URBIS

# AIE Concept Plan and Stage 1 Modification (SSD-10448 MOD 6) and Stage 4 Development Application (SSD-60513208)

Environmental Impact Statement

Prepared for
**Mirvac**
November 2023

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| Report Number | Final |

**Urbis acknowledges the important contribution that Aboriginal and Torres Strait Islander people make in creating a strong and vibrant Australian society.**

**We acknowledge, in each of our offices, the Traditional Owners on whose land we stand.**



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# CONTENTS


**Signed Declaration** ..... **1**

**Glossary and Abbreviations** ..... **3**

**Executive Summary** ..... **5**
Site History ..... 5
Proposal Overview ..... 6
Consultation ..... 8
Justification of the Project ..... 8

**1. Introduction** ..... **10**
1.1. Applicant Details ..... 10
1.2. Project Description ..... 10
1.2.1. Project Terminology ..... 12
1.3. Project Background ..... 12
1.3.1. SSD-10448 Concept Proposal and Stage 1 Development ..... 12
1.3.2. Modifications to Approval ..... 12

**2. Strategic Context** ..... **18**
2.1. Project Justification ..... 18
2.1.1. Greater Sydney Region Plan: A Metropolis of Three Cities ..... 18
2.1.2. Our Greater Sydney 2056: Western City District Plan ..... 19
2.1.3. Future Transport 2056 ..... 19
2.1.4. Freight and Ports Plan 2018 – 2023 ..... 20
2.1.5. Penrith Local Strategic Planning Statement ..... 20
2.1.6. Western Sydney Aerotropolis Plan ..... 21
2.1.7. Western Sydney Employment Area ..... 21
2.1.8. Mamre Road Structure Plan ..... 22
2.1.9. Mamre Road Upgrade ..... 22
2.2. Key Features of the Site and Surrounds ..... 23
2.3. Cumulative Impacts with Future Projects ..... 25
2.4. Feasible Alternatives ..... 27

**3. Project Description** ..... **29**
3.1. Description of Modifications to Concept and Stage 1 Consent ..... 29
3.1.1. Overview ..... 29
3.1.2. Modified Concept Plan Layout ..... 29
3.1.2.1. Quantitative Comparison with Concept Consent ..... 30
3.1.2.2. Quantitative Comparison by Warehouse ..... 31
3.1.2.3. Vehicular Access ..... 32
3.1.3. Bulk Earthworks Levels ..... 32
3.1.4. Conditions subject to the modification ..... 32
3.1.5. Substantially the same development ..... 33
3.2. Description of Stage 4 – Warehouse 8 Development ..... 35
3.2.1. Warehouse 8 Construction ..... 37
3.2.2. Warehouse 8 Operations ..... 38
3.2.2.1. Overview ..... 38
3.2.2.2. Warehouse 8A ..... 39
3.2.2.3. Warehouse 8B ..... 39
3.2.2.4. Relationship Between Warehouses ..... 40
3.2.3. Warehouse 8 Building Design ..... 40
3.2.4. Landscaping ..... 42
3.2.5. Civil Works ..... 43
3.2.6. Utilities and Infrastructure ..... 43

**4. Statutory Context** ..... **45**
4.1. Statutory Requirements ..... 45

4.2. Pre-Conditions ....47
4.3. Mandatory Considerations ....49

**5. Community Engagement ....52**
5.1. Consultation with Government and Agencies ....52
5.2. Consultation with Institutional Developer Landowners to the north, east and south ....52
5.3. Engagement Carried out ....52
5.4. Public Notification and Submissions ....53

**6. Assessment of Impacts ....54**
6.1. Traffic, Transport and Parking ....54
6.1.1. Existing Environment ....54
6.1.2. MOD 6 Parking ....55
6.1.3. MOD 6 Traffic Generation ....55
6.1.4. Warehouse 8 Parking ....56
6.1.5. Warehouse 8 Traffic ....57
6.1.6. Condition A14 Traffic Modelling ....58
6.1.7. Design and Access ....58
6.1.8. Summary ....60
6.2. Noise Impacts ....60
6.2.1. Existing Environment ....61
6.2.2. Operational Noise Sources ....62
6.2.3. Operational Noise Impacts ....65
6.2.3.1. Mitigation Measures and Recommendations ....68
6.2.4. Construction Noise and Vibration Assessment ....68
6.2.5. Summary ....69
6.3. Air Quality ....69
6.3.1. Mod 6 / Warehouse 8 Construction Phase ....69
6.3.2. Warehouse 8 Operational Phase ....69
6.3.3. Summary ....71
6.4. Environmentally Sustainable Development ....71
6.4.1. ESD Opportunities ....71
6.4.2. Greenhouse Gas and Energy Efficiency ....71
6.4.3. Water Efficiency ....72
6.4.4. Mitigation Measures ....72
6.5. Waste Management ....72
6.5.1. Demolition Works ....73
6.5.2. Warehouse 8 Construction Waste ....73
6.5.3. Warehouse 8 Operational Waste ....73
6.6. Aboriginal and Non-Aboriginal Heritage Assessment ....75
6.6.1. Aboriginal Heritage ....75
6.6.2. Non-Aboriginal Heritage ....76
6.6.3. Summary ....76
6.7. Visual Impact Assessment ....76
6.7.1. MOD 6 ....78
6.7.2. Warehouse 8 Development ....80
6.8. Bushfire ....80
6.8.1. Mitigation Measures ....81
6.9. Crime Prevention Through Environmental Design ....82
6.10. BCA & Fire Engineering ....83
6.10.1. BCA (Warehouse 8) ....83
6.10.2. Fire Engineering ....84
6.10.2.1. Fire Safety Strategy (Warehouse 8) ....84
6.10.2.2. Updated Estate Fire Safety Strategy (MOD 6) ....86
6.11. Stormwater Management ....86
6.11.1. AIE Waterway Health Strategy Overview ....87
6.11.2. MUSIC Modelling ....88
6.11.3. On Lot Management Measures ....88
6.11.4. Water Demands and Sources ....88

6.11.5. Summary ....89
6.12. Contamination ....89
6.13. Groundwater ....89
6.14. Soil and Salinity Management ....90
6.15. Biodiversity ....91
6.16. Warehouse 8 Built Form and Design ....91
6.17. Dangerous Goods ....92
6.17.1. Resilience and Hazards SEPP ....92
6.18. Flooding ....93
6.19. Social Impact ....94
6.20. Minimal Environmental Impact (MOD 6) ....94

**7. Justification of the Project ....95**
7.1. Project Design ....95
7.2. Strategic Context ....95
7.3. Statutory Context ....96
7.4. Community Views ....96
7.5. Likely Impacts of the Proposal ....97
7.6. Suitability of the Site ....98
7.7. Public Interest ....98

**8. Disclaimer ....99**

**Appendix A SEARs Compliance Table**
**Appendix B Updated Project Description**
**Appendix C Statutory Compliance Table**
**Appendix D Community Engagement Table**
**Appendix E Updated Mitigation Measures**
**Appendix F Architectural Drawings**
**Appendix G Landscape Plans**
**Appendix H Visual Impact Assessment**
**Appendix I Traffic Impact Assessment**
**Appendix J Noise and Vibration Assessment**
**Appendix K Air Quality Impact Assessment**
**Appendix L ESD Report**
**Appendix M BCA Assessment Report**
**Appendix N Fire Safety Strategy**
**Appendix O Social Impact Assessment Addendum**
**Appendix P Civil Report**
**Appendix Q Waste Management Plan**
**Appendix R Cost Summary Report**
**Appendix S BDAR Waiver**
**Appendix T Groundwater Management Plan**
**Appendix U Flood Risk Assessment**
**Appendix V Remediation Action Plan**
**Appendix W Erosion and Sediment Control Plan**
**Appendix X Heritage Consistency Letter**
**Appendix Y Bushfire Report**
**Appendix Z Geotechnical Assessment**
**Appendix AA Dangerous Goods Assessment (Warehouse 8A)**
**Appendix BB Dangerous Goods Assessment (Warehouse 8B)**
**Appendix CC Detailed Site Investigation**
**Appendix DD Site Survey**
**Appendix EE Tree Canopy Plan**
**Appendix FF EV Battery Storage Risk Assessment**
**Appendix GG Civils Plans**
**Appendix HH Detailed Operations Plan**

**FIGURES**

Figure 1 Estate Masterplan for Mod 6 ..... 7
Figure 2 Original AIE Concept Approval Layout ..... 13
Figure 3 Approved AIE MOD 2 Layout ..... 14
Figure 4 Approved AIE MOD 3 Layout ..... 15
Figure 5 Proposed Modified Sites (including AIE and EEP) ..... 16
Figure 6 Structure Plan ..... 18
Figure 7 Penrith's Economic Triangle ..... 20
Figure 8 Mamre Road Structure Plan ..... 22
Figure 9 788-884 Mamre Road, Kemps Creek ..... 23
Figure 10 Adjacent Development Applications ..... 25
Figure 11 Concept Proposal MOD 6 Layout ..... 30
Figure 12 Lot 8 Warehouse Layout ..... 38
Figure 13 Warehouse Elevations ..... 41
Figure 14 Proposed Warehouse 8 Design – 3D Render view from South-East ..... 41
Figure 15 Landscape Plan ..... 42
Figure 16 Proposed Tree Plantings – 3D Render view from Mamre Road ..... 43
Figure 17 Noise Source Locations ..... 62
Figure 18 Location of LCVIA Viewpoints ..... 77
Figure 19 Viewpoint 5b Photomontage ..... 79
Figure 20 Viewpoint 5c and 5d Photomontage ..... 79
Figure 21 Viewpoint 5d Photomontage ..... 80
Figure 22 Asset Protections Zones ..... 81

**PICTURES**

Picture 1 Proposed Warehouse 8 Floor Plan ..... 38
Picture 2 Detailed Operational Plan ..... 38
Picture 3 Additional Viewpoints 5b, 5c and 5d ..... 77
Picture 4 Additional Internal Viewpoints ..... 77
Picture 5 Existing Viewpoint 5b ..... 79
Picture 6 Proposed Viewpoint 5b ..... 79
Picture 7 Existing Viewpoint 5c ..... 79
Picture 8 Proposed Viewpoint 5c ..... 79
Picture 9 Existing Viewpoint 5d ..... 80
Picture 10 Proposed Viewpoint 5d ..... 80

**TABLES**

Table 1 Applicant Details ..... 10
Table 2 Project Objectives ..... 11
Table 3 Concept Plan and Modification Overview ..... 12
Table 4 Key Features of Site and Locality ..... 24
Table 5 Approved and Likely Future Developments ..... 26
Table 6 Project Alternatives ..... 27
Table 7 Concept Proposal Quantitative Comparison ..... 30
Table 8 Lot by Lot Comparison ..... 31
Table 9 Modified conditions of SSD-10448 (from MOD 3) ..... 32
Table 10 Project Details ..... 35

Table 11 Identification of Statutory Requirements for the Project ..... 45
Table 12 Pre-Conditions ..... 47
Table 13 Mandatory Consideration ..... 49
Table 14 August 2022 Traffic Flows at Mamre Road / Bakers Lane ..... 54
Table 15 Overall Parking requirements ..... 55
Table 16 Parking for Warehouse 8A & 8B ..... 55
Table 17 Traffic generation ..... 56
Table 18 Comparative Assessment ..... 57
Table 19 Revised MRP Model – Approved Developments ..... 58
Table 20 Nearest Sensitive Receivers ..... 61
Table 21 Operational Noise Limits ..... 61
Table 22 Typical Worst-case 15-Minute Period ..... 63
Table 23 Vehicle Noise Sources ..... 64
Table 24 Operational Noise Assessment – MOD 6 Masterplan Development ..... 65
Table 25 Sleep Disturbance Screening Assessment – MOD 6 Masterplan Development ..... 66
Table 26 Intermediate Monitoring Location Reference Levels ..... 66
Table 27 Potential Air Quality Impacts and Mitigation Measures ..... 69
Table 28 Warehouse 8A – Operational Waste ..... 73
Table 29 Warehouse 8B - Operational Waste ..... 74
Table 30 Waste Storage and collection ..... 74
Table 31 Fire Safety Measures ..... 83
Table 32 Quantities Stored and SEPP 33 Threshold for Overall Storage ..... 92

# Signed Declaration

| | | |
|---|---|---|
| **Project details** | | |
| Project name | Aspect Industrial Estate | |
| Application number | SSD-60513208 & SSD-10448 MOD 6 | |
| Address of the land in respect of which the development application is made | 788-882 Mamre Road, Kemps Creek, NSW 2178<br>▪ Lots 1, 2 & 5 DP 1285305 and Lots 6 & 7 DP 1291562 | |
| **Applicant details** | | |
| Applicant name | Mirvac Industrial Developments Pty Ltd (Stephen Foster – National Development Director) | |
| Applicant address | Level 28, 200 George Street, Sydney, NSW 2000 Australia | |
| **Details of people by whom this EIS was prepared** | | |
| Names and professional qualifications | Jacqueline Parker<br>Director<br>Urbis Pty Ltd<br>Bachelor of Planning (UNSW)<br>Master of Urban Development and Design (UNSW) | Nik Wheeler<br>Associate Director<br>Urbis Pty Ltd<br>Bachelor of Geography and Town Planning (University of Birmingham)<br>Masters in Town Planning (University of Manchester) |
| Address | Level 8, Angel Place, 123 Pitt Street, Sydney NSW 2000 | |
| **Declaration** | | |

The undersigned declares that this EIS:

- has been prepared in accordance with the *Environmental Planning and Assessment Regulation 2021*;
- 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;<br>▪ contains an accurate summary of the findings of any community engagement; and<br>▪ contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.<br>▪ Is in accordance with the *Registered Environmental Assessment Practitioner Guidelines.* | | |
| **Signatures** | | |
| |  <br>Jacqueline Parker, Director<br>(RPIA Plus EIA no. 68278) |  <br>Nik Wheeler, Associate Director |
| Date | 27 November 2023 | 27 November 2023 |

# Glossary and Abbreviations

| Reference | Description |
|---|---|
| ACHAR | Aboriginal Cultural Heritage Assessment Report |
| AIE | Aspect Industrial Estate |
| AQIA | Air Quality Impact Assessment |
| ARI | Average Recurrence Interval |
| BAM | Biodiversity Assessment Method |
| BC Act | *Biodiversity Conservation Act 2016* |
| BC Reg | *Biodiversity Conservation Regulation 2017* |
| BDAR | Biodiversity Development Assessment Report |
| CEEC | Critically Endangered Ecological Community |
| CDA | Concept Development Application |
| CEMP | Construction Environmental Management Plan |
| CMP | Construction Management Plan |
| CTMP | Construction Traffic Environmental Plan |
| DCP | Development Control Plan |
| DPE | New South Wales Department of Planning and Environment |
| EIS | Environmental Impact Statement |
| EP&A Act | *Environmental Planning and Assessment Act 1979* |
| EPA Regulation | *Environmental Planning and Assessment Regulation 2021* |
| EPBC Act | *Environment Protection and Biodiversity Conservation Act 1999* |
| EPA | New South Wales Environment Protection Authority |
| EPI | Environmental Planning Instrument |
| ESD | Ecologically Sustainable Development |
| HIPAP | Hazardous Industry Planning Advisory Paper |
| LEP | Local Environmental Plan |
| MNES | Matters of National Environmental Significance |
| MRP | Mamre Road Precinct |

| Reference | Description |
|---|---|
| NML | Noise Management Level |
| NRAR | Natural Resource Access Regulator |
| OEMP | Operational Environmental Management Plan |
| PBP | Planning for Bushfire Protection |
| PCT | Plant Community Type |
| POM | Plan of Management |
| PSI | Preliminary Site Investigation |
| SEARs | Secretary's Environmental Assessment Requirements |
| SEPP | State Environmental Planning Policy |
| SIA | Social Impact Assessment |
| SIDRA | Signalised & Unsignalised Intersection Design and Research Aid |
| Site | 788-882 Mamre Road, Kemps Creek, NSW 2178<br>Lots 1, 2 and 5 DP 1285305 and Lots 6 and 7 in DP1291562 |
| SSD | State Significant Development |
| SSDA | State Significant Development Application |
| TIA | Traffic Impact Assessment |
| UXO | Unexploded Ordnance |
| VIS | Vegetation Integrity Score |
| WMP | Waste Management Plan |
| WSUD | Water Sensitive Urban Design |
| WWTP | Wastewater Treatment Plant |

# Executive Summary

This Environmental Impact Statement (**EIS**) has been prepared on behalf of Mirvac Industrial Developments Pty Limited (**Mirvac**) in support of a concurrent Concept Approval modification application to SSD-10448 (**MOD 6**) and a Stage 4, State Significant Development Application (**SSDA**) for the staged development of 788-882 Mamre Road, Kemps Creek (Lots 1, 2 and 5 DP 1285305 and Lots 6 and 7 in DP1291562) known as Aspect Industrial Estate (**AIE**).

# Site History

The AIE is currently in the process of being created in accordance with the Concept Proposal and Stage 1 Development SSD-10448 which was approved by the Minister for Planning under delegation on 24th May 2022. This included a Masterplan and Subdivision Plan, which set out the approved lot layout and building envelopes.

The consent granted approval for:

- A Concept Plan for the staged development of an industrial estate comprising 11 buildings with a total GFA of up to 248,112m$^2$ for industrial, warehouse and distribution centres, and café uses;
- A Stage 1 development comprised of:
  - site preparation works,
  - vegetation clearing,
  - realignment of the existing creek,
  - construction of access road including eastern half of Mamre Road / Access Road 1 intersection works,
  - construction fitout and operation of two warehouse buildings with ancillary offices, car parks, landscaping, signage and a café construction and operation of services and utilities, and subdivision of the site into three lots.

The SSD-10448 approval is currently subject to various modification applications and a Stage 2 SSDA.

- The first modification (**MOD1**) sought to amend a condition of consent relating to temporary construction access and permanent signalised intersection works. This was approved on 25 August 2022.
- A second modification (**MOD 2**) sought to amend the Concept Masterplan incorporating changes to the Access Road 2 layout, lot configuration and driveways and building footprints north of Access Road 1. The Stage 1 construction works were also modified for Warehouses 1 and 3, associated access, hardstand, ridge heights and landscaping, along with the layout and arrangements of Access Roads 1 and 2. MOD 2 was approved by DPE on 30th November 2022.
- A third modification (**MOD 3**) sought to amend the Concept Masterplan to reconfigure the estate to reduce the overall number of lots from 11 to 9, relocate Access Road 4 and create new warehouse footprints, along with updating road subdivision, civils works and landscaping. MOD 3 was approved by DPE on 2nd March 2023.
- There was a concurrent SSD application (**SSD-46516461**) for the development of Warehouse 9 on the Lot 9 at AIE, the configuration of which is being amended through MOD3. This proposed the construction of a new 66,341sqm building for use as ‘warehouse and distribution’ to be built to a ridge height of 14.6m, comprising a warehouse, loading docks, dock offices, parking spaces and new vehicle crossovers, along with on lot landscaping and stormwater management. Warehouse 9 was approved by DPE on 2nd March 2023.
- A fourth Modification Application 4 (**MOD 4**) seeks to modify the waterway health strategy by incorporating land at Mirvac’s Elizabeth Enterprise Precinct at 1669-1723 & 1669A Elizabeth Drive, Badgerys Creek (Lot 100 DP1283398 & Lot 741 DP810111) (EEP) within the AIE SSD 10448 Concept Approval. The incorporation of the EEP land within the SSD 10448 concept approval will enable development on AIE to proceed by demonstrating cumulative compliance with the MARV and / or flow duration curve requirements for waterway health modelling. The updated WSUD Strategy will support

the approved on-lot developments within Lots 1, 3 and 9 of the AIE, the separate SSDA submissions for the on-lot developments within Lots 2 and 8 as well as future DAs or SSDAs for development within Lots 6 and 7. It is noted that the proposed cumulative waterway health approach for AIE and EEP is intended to be an interim solution until such time as the regional waterway health solution is agreed and implemented and will ensure compliance with the Draft Technical Guidance for achieving Wianamatta South Creek Stormwater Management Targets (NSW Government, 2022) or any other reason as approved by DPE.

- If MOD4 is approved ahead of this modification application, it should be noted that Mirvac's Elizabeth Enterprise Precinct at 1669A Elizabeth Drive, Badgerys Creek and 1669-1723 Elizabeth Drive, Badgerys Creek (Lot 100 DP1283398 & Lot 741 DP810111) will be included within the site description for the approval of this modification.
- There is also an SSDA application (**SSD-46516458**) for the development of Warehouse 4 on the amalgamated lots 4 & 5 which is to be amended through an accompanying modification. This proposed the construction of a new 26,914sqm warehouse and distribution facility with a partial, high-bay warehouse area which will support freezer rooms and other ancillary spaces. The works under this SSD include the construction of the warehouse with manual freezer rooms, high-bay automated freezers, loading docks, offices & dock offices, internal workshops & mechanical services, parking spaces and new vehicle crossovers, along with on lot landscaping and stormwater management. This SSDA and modification for the development of Warehouse 4 was "soft" lodged for Test of Adequacy review by DPE prior to formal TOA submission.
- An SSDA application is being progressed for the development of Warehouse 2 on AIE Lot 2 in accordance with the masterplan layout established by MOD 2 (**SSD-58257960**). Warehouse 2 is proposed to be comprised of 22,595sqm of warehouse space supported by 1,500sqm of office and 200sqm of dock office space. This application was formally lodged on 10 November 2023 and is currently on public exhibition from 16 November to 13 December 2023.
- The fifth proposed modification (**MOD 5**) seeks to modify the Stage 1 Approval at the AIE site to support temporary vehicular access to the approved Warehouse 1, CEVA tenant operations. This seeks the modification of Condition D6 to allow the issuance of OC for Warehouse 1 prior to completion of the entirety of the Stage 1 Phase 1 road works, specifically the Mamre Road intersection works. It introduces new conditions of consent that allow the temporary use of construction access roads for operational vehicular access to Warehouse 1 until such time as the Mamre Road intersection works are completed.

