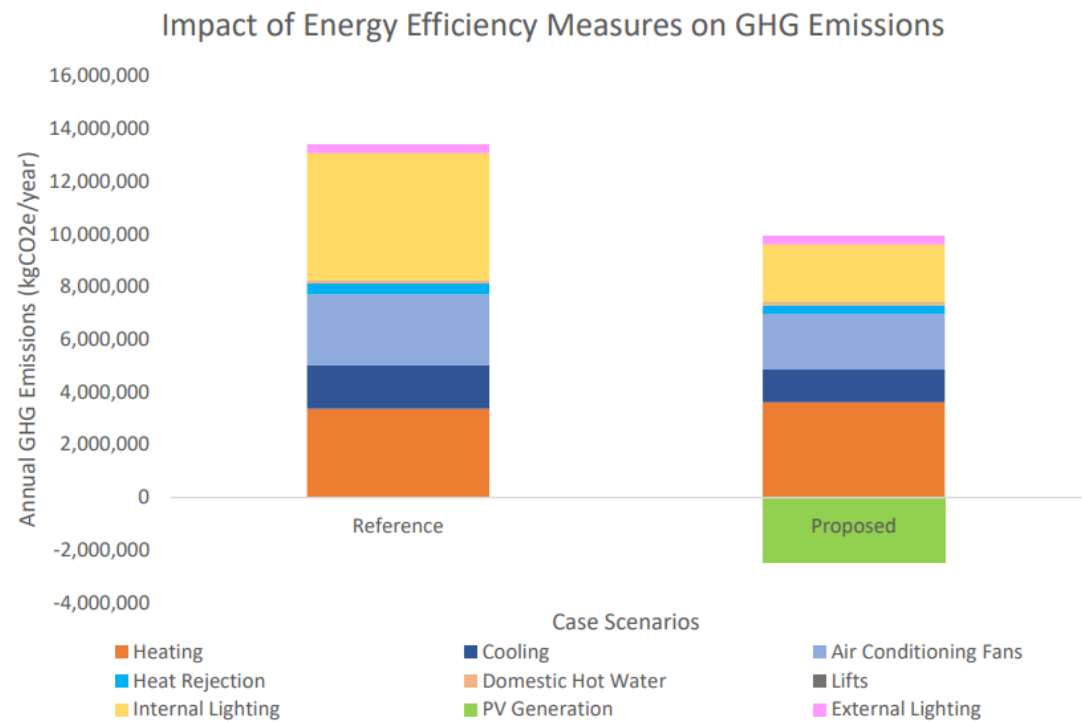


Figure 65 Impact of Energy Efficiency Measures on GHG Emissions

Source: Northrop

6.16.2 Greenhouse Gas Emissions Mitigation Measures

The energy efficiency measures outlined in provide direct measures to lowering greenhouse gas emissions. Additional mitigation measures to reduce the emissions across all scopes are outlined in Table 58 below.

Table 58 Greenhouse Gas Emissions Mitigation Measures

Impact/Issue	Mitigation measures
Greenhouse Gas Emissions	- Electrify all systems and source the electricity from green power sources, either from the grids or in house generation. - Support the use of high-capacity public transport and carbon-free alternatives (e.g. electric vehicles and bicycles) to and from the Proposal site. - Build with construction materials that contribute lower embodied carbon. - Support third-party suppliers that are carbon neutral. - Utilise nature-based carbon offsets.

Source: Northrop

6.16.3 Assessment of Energy Efficiency Impacts

A high-level energy analysis of integrating the energy efficiency measures for a dual tenancy office and warehouse facility was completed, and the comparison between a Reference and Proposed case, as shown in Figure 66 below. The areas assumed in this case are 8,700m² and 258,120m² for office and warehouse

respectively. The analysis indicates a potential 44% reduction in energy consumption when compared against the National Construction Code (NCC) 2019 Deemed-to-satisfy (DTS) compliant build (reference project).

