



Mainfreight Distribution Warehouse – Modification 3

SSD-5746

Goodman Property Services (Aust) Pty Ltd

Prepared by:

SLR Consulting Australia

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0.1	19 August 2025	Tam Durney	April Hudson	Tam Durney
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Basis of Report

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

This report is for the exclusive use of the Client. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

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Executive Summary

INTRODUCTION

NSW Department of Planning and Infrastructure (DPI, now the NSW Department of Planning, Housing and Infrastructure (DPHI)) granted Development Consent to Goodman Property Services (Aust) Pty Ltd. (the Applicant) for the expansion of the Mainfreight Pty Ltd (Mainfreight) operated storage and distribution centre (SDC) on 9 August 2013.

This Modification Report has been prepared to accompany an application to modify Development Consent SSD-5746 under Section 4.55(1A) of the *Environmental Planning and Assessment Act 1979* (EP&A Act). This modification shall be known as Modification 3 of SSD 5746 (MOD 3). The purpose of MOD 3 is to enhance operational efficiency through optimising truck movements and to remove the requirement to complete an annual review.

DEVELOPMENT SITE

The 'Mainfreight SDC' is owned by Goodman Property Services (Aust) Pty Ltd (Goodman). The site presently accommodates the transport, storage and logistics operations of Mainfreight, and is located at 30–50 Yarrowa St, Prestons NSW 2170 (the Site).

APPROVED DEVELOPMENT

The existing development consent enables the operation of the Mainfreight SDC, which includes two warehouse buildings, two offices, a weighbridge, hardstand area, refuelling facility for trucks, parking and other ancillary features.

PROPOSED MODIFICATION 3

The proposed modifications have been identified by Mainfreight as being essential to the ongoing successful management of the SDC and improve the overall delivery of Mainfreight services which include; transport, storage and logistics operations. The information below provides further detail on each of the elements proposed for modification:

- Adjustment to Number of Trucks Movements - Amend Condition B5A of SSD 5746 (as modified) which allows a maximum of 40 truck movements between the hours of 10:00pm and 5:00am for the Mainfreight SDC.
Mainfreight is proposing to increase the maximum to 60 movements.
- Remove Requirement to Complete Annual Review - Remove Condition D5 of SSD 5746 (as modified), which requires an annual review of the environmental performance of the facility.

IMPACT ASSESSMENT

Agency consultation along with specialist input has been undertaken to assist in identifying potential impacts associated with MOD 3 and any additional mitigation and management measures required.

To support MOD 3, SLR's Transport Advisory Team were engaged to assess the implications associated with matters relating to traffic and transport. The findings of the assessment are summarised below.

Other environmental aspects were assessed against existing studies including the 2023-2024 Annual Review (SLR, 2024) and a recent Acoustical Certificate completed by Koikas Acoustics (March 2025). The Acoustical Certificate included noise measurements and review against the noise criteria outlines in the Environmental Protection Licence (EPL) (No. 21221) issued by the NSW EPA.



Traffic and Transport

Based on the analysis and discussion documented in the transport advisory technical memorandum and concludes:

- The geometric feature of the nominated design vehicle has not been proposed to change with the surrounding road network being approved for 26m B-Double heavy vehicles as per the NHVR.
- The increase of heavy vehicles from 40 movements to 60 during the hours of 10:00pm and 5:00am will result in no impacts to the off-peak traffic period safety or operation.
- The additional 20 truck movements between 10:00pm and 5:00am are not additional to the conditioned 560 daily movement threshold i.e. the daily limit is still 560 movements per day.
- The proposed increase to 60 truck movements between 10:00pm and 5:00am equates to an average of 8.6 movements per hour, compared with 5.7 movements per hour under the current approval. This represents an additional 2.9 truck movements per hour.

Noise

The Acoustical Certificate (Kiokas Acoustics, 2025) concludes that noise from the Mainfreight SDC is within the EPL limits for both Identification No. 1 and No. 2 and was inaudible at both monitoring location. This is consistent with noise modelling conducted in the previous EPL Noise Assessment (Hibbs Associated Pty Ltd, n.d) which predicted noise levels to be within the EPL limits. This finding was reinforced by the lack of noise complaints to date from the community for the Mainfreight SDC.

Based on the findings of the Acoustical Certificate, the proposed modification is not anticipated to significantly change or increase the noise emissions given the current local environment and surrounding industry.

JUSTIFICATION AND CONCLUSION

The appropriate approvals pathway for MOD 3 is deemed to be under Section 4.55(1A) of the EP&A Act for modifications involving no or minimal environmental impact, as demonstrated by this Modification Report.

Importantly, the proposed modification will result in substantially the same development to the current approval. Given the scale of the development, a comparison of the qualitative and quantitative changes posed at a macro level have been considered in order to ascertain whether the development as modified is fundamentally the same as the originally approved development.

It is considered that the modified development is essentially and materially the same in essence as the originally approved development. The modification will allow the approved Mainfreight SDC to operate in a more efficient manner and increased client serviceability. This enhancement is designed to streamline operations, reduce downtime, and increase overall productivity. Importantly, these changes will not impact the original purpose of the development, which is to provide a storage and distribution centre.

The proposed modification will provide economic growth and employment opportunities and will not result in any greater than minor impacts to the community or environment.

On this basis, there is no evidence to suggest that the amendments under MOD 3 will impact on the long-term health and diversity of the environment.



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Appendix C	Annual Review 2023-2024
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Acronyms and Abbreviations

BC Act	<i>Biodiversity Conservation Act 2017</i>
CBD	Central Business District
DCP	Development Control Plan
DPHI	NSW Department of Planning, Housing and Infrastructure
DPI	Department of Planning and Infrastructure
DCCEEW	Commonwealth Department of Climate Change, Energy, the Environment and Water
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA	Environmental Protection Authority
EPBC Act	<i>Environmental Protection and Biodiversity Conservation Act 1999</i>
EPIs	Environmental Planning Instruments
EPL	Environmental Protection License
ESD	Ecological Sustainable Development
FRNSW	Fire and Rescue NSW
Goodman	Goodman Property Services (Aust) Pty Ltd
km	kilometres
LC Act	<i>Crowns Land Act 1989</i>
Liverpool LEP	<i>Liverpool Local Environmental Plan 2008</i>
LGA	Local Government Area
LPG	Liquid Petroleum Gas
m	metres
Mainfreight	Mainfreight Pty Ltd
MNES	Matters of National Environmental Significance
MOD	Modification
NHRV	National Heavy Vehicle Regulator
NSW	New South Wales
PHA	Preliminary Hazard Assessment
Planning Systems SEPP	<i>State Environmental Planning Policy (Planning Systems) 2021</i>
POEO Act	<i>Protection of Environmental Operations Act 1997</i>
PUD	Pick-up and delivery
Resilience and Hazards SEPP	<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>
RFS	Rural Fire Service
Roads Act	<i>Roads Act 1993</i>
SEARs	Secretary Environmental Assessment Requirements
SEPPs	State Environmental Planning Policies
SLR	SLR Consulting Australia Pty Ltd



SSD	State Significant Development
TfNSW	Transport for New South Wales
TMP	Traffic Management Plan
the Site	The Mainfreight SDC located at Yarrawa Street, Prestons, which is the subject of this modification.
Transport and Infrastructure SEPP	<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>
WM Act	<i>Water Management Act 2000</i>
WMP	Waste Management Plan



1.0 Introduction

NSW Department of Planning and Infrastructure (DPI (now the Department of Planning, Housing and Infrastructure (DPHI)) granted Development Consent to Goodman Property Services (Aust) Pty Ltd. for the expansion of the Mainfreight Pty Ltd (Mainfreight) operated storage and distribution centre (SDC) on 9 August 2013.

The original consent enabled the construction and operation of 'Mainfreight SDC', including a hardstand area, new access driveways, and other ancillary developments of the Site, located at Yarrawa Street, Prestons (the Site).

Modification 1 (MOD 1) sought to amend conditions of consent relating to floor area of the approved expansion (Condition B5(a)), dangerous goods storage quantity (Condition B6), and 24-hour truck operations (Condition 27). To support the modification application an acoustic report and dangerous goods advice were included in the submission. DPI approved the modification on 27 May 2014. Modification 2 (MOD 2) was prepared and subsequently withdrawn.

SLR Consulting Australia Pty Ltd (SLR), on behalf of Goodman Property Services (Aust) Pty Ltd, has prepared this Modification Report to accompany an application to modify Development Consent SSD-5746 section 4.55(1A) of the *Environmental Planning and Assessment Act 1979* (EP&A Act). This report has been prepared having regard to the State Significant Development (SSD) Guidelines – Preparing a Modification Report (DPIE, 2022). This modification shall be known as Modification 3 of SSD 5746 (MOD 3). The purpose of MOD 3 is to enhance operational efficiency through optimising truck movements and to remove the requirement to complete an annual review.

This will allow Mainfreight to meet market demands by increasing the number of truck movements at the Mainfreight SDC.

1.1 Summary of the Approved Project

1.1.1 Mainfreight

Mainfreight Pty Ltd (Mainfreight) is a New Zealand logistics company operating more than 330 branches worldwide across 27 countries.

Mainfreight currently operates 16 warehouses and distribution facilities across Australia.

1.1.2 Site Background

The Site is owned by Goodman Property Services (Aust) Pty Ltd (Goodman) and presently accommodates the logistics operations of Mainfreight.

The Site is presently comprised of the following:

- Two warehouse buildings joined by an awning creating a breezeway.
- Two offices (both two levels).
- A weighbridge and a covered truck wash facility with water recycling facilities.
- Refuelling facility for trucks (diesel) and forklifts, Liquid Petroleum Gas (LPG).
- Hardstand area, site landscaping, and parking areas.
- Entrance/exit to Yarrawa Street for cars and trucks on the north-west corner and exit to Yarrawa Street for trucks.
- Dangerous goods storage area.
- Hardstand area.
- Truck wash facility.



- Other ancillary developments of the site; and
- Site signage and perimeter fencing.