# Proposal Overview

As part of the staged development of AIE, Mirvac is seeking approval for a modification of the Concept Proposal and Stage 1 Development under SSD-10448 (**MOD 6**) and a new DA (**SSD-60513208**) for the Stage 4 development of 'Warehouse 8'.

**Concept Modification to SSD-10448**

- Reduction in warehouse & office GFA from 45,146m$^2$ to 43,850m$^2$.
- Change in building footprint to comprise two separate warehouse tenancies (8A and 8B).
- Slight extension of hardstand on the southern side of the building.
- Consolidation of on-site car parking towards the Access Road 1 frontage. This will increase car parking on Lot 8 from 166 to 178 on site car parking spaces.
- Relocation of car park ingress/egress crossing to Access Road 4.
- Inclusion of one additional heavy vehicle crossing to Access Road 4 to provide separate truck access for Warehouse 8A and 8B.

**Stage 1 Modification to SSD-10448**

- Modify conditions of consent relating to plan references.

**Stage 4 SSDA for SSD-60513208**

- Minor site grading works to provide for building pads and hardstand.

- Installation of on-lot infrastructure, including on-lot stormwater and waterway health measures.
- Construction of a single building comprising warehouse 8A and 8B to a height of 13.7m with rooftop plant, including:
  - Warehouse 8A - 34,900m2 ground floor warehouse area, a 2,500m$^2$ warehouse mezzanine, 500m$^2$ of office space and a 300m$^2$ dock office.
  - Warehouse 8B – 5,300m$^2$ of warehousing and 350m$^2$ office.
- Construction of two heavy vehicle crossings and one car park crossing to Access Road 4.
- Construction of hardstand areas to south of warehouses for truck manoeuvring.
- On site services and infrastructure.
- Landscaping along site frontages and within car park area.
- Parking for 178 cars.
- Use of Warehouse 8A and 8B for warehouse and distribution purposes 24 hours a day 7 days a week; and
- Ancillary use of Warehouse 8A for the purpose of a workshop and training area, associated with the car parts to be stored within the warehouse.

The lot layout and Warehouse 8 footprint has been designed to be consistent across MOD 6 and the Stage 4 development. **Figure 1** below illustrates the amended site layout as part of MOD 6, showing the proposed Warehouse 8 layout within the wider estate.

Figure 1 Estate Masterplan for Mod 6

*Source: SBA*

As the Stage 4 development is for the purposes of a 'warehouse and distribution centre' with a capital investment value of in excess of $60 million, it is classified as a State Significant Development (SSD) under Clause 12, Schedule 1 of the State Environmental Planning Policy (Planning Systems) 2021.

This EIS has been prepared in response to Secretary's Environmental Assessment Requirements (SEARs) for the Stage 4 SSDA (SSD-60513208), issued on 17th August 2023. This report includes assessment of compliance with the statutory and strategic planning framework, and all other potential environmental impacts identified through the preparation of this SSDA.

The intended outcome of the project is to meet the demand for warehousing space in NSW, which will support the economy and deliver jobs in a strategic precinct close to the new Nancy Bird Walton Airport. The site is strategically located within the Mamre Road Precinct, within the Western Sydney Employment Area, which was rezoned in June 2020 for the intended use of warehousing and industrial development.

The development will incorporate the latest technology for the future tenant and ensure that minimal environmental impact arises from the development, due to the consideration of issues as part of the broader siting and design of the warehouse, along with incorporating environmentally sustainable design measures.

# Consultation

Community and stakeholder engagement has been undertaken by Urbis and the Project Team in the preparation of the SSDA. This includes direct engagement and consultation with:

- Neighbouring private landowners and occupants;
- Adjoining landowners including GPT Group and Altis Property Partners;
- Government, agency and utility stakeholders including the Department of Planning and Environment, Fire NSW (**FRNSW**), Environment and Heritage (**EHG**), Penrith City Council, as well as the Transport for NSW (**TfNSW**).

The outcomes of the community and stakeholder engagement have been incorporated into the proposed development and are discussed in detail in this EIS.

# Justification of the Project

This EIS assesses the development as proposed with regards to relevant planning instruments and policies. The EIS outlines the proposed mitigation measures to ensure the project does not result in adverse or unreasonable environmental effects. Project alternatives were considered for this scheme, however, the proposed development represents the best outcome for the site and the future tenant.

The key issues for all components of the project identified in the SEARs have been assessed in detail, with specialist reports underpinning the key findings and recommendations identified in the Assessment of Impacts in **Section 6**.

It has been demonstrated that for each of the likely impacts identified in the assessment of the key issues, the impact will either be positive or can be appropriately mitigated. The proposal represents a positive development outcome for the site and surrounding area for the following reasons:

- **The proposal is consistent with state and local strategic planning policies:**

  The proposal is consistent with the relevant goals and strategies contained in:

  – Greater Sydney Region Plan: A Metropolis of Three Cities.
  – Our Greater Sydney 2056: Western City District Plan.
  – Future Transport 2056.
  – Freights and Ports Plan 2018-2023.
  – Western Sydney Aerotropolis Plan.
  – Penrith Local Strategic Planning Statement.
  – Western Sydney Employment Area.

  - Mamre Road Structure Plan.
  - Mamre Road Upgrade.

- **The proposal satisfies the applicable local and state development controls:**

  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*
  - *State Environmental Planning Policy (Planning Systems) 2021*
  - *State Environmental Planning Policy (Resilience and Hazards) 2021*
  - *State Environmental Planning Policy (Transport and Infrastructure) 2021*

- **The design responds appropriately to the opportunities and constraints presented by the site:**

  - The main opportunities and constraints of this site include its location in a recently rezoned industrial precinct. The AIE benefits from a creek alignment along the northern estate boundary, providing useable land areas. The AIE also benefits from access to Mamre Road, and vehicular access through the Access Roads to neighbouring landholdings. The AIE layout was approved to respond to the environmental constraints on the site, of note the biodiversity, bushfire safety and requirements for on-site water management. The proposed modification and Warehouse 8 development will align and appropriately update the AIE's response to these components.
  - The proposed layout for Lot 8 and Warehouse 8 (as proposed to be modified by SSD-10448 MOD 6) is generally consistent with the approved concept plan of SSD-10448 through only seeking a minor change to the building footprint to create a Warehouse 8A and 8B. It will not impact the site topography and access provisions via Mamre Road through this estate to the wider Mamre Road Precinct and the proposal aligns with the water management strategy contemplated by SSD10448 MOD 4.

- **The proposal is highly suitable for the site:**

  - The Mamre Road Precinct is zoned IN1 General Industrial. Warehouse and industrial uses are approved on the site and the proposal maintains these approved warehouse and distribution uses. The proposal seeks to deliver Warehouse 8A and 8B (together forming the 'Warehouse 8' development) which will provide much needed warehouse and logistics space in the Mamre Road Precinct, consistent with the strategic visions for the precinct and relevant statutory matters for consideration.
  - The proposal has been designed with consideration of the waterway health and stormwater management initiatives contemplated by MOD 4 to SSD-10448. As detailed above, MOD 4 seeks to include the Mirvac owned site at EEP within the extent of the AIE and introduce a revised WSUD strategy. Accordingly, the proposal will meet the stormwater quality and flow targets requirements under the Mamre Road Precinct DCP 2021. In addition to this, the proposal includes additional rainwater and stormwater management works and will remain suitable for the site.
  - The proposal is generally consistent with the relevant matters for consideration, retains the approved services and will ensure that the internal road layout will service the site in a suitable and efficient manner ensuring the proposal remains suitable for the site.

- **The proposal is in the public interest:**

  - The proposal is consistent with the planning and environmental policies applicable to the site and will deliver on the intended employment land function for the Mamre Road Precinct consistent with the strategic visions for the precinct, zoning of the site and is therefore considered to be in the public interest.

**In view of the above, it is considered that this SSD Application has significant merit and should be approved subject to the implementation of the mitigation measures described in this report and supporting documents.**

# 1. Introduction

This section of the report identifies the applicant for the project and describes the site and proposed development. It outlines the site history and feasible alternatives explored in the development of the proposed concept, including key strategies to avoid or minimise potential impacts.

## 1.1. Applicant Details

The applicant details for the proposed development are listed in the following table.

Table 1 Applicant Details

| Descriptor | Proponent Details |
|---|---|
| Full Name(s) | Mirvac Industrial Developments Pty Limited |
| Postal Address | Level 28, 200 George Street<br>Sydney, NSW 2000 Australia |
| ABN | 47 127 755 239 |
| Nominated Contact | Stephen Foster – National Development Director |

## 1.2. Project Description

This EIS is submitted to the Department of Planning and Environment (**DPE**) on behalf of the Mirvac and in support of a modification application to the approved concept plan and Stage 1 Works under SSD-10448 (**MOD 6**) as well as a Stage 2 SSD development application for the construction of Warehouse 8 (SSD-60513208). The proposal is located at 788-882 Mamre Road, Kemps Creek (Lots 1, 2 and 5 DP 1285305 and Lots 6 and 7 in DP1291562), known as Aspect Industrial Estate (**AIE**). It is noted that the lot refences have been refined from the original lot descriptions for SSD 10448 (being Lots 54 – 58 in DP 259135 and Lots 1-5 DP 1285305), due to a boundary adjustment for road dedication for the widening of Mamre Road.

The SSDA and modification seeks consent for:

**Concept Modification to SSD-10448**

- Reduction in warehouse & office GFA from 45,146m$^2$ to 43,850m$^2$.
- Change in building footprint to comprise two separate warehouse tenancies (8A and 8B).
- Slight extension of hardstand on the southern side of the building.
- Consolidation of on-site car parking towards the Access Road 1 frontage. This will provide an increase in on site car parking from 166 to 178 on site car parking spaces.
- Relocation of car park ingress/egress crossing to Access Road 4.
- Inclusion of one additional heavy vehicle crossing to Access Road 4 to provide separate truck access for Warehouse 8A and 8B.

**Stage 1 Modification to SSD-10448**

- Modify conditions of consent relating to plan references.

**Stage 4 SSDA for SSD-60513208**

- Minor site grading works to provide for building pads and hardstand.
- Installation of on-lot infrastructure, including on-lot stormwater and waterway health measures.

- Construction of a single building comprising warehouse 8A and 8B to a height of 13.7m with rooftop plant, including:
  - Warehouse 8A - 34,900m$^2$ of ground level warehousing, 2,500m$^2$ of mezzanine warehousing, 500m$^2$ of office space and a 300m$^2$ dock office
  - Warehouse 8B – 5,300m$^2$ of warehousing and 350m$^2$ office.
- Construction of two heavy vehicle crossings and one car park crossing to Access Road 4.
- Construction of hardstand areas to south of warehouses for truck manoeuvring.
- On site services and infrastructure.
- Landscaping along site frontages and within car park area.
- Parking for 178 cars.
- Use of Warehouse 8A and 8B for warehouse and distribution purposes 24 hours a day 7 days a week; and
- Ancillary use of Warehouse 8A for the purpose of a workshop and training area, associated with the car parts to be stored within the warehouse.

The key objectives for the proposed development and the way in which these have been achieved are summarised in **Table 2**.

Table 2 Project Objectives

| **Project Objective** | **Proposed Development** |
|---|---|
| Align with the Mamre Road Precinct's aim to support the need for additional logistics, industrial and urban services land, in response to long-term projected population and development growth in Sydney. | The proposal will effectively utilise the limited supply of serviced and zoned employment land and integrate with existing and planned infrastructure to deliver rationalised and suitable warehouse space to address user demand. |
| Contribute to the employment options for Western Sydney and build upon the opportunities presented by the Western Sydney Aerotropolis. | The proposal will facilitate the continued delivery of the AIE and contribute to local employment opportunities in Western Sydney. The proposed MOD 6 and Warehouse 8 development will provide for an employment generating land use in specific response to tenant enquiry and demand. |
| Ensure minimal environmental and amenity impact by responding to the site context and key interfaces with surrounding lands including sensitive receivers. | The proposed development has been designed to minimize any adverse environmental impacts as detailed in **Section 6**. |
| Deliver high quality market leading industrial and logistics facilities. | The proposed Warehouse 8 has been prepared to achieve a high-quality design with a visually interesting and distinct building appearance, consistent with the appearance of approved AIE warehouse designs. |
| Deliver sustainable development in line with Mirvac's sustainability objectives. | An ESD strategy is proposed for the Warehouse 8 development. |

### 1.2.1. Project Terminology

The proposed modification to the approved SSD-10448 concept proposal and stage 1 works will be referred to as '**MOD 6**' for the purposes of this report. The approved industrial estate development which will be modified by the proposed modification application will continue to be referred to as the Aspect Industrial Estate (**AIE**).

This proposal relates to Stage 4 of the AIE development and for the purposes of this report, it will be referred as the '**Warehouse 8 Development**' or the **'Stage 4 Development**'. This development will be applicable to 788-882 Mamre Road, Kemps Creek and for the purposes of this report, the site will be referred to as '**Warehouse 8**'. The Stage 4 Development refers to the proposal submitted for approval under SSD-60513208.

The MOD 6 and Stage 4 SSD Development will be collectively referred to as '**the proposal**' for the purposes of this assessment. An overview of the proposal is provided in **Section 1.2** and detailed description of the modifications to the Concept Proposal and Stage 1 Development as well as the Stage 4 works are described in detail in **Section 4** of this EIS.

## 1.3. Project Background

### 1.3.1. SSD-10448 Concept Proposal and Stage 1 Development

On 24th May 2022 a state significant development application (SSD-10448) was approved by DPE for a new industrial estate known as Aspect Industrial Estate (AIE), within which this proposed warehouse development is sited. The approval granted consent for:

- A Concept Proposal for the staged development of an industrial estate comprising 11 warehouse / industrial buildings with a total GFA of up to 248,112sqm, ancillary offices and café and associated infrastructure; and
- Stage 1 development including sitewide bulk earthworks, riparian corridor realignment, construction of access roads and the Mamre Road/Access Road 1 intersection, construction and operation of Buildings 1 and 3, services and utilities installation and subdivision.

### 1.3.2. Modifications to Approval

Mirvac is currently responding to a number of tenant enquiries for industrial and warehousing operations across AIE. These tenant enquiries have resulted in the need to prepare various modifications to the Concept Proposal to amend the approval in order to accommodate the warehouse requirements of the future tenants.

**Table 3** below outlines the original approval for AIE and the various subsequent modifications approved or sought to the consent.

Table 3 Concept Plan and Modification Overview

| DA Number | Description of Development |
|---|---|
| SSD-10448 | A Concept Plan for the AIE comprising 11 industrial or warehouse and distribution centre buildings, internal road network layout, building locations, gross floor area (GFA), car parking, concept landscaping, building heights, setbacks and built form parameters.<br><br>The Concept Consent assessed and approved all the ground works, ecology, flooding and Aboriginal and non-Aboriginal impacts and mitigation measures to facilitate the development of the Estate.<br><br>Stage 1 development works comprising road and services infrastructure, site preparation works across the estate and construction of the warehouse and distribution and industrial buildings on Lots 1 and 3 along with subdivision of Stage 1. |

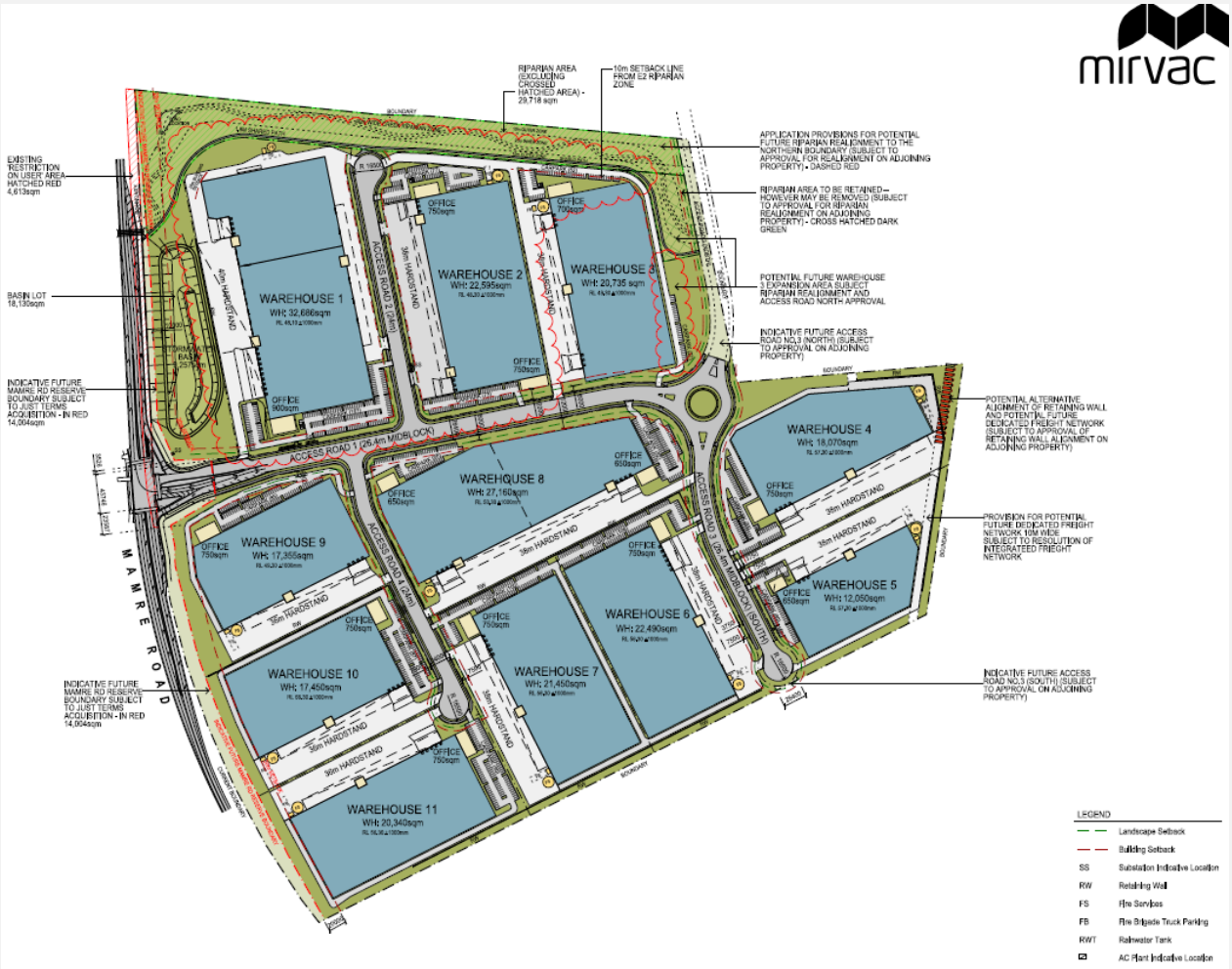
| DA Number | Description of Development |
|---|---|
| | The original Concept Approval layout for the AIE is illustrated in Figure 2 below. |