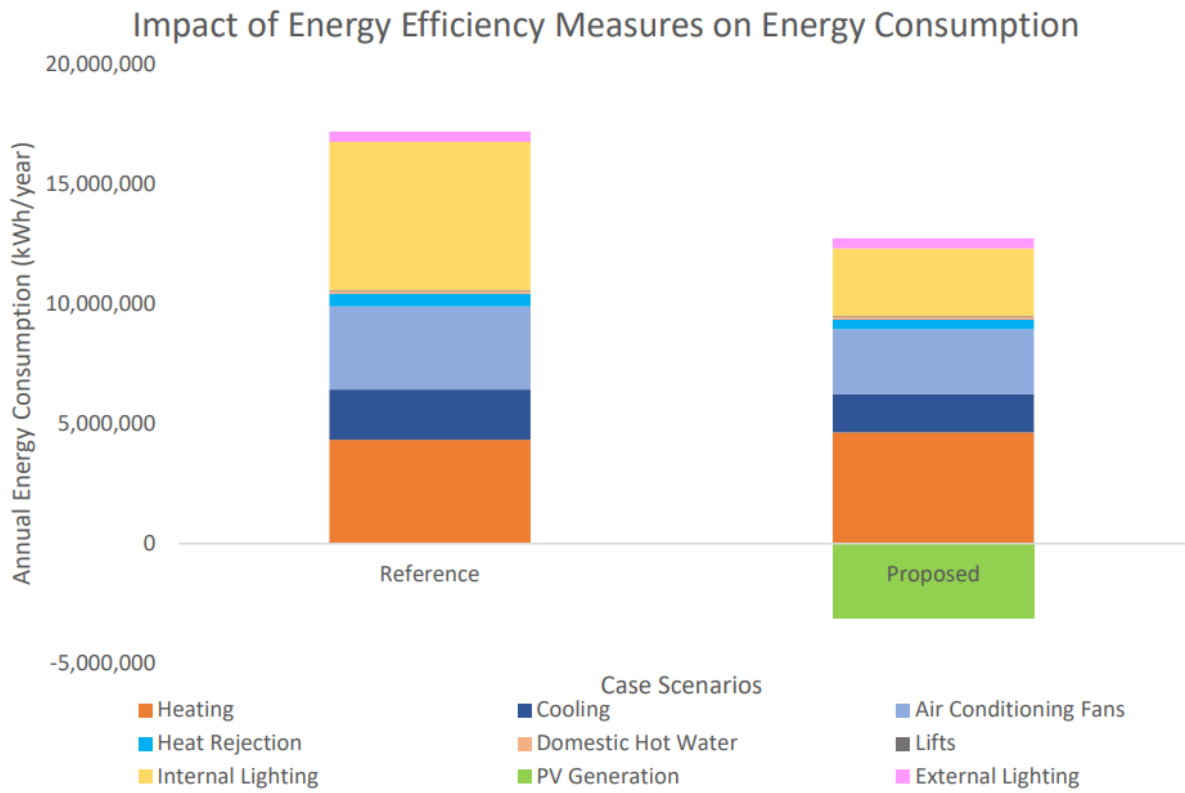


Figure 66 Impact of Energy Efficiency Measures on Energy Consumption Context

Source: Northrop

6.17 Airport Safeguarding

An Aeronautical Impact Assessment has been prepared by Landrum and Brown and is include at **Appendix KK**. It includes a risk assessment of the proposed development on Western Sydney Airport operations, addressing the relevant provisions of State Environmental Planning Policy (Western Parkland City) 2021 (Western Parkland City SEPP) given its proximity to the Western Sydney Airport, as well as the Western Sydney Aerotropolis Plan, as is required by the SEARs.

The report also includes an assessment of the Proposal in relation to other guidelines including:

- National Airports Safeguarding Framework;
- Industry and Employment SEPP; and
- Penrith Local Environmental Plan 2010.

An assessment of the Proposal's compliance with each of these policies is provided in the following subsections.

6.17.1 National Airports Safeguarding Framework

The National Airports Safeguarding Framework (NASF) includes a number of guidelines that seek to improve community amenity by minimising aircraft noise-sensitive developments near airports and improve safety outcomes by ensuring aviation safety requirements are recognised in land use planning decisions through guidelines being adopted by jurisdictions on various safety-related issues.

Accordingly, the Landrum and Brown's assessment of the Proposal is summarised in **Table 59** below.