1.1.3 Existing Approvals Summary

1.1.3.1 Development Consent SSD 5746

Table 1 Approved Development Description Summary

Aspect	Details													
Purpose	Transport logistics services													
Address	30 – 50 Yarrowa St, Prestons NSW 2170.													
Lot and Deposited Plan (DP) (Address)	Lot 10/ DP1203200 (30-50 Yarrowa St, Prestons) Note: Freehold – Owned by Goodman Property Services (Aust) Pty Ltd													
Local Government Area (LGA)	Liverpool LGA													
Hours of operation	<i>Table 2: Operating Hours</i> <table><tr><th>Activity</th><th>Day</th><th>Hours</th></tr><tr><td rowspan="3">Construction</td><td>Monday – Friday</td><td>7am to 6pm</td></tr><tr><td>Saturday</td><td>8am to 1pm</td></tr><tr><td>Sunday & Public Holidays</td><td>No Construction</td></tr><tr><td>Operations</td><td>Monday - Sunday</td><td>24 hours (Truck movements restricted to between 5am and 7pm)</td></tr></table>	Activity	Day	Hours	Construction	Monday – Friday	7am to 6pm	Saturday	8am to 1pm	Sunday & Public Holidays	No Construction	Operations	Monday - Sunday	24 hours (Truck movements restricted to between 5am and 7pm)
Activity	Day	Hours												
Construction	Monday – Friday	7am to 6pm												
	Saturday	8am to 1pm												
	Sunday & Public Holidays	No Construction												
Operations	Monday - Sunday	24 hours (Truck movements restricted to between 5am and 7pm)												
Employment	The total staff numbers are approximately 197 persons (141 warehouse staff and 56 office staff).													
Vehicle access	Access to the Mainfreight SDC is via the approved existing exits and entrances on site which are located on Yarrowa Street. Vehicle movements are essentially split into two distinct precincts: • Movements associated with the Transport Shed (being the one closest to Yarrowa Street); and • Traffic flow for the warehouse at the rear of the site, known as the Logistics Shed.													
Parking	As per condition C11 of SSD 5746 (as modified), provision has been made for 177 on-site car parking spaces and 70 truck parking spaces. Including an additional 40 car parking spaces adjacent to the northern boundary, within the hardstand area.													
Traffic generation	The Traffic Management Plan (TMP) completed as part of the original EIS noted that with regard to daily trips, the survey data recorded a total of 384 arrival and departure trips. Therefore, application of the 23% factor indicates that daily staff-related trips are about 472 light vehicles per day. These trips are generally evenly distributed throughout the 3-hour morning and evening peak periods. The daily trip generation of operational traffic from heavy vehicle movements (trucks) to/from the site, is approximately 560 trips consisting of: • 500 truck trips associated with the Transport Shed; and • 60 truck trips associated with the Logistics Shed.													
Waste management	Waste is managed in accordance with the approved Waste Management Plan (WMP) and condition C37 of SSD 5746 (as modified)													



1.1.3.2 Modification SSD 5746 MOD 1

MOD 1 sought to amend conditions of consent relating to floor area of the approved expansion (Condition B5(a)), dangerous goods storage quantity (Condition B6), and 24-hour truck operations (Condition C27). To support the modification application an acoustic report and dangerous goods advice were included in the submission.

DPI approved the modification on 27 May 2014.

1.1.3.3 Modification SSD 5746 MOD 2 (Withdrawn)

MOD 2 was prepared but withdrawn from application.

1.2 Description of the Proposed Modification

1.2.1.1 Modification SSD 5746 MOD 3

The proposed modifications have been identified by Mainfreight as being essential to the ongoing successful management of the facility and improve the overall delivery of Mainfreight services. The information below provides further detail on each of the elements proposed for modification:

- Adjustment to Number of Trucks Movements - Amend Condition B5A of SSD 5746 (as modified) which allows a maximum of 40 truck movements between the hours of 10:00pm and 5:00am for the Mainfreight SDC Mainfreight is proposing to increase the maximum to 60 movements.
- Remove Requirement to Complete Annual Review - Remove Condition D5 of SSD 5746 (as modified), which requires an annual review of the environmental performance of the facility.



2.0 Site and Strategic Context

2.1 Site Context

The Site is located within Lot 10 / DP1203200 at 30-50 Yarrowa Street, Prestons, approximately seven kilometres (km) west of Liverpool City Centre. Under the provisions of the *Liverpool Local Environmental Plan 2008* (Liverpool LEP), the Site and majority of adjoining lands are zoned E5 Heavy Industry (refer Figure 1). The approved land use, freight transport facilities, is permitted with consent. The modification does not alter the permissibility of the development, nor suitability against the zone objectives.

The nearest residential properties are located 210 metres (m) directly west of the Site. This land is zoned R2 (Low Density Residential). To the north-east of the Site, the nearest residential property is approximately 368 m from the Site. Approximately 616 m south of the warehouse, the land is also zoned R2 Low Density Residential area (refer Figure 1).

2.1.1 Regional Context

The suburb of Prestons is located within the City of Liverpool Local Government Area (LGA) in south-western Sydney, NSW. While much smaller in area than rural LGAs, the City of Liverpool spans approximately 305 km² and has a population of approximately 234,355 as of the 2021 Census (ABS, 2021), making it one of the fastest-growing areas in the state. Prestons is situated about 37 km south-west of the Sydney CBD and is conveniently accessible via the M5 and M7 Motorways. The suburb is bordered by other residential and semi-rural suburbs including Casula, Hoxton Park, West Hoxton, and Lurnea (refer Figure 2 and Figure 3).

2.1.2 Location and site description

Table 2 Schedule of Land Titles

Lot and Deposited Plan (DP)	Address	Area (approximate)	Road Frontage
Lot 10/DP1203200	30-50 Yarrowa Street	2000 m ²	Yarrowa Street (north of the site)

2.1.3 Zoning

Under the provisions of the *Liverpool Local Environmental Plan 2008* the land is zoned E5 (Heavy Industrial). The approved land use “Freight Transport Facilities” is permitted with consent. The modification does not alter the permissibility of the development, nor its suitability against the zone objectives.

2.1.4 Surroundings

The Site is located directly adjacent (west) to the Cabramatta River. The Cabramatta River is a small watercourse in south-western Sydney, flowing through the suburb of Cabramatta. Once more prominent, it has been largely altered by urban development but still plays a key role in local drainage and ecology. Efforts to improve water quality and enhance the surrounding environment continue, with parks and walking tracks along its banks offering a connection to the area's natural history.



Figure 1 Surrounding Land Uses and Receptors (Source: ePlanning spatial viewer)

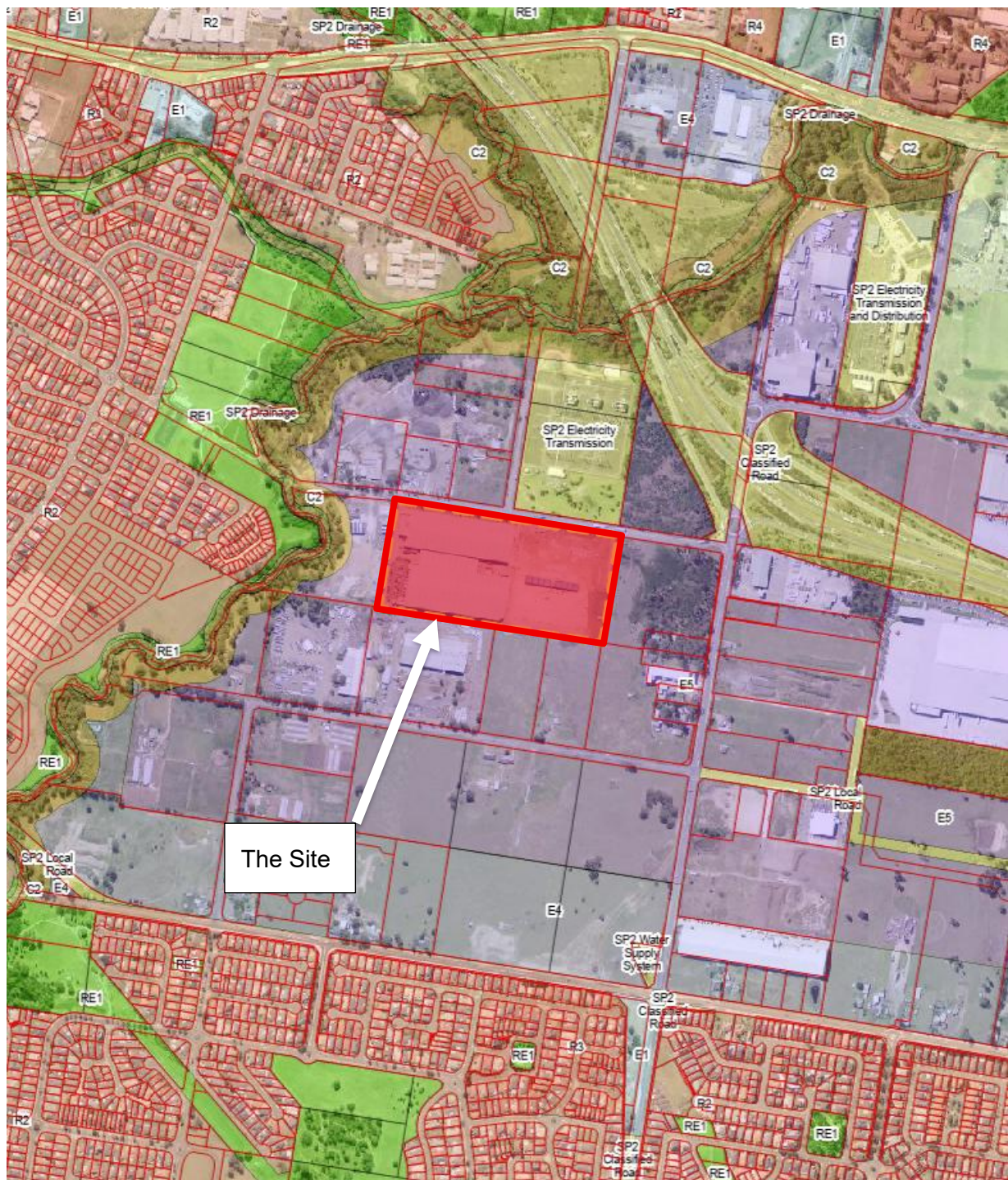
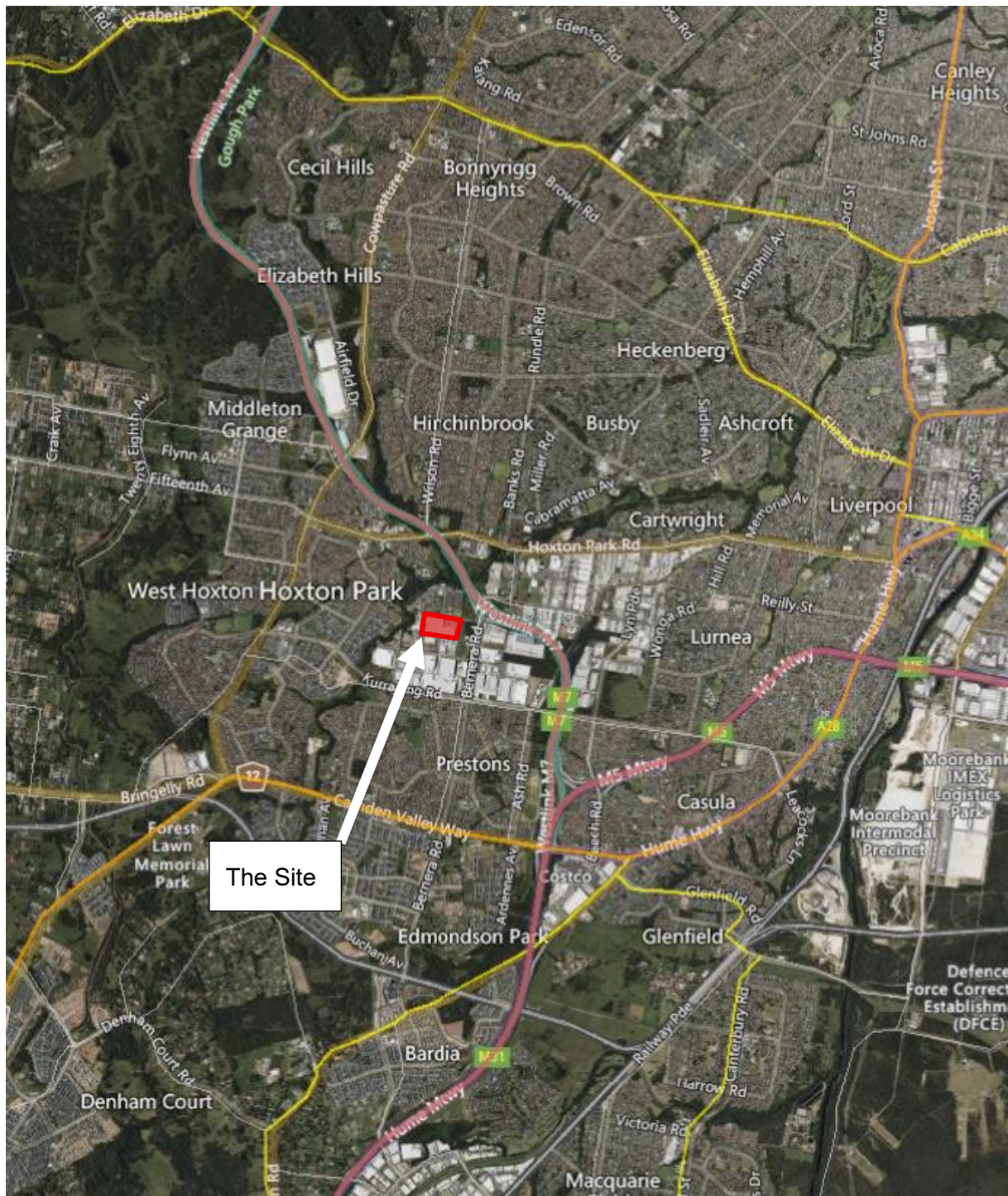