Figure 2 Original AIE Concept Approval Layout

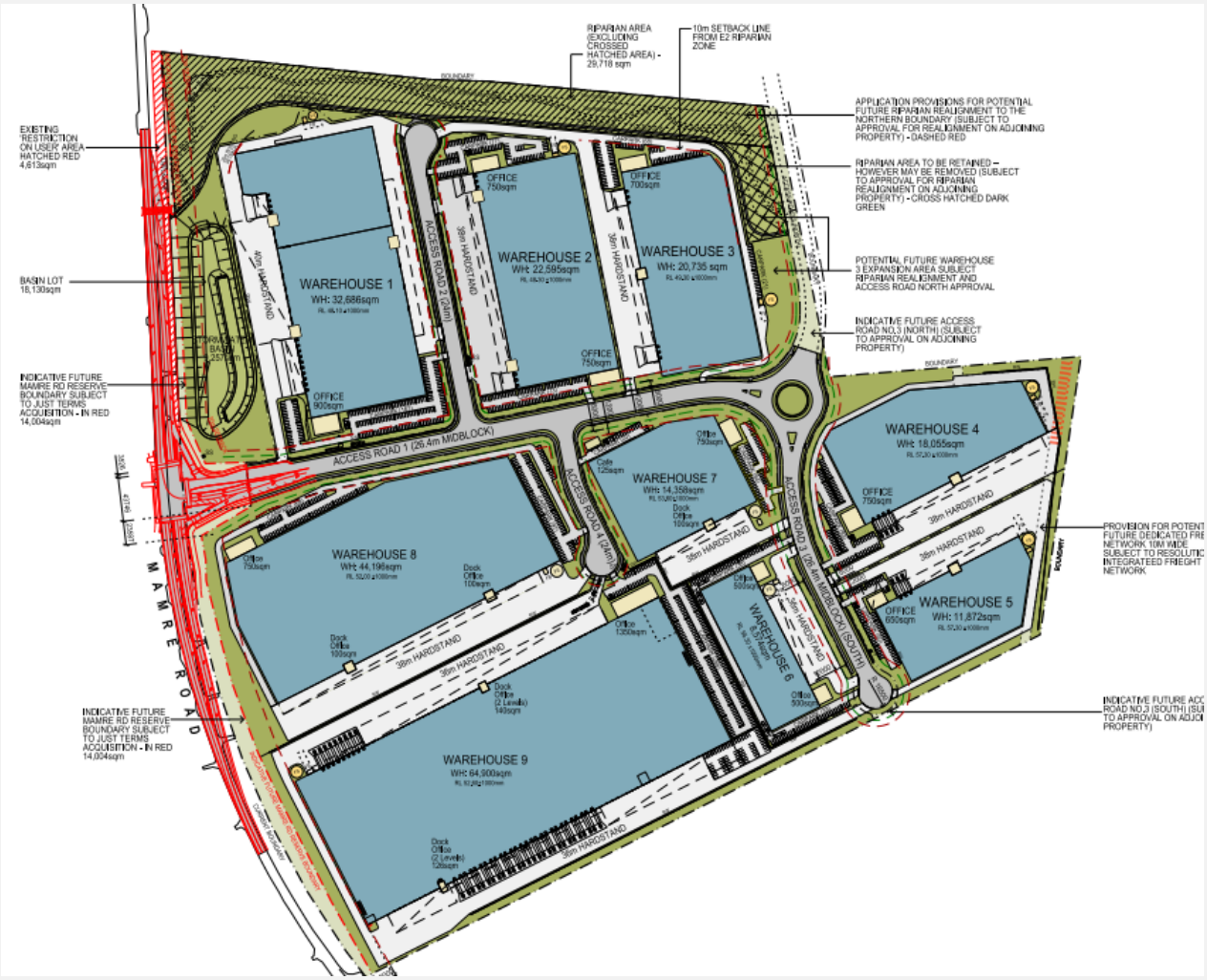

| | |
|---|---|
| SSD-10488 MOD1 | Modification Application 1 (MOD 1) was approved by DPE on 25th August 2022, for a minor amendment to Condition D13 to the SSD-10448 development consent, to require a Works Authorisation Deed for a temporary access road connection to Mamre Road. This change was required by TfNSW. |
| SSD-10488 MOD2 | Modification Application 2 (MOD 2) to the Concept Proposal and the Stage 1 Development, proposed the relocation of Access Road 2 further west and shortening of its length, adjusted vehicle access to Lot 3 and revised parking provision across Lots 1, 2 & 3.<br><br>Stage 1 modifications were proposed to the construction of Warehouse 1 and Warehouse 3, resulting in changes to GFA, car parking, hardstanding and façades. The updated Concept Plan is illustrated in **Figure 3** below.<br><br>MOD 2 was approved by DPE on 30th November 2022. |

| DA Number | Description of Development |
|---|---|
| | |

Figure 3 Approved AIE MOD 2 Layout

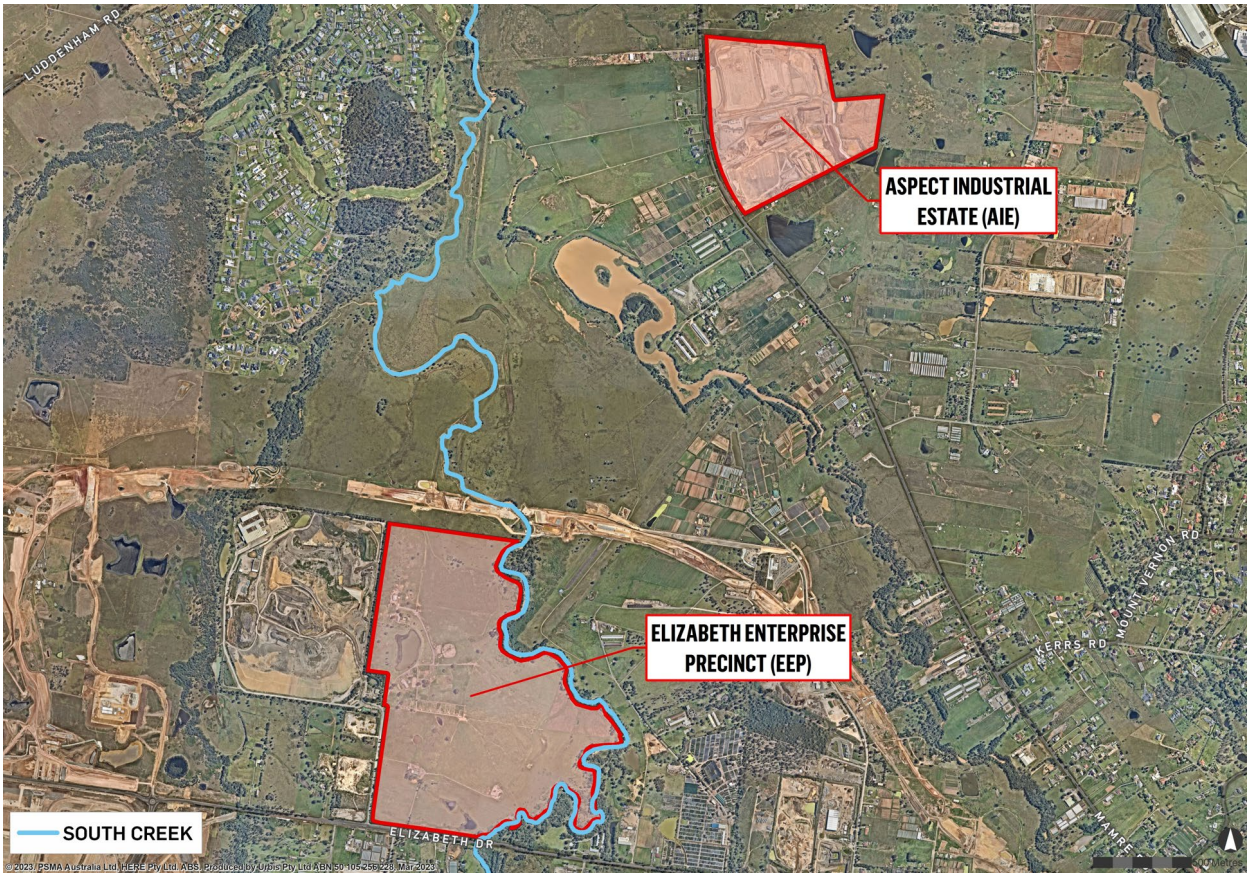



| | |
|---|---|
| SSD-10448 MOD3 | Modification 3 (MOD 3) sought to amend the Concept Plan to reconfigure the estate to reduce the overall number of lots from 11 to 9, relocate Access Road 4 and create new warehouse footprints, along with updating road subdivision, civils works and landscaping. See **Figure 4** below.<br><br>MOD 3 was approved by DPE on 2nd March 2023. |

| DA Number | Description of Development |
|---|---|
| Figure 4 Approved AIE MOD 3 Layout   | |
| SSD-46516461 (Warehouse 9) | There was a concurrent SSD application for the development of Warehouse 9 on the Lot 9 at AIE to be amended through MOD 3. The application sought approval for the construction of new 66,341sqm building for use as ‘warehouse and distribution’ to be built to a ridge height of 14.6m, comprising a warehouse, loading docks, dock offices, parking spaces and new vehicle crossovers, along with on lot landscaping and stormwater management.<br><br>Warehouse 9 was approved by DPE on 2nd March 2023. |
| SSD-10448 MOD 4 | Modification Application 4 (MOD 4) seeks to incorporate Mirvac owned land at Elizabeth Enterprise Precinct at 1669-1732 Elizabeth Drive, Kemps Creek (Lot 5 DP860456 & Lot 741 DP810111) (EEP) within the SSD 10448 Approval. The incorporation of the EEP land within the SSD 10448 approval will allow the land to be used for infiltration purposes to meet the MARV targets at AIE.<br><br>MOD 4 will also seek an amendment the Stage 1 Development to remove the approved evaporation ponds on Lots 2 and 8 of AIE and introduce new stormwater infrastructure for irrigation purposes.<br><br>The WSUD Strategy to support the proposed additional development of Lots 8 (and Lot 2 subject to a separate SSDA) on the AIE Site, including previously approved |

| DA Number | Description of Development |
|---|---|
| | Lots 1, 3 and 9, involves retaining a large portion of the EEP Site in its undeveloped condition and removing all impervious surfaces on the EEP Site.<br><br>Any further amendments to the WSUD Strategy that would be required to support further development of the AIE Site will form part of subsequent applications, i.e., further Modifications to SSD-10448, or as part of supplementary SSDA/DA submissions. This approach is formulated to allow development to occur prior to the establishment of the Sydney Water Regional Solution for Mamre Road.<br><br>MOD 4 is currently under assessment by DPE. |

Figure 5 Proposed Modified Sites (including AIE and EEP)




| | |
|---|---|
| SSD-46516458 | There is an SSD application for the development of Warehouse 4 on the Lot 4 at AIE to be amended through an accompanying modification. This proposes the construction of new 26,914 sqm building for use as 'warehouse and distribution' to be built to a height of part 18m and part 43m for cold storage. The proposal comprises a warehouse, loading docks, dock offices, parking spaces and new vehicle crossovers, along with on lot landscaping and stormwater management.<br><br>This SSDA and modification for the development of Warehouse 4 was "soft" lodged for Test of Adequacy review by DPE prior to formal TOA submission. |
| SSD-58257960 | A separate SSDA application is being lodged for the development of Warehouse 2 on AIE Lot 2 in accordance with the masterplan layout as established by MOD 3. Warehouse 2 is proposed to be used for warehouse and distribution premises 24 hours a day 7 days a week. No specific operator has been secured for Warehouse |

| DA Number | Description of Development |
|---|---|
| | 2. The design includes a 22,595sqm warehouse space, 1,500sqm office, 200sqm dock office and 139 car parking spaces.<br><br>This application was formally lodged on 10 November 2023 and is currently on public exhibition from 16 November to 13 December 2023. |
| SSD-10448 MOD 5 | The fifth proposed modification (**MOD 5**) seeks to modify the Stage 1 Approval at the AIE site to support temporary vehicular access to the approved Warehouse 1, CEVA tenant operations. MOD 5 seeks to modify Condition D6 to allow the issuance of OC for Warehouse 1 prior to completion of the entirety of the Stage 1 Phase 1 road works, specifically the Mamre Road intersection works. It introduces new conditions of consent that allow the temporary use of construction access roads for operational vehicular access to Warehouse 1 until such time as the Mamre Road intersection works are completed. |

The MOD 6 and Stage 4 development forms the next phase of development activity at AIE. Mirvac has been progressing discussions with future tenants for the precinct. To respond to unique tenant requests, modified warehouse and lot layouts are required to accommodate the size and configuration of the intended operations.

This proposal will facilitate the required warehouse layout for the new tenancy within Warehouse 8, in accordance with the intended operational requirements for Volkswagen Group Australia' (**VGA**) for parts storage and staff training at Warehouse 8A. Warehouse 8B will provide an option for expansion of the VGA operations. Future operations may include the storage of car parts or other parts that are required for storage and distribution, which can help to serve the future business with flexibility as VGA responds to market and growth requirements in Australia.

# 2. Strategic Context

This section of the EIS describes the way in which the proposal addresses the strategic planning policies relevant to the site. It identifies the key strategic issues relevant to the assessment and evaluation of the project.

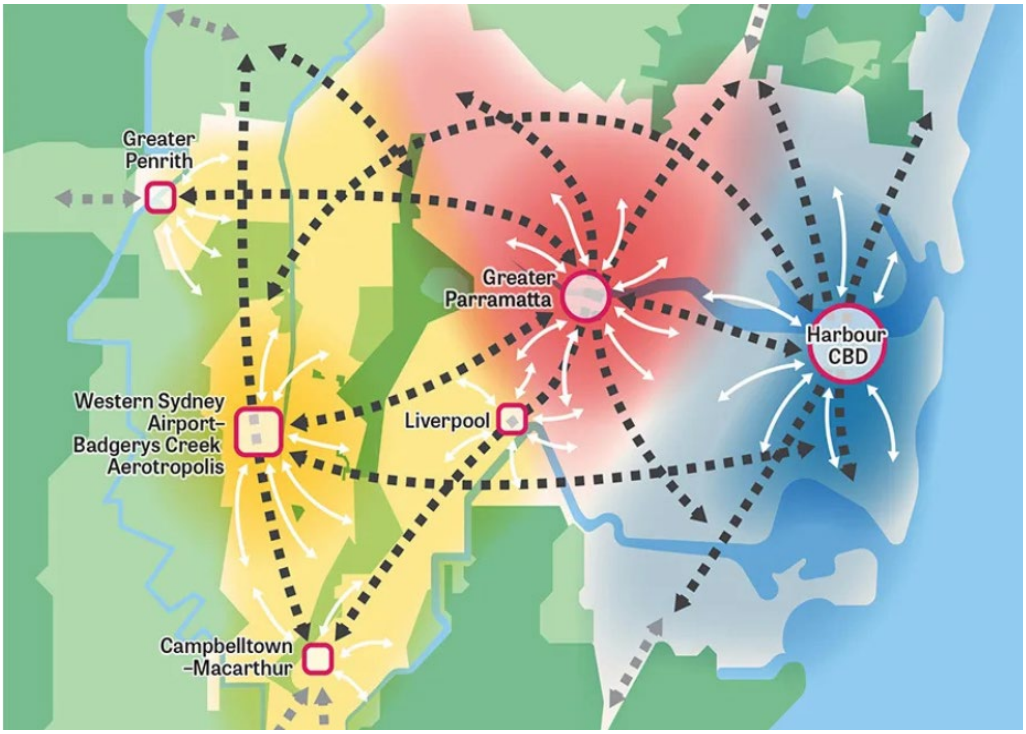
## 2.1. Project Justification

The proposed development is aligned with the State, district and local strategic plans and policies applying to the site as outlined below.

### 2.1.1. Greater Sydney Region Plan: A Metropolis of Three Cities

*The Greater Sydney Region Plan: A Metropolis of Three Cities* (Region Plan) provides the overarching strategic plan for growth and change in Sydney. It is a 20-year plan with a 40-year vision that seeks to transform Greater Sydney into a metropolis of three cities - the Western Parkland City, Central River City and Eastern Harbour City as illustrated in **Figure 6** below. It identifies key challenges facing Sydney including increasing the population to eight million by 2056, 817,000 new jobs and a requirement of 725,000 new homes by 2036.

Figure 6 Structure Plan




*Source: Greater Sydney Commission*

The proposed development supports the vision of the Region Plan as summarised below:

- **Infrastructure and collaboration:** The site is accessible to existing road infrastructure which provides strong connections to the wider region. The precinct fronts Mamre Road which provides direct access to the M4 Motorway, Great Western Highway and Elizabeth Drive. This road is undergoing detailed design for an upgrade by TfNSW to service the future employment lands. In addition, the proposal seeks to provide essential infrastructure, e.g., sewer, water, electricity, telecommunications to the site. Preliminary discussions regarding the servicing of the site have commenced with Sydney Water, Jemena, NBN, and Endeavour Energy.

  - Through the Western Sydney City Deal, there are significant infrastructure commitments proposed to service the Western Sydney International Airport and significant road upgrades and public transport projects to support the future employment of the site and surrounding area. As such, the proposal will ensure that the employment land uses are delivered in alignment with the intended infrastructure growth in the area.

- **Liveability:** The proposal will support the 30-minute city by providing employment to nearby residential suburbs. It is also surrounded by land identified for future employment. The proposed future uses at Warehouse 8 and the broader AIE will not negatively impact on surrounding residential areas.
- **Productivity:** The proposal development responds to the industrial land shortfall identified in the Region Plan and aims to respond to the market requirements of the intended tenants. The proposal will further realize the provision of industrial, employment land within the Western Sydney Aerotropolis. The site is well-located to the M4 and M7 Motorways and will support the vision for employment within the Western Sydney Aerotropolis.

## 2.1.2. Our Greater Sydney 2056: Western City District Plan

The *Western District Plan* (**District Plan**) is a 20-year plan to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan. The intent of the District Plan is to inform local strategic planning statements and local environmental plans, guiding the planning and support for growth and change across the district. The proposal aligns with the vision of the District Plan, as summarised below:

- **Infrastructure and Collaboration:** The proposal will align with the approved collaboration between the AIE precinct development for the delivery of essential infrastructure needed to support the Western Parkland City. The proposal will align with the intended road infrastructure upgrades in the area as well as the necessary utility infrastructure. The proposal will not compromise the approved AIE's collaboration in delivery of essential infrastructure needed to support the Western Parkland City.
- **Liveability:** The proposal will ensure the realization of employment opportunities at the site accessible to nearby residents, thus contributing to the 30-minute city vision.
- **Productivity:** The site is within the Western Sydney Aerotropolis (WSA) and surrounded by land identified for future employment. The proposal will supply industrial lands within a land release area in response to long-term projected population and development growth.
- **Sustainability:** The proposal includes a range of measures to mitigate, minimise or manage the potential environmental impact of the proposal. The EIS will detail stormwater management measures to protect and manage the existing natural systems and ecologically sustainable development initiatives to minimise demand on infrastructure systems, such as sewer, water and electricity.

## 2.1.3. Future Transport 2056

The Future Transport Strategy sets the 40-year vision and strategy for managing the growth of transport services and infrastructure in NSW over the next 40 years. It has been developed alongside the Region Plan in order to provide an integrated planning framework for NSW, that supports the repositioning of Sydney as a metropolis of three cities.

For Greater Sydney, the plan is also built on the same vision of the 30-minute city, which it says will be underpinned by an integrated network of city-shaping, city-serving and centre serving corridors. To support this vision, transport for NSW has established 6 outcomes for Greater Sydney which demonstrate its aspirations for transport over the next 40 years. These outcomes will be used to guide transport services and infrastructure in Greater Sydney to 2056. The identified and relevant Greater Sydney outcomes include:

- Successful places,
- A strong economy,
- Safety and performance,
- Accessible services, and
- Sustainability.

Transport networks in the Western Parkland City will be developed in order to support sustainability and jobs growth in the District. The plan identifies that strategic transport corridors will integrate the city to create 30-minute connections to strategic centres and metropolitan centres and clusters. The WSA, as an economic catalyst, is also identified as a key node in this network that will be served by north-south rail links and east-west connections.

The site is well placed to gain from the future transport network upgrades, especially with regard to the intended partial upgrade of Mamre Road which fronts the AIE precinct. The proposal will generate much needed increases to employment, activity and demand of travel in conjunction with the future increases in transport capacity.

## 2.1.4. Freight and Ports Plan 2018 – 2023

The NSW Freight and Ports Plan 2018 – 2023 sets clear initiatives and targets to make NSW freight transport more efficient and safer, so NSW can continue to move and grow. The Western Sydney Freight Line and Intermodal Terminal are initiatives identified to contribute to the growing demand on logistics in Western Sydney through the delivery of the Western Sydney Airport and Aerotropolis.

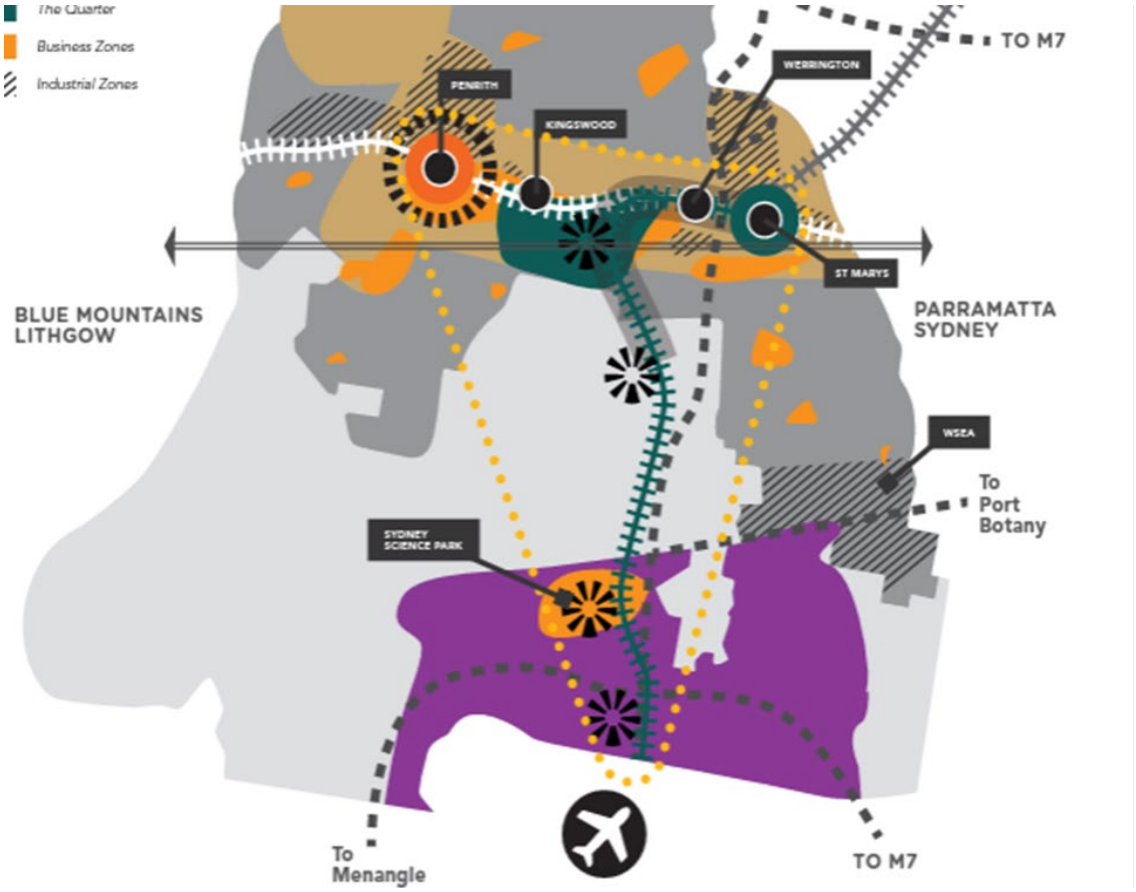
The proposal does not impact the delivery of these initiatives and contributes to the delivery of jobs within a 30-minute catchment of the Aerotropolis.