Table 59 Assessment of the Proposal against the NASF Guidelines

Guideline	Function	Comments and compliance
Guideline A Measures for managing impacts of aircraft noise	Guideline A provides guidance to Commonwealth, State, Territory and Local Government decision makers to manage the impacts of noise around airports including assessing the suitability of developments.	The proposed development site is located outside the ANEC zone at all stages and therefore no action is required.
Guideline B Managing the risk of building generated windshear and turbulence at airports	Guideline B provides guidance to commonwealth, State/territory and local government decision makers and airport operators to manage the risk of building generated windshear (i.e. changes in wind speed and/or direction between two points) and building generated turbulence (i.e. rapid irregular changes in wind speed and/or direction at a fixed point) at airports.	The Summit at Kemps Creek Development Site will be located beyond the airport boundary and will not have a risk of generating windshear and turbulence at the airport. The building and the cranes will not have an impact upon the airport.
Guideline C Managing the risk of wildlife strikes in the vicinity of airports	Guideline C provides guidance to State/territory and local government decision makers to manage the risk of collisions between wildlife and aircraft at or near airports where that risk may be increased by the presence of wildlife-attracting land uses.	The report recommends the development continues to assess the appropriate types of flora that will enhance the visual features of the estate without being an attractant for birds or bats and not encouraging fauna such as rats and mice, being recognised as food, which would attract birds to the site.
Guideline D Managing the risk of wind turbine farms as physical obstacles for air navigation	Guideline D provides guidance to State/Territory and local government decision makers, airport operators and developers of wind farms to jointly address the risk to civil aviation arising from the development, presence and use of wind farms and wind monitoring towers.	No wind turbines are proposed for the site. therefore, the Proposal will comply with this guideline.
Guideline E Managing the risk of distractions to pilots from lighting in the vicinity of airports	The objective of this clause is to safeguard airport operations from the risk of lighting and reflectivity. distractions for pilots.	The proposed buildings and cranes will not cause any risk of distractions to pilots from lighting in the vicinity of the Western Sydney Airport.

Guideline	Function	Comments and compliance
Guideline F Managing the risk of intrusions into the protected airspace of airports	Guideline F provides guidance to State/Territory and local government decision makers as well as airport operators to jointly address the issue of intrusions into the operational airspace of airports by tall structures, such as buildings and cranes, as well as trees in the vicinity of airports and roof top exhaust plumes.	Planned activity within the proposed development is not likely to produce an exhaust plume that would affect the ability of aircraft to operate in the prescribed airspace. The proposed development includes a maximum building height of 100.8m AHD, with associated cranes having a height of approximately 120.8m AHD. Accordingly, the Proposal will not infringe the PANS OPS surfaces at Western Sydney Airport, the lowest of which is approximately 207.9m AHD. Additionally, it will not infringe the OLS for Western Sydney Airport which has a height of 200m AHD at its lowest point.
Guideline G Protecting aviation facilities – Communication, Navigation and Surveillance (CNS)	The purpose of Guideline G is to: - provide land use guidance to better protect CNS facilities and allow aircraft to safely flow across Australia airspace; - provide a consistent approach to land use planning protection of CNS facilities; - inform procedures ensuring development and associated activities within Building Restricted Areas (BRA) of CNS facilities do not adversely affect the facility or cause interference for air traffic controllers or aircraft in transit; and - provide government land use planning decision makers with guidance to assess development proposals in BRA.	The proposed development will not have any impact upon the performance of ATC communications systems installed at Western Sydney Airport. The proposal is located outside the BRA and will not have any impact upon the performance of navigation aids installed at Western Sydney Airport. The proposed development site and associated cranes required will be located well beyond the airport boundary and will not impact the operation of such a surveillance system.
Guideline H Protecting strategically important Helicopter Landing Sites (HLS)	Guideline H provides guidance to State/Territory and local government decision makers as well as the owners/operators of identified strategically important HLS (SHLS) to ensure: - the ongoing operation of those SHLS; - the use of those SHLS are not compromised by any proposed development encroaching into flight paths; - new development (and associated activities) do not present a hazard to helicopters arriving or departing from those SHLS; and - any new SHLS are appropriately located.	The proposed development site is located well beyond the airport boundary and will not impact any HLS. As such, no action is required.
Guideline I Public Safety Areas (PSAs)	Guideline I provides guidance to Australian government, State, territory and local government decision makers on the assessment and treatment of potential increases in risk to public safety which could result from an aircraft incident or development proposal in areas near the end of an airport runway.	The proposed development site is located outside of the designated PSAs associated with the runways at Western Sydney Airport. As such, no action is required.

Source: Landrum and Brown

6.17.2 State Environmental Planning Policy (Western Parkland City) 2021

Although the site is subject to the provisions of the Industry and Employment SEPP, it is located in proximity to the Western Sydney Airport and is therefore still subject to the relevant provisions of State Environmental Planning Policy (Western Parkland City) 2021 (Western Parkland City SEPP). The Aeronautical Impact Assessment prepared by Landrum and Brown (**Appendix KK**) assesses the site against the relevant clauses of the Western City Parkland SEPP, with this assessment summarised under the following subheadings.

Clause 4.17 – Aircraft Noise

As outlined in **Table 59** above, the proposed development is located outside the ANEC zones and therefore complies with this clause.

Clause 4.18 – Building Generated Wind Shear And Turbulence

The development site is located outside of the Windshear Assessment Trigger Area and will not have any impact on turbulence at Western Sydney Airport.