Figure 2 Regional Locality (Source: NationalMap)



2.2 Strategic Context and Objectives

2.2.1 Yarrunga Release Area

The Yarrunga Release Area, covering approximately 227 hectares (ha), is located within the Liverpool LGA. It is bordered by the M7 Motorway to the north and east, Kurrajong Road to the south, and Cabramatta Creek to the west. Adjacent to the area on both sides of the M7 is the existing Prestons Industrial Area. In late 2005, Liverpool City Council resolved to rezone the entire Yarrunga Release Area for industrial use. This was formalised through Amendment No. 98 to the Liverpool LEP, which was gazetted on 20 July 2007. Together with the Liverpool Industrial Development Control Plan, the amendment facilitated the area's development.

2.2.2 Metropolitan Plan for Sydney 2036

In December 2005, the NSW Government released *City of Cities – A Plan for Sydney's Future*, which was updated in December 2010 to incorporate the Metropolitan Transport Plan, resulting in the *Metropolitan Plan for Sydney 2036* (the Metro Strategy). This long-term strategy aims to enhance the role of cities across the metropolitan area by integrating land use and transport planning and directing growth to key centres to improve access to jobs, services, and infrastructure. Its key objectives include:

- Mitigate and adapt to the impacts of climate change.
- Integrate infrastructure, particularly transport, with land uses as part of managing growth, city efficiency and sustainability.
- Strengthen governance, monitoring and implementation arrangements to secure delivery of outcomes.
- Address the Federal Government's new national criteria to improve capital city planning for all States and Territories, and
- Respond to the challenges of Sydney's faster than previously expected population growth.

The objectives were supported by stakeholder feedback during the public exhibition period.

This project aligns with the Metro Strategy by generating industrial employment opportunities and supporting regional supply and distribution networks. The use of the approved industrial warehouse is appropriate for the Site and is consistent with existing industrial activities.

2.2.3 Greater Sydney Region Plan

The Greater Sydney Region Plan, titled *A Metropolis of Three Cities*, sets out a long-term vision to reshape Greater Sydney into three interconnected cities by 2056:

1. **Eastern Harbour City** – anchored by the Sydney Central Business District (CBD).
2. **Central River City** – centred around Parramatta; and
3. **Western Parkland City** – built around the new Western Sydney Airport and Aerotropolis.

The Plan aims to ensure that most residents live within 30 minutes of jobs, education, and essential services. It integrates land use, transport, and infrastructure planning to improve liveability, productivity, and sustainability across the region.

Key objectives include:

- Supporting infrastructure that aligns with growth.



- Creating walkable, connected communities.
- Delivering diverse and affordable housing.
- Enhancing environmental heritage and public spaces.
- Strengthening economic hubs like the Harbour CBD, Greater Parramatta, and the Western Sydney Aerotropolis.

Specifically, the modification aligns with Objective 16 – Freight and logistics network is competitive and efficient. The Mainfreight SDC supports Greater Sydney's freight and logistics sector.

2.2.4 Western City District Plan

The Western City District Plan is a 20-year strategic blueprint guiding growth and development across the Western Parkland City—one of the three cities in the *Greater Sydney Region Plan*. It translates the broader regional vision into district-level priorities and actions, focusing on economic, social, and environmental outcomes.

This will be achieved by:

- Creating a once-in-a-generation economic boom with the Western Sydney Airport and Badgerys Creek Aerotropolis bringing together infrastructure, businesses and knowledge-intensive jobs.
- Building on the Western Sydney City Deal to transform the Western City District over the next 20 to 40 years by building on natural and community assets and developing a more contained Western City District with a greater choice of jobs, transport and services aligned with growth.
- Delivering the first stage of the North South Rail Link.
- Collaborating and building strong relationships between Liverpool, Greater Penrith and Campbelltown-Macarthur reinforced by the emerging Badgerys Creek Aerotropolis forming a unique metropolitan cluster.
- Providing major transport links for people and freight by unprecedented transport investments.
- Developing a range of housing, providing access to public transport and infrastructure including schools, hospitals and community facilities.
- Linking walking and cycling paths, bushland and a green urban landscape framed by the Greater Blue Mountains World Heritage Area, the Scenic Hills and Western Sydney Parklands.
- Enhancing and protecting South Creek, Georges River and Hawkesbury Nepean river systems.
- Mitigating the heat island effect and providing cooler places by extending urban tree canopy and retaining water in the landscape.
- Protecting the District's natural landscapes, heritage and tourism assets, unique rural areas and villages; and
- Protecting the environmental, social and economic values of the Metropolitan Rural Area.

The Mainfreight SDC ensures ongoing support of transport investments, supports local employment and encourages growth of transport and services.



3.0 Description of Modification (MOD 3)

The proposed modifications have been identified by Mainfreight as being essential to the ongoing successful management of the facility and improve the overall delivery of Mainfreight services. The information below provides further detail on each element of the Modification Application.

3.1 Adjustment to Number of Trucks

Mainfreight seeks to amend Condition B5A of SSD 5746 (as modified) which sets a maximum of 40 truck movements between the hours of 10:00pm and 5:00am for the Mainfreight SDC. Specifically, Mainfreight is proposing to increase the maximum 60 movements.

3.1.1 Operational Justification

The proposed increase is required to meet the significant growth in Mainfreight's operations and broader Australian supply chain demands since the original movement limits were determined in 2013. The specific operational drivers for this modification include:

- **East Coast Supply Chain Growth:** There is an increased requirement for product movement within the eastern states, necessitating a higher volume of heavy vehicles to facilitate regional distribution.
- **Strategic Node Efficiency:** As the Prestons site supports 16 warehouses across Australia and 330 branches worldwide, it serves as a critical node that must accommodate increased throughput to remain competitive.
- **Next-Day Delivery Requirements:** The modification allows Mainfreight to meet modern market demands and "next-day" delivery KPIs by optimizing the sorting and dispatch of freight during early morning hours.
- **Reduced Daytime Congestion:** Increasing the night-time cap allows the facility to process interstate line-haul arrivals during off-peak periods, which streamlines operations and reduces downtime.
- **Consistency with Daily Limits:** Importantly, the additional 20 night-time movements are not in addition to the total daily threshold; the facility will continue to operate within its approved limit of 560 daily movements.

This enhancement is essential for Mainfreight to provide increased client serviceability and ensure the ongoing successful management of the Mainfreight SDC.

3.2 Remove Requirement to Complete Annual Review

SLR understands that Mainfreight have held initial discussions with DPHI to discuss the removal of Condition D5 of SSD 5746 (as modified), which requires an annual review of the environmental performance of the facility. Discussion determined that Mainfreight would need to complete one annual review to determine if the requirement for subsequent annual reviews is necessary. Consequently, this MOD 3 includes the request to remove Condition D5, supported by the 2023-2024 Annual Review provided at Appendix C.

The justification for this removal is twofold. Firstly, the request seeks to align the development with contemporary regulatory frameworks for warehouse and distribution centres. Modern State Significant Development (SSD) consents typically favour Compliance Reporting over the broader Annual Review process, as it allows for more "nuanced and targeted" oversight of specific environmental risks. Transitioning to a Compliance Reporting



schedule would ensure that monitoring remains focused on the Site's primary operational impacts, such as traffic and noise, rather than administrative requirements that may no longer be fit-for-purpose for a mature operation.