## 2.1.5. Penrith Local Strategic Planning Statement

The Penrith Local Strategic Planning Statement (LSPS) was finalised on 23 March 2020. The LSPS identifies the vision and priorities for land use across the LGA, as well as outlines the special character and values of the place and how they will be managed into the future. The Structure Plan identifies land within Mamre Road Precinct within the Western Sydney Aerotropolis. The LSPS identifies Western Sydney Aerotropolis as a key employment generator for the LGA and seeks to create an economic triangle with Penrith CBD and St Marys (refer to **Figure 7** below).

The LSPS defers the details on the types of employment within the Western Sydney Aerotropolis to the Western Sydney Aerotropolis Plan, the main strategic planning document guiding this growth area.

Figure 7 Penrith's Economic Triangle




*Source: Penrith City Council*

## 2.1.6. Western Sydney Aerotropolis Plan

The Western Sydney Aerotropolis Plan (WSAP) finalised in October 2020, has been developed by the Western Sydney Planning Partnership and sets the planning framework for the Western Sydney Aerotropolis. Mamre Road Precinct, including the site, is identified as one of ten precincts within the growth area. Mamre Road Precinct is an initial precinct to be brought forward to create early employment opportunities and better coordinate infrastructure planning.

The WSAP identifies the planning pathway for Mamre Road Precinct under the WSEA SEPP, as the future employment land uses anticipated for the precinct align with the existing objectives of the WSEA. The Structure Plan identifies land within Mamre Road Precinct to be zoned for flexible employment with intended land uses being industrial, warehousing and logistics. The statutory planning pathway will be separate from the remaining Aerotropolis precincts, and the Mamre Road Precinct will have its own Development Control Plan. Part 5 of the WSAP outlines measures to protect the 24-hour operations of the Western Sydney (Nancy-Bird Walton) International Airport.

Key initiatives include:

- Preventing the encroachment of noise-sensitive land uses into areas affected by aircraft noise and operational airspace.
- Locating buildings to avoid wind shear and turbulence.
- Managing wildlife attraction.
- Locating wind turbines appropriately.
- Ensuring lighting does not distract/confuse pilots.
- Maintaining an obstacle free operational space.
- Ensuring off-airport development does not impact the communication, navigation and surveillance (CNS) equipment.
- Managing land uses in public safety areas.

The proposal does not impact the future airport operations.

## 2.1.7. Western Sydney Employment Area

The AIE forms part of the strategically significant employment precinct known as the WSEA, which is identified and endorsed in Region, District and local planning strategies.

Since the delivery of the M7 Motorway, the WSEA has developed rapidly into a freight and logistics hub which rivals many other industrial locations in Greater Sydney. The greenfield location offers opportunities for modern, custom design facilities and its proximity to Sydney's Motorway Network provides convenient access to Port Botany and Sydney Airport without the exposure to the congestion and vehicle restrictions present in many of the more established, inner ring industrial areas. Shifting land economies in these inner ring areas has also contributed to the growing dominance of the WSEA in Sydney's industrial market due to its ability to offer a supply of large, flat sites at a competitive market rate.

The importance of WSEA for employment will further be amplified through the delivery of the Western Sydney International (Nancy-Bird Walton) Airport, which will open 24-hour airport operations to Greater Sydney. The WSEA supports the economy's global function and promotes employment, such as industrial uses, freight, logistics and research and development functions, as well as opportunities for agribusiness and food production.

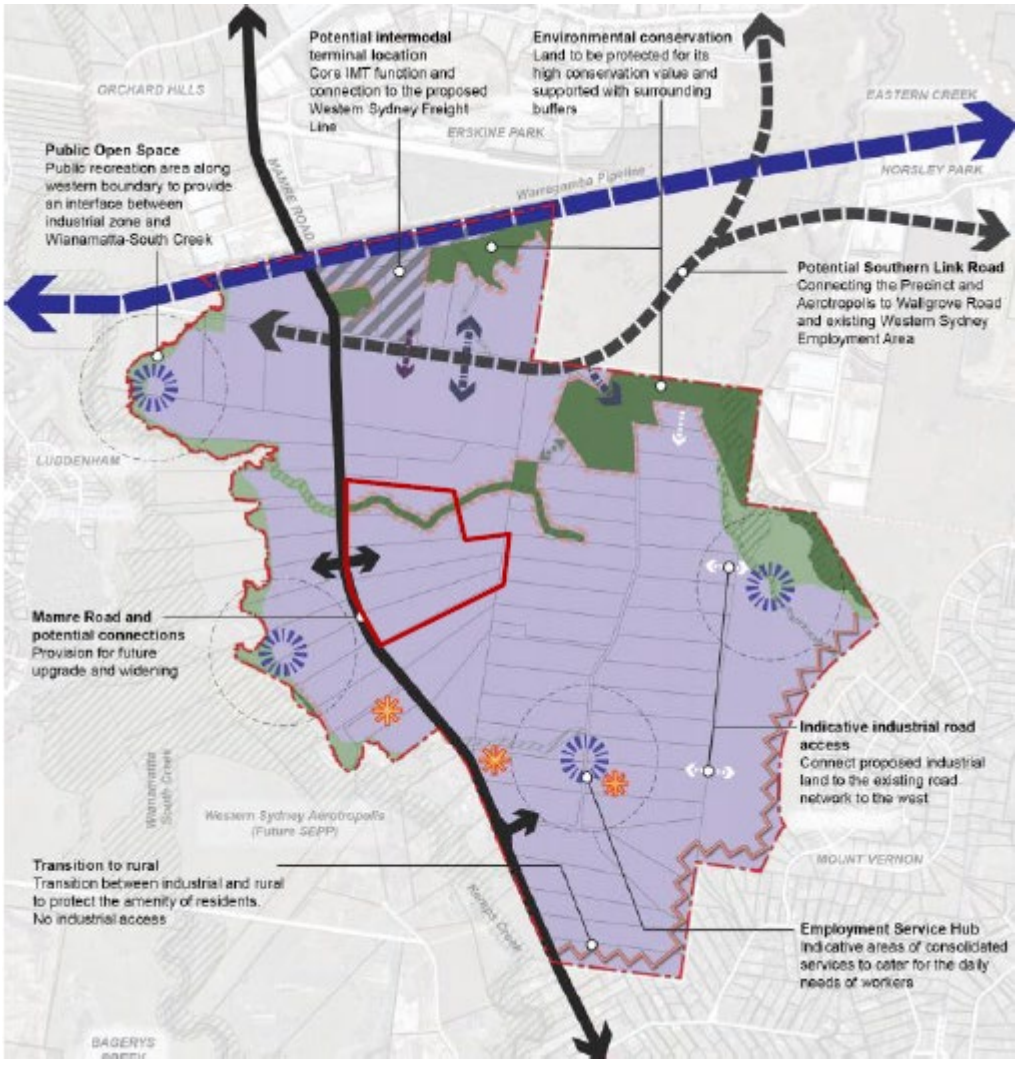
The proposal aligns with the strategic intentions of the Western Sydney Employment Area as it aims to deliver freight and logistics employment land within the area, satisfying the opportunities afforded to the area. The Warehouse 8 development will facilitate the accommodation and operations of the VGA tenant and will contribute to the competitive edge of this employment area through securing operational tenants in the area.

## 2.1.8. Mamre Road Structure Plan

The Mamre Road Structure Plan identifies the development intent for the precinct, highlighting future industrial, environment and drainage areas, as well as identifying key infrastructure required to support the precinct, as illustrated in **Figure 8** below.

The proposal delivers on the intent of the Structure Plan as it relates to the subject land. Consistent with the vision of the precinct, the development will not result in any adverse ecological impacts and will appropriately mitigate any potential acoustic impacts to noise sensitive receivers. The proposal will not negatively impact quality of the riparian corridor that is located within the AIE precinct.

Figure 8 Mamre Road Structure Plan




*Source: Department of Planning and Environment*

## 2.1.9. Mamre Road Upgrade

The NSW Government has started planning for a future upgrade of Mamre Road between Kerrs Road and the M4 Motorway, to support economic and residential growth in this area. The Mamre Road upgrade is part of a plan to progressively upgrade arterial roads in Western Sydney to deliver a more efficient, reliable network that meets the future needs of the community and the economy. This includes the need to support Western Sydney Airport and the Aerotropolis. The intended corridor width for Mamre Road as a Primary Arterial Road is 50 metres. Transport for NSW has completed the strategic design for the Mamre Road upgrade.

The proposal will deliver additional employment opportunities that will utilize and benefit from the intended Mamre Road portion upgrade (including the intended upgrade of the interim intersection to Mamre Road).

## 2.2. Key Features of the Site and Surrounds

The site is located at 788-882 Mamre Road, Kemps Creek within the Penrith local government area (**LGA**). The Aspect Industrial Estate (**AIE**) that covers 788-882 Mamre Road is legally described as Lots 1, 2 & 5 DP 1285305 and Lots 6 & 7 DP 1291562 (formerly being Lots 54 – 58 in DP 259135 and Lots 1-5 DP 1285305) and is currently owned by Mirvac.

The site is located within the suburb of Kemps Creek, which is situated within the Penrith LGA see **Figure 9** below. The site is approximately 4 kilometres (km) north-east of the future Western Sydney International (Nancy Bird Walton) Airport, 12 km south-east of Penrith CBD and 40 km west of the Sydney CBD and is located within the Mamre Road Precinct within the broader WSEA.

Site preparation and establishment works in accordance with SSD-10448 have commenced. The below image also shows the construction progress for Warehouse 1 in the northwestern corner of the site.

Figure 9 788-884 Mamre Road, Kemps Creek


*Source: Urbis*

The AIE has an area of approximately 56.3 hectares (ha) and currently the AIE is currently in the process of being created in accordance with the Concept Proposal and Stage 1 Development SSD-10448. The historic land uses on the site include rural residential, grazing, dairy farming, poultry farming and horticulture, with the approval on the site for industrial and warehouse uses through SSD-10448.

The AIE is bound by Mamre Road to the west and agricultural uses to the north, south and east. This land is identified for future employment land, as this site and the broader Mamre Road Precinct has been rezoned to, primarily, IN1 General Industrial under the *State Environmental Planning Policy (Industry and Employment) 2021* (Industry and Employment SEPP). A number of development applications have been lodged on land surrounding the site within the Mamre Road Precinct as summarised in **Section 2.3** below.

The key features of the site which have the potential to impact or be impacted by the proposed development are summarised in **Table 4** below.

Table 4 Key Features of Site and Locality

| Descriptor | Site Details |
|---|---|
| Existing Development | The site has previously supported agricultural uses including farming and grazing.<br><br>The site has an approved use for a warehouse distribution centre under SSD-10448. Site preparation works have been undertaken across the site in accordance with the approved Stage 1 development. |
| Topography | The peak of the AIE site is located to the north- eastern corner of the site (70 AHD) and slopes to the western boundary of Mamre road (40 AHD).<br><br>Approval has been granted by way of SSD-10448 for earthworks to establish the future road and development pad levels across the AIE. |
| Site Access | Into the Aspect Industrial Estate from Mamre Road. |
| Services | Services connections to the AIE are to be provided in accordance with SSD-10448. |
| Contamination | A Phase 1 and 2 Contamination Assessment was prepared for the concept approval SSD-10448 by JBS&G and Arcadis. These reports identified contaminates on the site and recommended mitigation measures to appropriately dispose of the contamination.<br><br>Conditions were included in the consent that will remove the contamination from the site before the works commenced. |
| Bushfire Prone Land | The Estate is mapped as containing Category 2 Bushfire Prone Vegetation.<br><br>Principles to address bushfire risk were established as part of the Concept Approval SSD-10448 including an APZ along the site's northern extent.<br><br>This MOD will not change the findings of that bushfire risk assessment. |
| Flora and Fauna | Native vegetation on the broader site is limited to small patches and sparsely scattered through the site. Conservation and removal of vegetation will be conducted in accordance with the Concept Proposal and Stage 1 Approval SSD-10448. The proposal seeks to maintain the flora and fauna in accordance with SSD-10448. |
| Heritage | No identified State or local items of environmental heritage are located on the land.<br><br>Aboriginal archaeology identified various artefacts and objects at the broader estate site. An Aboriginal Cultural Heritage Assessment Report was completed for the Concept Proposal and Stage 1 Development, and conditions of consent relating to aboriginal heritage were placed on the approval of SSD-10448.<br><br>The proposed MOD 6 will not change the findings or recommendations of the ACHAR. |

| Descriptor | Site Details |
|---|---|
| Western Sydney International Airport's ANEF | The site is affected by the contour 20, industrial development is suitable within this ANEF contour. |
| Surface Water, Hydrology and Flooding | The AIE is located within the South Creek sub-catchment with two unnamed watercourses within the estate (located to the north of lot 1, 2 and 3. |

## 2.3. Cumulative Impacts with Future Projects

The site is located within the Mamre Road Precinct which is zoned under the Industry and Employment SEPP. There is a number of likely future developments within the precinct which may be relevant in the cumulative impact assessment of the proposal are summarised in the following **Table 5** and **Figure 10** below.

The potential cumulative impacts of the project are addressed in **Section 6** of the EIS in accordance with the DPIE Assessing Cumulative Impacts guidelines.

Figure 10 Adjacent Development Applications

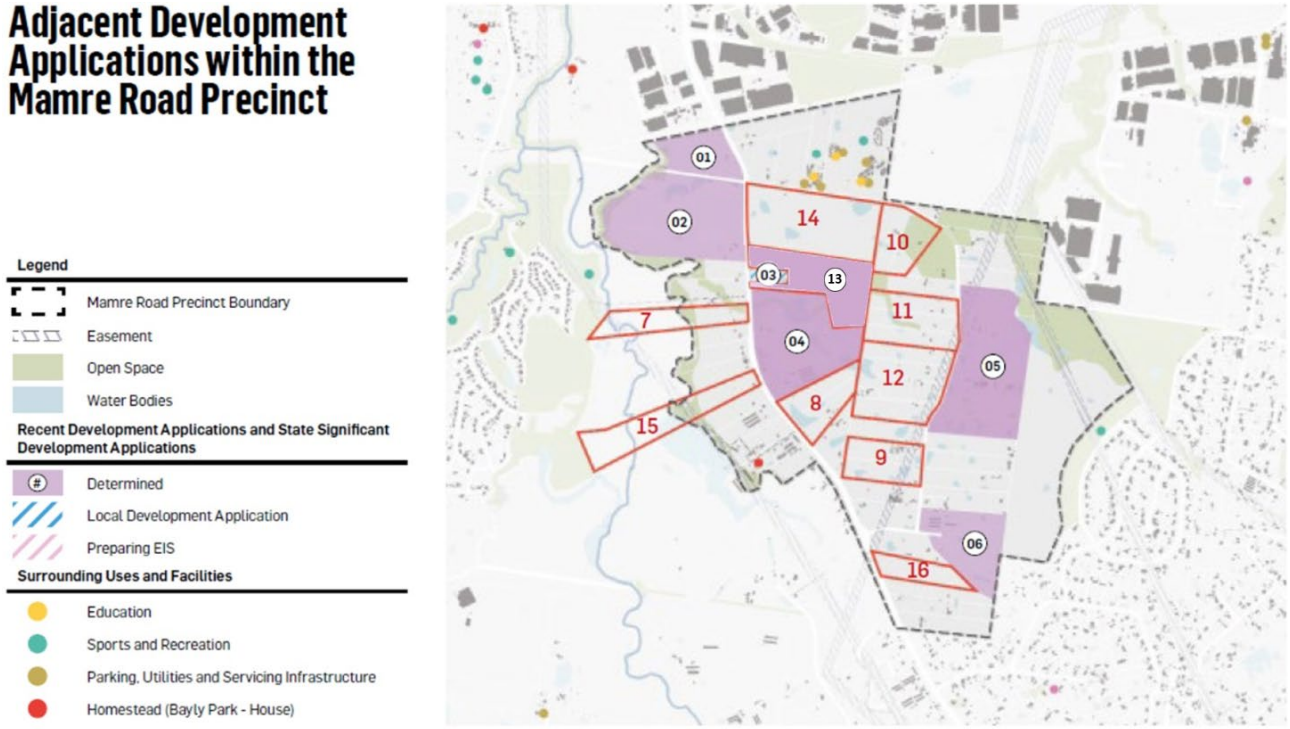



**Figure 1** Adjacent Development Applications within the Mamre Road Precinct

*Source: Urbis 2023*

Table 5 Approved and Likely Future Developments

| Reference Number | Site | Landowner | Status | GFA Proposed (Warehouse, logistics and industrial facilities) |
|---|---|---|---|---|
| 1 | Kemps Creek Warehouse, Logistics, and Industrial Facilities Hub | Frasers / Altis JV | Determined | 186,123sqm |
| 2 | Kemps Creek Data Centre | ARUP | Assessment | 68,934sqm |
| 3 | 772-782 Mamre Road | Altis | Local DA withdrawn | 16,887sqm |
| 4 | Aspect Industrial Estate | Mirvac | Determined | 251,042sqm |
| 5 | 200 Aldington Road | Stockland & Fife Capital | Determined | 340,540sqm |
| 6 | ESR Kemps Creek Logistics Park<br>(West link) | ESR | Stage 1 Determined | 167,028sqm |
| 7 | 805 Mamre Road, Kemps Creek | 805 Property Trust | SEARs received | 26,280sqm |
| 8 | Access Logistics Estate (884-928 Mamre Road, Kemps Creek) | Altis Property Partners | Response to submissions | 37,800sqm |
| 9 | Westgate 253-267 Aldington Road | Icon Oceania | SEARs received | 44,600sqm |
| 10 | 1-51 Aldington Road Estate | The Gibb Group Developments Discretionary Trust | SEARs received | 51,210sqm |
| 11 | Dexus Kemps Creek – 113-153 Aldington Road | Dexus Wholesale Management Limited | SEARs Received | 157,990sqm |
| 12 | 155-217 Aldington Road Estate | Frasers Property Industrial | Response to submissions | 65,327sqm |
| 13 | Yiribana Logistics Estate | The GPT Group | Determined | 54,982sqm |
| 14 | Summit at Kemps Creek 706-752 Mamre Road | Aliro and ISPT | SEARs received | 238,290sqm |

| Reference Number | Site | Landowner | Status | GFA Proposed (Warehouse, logistics and industrial facilities) |
|---|---|---|---|---|
| 15 | 859-869 Mamre Road | EI Australia | Local DA lodged | Remediation works to facilitate suitable future land uses and subsequent commercial/industrial redevelopment. |
| 16 | Westlink Industrial Estate | ESR Australia | SEARs received | 85,500 sqm |

The potential cumulative impacts of the project will be addressed in this report in accordance with the DPIE *Assessing Cumulative Impacts* guidelines.

## 2.4. Feasible Alternatives

Clause 192 of the *Environmental Planning and Assessment Regulation 2021* (the Regulation) requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the development.

**MOD 6**

A number of alternative layouts were considered as part of the preparation of the original SSD application. Mirvac has continued to refine the Concept Plan in response to ongoing technical investigations and tenant requirements with the proposed modification reflecting the outcome of this work.

The estate layout is being refined to meet the need of the future operators. MOD 6 is required to facilitate the future Warehouse 8A and 8B which is the only remaining location that can accommodate a warehouse of the size required for the operator at the estate. The co-located Warehouse 8A and 8B provide separate but related spaces, allowing for potential future growth opportunities for VGA.

**Warehouse 8 Development**

The Warehouse 8 building form will be consistent with the layout sought via MOD 6. In this regard, Mirvac identified two project alternatives which were considered in respect to the identified need for the lot layout and building locations which include Warehouse 8A and 8B. Each of these options is listed and discussed in the following table.

Table 6 Project Alternatives

| Option | Assessment |
|---|---|
| Option 1 - Do Nothing | The 'Do Nothing' alternative would result in the land comprising the AIE remaining not suitable for market requirements and therefore ultimately undeveloped. The risk and results of this alternative include the following.<br>▪ Outcomes for the site would be inconsistent with the strategic objectives, goals and direction of the Greater Sydney Region Plan – 'A Metropolis of Three Cities', Western City District Plan, draft Western Sydney Aerotropolis Plan, and Mamre Road Precinct Structure Plan.<br>▪ Failure to achieve the underlying objectives of the rezoning or the land as part of the WSEA, in particular the provision of a long-term supply of industrial land to serve the needs of the Sydney market. |

| Option | Assessment |
|---|---|
| | ▪ Land use outcomes that are inconsistent with the aims of the Industry and Employment SEPP.<br>▪ Failure to develop the AIE in a timely manner to align with market demand, potentially further contributing to a shortfall in the supply of serviced industrial sites in the short to medium term, with subsequent impacts on economic productivity and employment in the region.<br>▪ Loss of direct employment generating potential<br>Due to the significance of the risks noted above, the 'Do Nothing' alternative was discounted in favour of amending the overall site layout to respond to tenant enquiry to ensure a feasible and usable warehouse operation can be delivered on the site. |
| Option 2 - Alternative Design | Multiple layout options were analysed when considering the AIE Concept Master Plan in the approval of SSD-10448.<br>With some of the warehouses under construction and other lots subject to leases, limited flexibility is afforded to ensure warehouse configurations meets future occupier's specific needs.<br>Warehouse 8 will comprise one building with two separate tenancies (Warehouse 8A and 8B). Mirvac has secured a future tenant for Warehouse 8A who have carefully chosen the design reflected within the architectural plans to both suit their requirements and also ensure suitable environmental outcomes consistent with SSD-10448.<br>The split warehousing design is will include the fit-out and operation for a new tenant, VGA.<br>Warehouse 8A is proposed to be used by VGA for the primary purpose of parts storage prior to their distribution to vehicle repair stations throughout metropolitan Sydney for car servicing and repair. This Warehouse 8A will also provide space for the training of VGA mechanics, in the use and installation of the parts being stored in the warehouse. Warehouse 8B will provide for future expansion opportunities for VGA, including the potential for the storage of car parts or other parts that are required for storage and distribution, which can help to serve the future business with flexibility as VGA responds to market and growth requirements in Australia.<br>The development application will not expand the scope or scale of the overall, modified estate.<br>The warehouse will accommodate the intended operational requirements for VGA. As such, Warehouse 8 is purposely designed to meet this requirement. |

The proposed Warehouse 8 building will sit comfortably within the lot realignments sought by MOD 6 and is proposed such that it will ensure that the warehouse building will suit the needs of the future tenant and ensure the site can be used for a suitable economic purpose.