Clause 4.19 – Wildlife Hazards

The proposed development site lies within the 8km radius wildlife buffer zone (Area B). Within the 8km zone there are no incompatible uses that would normally relate to an industrial precinct such as the Proposal.

Clause 4.20 – Wind Turbines

The proposed development site is located in the 3-30km zone and there are no wind turbines planned for the development. Therefore, the site complies with this requirement.

Clause 4.21 – Lighting

The development site is located outside of the lighting intensity zones and will not have any impact on the airport operations from the risk of lighting and reflectivity distractions for pilots at Western Sydney Airport.

Clause 4.22 – Airspace Operations

The proposed development includes a maximum building height of 100.8m AHD, with associated cranes having a height of approximately 120.8m AHD. Accordingly, the Proposal will not infringe the PANS OPS surfaces at Western Sydney Airport, the lowest of which is approximately 207.9m AHD. Additionally, it will not infringe the OLS for Western Sydney Airport which has a height of 200m AHD at its lowest point.

Clause 4.23 – Public Safety Area

The Summit at Kemps Creek site is located outside of the designated PSAs associated with the runways at Western Sydney Airport.

6.17.3 Western Sydney Aerotropolis Plan 2020

The proposed development site is located outside the ANEC zones, and therefore will have no issue complying with the related objectives and planning principles of the Western Sydney Aerotropolis Plan and will not impact or affect the safeguarded airport operations.

6.17.4 State Environmental Planning Policy (Industry and Employment) 2021

The Proposal complies with the relevant provisions of the Industry and Employment SEPP, as is demonstrated in **Table 59** above.

6.17.5 Penrith Local Environmental Plan 2010

The proposed development has no issue complying with clause 7.9 of the Penrith LEP 2010 as it is located outside the ANEC zones.

6.18 Planning Agreement / Development Contributions

6.18.1 Mamre Road s7.11 Contributions Plan

The subject site zoned IN1 General Industrial and is subject to the adopted Mamre Road s7.11 Contributions Plan prepared by Penrith Council (adopted at the Council meeting of 28 March 2022). This provides for a rate of \$674,353 per net developable hectare of land, addressing the following infrastructure types:

- Transport works;
- Transport land acquisition;
- Open space works;
- Open space land acquisition; and
- Plan administration.

The Plan requires that the developments contribution be paid prior to the release of the construction certificate for this development due to it proposing building works. There is an opportunity for works in kind agreements to take place for the proposed local road infrastructure, with the Proposal involving the construction of local roads, as outlined in **Section 3.4.1**.

6.18.2 Special Infrastructure Contribution

The land within the Aerotropolis (being the entire site) is subject to a Special Infrastructure Contribution (SIC), gazetted by the Minister for Planning on 9 March 2022 (released on 25 March 2022). The rate for land identified as the Mamre Road Industrial Zone is subject to a contribution rate of \$226,065 (1 July 23) per net developable hectare.

Under the SIC, there is an opportunity to offset the cost of the Mamre Road corridor, and as such, the proponent has the ability to enter into a planning agreement to transfer the land for the road widening and subsequently discount the SIC amount. This includes a number of State infrastructure roads such as the Mamre Road corridor and future SLR corridor. The Proposal involves the transfer of land and construction of components of the SLR, as outlined in **Section 3.4.1**.

6.18.3 Public Benefit

The proposed development will deliver substantial public benefit through the redevelopment of currently under-utilised land zoned for industrial purposes. The creation of up to 1670 construction jobs during the delivery of the Proposal, and an ongoing 1,467 FTE jobs during operation, will contribute to the establishment of the MRP as a highly sought after industrial and employment generator for Western Sydney. The introduction of these jobs will be a driver for ongoing employment opportunities within the area.

As well as this, the proposed development will not result in any likely significant or detrimental economic impacts. On the contrary, the proposed development is likely to result in significant positive economic benefits, including the provision of additional industrial and employment floorspace, that will support demand for warehousing, distribution and general industrial facilities in this part of Sydney. The Proposal will align with the needs of modern tenant and business requirements, supporting the long-term potential and objectives of the locality.

The Proposal also includes land to the east of the site to allow for the provision of the potential future dedicated freight network which will help facilitate the freight and logistics network within the MRP. Therefore, given these substantive public benefits, the proposed development is also considered to be in the public interest.

7.0 Environmental Risk Assessment

The Environmental Risk Assessment (ERA) establishes a residual risk by reviewing the significance of environmental impacts and the ability to manage those impacts. The ERA for the proposed SSDA has been adapted from Australian Standard AS4369.1999 Risk Management and Environmental Risk Tools.