Secondly, the facility is already subject to Environment Protection Licence (EPL) No. 21221, which includes its own established reporting and monitoring protocols. Maintaining the Annual Review requirement under the SSD consent creates an unnecessary layer of duplication. By removing Condition D5, the reporting structure is streamlined to reflect the Site's operational reality as a logistics hub while ensuring that all environmental obligations continue to be met through the EPL and modern Compliance Reporting standards. This approach directly addresses DPHIs queries by replacing a legacy requirement with a more relevant and effective oversight mechanism.

3.3 Conditions of Consent

To facilitate the above proposed modifications, it is proposed that the conditions of the Consolidated Consent are modified as per Table 3 below. Similarly, the Summary of Modifications under Schedule B and D of the Consolidated Consent will also require updating to reflect this modification, as outlined in Table 3.

Table 3: Modified Conditions of Consent

Condition Reference	Current Condition	Proposed Condition / modification
Schedule B Condition 5(B5A)	<i>The number of truck movements between the hour of 10:00pm and 5:00am shall be restricted to a maximum of 40.</i>	The number of truck movements between the hour of 10:00pm and 5:00am shall be restricted to a maximum of 60 .
Schedule D Condition D5	<i>One year after the commencement of operation, and annually thereafter, unless the Director-General directs otherwise, the Applicant shall review the environmental performance of the development to the satisfaction of the Director-General. The review shall:</i> <i>a) describe the operations that were carried out in the past year;</i> <i>b) analyse the monitoring results and complaints records of the development over the past year, which includes a comparison of these results against the</i> <i>• relevant statutory requirements, limits or performance measures/criteria;</i> <i>• monitoring results of previous years; and</i> <i>• relevant predictions in the EIS;</i> <i>a) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;</i> <i>b) identify any trends in the monitoring data over the life of the development;</i> <i>c) provide a summary of results required for the EPL; and</i> <i>d) describe what measure will be implemented over the next year to improve the environmental performance of the development.</i>	Deleted



4.0 Statutory Context

4.1 Power to Grant Approval

The applicable approval pathway for the modification is through the SSD process. Goodman Property Services (Aust) Pty Ltd obtained Development Consent SSD 5746 from DPI (now DPHI) (under delegation) on 9 August 2013 under Part 4 of the EP&A Act for construction and ongoing operations. Since this time, the Development Consent has been modified on one occasion (and one withdrawn).

SLR have reviewed the proposed modification against the provisions of section 4.55 of the EP&A Act and have determined that the modification is best suited as a S4.55(1A) Modification Application.

The requirements of section 4.55(2) of the EP&A Act are listed in Table 4, with justification provided as to how each requirement is addressed by the proposal.

Table 4: Section 4.55(1A) Modification Requirements

Section 4.55(1A)	Proposed Modification
<i>Modifications involving no or minimal environmental impact A consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the regulations, modify the consent if—</i>	
<i>(a) it is satisfied that the proposed modification is of no or minimal environmental impact, and</i>	It has been demonstrated throughout this report that the modifications proposed result in minimal or no environmental impacts. Refer to Section 7.0.
<i>(b) it is satisfied that the development to which the consent as modified relates is the same or substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all), and</i>	It has been demonstrated throughout this report that the modifications proposed result in substantially the same development with minimal or no environmental impacts. Refer to Section 4.1.1.
<i>(c) it has notified the application in accordance with— (i) the regulations, if the regulations so require, or (ii) a development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for modification of a development consent, and</i>	Consultation with the DPHI and Liverpool City Council has occurred prior to the submission of this modification. The consultation provided the opportunity for the relevant approval body and public authority to provide comment on the modification, and any requirements to be considered throughout the application. A summary of the consultation completed for this modification is provided in Section 5.2 of this report. It is also assumed the DPHI will refer the modification application (including a copy of this Modification Report) to Liverpool City Council. Referrals to the relevant authorities may also include Environmental Protection Authority (EPA) and Transport for New South Wales (TfNSW), however, this will be complete during the assessment of the application.
<i>(d) it has considered any submissions made concerning the proposed modification within any</i>	Any submissions received will be considered by DPHI.



Section 4.55(1A)	Proposed Modification
<i>period prescribed by the regulations or provided by the development control plan, as the case may be.</i> <i>Subsections (1) and (2) do not apply to such a modification.</i>	

4.1.1 Substantially the Same Development

It is considered that the modifications outlined in Section 3.0 comply with the requirements of section 4.55(1A) of the EP&A Act. Importantly, the proposed modification will result in substantially the same development to the current approval.

Given the scale of the development a comparison of the qualitative and quantitative changes posed at a macro level have been considered to ascertain whether the development as modified is fundamentally the same as the originally approved development.

At a macro level the fundamental purpose of the approved development is to facilitate transport logistic for various businesses nationwide. The proposed modification will allow the already approved Mainfreight SDC to operate in a more efficient manner and meet current transport demands. It will not fundamentally change the approved development and is considered to be substantially the same.

4.2 Key Legislation

The below discussion outlines the key pieces of Commonwealth and NSW State legislation relevant to the MOD 3 and indicates the implications, if any, for the proposed modification.

4.2.1 Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act)

The EPBC Act is administered by the Commonwealth Government's Department of Climate Change, Energy, the Environment and Water (DCCEEW) and provides a legal framework to protect and manage nationally important flora, fauna, ecological communities, water resources and heritage places defined as Matters of National Environmental Significance (MNES).

An assessment of whether the development may have a significant impact on any MNES or on the environment of Commonwealth land was undertaken during the EIS investigations and preparation.

Despite MOD 3 resulting in amendments to operational aspects of the site, the modification will not have any impact on any matters of MNES listed under the EPBC Act, and it will not result in any impact to the environment of Commonwealth land.

4.2.2 Environmental Planning and Assessment Act 1979 (EP&A Act)

The EP&A Act is the primary land use planning statute in NSW. It governs matters such as planning administration, planning instruments, development assessments, building certification, infrastructure finance, appeals and enforcement. The EP&A Act seeks to promote management and conservation of natural and artificial resources, while also permitting appropriate development to occur.

Section 4.36 outlines the requirements for a proposal to be a SSD. Section 4.55 outlines the requirements for modifying an existing consent where the changes are substantially the same development as the development for which consent was originally granted.



The existing consent and proposed modifications are considered an SSD under *State Environmental Planning Policy (Planning Systems) 2021*.

The Modification Application will be lodged in accordance with the requirements under section 4.55(1A) of the EP&A Act.

4.2.3 Protection of Environmental Operations Act 1997 (POEO Act)

The *Protection of Environmental Operations Act 1997* (POEO Act) is the key piece of environment protection legislation administered by the EPA. The POEO Act provides a single licensing arrangement relating to air pollution, water pollution, noise pollution and waste management.

The Site presently holds an Environmental Protection License (EPL, No. 21221) which stipulates storage limits of dangerous goods, monitoring and reporting requirements.

The modification will not result in an increase of dangerous goods storage, nor proposes any changes that are likely to affect other aspects of the EPL.

4.2.4 Roads Act 1993 (Roads Act)

The objectives of the *Roads Act 1993* (Roads Act) include regulating the carrying out of various activities on public roads. Section 138 of the Roads Act requires consent to be obtained prior to disturbing or undertaking work in, on or over a public road.

Approvals were obtained under Section 138 of the Act as part of the original EIS. No changes to roads, including intersections, are anticipated as a result of the modification.

The modification seeks an increase in the number of truck movement. To support the modification, a technical memorandum is provided at Appendix A.

4.2.5 Water Management Act 2000 (WM Act)

The *Water Management Act 2000* (WM Act) is intended to ensure that water resources are conserved and properly managed for sustainable use benefitting both present and future generations. Water sharing plans prepared in accordance with the WM Act include rules for protecting the environment and administering water licensing and trading.

As per condition C9(c) of SSD 5746 (as modified) the Site is required to “maintain adequate fire-fighting capacity on site, including water supply in accordance with the requirements of the BCA and AS 2419.1, 2005.” This requirement is reflected in the Fire Safety Strategy at Appendix 17 of the original EIS.

The proposed modifications do not pose any change to the existing water requirements under SSD 5746 (as modified).

4.2.6 Crowns Land Act 1989

The *Crown Land Act 1989* aims to ensure that Crown land is managed for the benefit of the people of NSW and in particular to provide for (among other things) the regulation of the conditions under which Crown land is permitted to be occupied, used, sold, leased, licensed or otherwise dealt with.

No Crown land is identified on the Site, nor does the modification pose any risk of interacting with Crown land.



4.2.7 Biodiversity Conservation Act 2017 (BC Act)

The purpose of the *Biodiversity Conservation Act 2017* (BC Act) is to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development. Clause 7.9 outlines the biodiversity assessment requirements for SSD.

The Site is currently operational, and no clearing of vegetation or construction activities are proposed for this modification. The proposal is not anticipated to pose any additional biodiversity impacts.

4.2.8 National Parks and Wildlife Act 1974

The objective of the *National Parks and Wildlife Act 1974* relates to the establishment, preservation and management of national parks, historic sites and certain other areas and the protection of certain fauna, native plants and Aboriginal heritage.

The Site does not contain an item of environmental heritage and does not adjoin any heritage item. The Site is not located within a heritage conservation area. No ground disturbance activities are proposed, and therefore no impacts to items of heritage significance are anticipated.

4.2.9 Fisheries Management Act 1994

The *Fisheries Management Act 1994* sets out objective as a requirement to manage the long-term sustainability of fisheries resources for the benefit of all users and interest groups both now and in the future.

The Site and proposed modification will have no impacts to fisheries resources.

4.2.10 Contaminated Land Management Act 1997

The general objective of the *Contaminated Land Management Act 1997* is to establish a process for investigating and (where appropriate) remediating land that the EPA considers to be contaminated significantly enough to require regulation.

The previous uses of the land do not suggest that the Site is contaminated.

The proposed modifications will not impact contaminated land and are unlikely to generate a contamination risk.

4.2.11 Rural Fires Act 1997

The *Rural Fires Act 1997* establishes a duty for owners and occupiers of land to prevent bushfires and provides for bushfire prevention measures including hazard reduction.

The proposed modifications will not increase bushfire risk. Review of recent bushfire risk mapping on 24 June 2025 indicated a reduction in the risk rating compared to the original EIS.