# 3. Project Description

The following sections of the EIS detail the components of the proposal including the key numeric parameters and any demolition, site preparation, construction and operations subject to MOD 6 and the Warehouse 8 Development.

**Section 3.1** describes the proposed MOD 6 development which includes the required amendments to the Concept Proposal to allow implementation of the Stage 4 Development. **Section 3.2** provides a detailed description of each component of the warehouse and distribution facility proposed as part of the Stage 4 Warehouse 8 Development.

## 3.1. Description of Modifications to Concept and Stage 1 Consent

This section of the report describes the proposed modifications, including the project description and specific elements of the proposed development. It includes a comparative analysis of the original development and the proposed modifications, justifying the lodgement of the application in accordance with section 4.55(1A) of the EP&A Act, 1979.

### 3.1.1. Overview

The following modifications are proposed to the Concept Proposal and Stage 1 Development granted consent by way of SSD-10448. Specifically, these modifications include:

**Concept Modification to SSD-10448**

- Reduction in Warehouse 8 GFA from 45,146m$^2$ to 43,850m$^2$.
- Change in building footprint to comprise two separate warehouse tenancies (8A and 8B).
- Slight extension of hardstand on the southern side of the building.
- Consolidation of on-site car parking towards the Access Road 1 frontage. This will provide for a minor increase in on site car parking from 166 spaces to 178 on-site car parking spaces.
- Relocation of car park ingress/egress crossing to Access Road 4.
- Inclusion of one additional heavy vehicle crossing to Access Road 4 to provide separate truck access for Warehouse 8A and 8B.

**Stage 1 Modification to SSD-10448**

- Modify conditions of consent relating to plan references.

### 3.1.2. Modified Concept Plan Layout

The Concept Proposal layout as proposed to be modified by MOD 6 is shown at **Figure 11** below**.**

Figure 11 Concept Proposal MOD 6 Layout


### 3.1.2.1. Quantitative Comparison with Concept Consent

The proposed modification will result in an increase in an overall reduction to the total building GFA across the AIE. The proposed modification also seeks to adjust the areas of the 'Basin Lot Area' and the 'Total Developable Area' to reflect impacts generated by the approved construction works at Lot 1.

The approved retaining walls at Lot 1 have encroached into the basin area during construction. As such, the Lot 1 boundary and areas as well as the basin areas are proposed to be revised as part of MOD 6. The proposed modifications to the concept masterplan's area calculations are detailed in **Table 7**.

Table 7 Concept Proposal Quantitative Comparison

| Metric | SSD 10448 | SSD 10448 – MOD 3 | SSD 10448 – MOD 6 | Difference from SSD (MOD 3) |
|---|---|---|---|---|
| Mamre Road Reserve Area | 14,004 $m^2$ | 14,004 $m^2$ | 14,004 $m^2$ | nil |
| Access Roads Area | 46,465 $m^2$ | 39,876 $m^2$ | 39,876 $m^2$ | nil |
| Future Roads Area | 3,415 $m^2$ | 3,570 $m^2$ | 3,570 $m^2$ | nil |
| Creek Riparian Area | 29,617 $m^2$ | 29,718 $m^2$ | 29,718 $m^2$ | nil |
| Retained Riparian Area | 4,004 $m^2$ | 4,042 $m^2$ | 4,042 $m^2$ | nil |

| Metric | SSD 10448 | SSD 10448 – MOD 3 | SSD 10448 – MOD 6 | Difference from SSD (MOD 3) |
|---|---|---|---|---|
| Basin Lot Area | 17,300 $m^2$ | 18,157 $m^2$ | 18,109 $m^2$ | -48 $m^2$ |
| Total Developable Area | 443,408 $m^2$ | 448,956 $m^2$ | 449,004 $m^2$ | +48 $m^2$ |
| Total Office (incl. dock office) | 11,480 $m^2$ | 9,708 $m^2$ | 9,916 $m^2$ | +208 $m^2$ |
| Total Warehouse Area | 236,510 $m^2$ | 237,813 $m^2$ | 236,475 $m^2$ | -1,338 $m^2$ |
| Café | 122 $m^2$ | 125 $m^2$ | 125 $m^2$ | nil |
| Total Building Area (GFA) | 248,112 $m^2$ | 247,646 $m^2$ | 246,516 $m^2$ | -1,130 $m^2$ |
| Restriction on User Area | 4,613 $m^2$ | 4,613 $m^2$ | 4,613 $m^2$ | nil |

### 3.1.2.2. Quantitative Comparison by Warehouse

A comparative analysis of the proposed changes to the approved Concept Proposal on a lot-by-lot basis (for those lots proposed to be modified by MOD 6 has been undertaken at **Table 8**.

Table 8 Lot by Lot Comparison

| Location on the site | Concept Approval<br>SSD-10448 (modified by MOD 3) | Modification (MOD6)<br>WH8A / WH8B | Difference |
|---|---|---|---|
| **Warehouse 8** | | | |
| Site Area | 75,710$m^2$ | 75,710$m^2$ | Nil |
| Main office | 750$m^2$ | 500$m^2$ / 350$m^2$ | +100 $m^2$ |
| Ground Floor Warehouse | 44,196 $m^2$ | 34,900$m^2$ / 5,300$m^2$ | -3,996 $m^2$ |
| Dock office | 200 $m^2$ | 300$m^2$ | +100 $m^2$ |
| Mezzanine Warehouse | Nil | 2,500$m^2$ | +2,500 $m^2$ |
| Car parking | 166 | 178 | +12 |
| Total GFA | 45,146 $m^2$ | 43,850 $m^2$ | -1,296 $m^2$ |

**Warehouse 8 – Building Envelope Details**

- 40m setback to the southern boundary which is used as a hardstand and loading dock area.
- 20m setback to the western boundary which accommodates a driveway and landscaping area.
- 10m setback to the eastern boundary of Access Road 4 which includes a carpark.

- 13.5m setback to the northern boundary of Access Road 1 which includes a carpark and landscaping area.

#### 3.1.2.3. Vehicular Access

Consistent with the approved concept masterplan (SSD-10448 MOD 3), Lot 8 will feature light and heavy vehicular access from Access Road 4. The proposed modification seeks to establish an additional truck entry/exit driveway off of Access Road 4 as to accommodate separate heavy vehicle accessways for Warehouse 8A and 8B.

### 3.1.3. Bulk Earthworks Levels

Bulk earthworks within Lot/Warehouse 8 will be undertaken as part of estate-wide infrastructure works that have been approved under SSD-10448. The bulk earthworks as part of the Stage 1 works under SSD-10448 will result in construction of a benched pad to prepare Lot/Warehouse 8 for works proposed under SSD-60513208. The pad has been approved to be crested to allow stormwater runoff until on-lot development occurs. As such, the level at the crest of the pad (generally in the centre), is higher than the levels at the boundary of the lot.

The Concept approval SSD-10448 MOD 3 provided for an FFL for Warehouse 8 of RL 52.00 +/- 1000mm. This FFL was originally set on Lot 8 to facilitate the intended lot cut/fill balance while also accommodating a small amount of import to be offset by spoil generated by on lot works.

MOD 6 seeks to modify the concept approval to raise the FFL of Warehouse 8 to RL 52.57 +/- 1000mm as illustrated on the revised Concept Masterplan. The proposed modification to the levels aims to accommodate the additional works and spoils generated from the on-lot development including footings, stormwater excavation and inground services which will support the development contemplated under SSD-60513208.

The earthworks to support the change in FFL from the approved Stage 1 BE levels on Lot 8 will be contained within the Lot 8 on lot civils plans at **Appendix GG** under SSD-60513208. These works are further described in **Section 3.2** of this EIS.

### 3.1.4. Conditions subject to the modification

Conditions to be modified by the MOD 6 application are detailed in Table 9 below.

Table 9 Modified conditions of SSD-10448 (from MOD 3)

<table>
<tr><th colspan="2">Approved Condition</th><th colspan="2">Proposed Modified Condition</th></tr>
<tr><td colspan="2">A7. The maximum GFA for future development on the site for the land uses described in Table 1 must not exceed the limits described in that table.<br><br>Table 1. Maximum GFA of the Concept Proposal</td><td colspan="2">A7. The maximum GFA for future development on the site for the land uses described in Table 1 must not exceed the limits described in that table.<br><br>Table 1. Maximum GFA of the Concept Proposal</td></tr>
<tr><td>Land Use</td><td>Maximum GFA (m$^2$)</td><td>Land Use</td><td>Maximum GFA (m$^2$)</td></tr>
<tr><td>Warehouse and distribution centres and general industrial</td><td>237,813</td><td>Warehouse and distribution centres and general industrial</td><td>236,475</td></tr>
<tr><td>Ancillary offices</td><td>9,708</td><td>Ancillary offices</td><td>9,916</td></tr>
<tr><td>Café</td><td>125</td><td>Café</td><td>125</td></tr>
<tr><td>Total</td><td>247,646</td><td>Total</td><td>245,377</td></tr>
<tr><td colspan="2">Appendix 1</td><td colspan="2">Appendix 1</td></tr>
</table>

| Approved Condition | | | | Proposed Modified Condition | | | |
|---|---|---|---|---|---|---|---|
| Table 6 Drawing No Schedule of Approved Plans – Concept Proposal | | | | Table 6 Drawing No Schedule of Approved Plans – Concept Proposal | | | |
| **Drawing No** | **Title** | **Issue** | **Date** | **Drawing No** | **Title** | **Issue** | **Date** |
| **Architectural Plan prepared by SBA Architects** | | | | **Architectural Plan prepared by SBA Architects** | | | |
| MP3-02 | Aspect Industrial Estate Lots 54-58 (DP 259135) Mamre Road, Kemps Creek – SSDA-MOD 3 Estate Masterplan | F | 07/02/2023 | **MP6-02** | Aspect Industrial Estate **Lots 1, 2 & 5 DP 1285305, Lots 6 & 7 DP 1291562** Mamre Road, Kemps Creek – SSDA **MOD 6** Estate Masterplan | **H** | **06/09/2023** |
| **Landscape Plan prepared by Site Image Landscape Architects** | | | | **Landscape Plan prepared by Site Image Landscape Architects** | | | |
| 003 | Aspect Industrial Estate Kemps Creek Landscape Masterplan MOD 3 | G | 20/12/2022 | 003 | Aspect Industrial Estate Kemps Creek Landscape Masterplan **MOD 6** | **J** | **15/09/2023** |
| **Tree Canopy Plan prepared by Site Image Landscape Architects** | | | | **Tree Canopy Plan prepared by Site Image Landscape Architects** | | | |
| MOD3_ SK001 | Kemps Creek Lots 54-58 DP259135 Mamre Road Kemps Creek NSW Tree Canopy Plan | I | 13/12/2022 | **MOD6_ SK001** | **840-882 Mamre Road Kemps Creek NSW 2178. Lots 1,2 & 5 DP1285305 & Lots 6 & 7 DP1291562** Tree Canopy Plan | **B** | **31/10/2023** |

## 3.1.5. Substantially the same development

Based on the description of the proposed modifications above, it is considered that MOD 6 is substantially the same development as that to which consent was originally granted, as is required by section 4.55(1A) of the Act.

The key principles of the approved development remain unchanged with the Concept Proposal retaining warehouse and distribution centre buildings in their general location and yield.

Minor changes are proposed to warehousing footprints, finished floor levels (FFL), parking, and landscaping across the site.

The proposed modifications do not substantially change the development for which consent was originally granted under SSD-10448 for the reasons outlined below:

- The development will remain consistent with the land use objectives for Zone IN1 General Industrial.
- The site will continue to consist of warehouse and distribution centre land uses.
- The proposed modification will result in less than 1% reduction in the GFA across the estate.
- The warehouse footprint, parking and hardstand areas are only slightly changed from the original consent. The modified car parking will be consistent with the Mamre Road Precinct DCP parking rates and consistent with the traffic generation rates established under the approved TMAP (under SSD-10448).
- The scale of built form is relatively consistent with that approved. There will be minimal change to access, operations and environmental impacts of the estate.
- The modifications to the warehouse will not diminish or detract from the design quality, or compromise the design intent, of the development for which the development consent was granted.
- The hours of operation remain unchanged.
- The proposal as modified will continue to align with the aims and objectives of relevant State and local planning instruments and planning guidelines.

## 3.2. Description of Stage 4 – Warehouse 8 Development

Consistent with the lot layout and warehouse envelope to be established under the MOD 6, the key components of the proposed Stage 4 development for Warehouse 8 on lot works are summarised below in **Table 10**. A copy of the architectural drawings is attached as **Appendix F**.

Table 10 Project Details

| **Descriptor** | **Project Details** |
|---|---|
| Project Area | The site has a total area of 75,720 $m^2$. |
| Site Description | Warehouse 8 within Lots 1, 2 and 5 DP 1285305 and Lots 6 and 7 in DP1291562<br><br>788-882 Mamre Road, Kemps Creek. |
| Project Description | The modified warehouse will be for a 43,850sqm building comprised of two adjoining, warehouse tenancies (Warehouse 8A and 8B). The proposal will also include the provision of carparking and hardstand areas around the warehouse building and the construction of site access points from Access Road 4.<br><br>Fit-out of the warehouse 8A for the proposed use by the intended tenant VGA.<br><br>Indicative fitout of Warehouse 8B for warehouse and distribution purposes.<br><br>Bulk earthworks will refine the pad levels from the approved Stage 1 BE levels, to accommodate the proposed development. |
| Operations | Both Warehouse 8A and 8B will operate as a warehouse and distribution premises on a 24/7 basis. |
| Goods stored on site | Warehouse 8A is proposed to be used for the primary purpose of parts storage prior to their distribution to vehicle repair stations throughout metropolitan Sydney for car servicing and repair. EV battery storage at the Warehouse 8A will comprise of 20 complete EV batteries (700 kg each) and 40 smaller modules.<br><br>Warehouse 8B will provide an option for expansion of the Warehouse 8A as it will provide space for storage of car parts related to potential future operations. |
| Car Parking and Loading | 178 parking spaces (150 at WH8A and 28 at WH8B) as well as 17 loading docks |
| Job Creation | **Warehouse 8A**<br><br>Anticipated 70 new construction jobs, distributed as follows: |

| **Construction Job / Role** | **No. of Jobs** |
|---|---|
| Steel Suppliers and Erectors | 10 |

| Descriptor | Project Details | |
|---|---|---|
| | Quantity Surveyors | 2 |
| | Building Certifiers | 2 |
| | Environmental Representative (Additional over department mandated for Mirvac QA purposes) | 1 |
| | Site-Based Design Team – Architects, Civil Engineering, and Building Services Engineer | 10 |
| | Construction Managers | 1 |
| | Site Engineers | 2 |
| | Design Manager | 1 |
| | Labourers | 20 |
| | Engineering Services Installers – Public Health, Electricians, Fire Services Installers, Mechanical Installers | 15 |
| | Carpenters | 2 |
| | Plasterers | 2 |
| | Anticipated 110 new Operations Jobs, distributed as follows:<br>▪ 10 Training Staff in total, each overseeing separate Training Modules (with 10 Training Modules available).<br>▪ 9 Staff members will be based within the Dock Office, including both the Manager and Staff.<br>▪ 22 Staff members will be based within the Office, comprising Managers and Staff.<br>▪ Approximately 60 Warehouse staff members, with staggered start times, reaching a peak of 50 Warehouse staff during specific periods. This peak includes staff with various start times.<br>**Warehouse 8B**<br>Anticipated 26 new construction jobs, distributed as follows: | |
| | **Construction Job / Role** | **No. of Jobs** |
| | Steel Suppliers and Erectors | 4 |
| | Quantity Surveyors | 1 |
| | Building Certifiers | 1 |

| Descriptor | Project Details | |
|---|---|---|
| | Site-Based Design Team – Architects, Civil Engineering, and Building Services Engineer | 4 |
| | Construction Managers | 1 |
| | Site Engineers | 1 |
| | Design Manager | 1 |
| | Labourers | 5 |
| | Engineering Services Installers – Public Health, Electricians, Fire Services Installers, Mechanical Installers | 5 |
| | Carpenters | 1 |
| | Plasterers | 1 |
| | Roofers | 1 |
| | Anticipated 20 new Operations Jobs. Based on the operations of similar warehouses of this size, a total of 20 operational roles are anticipated, distributed as follows:<br>▪ 3.4 operational roles per 100 sqm of office space, which amounts to 12 staff members for the 350 sqm office.<br>▪ 1.5 operational roles per 1000 sqm of warehouse space, resulting in 8 staff members for the 5,300 sqm warehouse space. | |
| Maximum Height | 13.7 metres | |
| Capital Investment Value | Warehouse 8A: $66,669,785 (excl. GST)<br>Warehouse 8B: $7,542,896 (excl. GST) | |

## 3.2.1. Warehouse 8 Construction

This Stage 4 Application seeks approval for the construction of a warehouse or distribution facility at Lot/ Warehouse 8 as established under the concept plan SSD-10448 MOD 6. Warehouse 8 will comprise one building with two separate warehouse tenancies, 8A and 8B.

The proposal seeks to undertake the overall construction works of Warehouse 8 (comprising 8A and 8B) in a staged manner, albeit with the intention of completing construction works simultaneously or a couple months apart. The construction program will target the completion of Warehouse 8A's construction first, allowing for the initiation of fit-out works at Warehouse 8A while finalizing construction of Warehouse 8B. This would allow for the efficient programming of VGA's operations at the site.

Construction activities for the proposal would only be undertaken during the following hours, consistent with the Stage 1 approved construction hours:

- 7:00 am to 6:00 pm, Mondays to Fridays.
- 8:00 am to 1:00 pm on Saturdays.

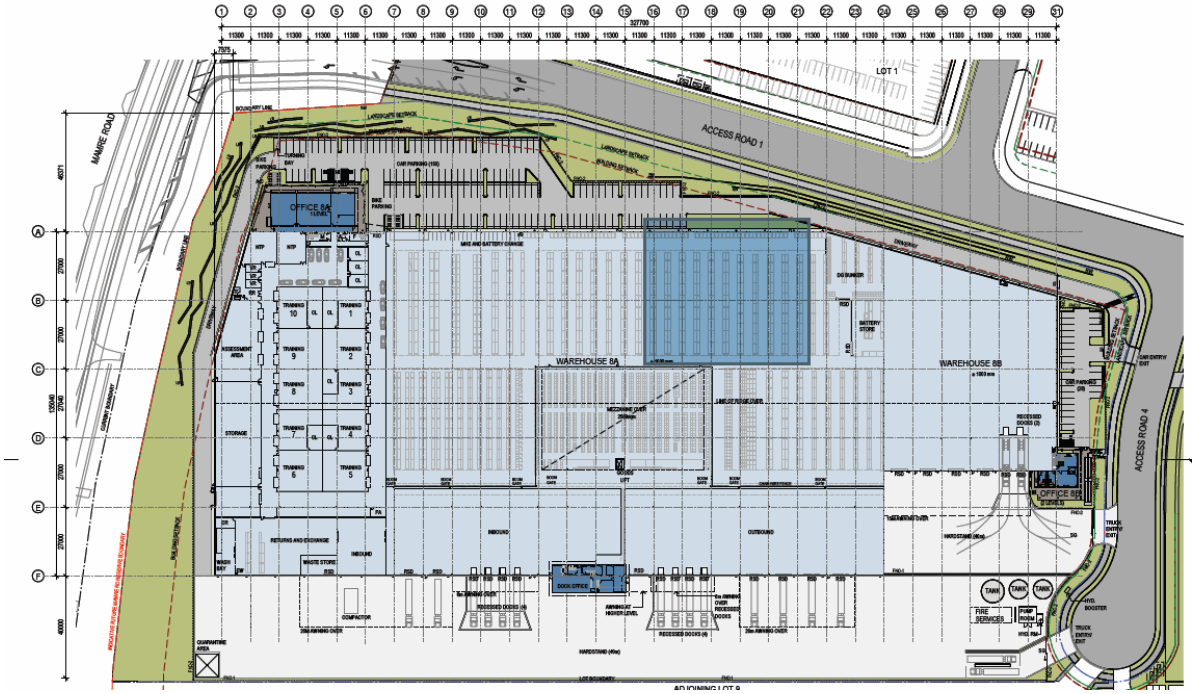
- At no time on Sundays or Public Holidays.