In accordance with the SEARs, the ERA addresses the following significant risk issues:

- The adequacy of baseline data;
- The potential cumulative impacts arising from other developments in the vicinity of the Site; and
- Measures to avoid, minimise, offset the predicted impacts where necessary involving the preparation of detailed contingency plans for managing any significant risk to the environment.

Figure 67 indicates the significance of environmental impacts and assigns a value between 1 and 10 based on:

- The receiving environment;
- The level of understanding of the type and extent of impacts; and
- The likely community response to the environmental consequence of the Proposal;

The manageability of environmental impact is assigned a value between 1 and 5 based on:

- The complexity of mitigation measures;
- The known level of performance of the safeguards proposed; and
- The opportunity for adaptive management.

The sum of the values assigned provides an indicative ranking of potential residual impacts after the mitigation measures are implemented.

Significance of impact	Manageability of impact				
	5 Complex	4 Substantial	3 Elementary	2 Standard	1 Simple
1 – Low	6 (Medium)	5 (Low/Medium)	4 (Low/Medium)	3 (Low)	2 (Low)
2 – Minor	7 (High/Medium)	6 (Medium)	5 (Low/Medium)	4 (Low/Medium)	3 (Low)
3 – Moderate	8 (High/Medium)	7 (High/Medium)	6 (Medium)	5 (Low/Medium)	4 (Low/Medium)
4 – High	9 (High)	8 (High/Medium)	7 (High/Medium)	6 (Medium)	5 (Low/Medium)
5 – Extreme	10 (High)	9 (High)	8 (High/Medium)	7 (High/Medium)	6 (Medium)

Figure 67 Risk Assessment Matrix

Table 60 *Environmental Risk Assessment*

Item	Phase	Potential Environmental Impact	Proposed Mitigation Measures and / or Comment	Risk assessment		
				Significance of Impact	Manageability of Impact	Residual Impact
Traffic and Transport	C / O	• Increase in construction traffic on local roads. • Increase in traffic and parking during operation.	• A Construction Traffic Management Plan will be prepared to detail measures to minimise any adverse impacts arising from construction traffic. • Additional parking demand generated by the proposed development will be accommodated within the site.	C = 3 O = 2	C = 3 O = 2	C = 5 (low/medium) O = 4 (low/medium)
Soil and Water	C	• Sediment and Erosion produced from construction.	• Suitable erosion and sediment controls shall be provided by the Contractor and maintained throughout all stages of works, including at completion of the bulk earthworks.	C = 2	C = 2	C = 4 (low/medium)
Noise and Vibration	C / O	• Increase in noise and vibrations levels during construction. • Increase in noise levels during operation.	• A Construction Noise and Vibration Management Plan (CNVMP) would be prepared before any work begins. This would identify all potentially impacted receivers, assess the potential noise and vibration impacts from the Proposal and provide details regarding how the impacts would be minimised through the use of all feasible and reasonable mitigation measures. • Given that the surrounding locality has been rezoned to accommodate industrial land uses, any potential noise impacts to surrounding receivers are considered to be manageable in the context of the overall development.	C = 3 O = 2	C = 2 O = 2	C = 5 (low/medium) O = 4 (low/medium)
Aboriginal Cultural Heritage	C / O	• Potential impacts to Aboriginal artefacts.	• The proposed development will be in accordance with the Aboriginal Cultural Heritage Assessment Report (ACHAR) (Appendix W) and the mitigation measures proposed.	C = 3 O = 2	C = 2 O = 2	C = 5 (low/medium) O = 4 (low/medium)
Non-Aboriginal Cultural Heritage	C / O	• Potential impacts to archaeology.	• Implementation of an unexpected finds protocol. Should unanticipated relics be discovered during the course of the Proposal, work in the vicinity must cease and an archaeologist contacted to make a preliminary assessment of the find	C = 3 O = 2	C = 2 O = 2	C = 5 (low/medium) O = 4 (low/medium)