4.3 Environmental Planning Instruments

Environmental Planning Instruments (EPIs) are State Environmental Planning Policies (SEPPs) and Local Environment Plans (LEPs) made under the EP&A Act. The various SEPPs and the Liverpool LEP have been addressed in relation to the original EIS, response to submissions and previous modification applications. This modification application does not materially change the assessment originally undertaken by DPI. EPI's or clauses not



previously assessed or requiring further assessment relating to this modification are detailed below.

4.3.1 State Environmental Planning Policy (Resilience and Hazards) 2021

4.3.1.1 Chapter 3 Hazardous & Offensive Development

The aim of Chapter 3 of the *State Environmental Planning Policy (Resilience and Hazards) 2021* (Resilience and Hazards SEPP) is to ensure that development involving a hazardous or offensive industry is appropriately considered to ensure adverse impacts are appropriately mitigated and reduced.

The Resilience and Hazards SEPP define 'Potentially Hazardous Industry' and 'Potentially Offensive Industry' as follows:

potentially hazardous industry means a development for the purposes of any industry which, if the development were to operate without employing any measures (including, for example, isolation from existing or likely future development on other land) to reduce or minimise its impact in the locality or on the existing or likely future development on other land, would pose a significant risk in relation to the locality—

- (a) to human health, life or property, or
- (b) to the biophysical environment,

and includes a hazardous industry and a hazardous storage establishment.

potentially offensive industry means a development for the purposes of an industry which, if the development were to operate without employing any measures (including, for example, isolation from existing or likely future development on other land) to reduce or minimise its impact in the locality or on the existing or likely future development on other land, would emit a polluting discharge (including for example, noise) in a manner which would have a significant adverse impact in the locality or on the existing or likely future development on other land, and includes an offensive industry and an offensive storage establishment.

Consideration of this chapter (formerly the State Environmental Planning Policy No.33 – Hazardous and Offensive Development) was complete during the assessment of SSD-5746. Including preparation of a Preliminary Hazard Assessment (PHA) completed by OneGroup to support the storage of dangerous goods on Site.

The PHA identifies potential causes of hazardous event and the consequences of that event based on the inventory identified and the proposed dangerous goods store design.

The risk mitigation strategies proposed for spills of hazardous materials resulted in an overall Low risk rating and this hazard does not require further quantification of the risk. It is not considered likely that the proposed modification would not result in an increased quantity or transport of dangerous goods. Hence the need for additional assessments has not been triggered.

4.3.1.2 Chapter 4 Remediation of Land

The aim of Chapter 4 of the Resilience and Hazards SEPP is to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment.

Clause 4.6 Contamination and Remediation to be Considered in Determining Development Application



Clause 4.6 of the SEPP (Resilience and Hazards) 2021 states the following:

- (1) A consent authority must not consent to the carrying out of any development on land unless—*
- (a) it has considered whether the land is contaminated, and*
 - (b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and*
 - (c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.*

A search of the EPA contaminated lands register was completed on 20 August 2025 did not identify any sites within the Liverpool LGA. The proposed modifications will not impact on any known contaminated lands or result in a risk of harm to human health or the environment. Hence this chapter has not been given further consideration.

4.3.2 State Environmental Planning Policy (Biodiversity and Conservation) 2021

No vegetation clearing or ground disturbance activities are proposed as part of this modification. Hence the proposed development has not considered this SEPP further.

4.3.3 State Environmental Planning Policy (Transport and Infrastructure) 2021

4.3.3.1 Chapter 2 Infrastructure

Chapter 2 of the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP) aims to facilitate the effective delivery of infrastructure across NSW by improving regulatory certainty and efficiency through a consistent planning regime and greater flexibility in the location of infrastructure and service facilities. The proposed modification will ensure the Mainfreight SDC is able to provide improved services vital to the transport industry.

4.3.3.2 Clause 2.122 Traffic-generating development

Clause 2.122 of the Transport and Infrastructure SEPP specifies that the consent authority for any of the traffic-generating developments listed in Schedule 3 refer the development application to TfNSW and take into consideration any submission received from TfNSW, the accessibility of the site and any potential traffic safety, road congestion or parking implications. Under Schedule of the Transport and Infrastructure SEPP the site fits the definition of a “warehouse and distribution centre”, given the combined size/capacity of the modified development and the SSD assessment process, it is understood the development application will be referred to TfNSW.

Impacts of the modified development on existing traffic generation and the surrounding network has been assessed within the Traffic Impact Assessment prepared by SLR –Traffic Advisory Team (Appendix A). Further discussion provided in Section 7.1 of this report.

As part of the proposed modification relates to increasing vehicle movements, the modification will require referrals and concurrences in accordance with Transport & Infrastructure SEPP.



4.3.4 State Environmental Planning Policy (Planning Systems) 2021

4.3.4.1 Chapter 2 State and Regional Development

In accordance with Clause 2.6 of Part 2.2 of the State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP), the development is classified as SSD.

4.3.5 Liverpool Local Environmental Plan 2008

Under the provisions of the Liverpool LEP, the land is zoned E5 (Heavy Industrial) and the approved land use “Freight Transport Facilities” is permitted with consent. The modification does not alter the permissibility of the development, nor its suitability against the zone objectives.

The objective of the zone are:

- *To provide areas for industries that need to be separated from other land uses.*
- *To ensure the efficient and viable use of land for industrial uses.*
- *To minimise any adverse effect of industry on other land uses.*
- *To encourage employment opportunities; and*
- *To preserve opportunities for a wide range of industries and similar land uses by prohibiting land uses that detract from or undermine such opportunities.*

The original Development Consent was permitted within the E5 zone. As the proposed modification remains consistent with the objectives of the E5 zone, the modification does not alter the approved use of the Mainfreight SDC.

4.3.6 Liverpool Development Control Plan (DCP)

The *Liverpool Development Control Plan 2008* (Liverpool DCP) applies to all land within the Liverpool LGA. However, pursuant to Clause 2.10 of the Planning Systems SEPP, DCPs do not apply to SSD proposals including SSD modifications. On this basis, no further consideration has been given to the Liverpool DCP in this modification report.



5.0 Community and Stakeholder Engagement

5.1 Stakeholder Consultation

The identified level of engagement with key stakeholders detailed in the following section is considered to be proportionate to the level of impacts associated with the modifications and consistent with the published 'Undertaking Engagement Guidelines for State Significant Projects' (NSW government, 2024).

Table 5: Identified Stakeholders

Stakeholder	Area of interest	Communication tool proposed
DPHI – Industry Assessment and Compliance teams	- Regulatory compliance - All environmental and social aspects	- Email/phone call - Link to development webpage - Briefing/meeting
Liverpool City Council	- Regulatory compliance - All environmental and social aspects	- Email/phone call - Link to development webpage - Briefing/meeting
EPA	Monitoring requirements	- Email/phone call - Link to development webpage - Briefing/meeting
TfNSW	Compliance of site access	- Email/phone call - Link to development webpage - Briefing/meeting

5.2 Government Consultation

A Scoping Letter was submitted to DPHI on 6 July 2025 to introduce the scope of MOD 3 and seek feedback on the intended s4.55 approval pathway and determine requirements to be addressed.

DPHI responded via email correspondence on 8 August 2025 confirming the minimum requirements to be addressed in a future application and provided guidance to complete the modification assessment under section 4.55(1A), provided minimal impacts are shown, refer to Table 6.

Table 6 Government consultation summary

Stakeholder	Response received	Where addressed
DPHI – Industry Assessment and Compliance teams	Received 8/07/2025 <u>Noise</u> <i>The 40 vehicle traffic restriction appears to be due to noise in <u>Mod 1</u>. If it is proposed to change or remove this condition, the main assessment of this change should focus on any changes to noise impacts, including consideration of existing noise limits.</i> <u>Modification Type</u> <i>The Scoping Report suggests the modification request will use the 4.55(2) pathway. However, section 7.2 of the report suggests the modification would have minimal</i>	<u>Noise</u> MOD3 has reviewed the noise environment and potential constraints as discussed in section 7.2. <u>Modification Type</u> Preparation of MOD3 has identified an assessment pathway under 1A to be more applicable in this instance. Hence, these criteria have been adopted. Refer to section 4.1.



Stakeholder	Response received	Where addressed
	<i>environmental impact. If the modification assessment concludes this, the 1A pathway may be more appropriate.</i> <u>Removal of Annual Reporting</u> <i>The modification should also focus on why annual reporting is no longer required for the modification.</i>	<u>Removal of Annual Reporting</u>
Liverpool City Council	No response received.	NA

In addition, consultation (via email) with Liverpool City Council was undertaken on 14 August 2025, which included provision of a scoping letter. To date no formal response has been received. Further government agencies consultation will be undertaken following submission of the modification, should referral be required.



5.3 Community Consultation

The original EIS did not identify any key concerns from the community regarding the proposed development, nor has Mainfreight received any community complaints. Hence it is not expected for the community to raise additional concerns following submission of this modification.

As noted in Section 4 of Undertaking Engagement Guidelines for State Significant Projects (DPHI, 2024):

“For SSD modification applications and requests to modify SSI approvals that involve greater than minimal environmental impact, the Department will publicly exhibit the application and modification report for at least 14 days before the Department completes its assessment of the application. The Department will also give public notice of the exhibition in accordance with the relevant statutory requirements”.

Hence, provided the proposed modifications can show there will be no greater than minimal impact, public exhibition will not be required.

However, should public exhibition be required on the NSW Planning Portal, the public will be provided with the opportunity to make a written submission on the proposed modification. After which time, any feedback received will be addressed in a response to submissions report.



6.0 Land Use Conflict Risk Assessment

The approved development on the Site under SSD-5746 included a comprehensive assessment against all potential land use conflict risks and it was determined all potential risks and impacts could be appropriately mitigated to an acceptable level. An assessment against the land use risks that may be associated with MOD 3 is provided in Table 7.