## 3.2.2. Warehouse 8 Operations

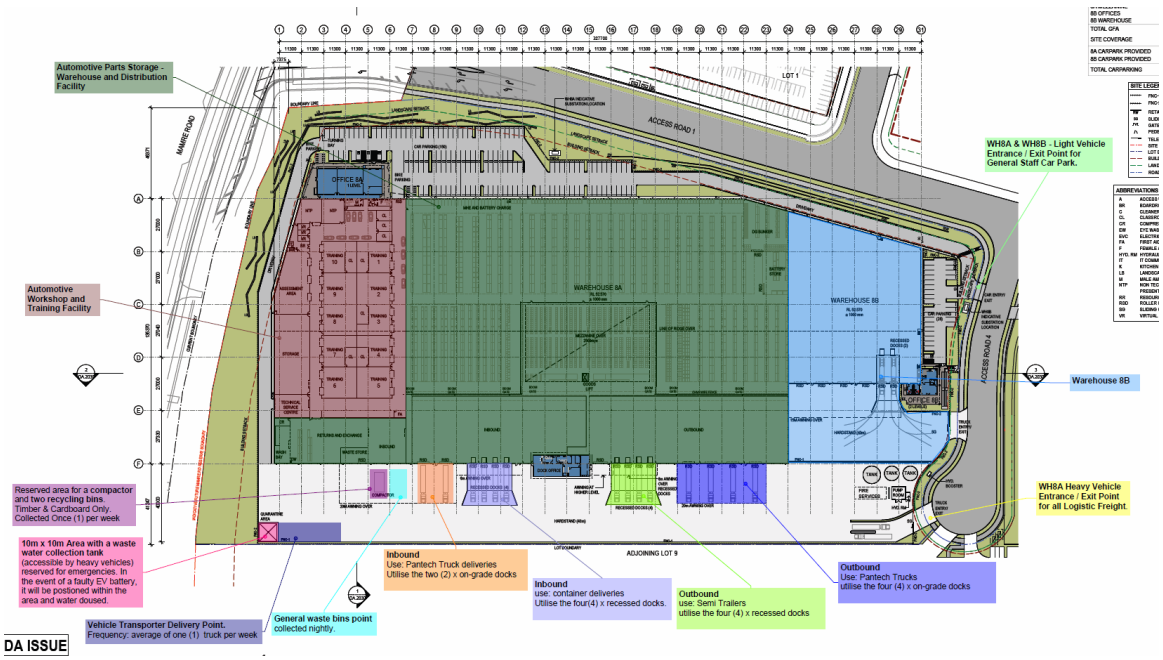
### 3.2.2.1. Overview

The layout and the proposed operational uses across Warehouse 8 is provided in the Detailed Operational Plan (**Appendix HH**) and described in **Section 3.2.2.2** and **Section 3.2.2.3** below. The proposed development and operational layout is illustrated at **Figure 12** below.

Figure 12 Lot 8 Warehouse Layout




Picture 1 Proposed Warehouse 8 Floor Plan




Picture 2 Detailed Operational Plan
*Source: SBA Architects*

### 3.2.2.2. Warehouse 8A

Warehouse 8A is proposed to be used for warehouse and distribution premises 24 hours a day 7 days a week. It will be tenanted by a car manufacturer VGA and will be used for the primary purpose of parts storage prior to their distribution to vehicle repair stations throughout metropolitan Sydney for car servicing and repair. The warehouse component will comprise:

- Main warehouse level: Racking for storage of car parts; 60m$^2$ wash bay for the internal wash down area of spare parts; dangerous goods storage bunker and battery storage comprising full height precast 4-hour fire rated rooms for storage of air bag components and EV batteries.
- Mezzanine Level: low level shelving across the mezzanine for storage of small parts.
- Part 20m/ Part 6m wide awning along the southern side of the building providing shelter to 6 inbound and 8 outbound docks and roller shutter doors.

An ancillary use proposed within Warehouse 8A is the operation of a workshop and training facility, to train VGA dealership mechanics in the proper use and installation of the spare parts stored on site. The ancillary workshop and training facility will feature the following spaces:

- Ten workshop training areas are proposed, along with a kitchen and amenities for workshop training personnel. Each Training Workshop Module will have 10 personnel for a total of 100 personnel if all Training Facilities are utilized. Regarding exhaust reels, each training room has two locations and the assessment area has three locations, accommodating a maximum of 23 cars at any time.
- Technical Service Centre: This specialized room is dedicated to all training related to the operation of Electric Vehicle Batteries with a specific focus on battery-related activities.
- Assessment Area: Like the training workshops but with the capacity for hosting larger seminars/training.
- Presentation Rooms, Non-Technical Presentation Rooms, Virtual Reality Rooms, Classrooms, and a Fire Aid Room
- Storage rooms and parking areas for vehicle showcases.

All actual mechanical work will be undertaken to vehicles at the operator's off-site vehicle repair stations. The workshop and training facility will generally operate between the hours of 8 am and 5 pm weekdays and will feature a maximum capacity of 150 people within the Training Facility.

Ancillary office areas are proposed to be constructed as part of the overall warehouse structure with a total area of 800m$^2$. The office areas include a 1-level, 500m$^2$ main office and amenities structure as well as a 1-level 300m$^2$ dock office is also proposed as part of Warehouse 8A. The WH8A Main Office, shared between the Training Facility and Warehouse, will include 22 staff members. Remaining personnel shall be external parties attending training events and shall be subject to the training offering and scheduling on a given day.

Additionally, the following external areas will support the operations of Warehouse 8A:

- 150 parking spaces serving Warehouse 8A to the north of the building.
- 8 recessed docks and 6 on-grade docks, all equipped with Roller Shutter Doors. Accompanied by a dock office.
- Two Roller Shutter Doors connect to the Western and Northern warehouses, facilitating the movement of cars in and out of the Workshop Training Area.
- Includes a designated Quarantine Area.
- A compactor and two recycling bins.
- Designated point for potential Vehicle Transports delivery.

### 3.2.2.3. Warehouse 8B

Warehouse 8B is proposed to be used for warehouse and distribution premises 24 hours a day 7 days a week. Warehouse 8B will provide an option for expansion of the Warehouse 8A operator as their business expands in Australia. Future operations may include the storage of car parts or other parts that are required

for storage and distribution, which can help to serve the future business with flexibility as VGA responds to market and growth requirements in Australia.

Out of the 178 parking spaces located at the site, 28 will serve Warehouse 8B to the east of the building. Warehouse 8B will also be supported by four on-grade docks and two recessed docks.

#### 3.2.2.4. Relationship Between Warehouses

Warehouse 8A & 8B are adjacent warehouses that are intended to accommodate operations that benefit from proximity between the two proposed buildings. Warehouse 8A will meet the requirements of VGA's current spare parts operation, where these will be stored within the warehouse prior to distribution to vehicle repair stations throughout the Sydney metropolitan area. It will also contain an ancillary workshop and training facility to train dealership mechanics in the proper use and installation of the spare parts stored on site.

Mirvac is assessing the opportunity of utilising Warehouse 8B to support the future warehousing and distribution demands of VGA, albeit no agreement has been formalised.

It is intended that the two warehouses will be constructed at the same time by the same contractor and will accommodate the same warehouses and distribution uses.

Through accommodating two warehouses on this site, there are clear synergies by allowing future growth, and the potential for sharing of staff across the premises. This allows for an efficient business operation within Aspect Industrial Estate where both warehouse personnel and management can benefit from the co-location of the warehousing in the future.

The adjacencies of the warehouses will facilitate easy movement of staff and goods between the warehouses in the future but will also allow for sufficient separation between the two parts of the operations where business needs require.

Where greater integration is needed between the two warehouse buildings, there may be an opportunity to in the future to remodel the warehousing internal walls and hardstand management to facilitate additional collective operations, subject to the receipt of appropriate approvals.

The development of the two warehouses at this one site is considered an astute and pragmatic response to the potential growth aspirations of VGA within Western Sydney.

## 3.2.3. Warehouse 8 Building Design

The warehouse building is proposed to feature façade materials and building elements that will support the proposed areas described above. This includes the following:

- The warehouse will be constructed with a metal cladding finish in 'shale grey' with patterned, precast and off-form concrete panel at the lower elevations. The proposed materials and finishes as illustrated in **Figure 13** below. Patterns and visual articulation is proposed across the west façade with areas with 'dover white' metal cladding.
- Ventilation grilles are proposed to be comprised of 'shale grey' louvres.
- The main office area will comprise an articulated design with a 'Gal' finish metal screen structure and light grey aluminium cladding.
- A mix of surfmist 'metal roof' and translucent roof sheeting is proposed.
- 3 x illuminated building identification/tenant signs are proposed. This includes 1 x sign at the east elevation with dimensions of 11m x 3m, 1 x sign at the north elevation with dimensions of 43m x 3m and 1 x signs at the west elevation with dimensions of 22.5m x 3m. The contents of the Northern and Western elevation signs shall be the Volkswagen Group Australia brand logo, as reflected in the views provided in **Appendix H2** Visual Impact Assessment - High Resolution Views. Note that the content of the Eastern Façade signage is pending identification due to unspecified operations for WH8B at this stage.

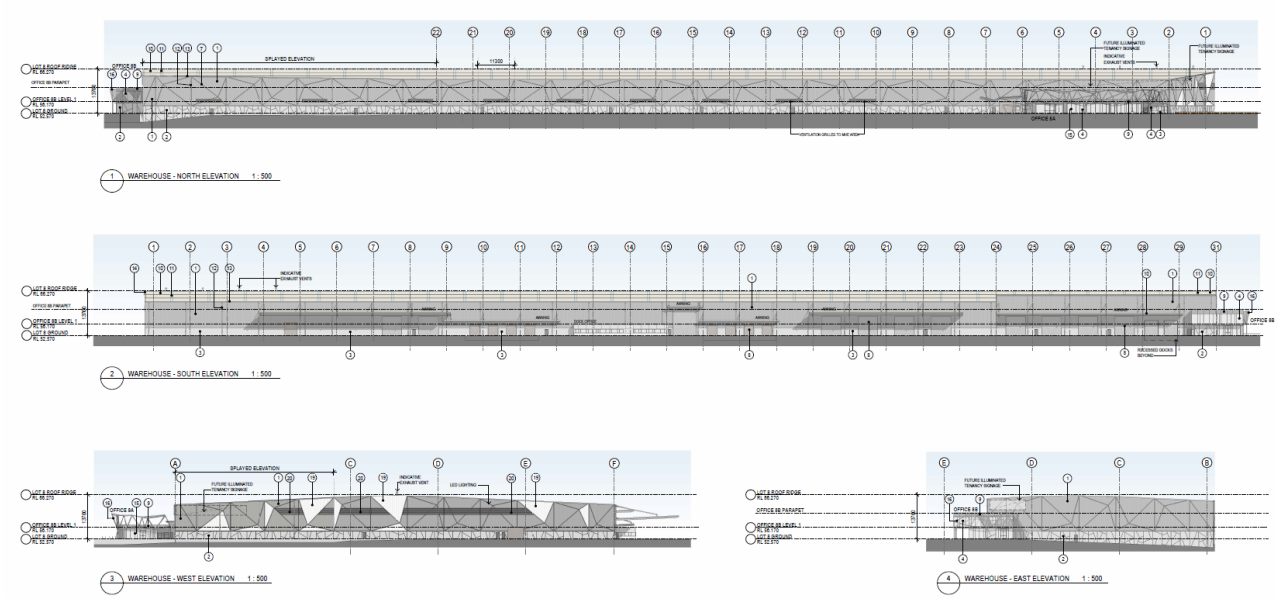
  The proposed LED illumination for the western façade signage will comply with AS 4282 Control of the Obtrusive Effects of Outdoor Lighting standard. Compliance with this standard ensures protection from any light spills. The western façade logo, containing the Volkswagen Group Australia brand logo, will be

manufactured by Albert Smiths Signs Australia, who confirmed that the sign will be in compliance with the referenced standard.

The areas of the proposed signs are demonstrated in **Figure 13** below, with further detail provided in the Lot 8 Signage Plan prepared by SBA Architects (**Appendix F**).

- The visual design and articulation is demonstrated in **Figure 13** and below and further detailed at **Appendix F**.

Figure 13 Warehouse Elevations




*Source: SBA Architects*

Figure 14 Proposed Warehouse 8 Design – 3D Render view from South-East

*Source: Clouston Associates*

## 3.2.4. Landscaping

The development includes landscaping works to Lot 4 within the boundary setbacks, car parking areas and around the building. The proposed development includes a mix of vegetative types including shrubs, mature trees and grass covers. The trees that are selected include Spotted Gums, Thin Leaved Paperbarks and Prickly Leaved Paperbacks. Warehouse 8 is expected the accommodate circa 14% tree canopy cover, whilst the total site tree canopy cover for AIE is anticipated to be 12%.

This above is accompanied by other hard landscaping features including paving, gravel and fencing.

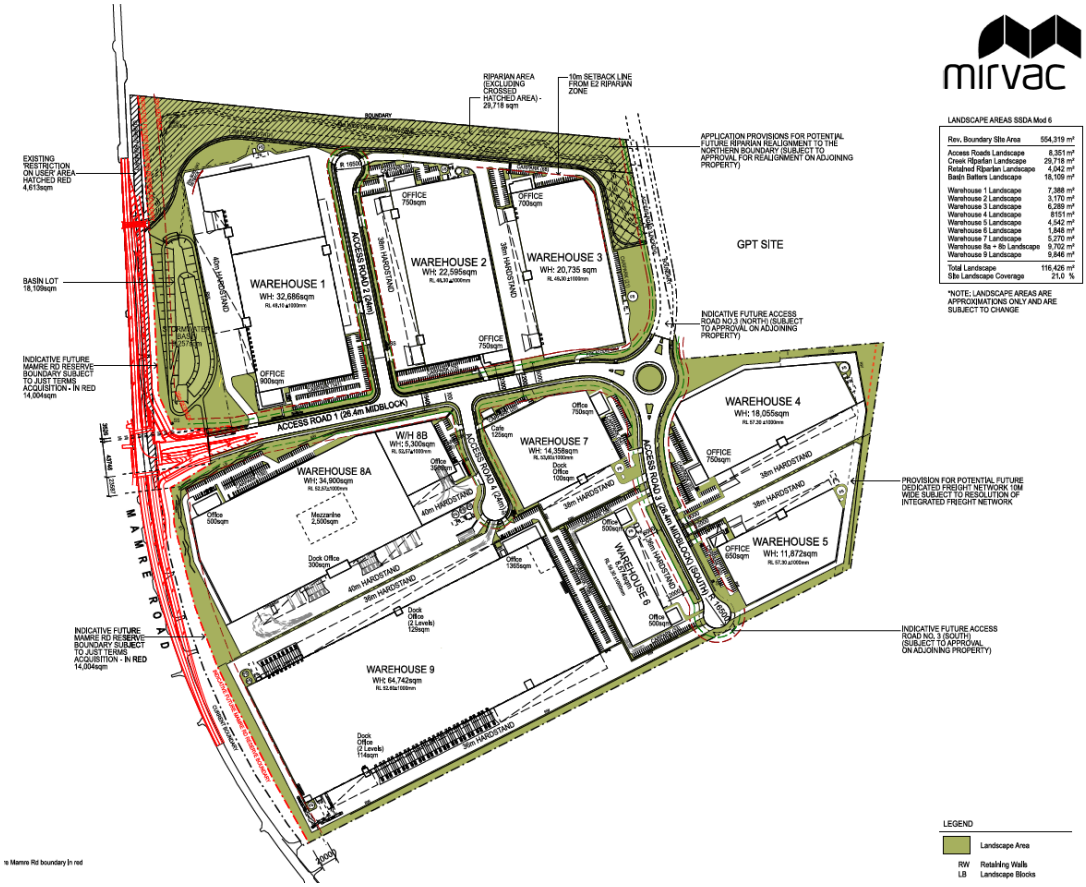
Below is an extract from the Landscape Plans prepared by Site Image which accompany this proposal in **Appendix F**. This shows the total landscape coverage area across the estate of 21%.

Of note, a series of tiered, low height, landscape feature walls are proposed along the western and northern boundary of Lot 8, adjacent to Mamre Road and Access Road 1, toward the north-west of Lot 8. The extent of proposed landscape feature walls within Lot 8 is shown on drawings DA.C2840 to C2843 and DA.C2811 at **Appendix P**.

The landscape feature walls have been set out by the landscape architect and follow a semi-irregular alignment and pattern. Each landscape feature wall tier is at most 1m high, with some tiers being maximum 0.5m in height. These landscape feature walls are proposed to be screened by additional landscaping. Refer to Site Image landscape drawings at **Appendix G** for more details.

The visual screening provided by the proposed landscaping, including the proposed landscape feature walls, are demonstrated in the visual render at **Figure 16**.

Figure 15 Landscape Plan




*Source: SBA Architects*

Figure 16 Proposed Tree Plantings – 3D Render view from Mamre Road

*Source: Clouston Associates*

## 3.2.5. Civil Works

Further to the bulk earthwork levels resulting from the approved by SSD-10448 (Stage 1 consent as modified by MOD 3) and as contemplated as part of MOD 6, retaining walls are proposed adjacent to Access Road 1 to facilitate the final, finishing levels at Lot /Warehouse.

Retaining walls are proposed along the northern boundary of Lot 8 adjacent to Access Road 1, toward the north-east of Lot 8. In accordance with the Mamre Road Precinct DCP, where the total height to be retained exceeds 2 metres, walls will be tiered such that the total height of a single tier does not exceed 2 metres. The extent of proposed retaining walls within Lot 8 is shown on drawings DA.C2840 to C2843 and DA.CS2811 at **Appendix P**.

Additionally, on lot stormwater management is proposed at Lot 8. This includes rainwater tanks and gross pollutant traps (GPTs) at the points of discharge from the internal stormwater drainage network to the estate network at Estate Roads 1 and 4.

## 3.2.6. Utilities and Infrastructure

Lead-in utility services required to service Lot/Warehouse 8 will be installed as part of the estate-wide infrastructure works approved under SSD-10448. Subsequently, further consultation with the relevant specialists have confirmed that the proposed development will be supported by the required utility services (further detail at **Appendix D**). This includes:

- Potable water
- Recycled water
- Sewerage (connected to an Interim Operating Procedure prior to ultimate connection to the Upper South Creek Advanced Water Recycling Centre)
  - Qalcheck have been engaged to confirm that Sydney Water have sized the potable and recycled water mains and that there are satisfactory mains for drinking water, wastewater, and recycled water services in support of the proposed Warehouse 8 development.
- Electrical and street lighting
  - Engagement with Edgewater Connections have found that there is adequate supply for electrical services for Warehouse 8A and 8B as Endeavour Energy created projects, Subdivision projects UIS0950 and UIS0882 which will create new High Voltage Capacity. This will support the creation of dedicated Substations located on the site

- Telecommunications (NBN)

Details of the lead-in infrastructure works that will service the AIE Site are presented in AT&L's MOD 6 Civil Infrastructure Report.

# 4. Statutory Context

This section of the report provides an overview of the key statutory requirements relevant to the site and the project, including:

- *Environmental Planning and Assessment Act 1979.*
- *Environmental Planning Assessment Regulation 2021.*
- *State Environmental Planning Policy (Industry and Employment) 2021.*
- *State Environmental Planning Policy (Planning Systems) 2021.*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021.*
- *State Environmental Planning Policy (Precincts—Western Parkland City) 2021.*
- *State Environmental Planning Policy (Resilience and Hazards) 2021.*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021.*
- State Environmental Planning Policy (Sustainable Buildings) 2022.
- *Penrith Local Environmental Plan 2010.*

This section identifies the key statutory matters which are addressed in detail within the EIS, including the power to grant consent, permissibility, other approvals, pre-conditions and mandatory considerations.

## 4.1. Statutory Requirements

**Table 11** categorises and summarises the relevant requirements in accordance with the DPE *State Significant Development Guidelines* for MOD 6 and the Stage 4 Development. A detailed statutory compliance table for the project is provided at **Appendix C**.

Table 11 Identification of Statutory Requirements for the Project

| Statutory Relevance | Action |
|---|---|
| **MOD 6** | |
| *Power to grant approval* | In accordance with Schedule 1 of the Planning Systems SEPP, development that has a CIV of more than $50 million for the purpose of warehouses or distribution centres are classified as SSD.<br><br>The proposed modification to the approval of SSD-10448 will remain consistent with this SEPP and is appropriately characterised as SSD. |
| Permissibility | The site is majority zoned IN1 in accordance with the Industry and Employment SEPP, where 'Warehouse and Distribution Centres' and buildings for the purpose of 'industry' are permissible with consent in the IN1 Zone.<br><br>The proposed modification retains the approved uses of industry and warehouse and distribution centre and therefore remains a permissible form of development within the IN1 zone. |
| *Commonwealth Environment Protection and Biodiversity Conservation* | SSD-10448 was accompanied by a Biodiversity Development Assessment Report (BDAR) in accordance with the NSW Framework and in consultation with NRAR. A habitat assessment was undertaken and identified the Latham's Snip and Grey-headed Flying-fox as 'matters of national environmental significance'. The BDAR |

| Statutory Relevance | Action |
|---|---|
| *(EPBC) Act 1999* | concluded that the development will not have impact on either species.<br><br>The modified development remains within the extent of building works approved by SSD-10448 and thus does not change the impact to the potential habitats across the subject site. Accordingly, it will not result in any impacts on the relevant species and maintains compliance with the EPBC Act<br><br>Refer BDAR Waiver letter at **Appendix S**. |
| **Stage 4 Development (Warehouse 8)** | |
| *Power to grant approval* | In accordance with Schedule 1 of the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP), development that has a CIV of more than $50 million for the purpose of Warehouse or distribution centre are classified as SSD:<br><br>*(12) Warehouse or distribution centres*<br><br>*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.*<br><br>*(2) This section does not apply to development for the purposes of warehouses or distribution centres to which section 18 or 19 applies.*<br><br>*(3) In this section—*<br><br>*relevant amount means—*<br><br>*(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*<br><br>*(b) for any other development—$50 million.*<br><br>The proposed Warehouse 8A has an estimated CIV of $66,669,785 (excl. GST) (refer **Appendix R**). Accordingly, the proposed Warehouse 8A SSD for the purposes of the Planning Systems SEPP.<br><br>The proposed Warehouse 8B has an estimated CIV of $7,542,896 (excl. GST) (refer **Appendix R**). The development of Warehouse 8A and Warehouse 8B was issued SEARs (SSD-60513208). As such, approval for Warehouse 8B can be granted as it has been declared to be 'sufficiently related' to the SSD element, being WH8A. |
| Permissibility | The Warehouse 8 site is located on land zoned IN1 General Industrial in accordance with clause 2.10, Chapter 2 Western Sydney Employment Area of the Industry and Employment SEPP. Warehouse and distribution centre is permitted with consent in the IN1 Zone. |
| *Commonwealth Environment Protection and* | SSD-10448 was accompanied by a Biodiversity Development Assessment Report (BDAR) in accordance with the NSW Framework and in consultation with NRAR. A habitat assessment was undertaken and identified the Latham's Snip and Grey- |

| Statutory Relevance | Action |
|---|---|
| *Biodiversity Conservation (EPBC) Act 1999* | headed Flying-fox as 'matters of national environmental significance'. The BDAR concluded that the development will not have impact on either species.<br><br>Development on Lot 8 remains within the extent of building works approved by SSD-10448 and thus does not change the impact to the potential habitats across the subject site. Accordingly, it will not result in any impacts on the relevant species and maintains compliance with the EPBC Act.<br><br>Refer BDAR Waiver letter at **Appendix S**. |

## 4.2. Pre-Conditions

**Table 12** outlines the pre-conditions to exercising the power to grant approval which are relevant to the project and the section where these matters are addressed within the EIS.