Item	Phase	Potential Environmental Impact	Proposed Mitigation Measures and / or Comment	Risk assessment		
				Significance of Impact	Manageability of Impact	Residual Impact
Biodiversity	C / O	- Potential impacts on flora and fauna during construction and operation. - Tree removal and construction impacts on tree health.	The proposed development will be in accordance with the Biodiversity Development Assessment Report (BDAR) (Appendix Z) and the mitigation measures proposed, that includes the Weed Eradication and Management Plan (WEMP)(Appendix AA) and Construction Environmental Management Plan (CEMP)(Appendix BB).	C = 3 O = 2	C = 3 O = 2	C = 6 (medium) O = 4 (low/medium)
Social and Economic Impact	C / O	Potential impacts on the amenity of the surrounding Mamre Road locality.	The proposed development will be in accordance with the Social and Economic Impact Assessment prepared by Ethos Urban (Appendix CC) and the recommended mitigation measures for managing social impacts on the surrounding community.	C = 3 O = 3	C = 2 O = 3	C = 5 (low/medium) O = 6 (medium)
Air Quality	C / O	Potential for reduced air quality during construction and operation of the proposed development.	The proposed development will be in accordance with the Air Quality Impact Assessment prepared by SLR and the recommended mitigation measures for managing air quality.	C = 3 O = 2	C = 2 O = 2	C = 5 (low/medium) O = 4 (low/medium)
Contamination	C	Risks posed by contamination on site.	- The proposed development will proceed in accordance with the recommendations of the Remediation Action Plan - A Remediation Environmental Management Plan (REMP), to document the monitoring and management measures required to control the environmental impacts of the works and ensure the validation protocols are being addressed. - A Work Health and Safety Plan (WHSP) to document the procedures to be followed to manage the risks posed to the health of the remediation workforce.	C = 3	C = 3	C = 5 (low/medium)

8.0 Project Justification

In general, investment in major projects can only be justified if the benefits of doing so exceed the costs. Such an assessment must consider all costs and benefits, and not simply those that can be easily quantified. As a result, the EP&A Act specifies that such a justification must be made having regard to biophysical, economic and social considerations and the principles of ecologically sustainable development.

This means that the decision on whether a project can proceed or not needs to be made in the full knowledge of its effects, both positive and negative, whether those impacts can be quantified or not.

The Proposal involves the construction and operation of a warehousing and distribution facility. The assessment must therefore focus on the identification and appraisal of the effects of the proposed change over the site's existing condition.

Various components of the biophysical, social and economic environments, as well as the Proposal's alignment with the objects of the EP&A Act and other statutory instruments applicable to the site, have been examined in this EIS and are summarised below.

8.1 Design of the Proposal

The proposed building pad levels with the proposed site layout and design have been informed by a detailed analysis of site-specific opportunities and constraints. Consequently, the proposed pad level, site layout and built form represents the optimal outcome for the site. It also provides an appropriate and workable redevelopment scenario which meets the objectives of the Proposal as set out in **Section 1.2**, while mitigating adverse impacts on the surrounding environment and sensitive receivers.

In addition, the Proposal is commensurate with the Mamre Road Structure Plan and MRP DCP and maximises potential for employment generating floorspace, which is the key objective of the WSEA, whilst maintaining a high standard of amenity.

8.2 Consistency with the Strategic Context

The site is located at 706-752 Mamre Road, Kemps Creek, within the Penrith Local Government Area (LGA). It is legally described as Lot 1 DP 104958 and is approximately 522,477m² in area. It is located within the Mamre Road Precinct (MRP) which is located within the Western Sydney Employment Area (WSEA) and Western Sydney Aerotropolis. The site was rezoned in 2020 as part of the gazettal of the *State Environmental Planning Policy (Western Sydney Employment Area) 2009*, which has since been consolidated into *State Environmental Planning Policy (Industry and Employment) 2021* (Industry and Employment SEPP). The Industry and Employment SEPP rezoned the site to IN1 General Industrial.

The MRP is a major industrial precinct that is proposed to deliver approximately 850 hectares of industrial land, as well as complementary areas for environmental conservation, open space as well as the potential for a Western Sydney freight intermodal terminal. In accordance with the Structure Plan that accompanied the precinct's rezoning the site is identified for industrial purposes, and therefore the proposed industrial development aligns with the strategic intent for the site.

8.3 Consistency with the Statutory Context

As described in **Section 4.0** and **Appendix C**, the Proposal is consistent with all relevant statutory relating to the site, including:

- *Environmental Planning and Assessment Act 1979*;
- *Biodiversity and Conservation Act 2016*;
- *Environmental Planning and Assessment Regulation 2021*;
- *State Environmental Planning Policy (Planning Systems) 2021*;
- *State Environmental Planning Policy (Industry and Employment) 2021*;
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*;
- *State Environmental Planning Policy (Resilience and Hazards) 2021*; and
- *Mamre Road Precinct Development Control Plan*.

8.3.1 Objects of the EP&A Act

This EIS has examined and considered all possible matters affecting or that are likely to affect the environment by reason of the proposed development. The Proposal is consistent with the relevant Objects of the Act as listed under Section 1.3 of the EP&A Act and will not result in any unjust or significant environmental impact.