Table 7: Land Use Risk Assessment Summary Table

Aspect	Identified Potential Conflict	Potential Implications from the Proposed Modifications	Additional Mitigation Measures
Visual Amenity	Visible increase in number of trucks on road network.	Compared to the approved development, there are only minor increase in the number of trucks (from 40 to 60). There would be an increase in the visual exposure to truck movements, however this would not significantly affect private receptor locations or public viewpoints.	No additional mitigation measures.
Water Quality	There would be a minor increase in potential for gross pollutants generated from increased vehicle movements.	Gross pollutants would be captured via onsite and offsite stormwater management systems presently in place. This minor increase would not result in measurable impact from the proposed modification.	No additional mitigation measures required.
Air quality	Additional vehicle emissions generated during ongoing operation.	The air quality in Liverpool LGA is generally noted as “good” quality as per the NSW Government air quality online spatial viewer (NSW Government, 2025). The proposed modification is not likely to significantly alter the average air quality.	No additional mitigation measures required.
Noise	Impacts of operational noise on residents.	It is anticipated that operational noise levels associated with MOD 3 will be compliant with the relevant criteria under standard and noise-enhancing weather conditions.	No additional mitigation measures required.
Hazard and Risk	No increased in the quantity or dangerous goods or transport of dangerous good is anticipated.	No impacts relating to dangerous goods is anticipated.	No additional mitigation measures required.
Traffic	Impact of operational traffic on the function and efficiency of the road network.	As the proposed increased truck movements are during the night time period, the local road network would not be impacted during peak times. Nonetheless SLRs Transport Advisory Team has assessed the implication of the proposed modification. Refer to Appendix A. Further discussion on transport and traffic is provided in Section 7.1.	No additional mitigation measures required.
Weeds and Pests Management	The proposed development has potential to increase the risk of transporting weeds and pests.	Increased transportation of weeds and pests is possible however the site is devoid of vegetation. Hence the likelihood of the proposed modification increasing the distribution and occurrence of weeds and pests is considered low.	No additional mitigation measures required.



Aspect	Identified Potential Conflict	Potential Implications from the Proposed Modifications	Additional Mitigation Measures
Waste	Increased waste production during operation.	While the proposal results in additional truck movements, the operational waste result from the modification is expected to be minor in nature and able to be managed in accordance with existing waste management provisions.	No additional mitigation measures required.
Land use conflict with surrounding agricultural and residential land uses	Increased risk of conflict with surrounding residential and recreational uses resulting from the modified farm layout.	The site is situated in an industrial area, located some proximity from residential receivers. Additional impact to surround residential and recreational land uses is not expected.	No additional mitigation measures required.
Impacts to local surface water resources	No surface water resources would be impacted by the proposed modifications.	Potential for adverse impacts to local surface water resources is low as a result of the proposed modification. Given the controlled environment in which the Development will operate, including engineered surface water management systems, best management practices and mitigation measures, it poses a low risk to local water resources and no detectable impact is expected.	No additional mitigation measures required.
Impacts to local groundwater resources	No impacts to groundwater resources resulting from the proposed modifications.	Potential for adverse impacts to local groundwater resources is low as a result of the proposed modification. Given the controlled environment in which the Development will operate, including engineered surface water management systems, best management practices and mitigation measures, it poses a low risk to groundwater resources and no detectable impact is expected.	No additional mitigation measures required.

As demonstrated above, the proposed amendments under MOD 3 result in no additional land use conflicts to those originally assessed under SSD-5746 and subsequent modifications. Section 7.0 contains a comprehensive and focussed assessment of all land use conflict risks and environmental issues associated with the proposed modification.



7.0 Assessment of Impacts

This section addresses the potential environmental, social and economic impacts associated with the proposed modifications and where applicable nominates the measures that will be implemented by Mainfreight to mitigate and manage these impacts.

Table 8 provides an outline of the potential impacts assessed and/or justification to why further assessment is not required. Where the potential for impacts have been identified, sections providing further discussion have been indicated.

Table 8: Aspect and potential impacts

Aspect	Identified Potential Conflict	Further Assessment Completed
Traffic	Impact of operational traffic on the function and efficiency of the road network.	Yes, refer to Section 7.1
Noise	Potential for minor impacts of operational noise on residents.	Yes, refer to Section 7.2
Air quality	Minor increase in vehicle emissions.	Yes, refer to Section 7.3
Planning and land use	As per Section 6.0, no conflicts with land uses have been identified.	No further assessment.
Water Quality	As no construction is proposed, impacts to water quality are not anticipated.	No further assessment.
Biodiversity	No vegetation disturbance proposed. The facility is located in a previously disturbed environment surrounded by neighbouring industrial environment. There are not anticipated to be any impacts to biodiversity resulting from the proposed modifications.	No further assessment.
Aboriginal Heritage	No ground disturbance works are proposed. It is not considered likely for impact to Aboriginal heritage values to occur.	No further assessment.
Non-Aboriginal heritage	No ground disturbance works are proposed. It is not considered likely for impact to non-Aboriginal heritage values to occur.	No further assessment.
Hazard and Risk	No increase in dangerous goods stored or transported is proposed, hence there is not likely to be any impacts associated with hazards and risk.	No further assessment.
Visual Amenity	Visible increase in number of trucks on road network Compared to the approved development, there would be a minor increase in the number of trucks (from 40 to 60). A minor increase in the visual exposure to truck movements would result, however this would not significantly affect private receptor locations or public viewpoints.	Yes, refer to Section 7.4
Waste	Increased waste production during operation. While the proposed modification would result in additional truck movements, the operational waste result from the modification is expected to be minor in nature and able to be managed in accordance with existing waste management provisions.	Yes, refer to Section 7.5
Greenhouse Gas and Energy Efficiency	There would be a minor increase in emissions due to the increase in vehicle movements.	Yes, refer to Section 7.6



Aspect	Identified Potential Conflict	Further Assessment Completed
Social Impacts	There would be a minor decrease in local air quality and road safety due to the increase in vehicle movements.	Yes, refer to Section 7.7
Economic	The proposed modifications would result in a minor increase in employment opportunity and increased Mainfreight customer serviceability.	Yes, refer to 7.8
Cumulative	Minor impacts have been identified throughout this report and will be addressed in this section.	Yes, refer to 7.9

7.1 Traffic and Transport

To support this Modification Report, SLR's Transport Advisory Team completed a review of the following resources to support the technical memorandum provided at Appendix A.

The review considered the proposed changes to heavy vehicle movements and determined the increase of 20 additional truck movements from 40 movements to 60 movements.

SLR reviewed the NSW National Heavy Vehicle Regulator (NHRV) network map "GML & CML 25/26m B-Double Network Map" surrounding the Site, which confirmed that the surrounding road network is approved for 26 m long B-Double trucks. Additionally, aerial imagery was also reviewed to determine the use/operation of the surrounding properties to the Site and its road frontage (Yarrawa Street). This review determined the surrounding properties using Yarrawa Street appear to be other industrial/distribution sites with the road providing no access through to the nearby residential estate. This indicates that the majority of movements along the Yarrawa Street would consist of heavy vehicles entering/leaving for deliveries and light vehicles used by the workers.

Based on the analysis and discussion documented in the transport advisory technical memorandum, the following is concluded:

- The geometric feature of the nominated design vehicle has not been proposed to change with the surrounding road network being approved for 26m B-Double heavy vehicles as per the NHVR.
- The increase of heavy vehicles from 40 movements to 60 during the hours of 10:00pm and 5:00am will result in no impacts to the off-peak traffic period safety or operation.
- The additional 20 truck movements between 10:00pm and 5:00am are not additional to the previously conditioned 560 daily movement threshold i.e. the daily limit is still 560 movements per day.
- The proposed increase to 60 truck movements between 10:00pm and 5:00am equates to an average of 8.6 movements per hour, compared with 5.7 movements per hour under the current approval. This represents an additional 2.9 truck movements per hour.

Based on the assessment the requested consent modification to permit 60 max truck movements between 10:00pm and 5:00am is reasonable from a traffic engineering perspective. The additional movements will not introduce any new impacts, nor will it exacerbate existing impacts that require mitigation.



7.2 Noise

Review of potential noise impacts included a recent Acoustical Certificate, (Koikas Acoustics, 2025) at Appendix B. The Acoustical Certificate included noise measurements and review against the noise criteria outlined in EPL (No. 21221) issued by the NSW EPA.

The Acoustical Certificate included measurements at the following two residential premises on Friday 14 March 2025:

- 22 Michelago Circuit, Prestons (EPA identification No. 1); and
- 23 Coffs Harbour Avenue, Hoxton Park (EPA identification No. 2).

In the analysis, reference to location 3 (No. 1) on the western side of the Site, and location 4 (No. 2) on the eastern side of the Site were utilised..

The Acoustical Certificate concludes that noise from the Mainfreight SDC is within the EPL limits for both Identification No. 1 and No. 2 and was inaudible at both monitoring location. This is consistent with noise modelling conducted in the previous EPL Noise Assessment (Hibbs Associated Pty Ltd, n.d) which predicted noise levels to be within the EPL limits. This finding was reinforced by the lack of noise complaints to date from the community for the Mainfreight Facility.

To further support the proposed increase to truck movement Koikas undertook an assessment of potential noise impacts against the night-time operational noise criteria of the consent at Appendix B.

Based on the Koikas Acoustics report dated 20 April 2026, the findings regarding the proposed increase in night-time truck movements from 40 to 60 between 10:00pm and 5:00am indicate that the environmental impact remains within acceptable limits. The assessment found that even with an average of 8.6 movements per hour, the predicted noise levels at the most affected residential areas stay well below the restrictions established by EPL No. 21221. Specifically, the noise contribution from the facility is estimated at approximately 11 dB for Kurrajong Road and 21 dB for Coffs Harbour Avenue, which is significantly lower than the allowable criteria. Attended surveys further confirmed that Site-related noise was essentially inaudible over ambient background levels at residential boundaries, even during peak periods where four trucks arrived within 15 minutes.

Regarding the risk of sleep disturbance, the assessment concludes that such an outcome is unlikely to occur. The proposed modification focuses on increasing the frequency of truck movements rather than the noise level produced by individual vehicles. Since the maximum noise levels (L_{Amax}) are not expected to change and the overall operational noise complies with the existing license requirements, the impact on residents' sleep is considered minimal.

The assessment also addressed road traffic noise and found the impacts to be negligible. For residents along Coffs Harbour Avenue and Yarrawa Street, the calculated noise levels of 48–49 dB ($L_{Aeq,1-hour}$) are within the EPA Road Noise Policy's recommended limit of 50 dB for night-time local roads. On Bernera Road, the additional truck movements are expected to increase existing traffic noise by only 0.5 dB, which is well below the 2 dB threshold that would be perceptible to the average person. Ultimately, the study determines that the Site will not generate significant additional traffic and will maintain acceptable acoustic amenity for the surrounding community while complying with all NSW EPA planning guidelines.