Table 12 Pre-Conditions

| Statutory Reference | Pre-condition | Relevance | Section in EIS |
|---|---|---|---|
| Section 4.24 of the Environmental Planning and Assessment Act 1979 | While any consent granted on the determination of a concept development application for a site remains in force, the determination of any further development application in respect of the site cannot be inconsistent with the consent for the concept proposals for the development of the site. | Concept development consent SSD-10448 applies to the site.<br><br>MOD 6 seeks to amend SSD-10448 such that the Stage 4 SSD application will remain consistent with the Concept Approval.<br><br>Consistency with the future stage conditions of consent for SSD-10448 are addressed in Appendix C. | **Appendix C** |
| *Clause 66 Environmental Planning and Assessment Regulation* | Pursuant to section 4.16(1) of the Act, a development application in relation to any land zoned IN1 General Industrial under State Environmental Planning Policy (Industry and Employment) 2021 must not be determined by the consent authority unless a contributions plan has been approved for the land to which the application relates. | The Mamre Road Precinct Contributions Plan 2022 was adopted by Penrith City Council and came into force over the land on 4 April 2022.<br><br>This requirement has been satisfied. | - |
| *State Environmental Planning Policy (Resilience and* | Chapter 4 of the Resilience and Hazards SEPP requires that a site must be suitably remediated | SSD-10448 approved a Remediation Action Plan for the AIE which will be | **Appendix W** |

| Statutory Reference | Pre-condition | Relevance | Section in EIS |
|---|---|---|---|
| *Hazards) 2021 – Clause 4.6(1)* | for the intended purpose prior to the grant of consent for that purpose. | implemented prior to construction works occurring on the Estate. Remediation of the site in accordance with the RAP will ensure that the site will be made suitable for the approved commercial and industrial uses.<br><br>Works recommended in the RAP must be undertaken as part of the site's CEMP required by the Stage 1 Consent Conditions (Part E to SSD 10448 consent).<br><br>MOD 6 and the Stage 4 Warehouse 8 development do not change the findings of the RAP nor change the approach to site remediation.<br><br>Subject to compliance with the RAP recommendations, the site will be made suitable for the intended purpose. | |
| *State Environmental Planning Policy (Transport and Infrastructure) 2021* | Schedule 3 of the Transport and Infrastructure SEPP identifies 'traffic generating development' which must be referred to Transport for NSW for concurrence. The schedule includes development for the purposes of industry incorporating 20,000sqm or more of gross floor area (GFA). | MOD 6 seeks to slightly reduce the overall GFA on the site when compared to the originally approved SDD consent. This results in a reduction in the daily traffic numbers to the site from those originally approved and from MOD 3.<br><br>The proposed Warehouse 8 development will feature a total GFA in excess of 20,000sqm.<br><br>This development will be referred to Transport for NSW as part of the SSD DA modification and Stage 4 SSD DA assessment. | **Section 6.1 Traffic, Transport & Parking** |

| Statutory Reference | Pre-condition | Relevance | Section in EIS |
|---|---|---|---|
| *State Environmental Planning Policy (Industry and Employment) 2021 - Clause 2.17 - Requirement for Development Control Plans* | Clause 2.17 of the Industry and Employment SEPP requires that a consent authority must not grant consent to development on any land to which Chapter 2 of that SEPP applies unless a development control plan has been prepared for the land. | The Mamre Road Precinct DCP was adopted in November 2021. This requirement has been satisfied. | - |
| *State Environmental Planning Policy (Industry and Employment) 2021 - Clause 2.28 – Industrial Release Area – satisfactory arrangements for the provision of regional transport infrastructure and services* | Clause 2.28 of the Industry and Employment SEPP provides that the consent authority must not consent to development on land identified on the 'Industrial Release Area Map' unless the Director-General has certified in writing to the consent authority that satisfactory arrangements have been made to contribute to the provision of regional transport infrastructure and services in relation to the land. | Satisfactory arrangements were confirmed prior to the issuance of consent for SSD-10448. No change is proposed that would affect delivery of infrastructure in accordance with those arrangements. | - |

## 4.3. Mandatory Considerations

**Table 13** outlines the relevant mandatory considerations to exercising the power to grant approval and the section where these matters are addressed within the EIS for both MOD 6 and the Stage 4 development.

Table 13 Mandatory Consideration

| Statutory Reference | Mandatory Consideration | Section in EIS |
|---|---|---|
| Consideration under the EP&A Act and Regulation | | |
| Section 1.3 | Relevant objects of the EP&A Act | **Appendix C** |
| Section 4.15 | Relevant environmental planning instruments | |
| | *State Environmental Planning Policy (Resilience and Hazards) 2021* | **Appendix C** |
| | *State Environmental Planning Policy (Industry and Employment) 2021* | **Appendix C** |
| | *State Environmental Planning Policy (Transport and Infrastructure) 2021* | **Appendix C** |
| | Relevant draft environmental planning instruments. | **Appendix C** |

| Statutory Reference | Mandatory Consideration | Section in EIS |
|---|---|---|
| | *Draft SEPP – Strategic Transport Corridors* | |
| | Relevant planning agreement or draft planning agreement. | A VPA has been negotiated, agreed and executed by the Applicant with public exhibition concluding in December 2021 to enable a satisfactory arrangement certificate (SAC) to be issued. |
| | Development Control Plan: Mamre Road Development Control Plan 2021 (MRDCP 2021).<br><br>Section 2.10 of SEPP (Precincts) provides that Development Control Plans do not apply to State Significant Development. Notwithstanding, assessment of the proposal has been undertaken against the requirements of the Mamre Road Precinct DCP at **Appendix C**. This is also a requirement of Condition A6 to the consent for SSD-10448. | **Appendix C** |
| | The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality. | **Section 7.5** |
| | The suitability of the site for the development. | **Section 7.6** |
| | The public interest. | **Section 7.7** |
| **Concept Approval** | | |
| Concept Approval DA SSD-10448 | Consistency of project with concept approval. This includes compliance of the proposed Warehouse 8 with conditions relating to future DAs in part B, Schedule 2 of the SSD-10448 development consent. | **Appendix C** |
| **Considerations under the EP&A Regulation 2021** | | |
| Section 35 | Assessment of consistency of development within the Mamre Road Precinct with Chapter 2 of *SEPP (Industry and Employment).* | **Appendix C** |
| **Considerations under other legislation** | | |
| *Biodiversity Conservation Act 2016* – section 7.14 | The likely impact of the proposed development on biodiversity values as assessed in the Biodiversity Development Assessment Report (BDAR). The Minister for Planning may (but is not required to) further consider under that BC Act the likely impact of | **Appendix C and Section 6.16** |

| Statutory Reference | Mandatory Consideration | Section in EIS |
|---|---|---|
| | the proposed development on biodiversity values. | |
| *National Parks and Wildlife Act* | The likely impact of the proposal on items of Aboriginal Cultural Heritage Significance. | **Section 6.6** |

# 5. Community Engagement

Community and stakeholder engagement has been undertaken by the Project Team during the preparation of this application. This includes direct engagement and consultation with:

- Government Agencies,
- Neighbouring Institutional Landowners to the north, east and south of AIE, and
- Any potential private landowners west of Mamre Road.

## 5.1. Consultation with Government and Agencies

Mirvac has been in ongoing consultation with Penrith City Council, TfNSW, utilities providers and other agencies throughout the preparation and assessment period for SSD-10448. Issues raised during these meetings have informed the proposed MOD 6 layout and arrangement, which subsequently informs the design of Warehouse 8.

During the preparation of this EIS, engagement has also been undertaken with FRNSW, EHG, Penrith City Council, as well as TfNSW. These agencies were contact via email (EHG, Penrith City Council and TfNSW contacted on 11.09.2023 and FRNSW contacted on 19.09.2023 with the email re-issued on 26.09.2023) as well as through the formal lodgement process on the planning portal on 20.09.2023 (with exception of EHG as they are not currently identified on the portal).

TfNSW was subsequently contacted over the phone on 20.09.02023 and 22.09.2023 to discuss the contents and methods of addressing their SEARs items.

Penrith City Council provided the following response on 27.09.2023 confirming that they had no further comment that this stage beyond the advice provided during the request for SEARs (received on 4th August 2023):

> *"Council previously considered and provided detailed comments on such plans, as part of the request for SEARs for the 'Aspect Industrial Estate Stage 4 Development' (SSD-60513208), and has no further comments at this stage.*
>
> *Furthermore, it is noted that Council's comment form part of the Planning Secretary's Environmental Assessment Requirements (SEARs), which have been issued by the Department of Planning & Environment, and therefore the issues raised within must be addressed in any such Environmental Impact Statement."*

Ongoing discussions will continue throughout the assessment phase of this application regarding the overall estate layout (MOD 6) and the Warehouse 8 design.

## 5.2. Consultation with Institutional Developer Landowners to the north, east and south

As shown on **Figure 10**, all land immediately surrounding the site to the north, east and south is subject to SSD applications. These lands are owned or optioned by institutional developers.

Mirvac has been involved with ongoing discussions with its immediate neighbours throughout the assessment and determination of SSD-10448.

Mirvac is in ongoing consultation with the adjoining landowners. The proposed modification is consistent with the existing determination in relation to the staging of the estate works and boundary interfaces.

## 5.3. Engagement Carried out

The Mamre Road Precinct is undergoing significant change with the majority of landholdings within the Precinct owned by institutional developers, subject to sale for this purpose, or subject to a development application for warehouse or industrial uses.

During preparation of the original SSD-10448, a thorough community engagement process was undertaken including letter drop and information line. No objection was received from any private neighbouring property owner or resident.

As a result of this circumstance, pre-lodgement community consultation involved the issuance of a letter to neighbours fronting the western side of Mamre Road. This was in order to make any residential landowner aware of the proposed modifications.

A letter detailing the proposed changes contemplated in the MOD 5 and Warehouse 8 SSD package, including copies of the approved Estate Masterplan for comparison, was issued to the following neighbouring residential landowners on 28th August 2023. Contact details for the proponent team were provided, encouraging feedback on the proposed modifications.

- 799-803 Mamre Road, Kemps Creek.
- 783-797 Mamre Road, Kemps Creek.
- 783A Mamre Road, Kemps Creek.
- 771-781 Mamre Road, Kemps Creek.
- 805-817 Mamre Road, Kemps Creek.
- 819-831 Mamre Road, Kemps Creek.
- 833-843 Mamre Road, Kemps Creek.
- 833B Mamre Road, Kemps Creek.
- 833A Mamre Road, Kemps Creek.
- 845-857 Mamre Road, Kemps Creek.
- 845A Mamre Road, Kemps Creek.
- 859-869 Mamre Road, Kemps Creek.
- 871-883 Mamre Road, Kemps Creek.
- 885-899 Mamre Road, Kemps Creek.
- 901 Mamre Road Kemps Creek.
- 917 Mamre Road Kemps Creek.
- 919-929 Mamre Road Kemps Creek.

No feedback has been received as yet from the neighbouring residential landowners following the letter drop.

## 5.4. Public Notification and Submissions

It is understood that the application will need to be notified in accordance with section 2.22 and Schedule 1 clause 10 to the EP&A Act from at least 14 days.

Any submissions received by The Department of Planning and Environment will need to be considered in the assessment of the proposed modifications.

# 6. Assessment of Impacts

This section describes the way in which the key issues identified in the SEARs have been assessed. It provides a comprehensive description of the specialist technical studies undertaken regarding the potential impacts of the proposed development and provides recommended mitigation, minimisation and management measures to avoid unacceptable impacts. Further detailed information is appended to the EIS, including:

- SEARs compliance table identifying where the SEARs have been addressed in the EIS at **Appendix A**.
- Architectural Plans at **Appendix F**.
- Statutory compliance table identifying where the relevant statutory requirements have been addressed at **Appendix C**.
- Proposed mitigation measures for the project which are additional to the measures built into the physical layout and design of the project at **Appendix E**.
- Other technical reports are attached at **Appendix F** to **HH**.

The detailed technical reports and plans prepared by specialists and appended to the EIS are individually referenced within the following sections.

## 6.1. Traffic, Transport and Parking

A Transport Impact Assessment at **Appendix I** has been prepared by Ason Group in support of the proposed Modification and Warehouse 8 SSDA. The Transport Impact Assessment provides an assessment of the parking, access and traffic arrangements in accordance with the relevant Australian Standards (AS 2890.1:2004, AS 2890.2:2018 and AS 2890.6:200), the Mamre Road Precinct DCP (**MRP DCP**) and the previously prepared 'Transport and Accessibility Management Plan, Aspect Industrial Estate' (**TMAP**) which was established as part of the original SSD-10448 approval.

### 6.1.1. Existing Environment

AIE is currently accessed from Mamre Road which connects the site to the Great Western Highway and M4 Motorway approximately 6 km to the north and Elizabeth Drive approximately 5 km to the south.

Mamre Road is identified in the MRP Structure Plan as a major transport corridor to support the growth of the Mamre Road Precinct. To support this growth there are proposals to widen Mamre Road in the future to increase its capacity to serve growing traffic demands as the area transitions from rural to industrial land uses, including additional traffic lanes between the M4 Motorway and Kerrs Road and the AIE within which the site is located.

Civil works including an upgraded intersection between the Mamre Road /internal AIE estate roads have been approved under SSD-10448. These roads works will provide access to the subject site. Internal roads will be constructed in stages in accordance with the Concept Masterplan.

**Existing Traffic Flows**

A recent traffic survey of the Mamre Road / Bakers Lane intersection (undertaken in August 2022) identified the traffic flows as detailed in **Table 14** at Mamre Road.

Table 14 August 2022 Traffic Flows at Mamre Road / Bakers Lane

| **August 2022 Traffic Volumes** | | |
|---|---|---|
| Direction | AM | PM |
| Mamre Road Northbound | 643 | 867 |
| Mamre Road Southbound | 791 | 710 |
| **% Change per Year** | | |

| Direction | AM | PM |
|---|---|---|
| Mamre Road Northbound | +1.4% | +0.1% |
| Mamre Road Southbound | +0.3% | +1.2% |

*Source: Ason Group*

The findings of the August 2022 survey found that growth in traffic flow over the past 4 years is lower compared to the traffic modelling undertaken in the Ason RFI (prepared for SSD-10448) adopted May 2018 which applied a 3% growth rate per year against the then recorded traffic flows.

## 6.1.2. MOD 6 Parking

The modified development will maintain consistency with the MRP DCP prescribed minimum parking rates (Warehouse - 1 space per 300sqm / Office - 1 space per 40sqm / Industries – 1 space per 200sqm / Café – 1 space per 10sqm). As outlined in the **Table 15** below, the proposed provision of 1,132 spaces across the entire AIE meets the DCP requirement.

Table 15 Overall Parking requirements

| **Use** | **Gross floor area (GFA)** | **Mamre Road DCP** | **Provision** |
|---|---|---|---|
| Warehouse GFA ($m^2$) | 236,475$m^2$ | 789 | 1,132 |
| Office GFA ($m^2$) | 8,450$m^2$ | 212 | |
| Dock Office GFA ($m^2$) | 1,466$m^2$ | 37 | |
| Café ($m^2$) | 125$m^2$ | 13 | |
| **Total ($m^2$)** | **246,516$m^2$** | **1,051** | **1,132** |

Table 16 Parking for Warehouse 8A & 8B

| **Location on the site** | **Modification GFA** | **Mamre Road DCP** | **Provision** |
|---|---|---|---|
| **Warehouse 8** | | | |
| Warehouse | 42,700 $m^2$ | 143 | 178 |
| Office | 1,150 $m^2$ | 29 | |
| Total | 43,850$m^2$ | 172 | |

The provision of car parking as identified in **Table 16.** This illustrates how Warehouse 8A and 8B, being the only warehouse subject to MOD 6, will meet the requirements of the Mamre Road DCP. As illustrated in **Table 16** the proposal will provide for 6 additional spaces above the DCP minimum parking rate. This additional provision in car parking spaces for Warehouse 8A and 8B will not result in any adverse traffic impacts as detailed in the sections below.

## 6.1.3. MOD 6 Traffic Generation

The amended site layout proposed by MOD 6 will result in a net reduction in traffic generation for the AIE beyond the latest approved modification application (MOD 3) as referenced in **Table 17** below. The traffic flows resulting from the proposal would generate 1% fewer trips during the AM peak and PM peak than that forecast by the MOD 3, Ason TMAP.

The TMAP found that the key intersection of Mamre Road / Access Road 1 would operate at satisfactory levels of service under the approved development. Noting the proposal for MOD 6 represents a reduction in the forecast traffic generation from that assumed in the TMAP as identified in **Table 17** below, it is concluded that the modified lot layout remains supportable on traffic planning grounds.

Table 17 Traffic generation

| Development | GFA ($m^2$) | AM Peak | PM Peak | Daily |
|---|---|---|---|---|
| Superseded Master Plan (SSD-10448) | 247,990 | 570 | 595 | 7,217 |
| MOD 3 | 247,521 | 569 | 594 | 7,203 |
| MOD 6 | 246,391 | 567 | 591 | 7,170 |
| Net difference between proposal and SSD-10448 MOD 3 | -1,130 | -2 | -3 | -33 |

The road network upgrades that were established as part of the original SSD, which incorporates the delivery of a signalised intersection at Mamre Road, have remained consistent under MOD 6.

### 6.1.4. Warehouse 8 Parking

The proposed development at Warehouse 8 provides parking in accordance with the prescribed MRP DCP parking rates, as per **Table 16** above.

The proposed number of parking spaces as part of the Warehouse 8 development is consistent with the concept plan (SSD-10448) as to be modified by MOD 6 as well as the MRP DCP prescribed parking rate.

Additionally, the proposed Warehouse 8 development will provide:

- 3 x Accessible parking spaces for Warehouse 8A and 1 x Accessible parking space for Warehouse 8B. This is consistent with prescribed rates under the Disability (Access to Premises – Buildings) Standards 2010.
- 2 spaces for electrical vehicles in accordance with the MRP DCP.
- 36 x bicycle spaces for Warehouse 8A and 4 x bicycle spaces for Warehouse 8B, and 1 x end of trip (EOT) facility each for both Warehouse 8A and 8B. This is in accordance with the MRP DCP.

In respect to the parking required by the VGA operations at Warehouse 8A, a first principles assessment was prepared which provides a more detailed assessment of the specific operations and traffic generation expected of the tenant on the basis of the information provided by the occupier. A review of established VGA operations at other sites found that the operational traffic at Warehouse 8A is anticipated to be as follows:

- 14 small trucks and vans are to be used for metro delivery during lunch time.
- Semi-trailers and B-Doubles are to be used for day and night shifts (movements detailed in **Section 6.1.5** of this report below).
- 150 on-site car parking spaces provides parking for:
  - 10 Admin / office staff.
  - 10 Staff training.
  - Day shift (6am – 3pm) staff parking, with 30 staff.
  - Night shift (3pm-10pm) staff parking, with 30 staff.

With consideration of the above, the provision of 150 of the 178 car parking spaces will adequately support the anticipated VGA operations at Warehouse 8A. With regard to Warehouse 8B, the provision of 28 (out of 178) car parking spaces will meet the MRP DCP, minimum parking requirement (MRP DCP requirement for 27 parking spaces).

## 6.1.5. Warehouse 8 Traffic

A comprehensive traffic impact assessment has been conducted in support the proposed Warehouse 8 development with consideration of both the adopted TMAP rate trip rates for the MRP as well as the first principles assessment of the intended VGA operations at Warehouse 8A. The TIA provides an updated trip model which is consistent with the approved AIE SSD while also including the anticipated traffic generation by the approved Stage 1 development, the approved WH9 SSD development as well as the in-progress, state significant developments for WH4 and WH2.

In accordance with the traffic generation rates adopted in the Ason TMAP, the proposed Warehouse 8 GFA of 43,850sqm is modelled to result in 101vph in the AM peak, 106vph in the PM peak and 1,277 vehicle trips per day.

The GFA for the Warehouse 8 Proposal is consistent with that envisaged under the MOD-6 Concept Masterplan, as such the traffic generation assessed also remains consistent when considered against adopted trip rates under the Ason TMAP.

**Table 18** below demonstrates the cumulative traffic of the proposed Warehouse 8 development in addition to the other approved and in-progress Warehouse developments across the AIE against the approved traffic generation balance approved as part of the Original Master Plan.