The Proposal seeks to develop an industry leading and connected employment precinct focused on quality, technology, flexibility and sustainability which complements the development of the MRP and nearby Aerotropolis. The Proposal involves the development of warehouse, distribution and general industrial development that is strategically aligned to the desired outcomes and use for the site and is consistent with the IN1 General Industrial zoning of the site, which are appropriately managed and responded to through the proposed built form design. Therefore, the proposed development promotes the orderly and economic use of the site.

8.3.2 EP&A Act – Clause 4.15 Evaluation

The following section assesses the Proposal against the relevant heads of consideration listed in section 4.15 of the EP&A Act.

8.3.3 EP&A Regulation

The EIS has addressed the specification criteria within clause 190 and clause 192 of the EP&A Regulation. Similarly, the EIS has addressed the principles of ecologically sustainable development through the precautionary principle (and other considerations), which assesses the threats of any serious or irreversible environmental damage.

8.3.4 Principles of Ecologically Sustainable Development

The EP&A Regulation lists four principles of ecologically sustainable development to be considered in assessing a project. They are:

- The precautionary principle;
- Intergenerational equity;
- Conservation of biological diversity and ecological integrity; and
- Improved valuation and pricing of environmental resources.

An analysis of these principles is provided under the following subheadings.

Precautionary Principle

The precautionary principle is utilised when uncertainty exists about potential environmental impacts. It provides that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The precautionary principle requires careful evaluation of potential environmental impacts in order to avoid, wherever practicable, serious or irreversible damage to the environment.

This EIS has not identified any serious threat of irreversible damage to the environment and therefore the precautionary principle is not relevant to the Proposal.

Intergenerational Equity

Inter-generational equity is concerned with ensuring that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations.

- The Proposal has been designed to benefit both the existing and future generations by:
- Implementing safeguards and management measures to protect environmental values;
- Facilitating job creation in close proximity to future residential areas; and
- Ensuring the WSEA is maintained and enhanced into the future for use by future generations.

The Proposal has integrated short and long-term social, financial and environmental considerations so that any foreseeable impacts are not left to be addressed by future generations. Issues with potential long term implications such as waste disposal would be avoided and/or minimised through construction planning and the application of safeguards and management measures described in this EIS and the appended technical reports.

Conservation of Biological Diversity and Ecological Integrity

The principle of biological diversity upholds that the conservation of biological diversity and ecological integrity should be a fundamental consideration.

The Proposal would not have any significant effect on the biological diversity and ecological integrity of the study area. The majority of the site has been identified as 'urban capable' and does not require further biodiversity assessment. The BDAR (**Appendix Z**) conducts an assessment of the areas identified as 'excluded land' within the study area, and determine no significant biodiversity impacts will occur as a result of the proposed development.

Improved Valuation, Pricing and Incentive Mechanisms

The principles of improved valuation and pricing of environmental resources requires consideration of all environmental resources which may be affected by a proposal, including air, water, land and living things. Mitigation measures for avoiding, reusing, recycling and managing waste during construction and operation would be implemented to ensure resources are used responsibly in the first instance.

Additional measures will be implemented to ensure no environmental resources in the locality are adversely impacted during the construction or operational phases.

8.4 Stakeholder Views

As outlined in **Section 5.0**, the project team have consulted with the key government and agency stakeholders including the DPHI, TfNSW and Sydney Water. The project team have also consulted with surrounding landowners regarding boundary works and the upgrading of the external road network. The Applicant will continue to work with LOG-N which will continue to collaborate to enable the delivery of the necessary external road upgrades to facilitate each of the proposed developments.

In addition, the project team have consulted with the schools and retirement village located on the northern side of Bakers Lane regarding the potential construction and operation impacts, include the external road network. The project team are committed to ongoing community consultation following the submission of the EIS. This includes during the exhibition and assessment of the project and following a determination.

8.5 Likely Impacts of the Development

8.5.1 Natural Environment

The environmental impact assessment of the proposed development has demonstrated that there are not anticipated to be more than minor impacts as a result of the development, and these are not considered to be of significance, either in nature or extent.

8.5.2 Built Environment

The Proposal will not have any significant impact on the built environment as the site and surrounding area of a rural residential nature with surrounding new industrial development beginning to be constructed. The sensitive receivers (school and retirement village) on the northern side of Bakers Lane and been considered within the relevant assessments and expect to result in minimal impact with appropriate mitigation measures implemented where relevant.

8.5.3 Social and Economic

The Proposal will deliver social benefit to the community through the creation of jobs in an area of high demand, delivery of state-of-the-art industrial logistics warehousing facilities, protection of environmental land and inclusion of sustainability initiatives.