Based on the findings of the Acoustical Certificate the proposed modification is not anticipated to significantly change or increase the noise emissions given the current local environment and surrounding industry.



7.3 Air Quality

An Air Quality Impact Assessment was undertaken by SLR during the EIS Process. Wheel-generated dust from on-site traffic movements and combustion emissions from vehicles idling on-site were found to be the main sources of potential emissions for the operational phase. All on-site traffic movement areas operate on sealed roads, and the operational fleet includes pick-up and delivery (PUD's) vehicles, semi-trailers and B-Doubles.

Review of the NSW Government Air Quality monitoring spatial viewer (NSW Government, 2025) identified air quality in the Liverpool LGA is presently categorised as “good”, correlating to a PM (Particulate Matter) 2.5 microgram per cubic meter or less.

The proposed modification will result in a minor increase in emissions production, which may result in a minor reduction of local air quality and production of odour emissions. However, this minor increase would not result in a noticeable impact to the local environment.

7.4 Visual Amenity

The proposed modifications will result in a minor increase in the number of truck movements (maximum of 20 truck movements per day). However, as the proposed modifications are focused on the night-time (10:00pm to 5:00am), this increase is not considered to result in significant visual impacts.

The primary activity associated with visual impact is the sustained use of external Site lighting and vehicle headlights during hours of darkness to facilitate the additional movements. Specifically, the increased frequency of heavy vehicles entering, exiting, and manoeuvring within the loading docks between 10:00pm and 5:00am will result in more frequent light emissions from vehicle lamps.

Despite this, the impact is mitigated by the fact that all existing Site lighting is designed and baffled in accordance with AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting to ensure that light spill remains contained within the Site boundary. Furthermore, given the industrial context of the Chipping Norton precinct and the separation distances to residential receptors, the additional vehicle movements will not fundamentally alter the night-time visual character of the area. Hence no additional assessment or mitigation measures are proposed.

7.5 Waste

There would be a minor increase in the volume of general worker waste and waste associated with transport movements (i.e. packaging waste including wooden pallets, plastic, and cardboard). The activity generating this impact is the increased frequency and intensity of loading and unloading tasks occurring during the night-time period (10:00pm to 5:00am) to support the additional 20 truck movements.

While the total daily limit of 560 heavy vehicle movements remains unchanged, the concentration of freight handling during these night-shift hours results in a higher rate of secondary packaging waste generation during this specific window. However, this increase is not anticipated to exceed the total predicted volume of waste outlined in the Waste Management Plan (WMP) for the site, as the overall daily throughput of the facility remains within approved limits.

Waste will continue to be managed as per the WMP prepared in accordance with Condition 37 under SSD 5746 (as modified). The existing Site waste streams are capable of absorbing



the minor shift in operational timing, and no changes to the approved WMP report are proposed.

7.6 Greenhouse Gas and Energy Efficiency

As discussed in Section 7.3, the proposed modification will result in a minor increase to vehicle emissions and intern greater contribution to Greenhouse Gas emissions. The specific activity generating these emissions is the sustained combustion of fuel from heavy vehicles and the operation of onsite loading plant equipment during the 10:00pm to 5:00am window.

While the total daily limit of 560 heavy vehicle movements remains unchanged, the redistribution of 20 movements to the night-time period ensures a higher level of operational intensity during these hours. However, this shift also allows for improved energy efficiency, as night-time travel typically involves less external traffic congestion and fewer stop-start idling events compared to daytime periods, which partially offsets the carbon intensity of the additional movements. Consequently, the relatively minor increase in emissions is unlikely to result in a noticeable impact to the local environment and remains consistent with the facility's role as an efficient logistics hub

7.7 Social Impacts

This modification report has considered potential impacts to the community resulting from the proposed increased vehicle movements. While the modification will result in a minor increase in emissions, noise and visual increase in vehicle movements, any impacts will occur during the night-time period and are largely inaudible and out of sight of sensitive receptors. The activity involves 20 additional heavy vehicle movements, which increases the number of individual noise events (L_{Amax}) and instances of vehicle light emissions during the night-time window. However, as the predicted noise levels remain consistent with existing approved levels and Site lighting is baffled to prevent spill, the impact on human health and sleep quality is negligible.

There will be a minor increase in employment opportunities which will have the potential to benefit the local community.

7.8 Economic Impacts

The proposed modification will allow Mainfreight SDC to increase their maximum allowable truck movements and consequently increase their workforce. The primary activity driving these impacts is the optimisation of the facility's throughput during off-peak hours (10:00pm to 5:00am), which allows the business to meet contemporary "just-in-time" supply chain requirements more effectively. By providing more reliable delivery windows for time-sensitive industries, the modification directly supports the commercial viability of the Site.

These changes will result in a positive impact to the local economy, wider region, and to Mainfreight's customer base, ensuring the facility remains a competitive and productive asset within the Chipping Norton industrial precinct..

7.9 Cumulative Impacts

The Site is in an industrial area with neighbouring business located to the north, east and west. This modification report has considered potential impact arising from the proposed modification, notably including traffic and noise. This modification report considers negligible cumulative impacts to sensitive receivers from noise and traffic generation. Refer to attached appendices and details summarised above.



7.10 Summary of Commitments

The Statement of Commitments, provided at Appendix D, has been included to provide an operational status update of the environmental management measures originally established for the facility. While the core commitments remain unchanged from the version submitted during the original application, their inclusion serves as a transparent record of the Site's compliance history and current operational status.

The coloured highlighting at Appendix D is intended to assist DPHI to distinguish between commitments that have been completed (such as one-off construction requirements) and those that remain ongoing as part of the facility's standard operating procedures. By providing this update, Mainfreight demonstrates that the proposed increase in night-time truck movements will be managed within a proven and robust environmental framework. This section and the associated Appendix confirm that all previous commitments remain integrated into the Site's management, ensuring that the modification does not detract from the environmental performance standards as originally approved.

7.11 Environmental Management and Performance

As justification for the removal of Condition D5 of SSD 5746 (as modified), MOD 3 has included a review of the 2023-2024 Annual Review (SLR, 2024). Table 9 provides a summary of the proposed activities to be completed in the next reporting period to address non-compliance findings and provides a response in the right hand column.

Table 9: Actions are proposed by Annual Review

Item	Actions are proposed to address non-compliance findings	Further Assessment Completed
AR1	Review of logistics processes with specific reference to truck movement limits.	MOD 3 includes review of transport as discussed in section 7.1 and Appendix A
AR2	Complete an independent, Secretary-endorsed Hazard audit.	A hazard audit will be completed as part of the Independent Environmental Audit (IEA).
AR3	Conduct annual noise monitoring.	Noise monitoring was completed as discussed in 7.2 and Appendix B.
AR4	As part of the EMP revision include monitoring and reporting mechanisms.	This action will be addressed prior to completion of the next IEA.
AR5	Establish a compliance management process including actions, timelines and responsibilities for key compliance obligations.	This action will be addressed prior to completion of the next IEA.
AR6	Consider establishing a formalised and publicised complaints line.	This action will be addressed prior to completion of the next IEA.

Review of the 2023-2024 Annual Review, against supporting technical studies and MOD 3 have largely addressed the non-compliant findings. However, it is noted that some of the actions are either in progress or cannot be finalised until the next audit has been completed. Specifically, Items AR4 – AR6 should be addressed in the next IEA.



8.0 Justification of the Modified Project

8.1 Economic Impacts

The existing Mainfreight SDC has resulted in increased economic activity within the surrounding locality. The two key aspects of economic impact relating to the facility include:

- Direct and derived economic effects associated with establishing the Mainfreight SDC which are ongoing during operation; and
- Ongoing direct and derived economic effects associated with operation of the Mainfreight SDC through additional employment opportunities induced by the increase in truck movements.

The proposed modifications will continue to provide positive economic impact as per the effects detailed above. In particular, the proposed modification is likely to increase efficiency and servicing capacity of Mainfreight services resulting in increased revenue for Mainfreight and the ability to service consumers more effectively.

8.2 Environmental Impacts

The potential environmental impacts of the modification will result in minimal environmental impact. This is evident through the results of additional assessment undertaken, as summarised in Section 7.0 of this report.

As detailed in Sections 7.1 and 7.2, the potential additional traffic and noise impacts respectively resulting from the proposed modification have been assessed. A traffic memo is also provided at Appendix A.

Detailed mitigation measures, as originally proposed under SSD-5746, remain relevant to the Site and modified development to reduce the potential for adverse traffic and noise impacts. Mainfreight have committed to enact reasonable and practicable measures to prevent or minimise impacts. The mitigation measures as already documented and approved will continue to be implemented. As such, the predicted noise levels at the assessed sensitive receptors will remain below the EPA assessment criterion. On this basis, the modification is expected to have a low to no greater impact on local amenity with respect to noise impacts.

8.3 Social Impacts

The potential negative social impacts have been considered in this report and are considered minor to negligible. The positive impacts arising from Mainfreight's ability to service more clients and provide employment opportunities will benefit the local community and economy, resulting in an overall positive outcome.

8.4 Ecological Sustainable Development

Australia's *National Strategy for Ecologically Sustainable Development* (Ecologically Sustainable Development Steering Committee, 1992) defines Ecologically Sustainable Development (ESD) as:

...using, conserving and enhancing the community's resources so that ecological processes, on which life depends, are maintained, and the total quality of life, now and in the future, can be increased.



The objects of the EP&A Act include ESD and a set of principles are provided in section 6(2) of the *Protection of the Environment Administration Act 1991*. The modification's compatibility with these principles is considered below.

8.4.1 Precautionary Principle

The precautionary principle holds that where there are threats of serious or irreversible environmental damage, the lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.

During the initial assessment of SSD-5746, a qualitative risk assessment, stakeholder consultation and review of applicable reports and completion of transport advisory letter was undertaken to identify potential impacts, issues or concerns and ensure these matters were taken into consideration through the planning and assessment process.

MOD 3 will result in two changes to the existing development consent. The additional impacts have been assessed, including traffic, noise, economic and social aspects, with the results included in this report. Where environmental impact is predicted, it is considered that existing management and mitigation measures would continue to be implemented to ensure impacts are minimised. As such, careful evaluation has been completed in order to avoid serious or irreversible damage to the environment.

8.4.2 Inter-generational Equity

Inter-generational equity is centred on the concept that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations.

As a result of the proposed modifications, the number of trucks operating from 10:00pm and 5:00am will increase from a maximum of 40 to 60 truck movements per day. The proposed modification will provide further economic growth and employment opportunity and will not result in any greater than minor impacts to the community or environment.

On this basis, there is no evidence to suggest that the amendments under MOD 3 will impact on the long-term health and diversity of the environment.

8.4.3 Conservation of Biological Diversity and Ecological Integrity

This principle holds that the conservation of biological diversity and ecological integrity should be a fundamental consideration for development proposals. No impacts to biodiversity are anticipated as a result of the proposed modification.

8.4.4 Improved Valuation, Pricing and Incentive Mechanisms

This principle deems that environmental factors should be included in the valuation of assets and services. Mainfreight have continued to adhere to their statement of commitments to minimise environmental harm, including the reduction of greenhouse gas emissions via the use of environmentally friendly refrigerants, contributing to lower greenhouse gas emissions and improved air quality.



9.0 Conclusion

This report outlines the proposed modifications under MOD 3. The primary objective of this modification is to enhance the operational efficiency and increase the capacity of Mainfreight's transport logistic services.

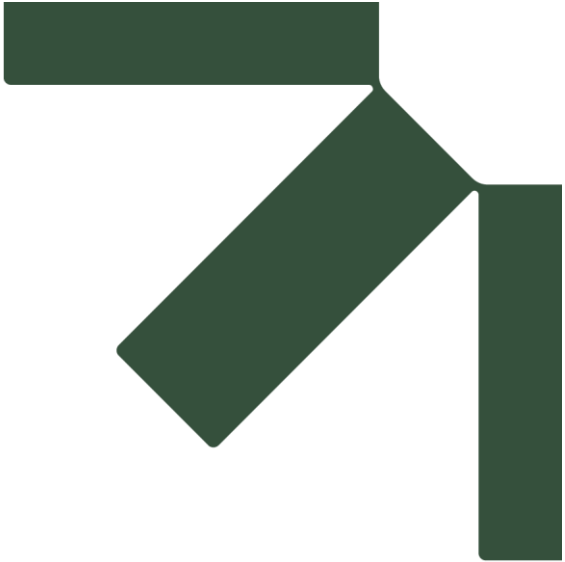
Any cumulative impacts from this modification are anticipated to be minor. This report has identified and assessed potential impacts relating to environmental matters, increased traffic movements and amenity issues including noise.

SLR's Transport Advisory Team has identified the minimal increase of 20 truck movements between 10:00pm and 5:00am will result in minimal impact to the surrounding road network during this off-peak traffic period.

Based on the findings of the Acoustical Certificate, the proposed modification is not anticipated to significantly change or increase the noise emissions given the current local environment and surrounding industry.

Importantly, the modification does not change the approved use of freight transport facilities nor is it considered to result in a substantially different development to the existing approved consent. Therefore, support for the proposed modification is essential to successfully deliver an increase in the capacity of Mainfreight's transport logistic services.





Appendix A Transport Advisory technical memorandum

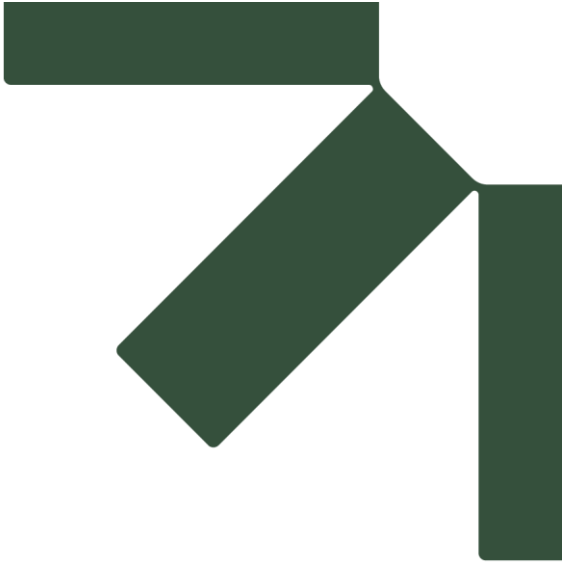
Mainfreight Distribution Warehouse – Modification 3

SSD-5746

Goodman Property Services (Aust) Pty Ltd

SLR Project No.: 630.032363.00001

4 May 2026



Appendix B Acoustical Certificate and Acoustical Report

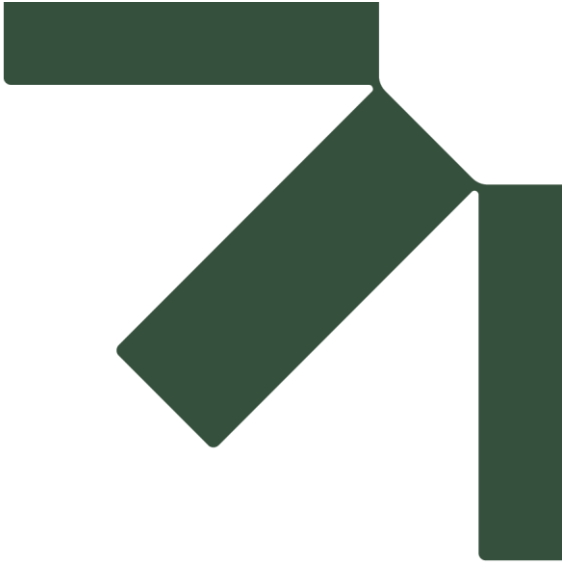
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Appendix C Annual Review 2023-2024

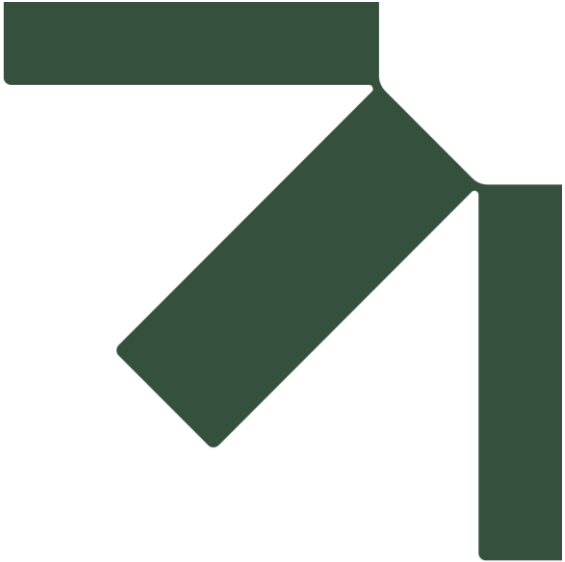
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Appendix D Statement of Commitments – Status update

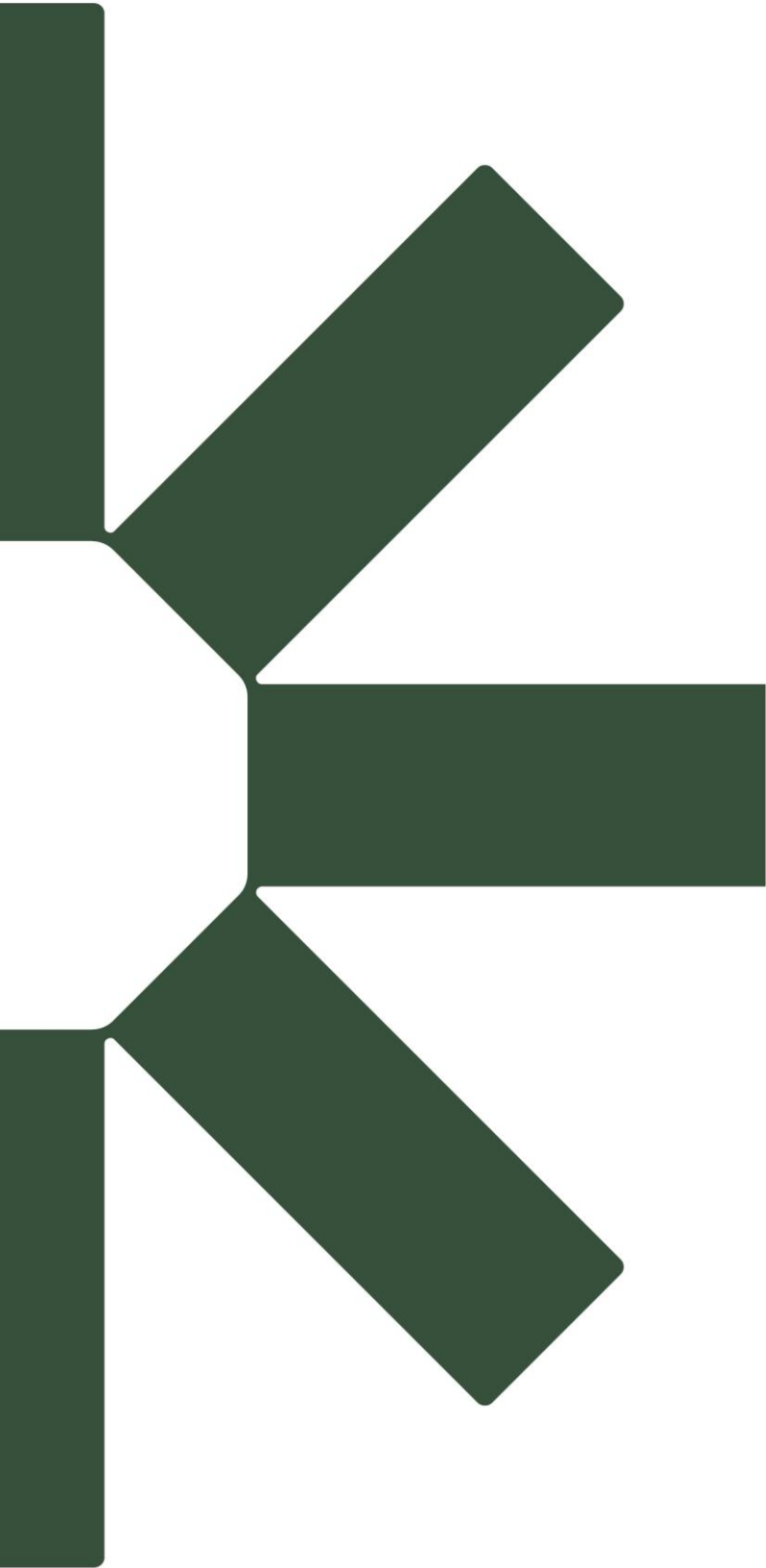
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