Moreover, the Proposal will not result in any likely significant or detrimental economic impacts, On the contrary, the proposed development is likely to result in significant positive economic benefits, including the provision of additional industrial and employment floorspace, that will support demand for warehousing and industrial facilities in this part of Sydney. Further, the Proposal will align with the needs of modern tenant and business requirements, supporting the long term potential and objectives of the locality.

8.6 Suitability of the Site

Having regard to the characteristics of the site and its location in Kemps Creek, the proposed development is considered suitable in that:

- The site is zoned as IN1 within the MRP which has been identified and recognised as appropriate for the development of an industrial precinct;
- The Proposal involves an industrial estate and an associated internal road network, which is consistent with the zoning and the intentions of the MRP and the approved and proposed developments in the vicinity of the site;
- The Proposal dedicates portions of the site to allow for the delivery of the Southern Link Road and the widening of Mamre Road, which is consistent with the road network specified within the MRP Structure Plan;
- Development of the site for employment uses is complementary to the Western Sydney Aerotropolis and the soon to be operational Western Sydney International Airport, through ensuring logistics and warehousing is available in close proximity;
- The surrounding area will be developed for industrial purposes consistent with this Proposal, ensuring a well-structured and accessible employment precinct is established to provide for ongoing jobs for workers within the broader Western Sydney Area; and
- The bulk earthworks for the site have been carefully considered to ensure a balanced cut and fill is achieved and to minimise the height and visual impacts of retaining walls.

8.7 Public Interest

The proposed development is in the public interest for the following reasons:

- The introduction of jobs within the new MRP will be a driver for ongoing employment opportunities;
- The proposed development is likely to result in significant positive economic benefits, including the provision of additional industrial and employment floorspace, that will support demand for warehousing and industrial facilities in this part of Sydney;
- The Proposal will align with the needs of modern tenant and business requirements, supporting the long-term potential and objectives of the locality; and
- Provision of land for the potential future dedicated freight network (AGV) will bolster the competitiveness and efficiency of the freight and logistics network.

9.0 Conclusion

The Environmental Impact Statement (EIS) has been prepared to consider the environmental, social and economic impacts of the proposed Concept Masterplan and Stage 1 Development for an industrial estate identified as Summit at Kemps Creek at 706-752 Mamre Road, Kemps Creek. The EIS has addressed the issues outlined in the SEARs (**Appendix A**) and in accordance with the EP&A Regulation.

The Proposal seeks to facilitate the redevelopment of the site for a new industrial warehouse and distribution development, known as Summit at Kemps Creek, in accordance with the site's recent rezoning (June 2020 to the *State Environmental Planning Policy (Western Sydney Employment Area) 2009*) for industrial purposes, and desired future outcome established by the MRP Structure Plan.

The EIS has considered a range of environmental issues including statutory and strategic context, suitability of the site, community and stakeholder engagement, traffic and transport, soils and water, urban design and visual, noise and vibration, infrastructure requirements, Aboriginal cultural heritage, non-Aboriginal cultural heritage, biodiversity, socio-economic impacts, ecologically sustainable development, air quality, waste, contamination, bushfire, hazards and risk, greenhouse gas and energy efficiency, airport safeguarding, and development contributions.

It is recognised by the Applicant that the LOG-N roadworks, consultation with adjacent schools on Bakers Lane, bulk earthworks and connection to neighbouring developments, and waterway health are assessment issues that require further resolution during the assessment of the SSDA following formal lodgement.

Having regard to biophysical, economic and social considerations, including the principles of ecologically sustainable development, the carrying out of the Proposal is justified for the following reasons:

- The Proposal is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including *State Environmental Planning Policy (Industry and Employment) 2021*;
- The Proposal is consistent with the desired future character of the area and relevant strategic planning documentation, including the Greater Sydney Region Plan and Mamre Road Structure Plan;
- The Proposal is generally consistent with the MRP DCP with minor inconsistencies being justified on a site-specific merit basis;
- The Proposal will not result in adverse environmental impacts, will contribute much-needed industrial land in Western Sydney, and will provide significant employment outcomes during both construction and operation; and
- The Proposal is suitable for the site and in the public interest.

Overall, the Proposal will facilitate employment development at a suitable scale and will assist in repurposing a strategically significant site within the Western Sydney Employment Area that is in line with the strategic direction for the area as established by the NSW Government. This will further safeguard the future of employment lands and assist in achieving the employment forecasts for Western Sydney. On this basis and given the merits of the Proposal, we have no hesitation in recommending the Proposal be approved.