Table 18 Comparative Assessment

| **Development** | **GFA ($m^2$)** | **AM Peak** | **PM Peak** | **Daily** |
|---|---|---|---|---|
| Original Master Plan (SSD-10448) | 247,990 | 570 | 595 | 7,217 |
| Stage 1 (assessed as part of MOD2) | (-) 55,421 | (-) 67 | (-) 69 | (-) 1,007 |
| Warehouse 9 (SSD-46516461) | (-) 66,516 | (-) 153 | (-) 160 | (-) 1,936 |
| Warehouse 4 (SSD-46516458) | (-) 18,905 | (-) 44 | (-) 46 | (-) 551 |
| Warehouse 2 (SSD-58257960) | (-) 24,295 | (-) 56 | (-) 58 | (-) 707 |
| Warehouse 8 | (-) 43,850 | (-) 101 | (-) 106 | (-) 1,277 |
| Remaining Balance | 39,003 | 149 | 156 | 1,739 |

**Table 18** above demonstrates that there is remaining traffic generation balance for future developments within the AIE and thus the proposed Warehouse 8 development aligns with the established traffic generation rates. Therefore, the proposal will not result in any adverse impacts to the performance to the transport infrastructure in the area, notably, no further upgrades are required to the Mamre Road/Access Road 1 intersection.

Of note, the Mamre Road/Access Road 1 intersection is anticipated to be completed in mid-2024. As such, during the construction of Warehouse 8, construction vehicles associated with Warehouse 8 shall utilize the Construction Access Road running through the Warehouse 8 hardstand until the completion of the Mamre Road / Access Road 1 intersection. After this completion, the Construction Access Road via Warehouse 8 hardstand will be decommissioned, enabling the completion of Warehouse 8 hardstand. Subsequently, by mid-2024 the relevant transport access infrastructure is anticipated to be completed to support the operations of Warehouse 8.

In respect to the potential traffic generated by the VGA operations at Warehouse 8A, a first principles assessment was prepared. With consideration of the established VGA operations at other sites, the operational traffic at Warehouse 8A is anticipated to be lower than the established traffic flow rate established under the Ason TMAP. The anticipated traffic flows for the Warehouse 8A, VGA tenant are as follows:

- AM Peak Hour: 31 veh/hr (25 light vehicles and 6 heavy vehicles)

- PM Peak Hour: 73 veh/hr (70 light vehicle and 3 heavy vehicles); and
- Daily: 416 vehicle trips (320 light vehicle trips and 96 heavy vehicle trips).

Thus, it is evident that the FPA indicates a lower potential for traffic generation by the Proposal than what was anticipated by the traffic generation rates adopted in the Ason TMAP during the road network peaks. Nevertheless, the traffic impact assessment of the Proposal is based on the TfNSW endorsed traffic generation rates consistent with the Ason TMAP.

## 6.1.6. Condition A14 Traffic Modelling

It is recognised that a number of developments have been approved within the broader MRP since this assessment. Therefore, in accordance with Condition A14, a revised traffic modelling analysis has been conducted maintaining the same methodology adopted within the Ason TMAP and Ason RFI which includes the full Masterplan of the AIE and only the approved development within the MRP. It should be noted that the Access Logistics Park (SSD-17647189) application has significantly progressed through the assessment process and is expected to receive approval. Therefore, its GFA has been included in the revised model.

The projects included in the revised modelling assessment are summarised in Table 19 below.

Table 19 Revised MRP Model – Approved Developments

| Development | SSD No. | Max allowable GFA as stated in the CoC ($m^2$) | Note |
|---|---|---|---|
| **Aspect Industrial Estate** | 10448 | 247,646 | Developments included within the Ason TMAP and Ason RFI modelling |
| **Kemps Creek Warehouse, Logistics and Industrial Facilities Hub** | 9522 | 187,378 | |
| **Yiribana Logistics Estate** | 10272349 | 54,982 | Developments included in the revised traffic modelling assessment |
| **Access Logistics Park** | 17647189 | 88,040 | |
| **Westlink Industrial Estate - Stage 1** | 9138102 | 81,317 | |
| **200 Aldington Road Industrial Estate** | 10479 | 340,540 | |

The revised traffic SIDRA modelling analysis indicates that the Mamre Road / Access Road 1 intersection would operate with satisfactory level of performance in 2026 and 2031 whilst accommodating the background traffic growth, as well as development traffic of the Proposal and other approved developments in the MRP.

Further, MOD-6 Masterplan represents a decrease in the forecast traffic generation that was assumed in the Ason TMAP and Ason RFI. The GFA for the Warehouse 8 Proposal is entirely consistent with that envisaged under the approved Concept Masterplan, as such the traffic generation assessed and accepted under the MOD-6 Masterplan also remains consistent. Therefore, it is concluded that the development remains supportable on traffic planning grounds.

## 6.1.7. Design and Access

The Transport Impact Statement confirms that the proposed development will maintain the appropriate site access arrangements across the modified AIE site and across the Lot 8. The site access, internal circulation and car parking arrangements have been developed with consideration of the requirements of the MRP DCP (and detailed further in **Appendix C**), along with the following relevant Australian Standards:

- AS2890.1:2004 for Car parking areas.

- AS2890.2:2018 for Commercial vehicle loading areas.
- AS2890.6:2009 for Accessible (disabled) parking.

In regard to the proposed design, it is notable that:

- A comparison between the MOD-3 and MOD-6 Masterplan demonstrates that 1 additional heavy vehicle access driveway is proposed along Access Road 4 to Warehouse 8B. The shortest distance between the Warehouse 8 vehicle access driveways is approximately 35m from each other. As such, Access Road 4 cul-de-sac will be compliant with AS2890.1:2004 and would be able to provide adequate pedestrian and cyclist refuge. Additionally, the intersection location and configuration will not result in any adverse queuing impacts as:
  - Vehicle movements generated under the proposed MOD-6 masterplan are less than that generated under the approved MOD-3 masterplan.
  - A comparison between the MOD-3 and MOD-6 Masterplan demonstrates that the 3 driveways located on the cul-de-sac are in the exact same location as per the approved MOD-3; 1 additional heavy vehicle access is proposed along Access Road 4 for Warehouse 8B in MOD-6. Further, the light vehicle access, subject to higher vehicle volumes, has been relocated further away from the cul-de-sac, thus proposes even less queuing potential under MOD-6.
  - With regard to the potential yielding of WH8A inbound truck movements, the movement control is no different to a priority-controlled intersection on any external road network.
  - The First Principles Assessment demonstrates a total of 6 and 3 heavy vehicle movements during AM and PM peaks. This equates to a low frequency of 1 HV movement every 10-20 minutes, resulting in minimal wait time, if any.
  - Access to each driveway would be unfettered during operational hours so all vehicles can move freely into and out of the Site with no chance for queuing to occur.

  Therefore, the distance between the light and heavy vehicle driveways is adequate from an operational perspective and here is no queuing potential at the Access Road 4 cul-de-sac despite close location of driveways.
- A 30m A-double has been adopted as the design vehicle for site access and circulation, whilst 20m Articulated Vehicles are generally adopted for loading dock parking.
- Swept path analysis demonstrates that the necessary manoeuvres can be accommodated by the proposed design. The circulation areas for heavy vehicles have been designed having regard for the requirements of AS2890.2:2018. A-Doubles can, and are expected to, travel beyond the point. Uncoupling will occur within uncoupling location.
- All service areas are to be designed with reference to AS 2890.2:2018. It is anticipated that service area design compliance with AS 2890.2 would form a standard condition of consent further to approval.
- All access driveways are generally designed in accordance with AS 2890.1:2004 and AS 2890.2:2018. As such, all the access points will be unfettered during operational hours so vehicles can move freely into and out of the Site with no chance for queuing to occur.
- All staff and employee parking access and modules are provided in accordance with AS2890.1:2004 for Class 1A users, which requires a minimum space length of 5.4m, a minimum width of 2.4m and a minimum aisle width of 5.8m.
- Warehouse 8A has been designed to the requirements of the future tenant. This includes inbound docks (where inbound goods will be unloaded) to the east of the hardstand; and outbound docks (where outbound goods will be loaded) to the west of the hardstand.
- A security gate will be located at the Site boundary, which will remain open during operational hours. Entry and exit to the hardstand will be managed by boom gates and an intercom system. Queuing analysis has been conducted to confirm that the boom gates are located to ensure that heavy vehicles can wait within the property boundary at the boom gate.
- A training area is located to the west of the warehouse, which includes separate rooms that will be accessed by B99 vehicles.

It is expected that any detailed construction drawings in relation to any modified areas of the car park or site access would comply with the relevant standards.

### 6.1.8. Summary

The proposed car parking provision and internal access areas will not result in any adverse traffic impacts and will comply with the parking and access requirements of the warehouse development.

- The proposed car parking provision for the overall Estate (1,132 spaces) and Warehouse 8 (178 spaces) complies with the accepted methodology established in the Ason TMAP and parking rates under the MRP DCP. Additionally, the proposed parking provision at Warehouse 8A will satisfy the expected parking demand for the VGA tenant as determined by the first principles assessment. As such, the development remains supportable on parking grounds and would satisfy the parking demands of the site.
- The proposal will accommodate the appropriate quantum of accessible and electric parking spaces as well as bicycle parking spaces for both Warehouse 8A and 8B in accordance with the MRP DCP requirements.
- The estimated traffic generation of the MOD 6 layout generates some 1% fewer trips than forecast in the approved SSD Masterplan traffic generation calculations. Additionally, the first principles assessment identifies that the traffic generated by the Warehouse 8A, VGA tenant operations are expected to be lower than the rates established under the Ason TMAP. As such, the proposal will not result in any additional traffic impacts beyond those anticipated in the original SSD-10448 masterplan approval. No further road infrastructure upgrades are required to support the proposal.
- With considerations of the expected traffic flow growth at Mamre Road as well as the cumulative impacts of other developments approved across the MRP, it is anticipated that the proposal can be supported by the approved/in-progress infrastructure upgrades in the area.
- The proposed modification seeks to revise the design of the heavy vehicle hardstand areas, circulation roadways, car park access and parking modules of the Concept Master Plan Lot 8 to accommodate tenant-specific requirements.
- In relation to the internal configuration of the site, light, heavy and emergency vehicular access as well as car parking and servicing areas will be designed in accordance with the relevant Australian Standards series.
- Swept path assessment demonstrates that the modified lot and hardstand layout design remains consistent with the relevant Australian Standards and MRP DCP design requirements.

Accordingly, it is concluded that the proposal design does not give rise to any additional adverse impacts and remains consistent with parking, traffic, and design conclusions of SSD-10448 and the established under the Ason TMAP.

The proposal can be supported on traffic grounds with no further mitigation measures beyond those established under the concept masterplan.

## 6.2. Noise Impacts

A Noise Impact Assessment (**NIA**) has been prepared by SLR Consulting and is included in **Appendix J**. The NIA provides an assessment of the potential noise impacts associated with the intended construction and operation of Lot 8 of the AIE as proposed under MOD 6 to SSD-10448 and the Warehouse 8 SSD-60513208. The NIA has been prepared in accordance with the approved conditions of SSD-10448 and requirements of the SEARs.

The noise and vibration assessment demonstrates that the proposal will not result in any adverse acoustic impacts subject to a detailed noise source inventory, ‘worst case’ scenario analysis as well as a cumulative impact assessment which considers the impacts of the approved and proposed developments across the AIE and broader MRP.

## 6.2.1. Existing Environment

The existing ambient noise environment surrounding the site currently consists predominantly of a rural environment. However, as detailed in **Section 2.2** and **Section 2.3** of this report, the immediately surrounding areas form part of the Mamre Road Precinct and the bulk of landholdings have either approval or a submitted applications to facilitate new industrial and/or warehouse developments. The nearest sensitive receivers in the surrounding area are detailed in **Table 20** below.

Table 20 Nearest Sensitive Receivers

| ID | Address | Type | Distance (m) | Direction |
|---|---|---|---|---|
| West Residential | Residences near Medinah Avenue, Luddenham | Residential | 1,450 | West |
| Southeast Residential | Residences near Mount Vernon Road and Kerrs Road, Mount Vernon | Residential | 2,200 | Southeast |
| BAPS Temple | 232 Aldington Road, Kemps Creek | Place of Worship | 900 | Southeast |

*Source: SLR*

With consideration of the location and land uses across the nearest sensitive receivers, the NIA identifies the appropriate project trigger noise levels and night-time sleep disturbance levels. Additionally, Condition A16 of the SSD-10448 Development Consent establishes operational noise limits are applicable to the nearest receivers as detailed in **Table 21** below. The noise limits established under Condition A16 have been prescribed by DPE to account for the cumulative acoustic impacts of the AIE in addition to the anticipated developments across the MRP. These noise limits have been designed to effectively share the recommended amenity noise levels across potential noise-contributing developments within the MRP and surrounds.

Table 21 Operational Noise Limits

| Location | Day LAeq(15minute) | Evening LAeq(15minute) | Night LAeq(15minute) |
|---|---|---|---|
| Residential receivers near Medinah Avenue (Luddenham), Mount Vernon Road (Mount Vernon) and Kerrs Road (Mount Vernon) | 39 | 34 | 29 |
| BAPS Temple – Outdoor Use Area (Except Car Parking Area) | 36 (When in use) | | |

*Source: SLR*

The noise limits identified in **Table 21** are 12 dBA below the relevant recommended amenity noise levels in under the NPfI as to apportion the noise contribution for the AIE based on its land size as a proportion of all developable industrial land within the MRP. the overarching objective is to ensure any nominal increase from a single development is not significant and not detectable by the community.

Additionally, the noise modelling prepared for the NIA accounted for the indicative, future Warehouse Buildings layout and the associated layout of hard and rural soft ground areas across the MRP.

**Approved AIE Operations**

A number of warehouse developments and operations have been approved across the AIE, including the following known tenants.

- Warehouse 1 – CEVA operations
- Warehouse 9 – Winnings operations

The future tenants of the other approved warehouse buildings are currently unknown but have been approved for warehouse and distribution operations with 24/7 operations. The operations of the approved

warehouses across the AIE have been considered for the operational noise modelling as part of the NIA. Of note, Condition A16(a) also specifies that the cumulative noise emission of fixed external mechanical plants for each warehouse building must not exceed 90dBA and must not exhibit tonal characteristic or strong low frequency content.

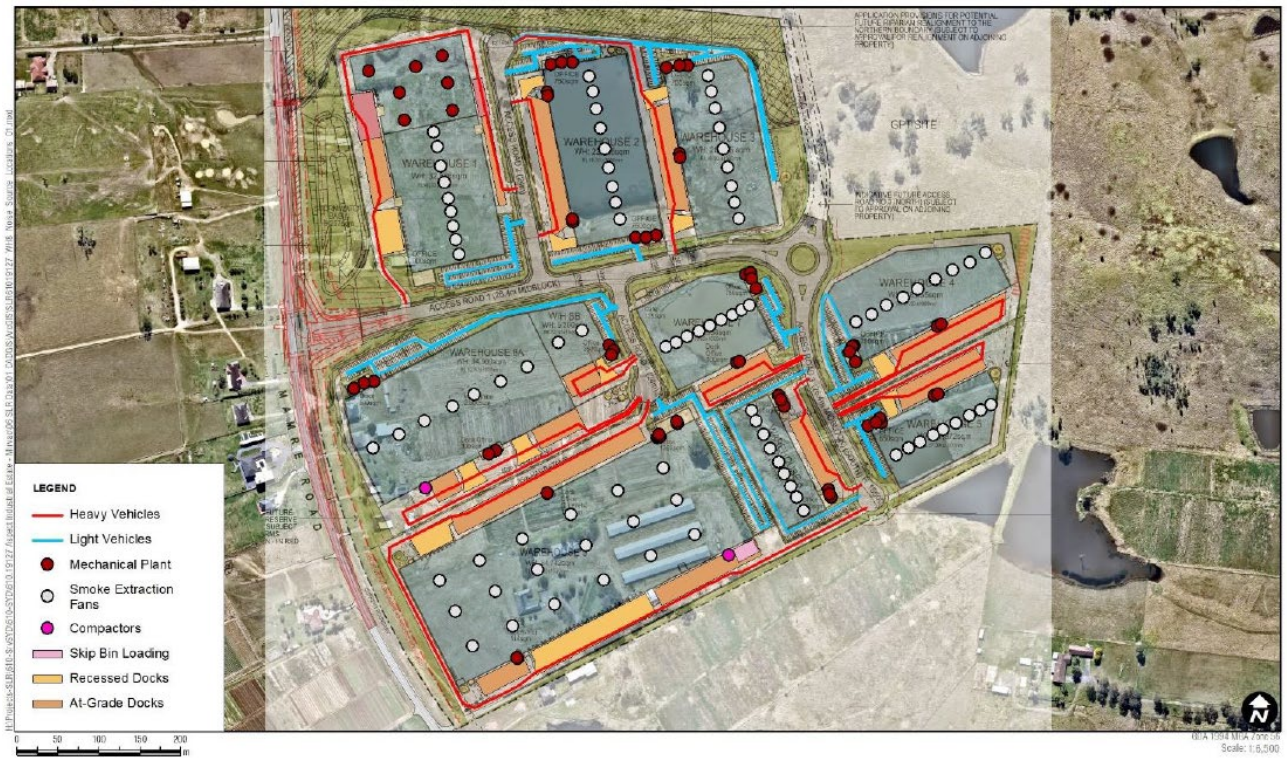
**Weather Conditions**

An analysis of the prevailing wind and temperature inversion conditions at the site was undertaken in accordance with the NPfI for a 10-year period from 2013 to 2022 as part of the WH2 NIA. The analysis determined that standard weather conditions are prevalent in the MRP during the daytime, evening and night-time periods, with noise-enhancing wind in southwest or west directions only during the night-time period. The analysis shows that noise-enhancing temperature inversions are a feature of the area during the night-time in winter.

## 6.2.2. Operational Noise Sources

The operational noise source assessment included an analysis of both the proposed operations at Lot 8 as well as the approved operations across the other 8 warehouse and distribution centres within the AIE. This informs a cumulative assessment of acoustic impacts across the AIE which provides a realistic, worst-case scenario assessment associated with the operation of the proposal. The noise sources associated with the AIE includes vehicle movements, loading dock activities as well as external fixed mechanical plant and equipment. **Figure 17** below provides an overview of the noise source locations across the AIE.

Figure 17 Noise Source Locations




*Source: SLR*

**On-Site Traffic**

- On-site vehicle movements have been identified as an operational source of noise. The traffic volumes specific to the customers' operations have been provided for Warehouse 1, Warehouse 9 and the proposed Warehouse 8A as their future tenants are known. Typical worst-case vehicle volumes for the other warehouses in the estate have been considered based on warehouse GFA generation rates provided by Mirvac. Warehouse 8B, 2, 3, 5, 6 and 7 uses generic movements based on the GFA and anticipated vehicle types,

- The volumes of on-site traffic were modelled to be representative of the expected typical worst-case 15-minute period for the daytime, evening, and night-time for operations across the entire AIE. The modelling conservatively assumes vehicle movements to reflect the worst-case impacts including:
  - Warehouse 1 and Warehouse 9 have been conservatively assumed to be heavy trucks for the typical worst-case 15-minute period.
  - An increased sound power level has been applied to all heavy/medium trucks in areas where they are expected to accelerate, such as at the entrance/exit of each lot.
  - Assumes that all light and heavy vehicles concurrently access all warehouses during the typical worst-case 15-minute assessment periods.

Based on the provided vehicle information, the typical worst-case 15-minute period volumes during the daytime, evening and night-time periods are detailed in **Table 22** below:

Table 22 Typical Worst-case 15-Minute Period

| **Warehouse** | **Number of Vehicles in Typical Worst-case 15-minute Period[1]** | | | | | |
|---|---|---|---|---|---|---|
| | Daytime / Evening | | | Night-time | | |
| | Light Vehicles | Medium Trucks | Heavy Trucks | Light Vehicles | Medium Trucks | Heavy Trucks |
| Warehouse 1 | 20 | 0 | 1 | 20 | 0 | 1 |
| Warehouse 2 | 12 | 3 | 2 | 11 | 2 | 1 |
| Warehouse 3 | 10 | 3 | 2 | 9 | 2 | 1 |
| Warehouse 4 | 9 | 2 | 1 | 8 | 2 | 1 |
| Warehouse 5 | 6 | 2 | 1 | 6 | 1 | 1 |
| Warehouse 6 | 5 | 2 | 1 | 5 | 1 | 1 |
| Warehouse 7 | 7 | 2 | 1 | 7 | 2 | 1 |
| Warehouse 8A | 18 | 3 medium<br>1 van | 1 | 8 | 1 medium<br>0 vans | 1 |
| Warehouse 8B | 3 | 1 | 1 | 3 | 1 | 1 |
| Warehouse 9 | 12 | 0 medium<br>6 vans | 3 | 7 | 0 medium<br>5 vans | 2 |

*Source: SLR*

The relevant sound power levels (SWLs) and modelling assumptions are detailed in **Table 23** below.

Medium and heavy trucks have been modelled in hardstands and on-lot truck access. Transit/sprinter vans have been modelled in the Warehouse 9 and Warehouse 8A hardstands and on-lot truck access. An increased sound power level has been applied to all heavy/medium vehicles in areas where they are expected to accelerate, such as at the entrance/exit of each lot. Light vehicles have been modelled in car parks and on-lot light-vehicle access.

Table 23 Vehicle Noise Sources

| Vehicle Type | Location | Sound Power Level (dBA) | Vehicle Speed (km/h) |
|---|---|---|---|
| Heavy trucks | Hardstands and on-lot truck access roads | 108[1]<br>Slow speed movement | 10 |
| | | 112[1]<br>Acceleration | 10 |
| Medium trucks | Hardstands and on-lot truck access roads | 103[1]<br>Slow speed movement | 10 |
| | | 107[1]<br>Acceleration | 10 |
| Transit/sprinter vans | Warehouse 9 and Warehouse 8A hardstands and on-lot truck access roads | 91[2] | 10 |
| Light vehicles | Car parks and on-lot light-vehicle access roads | 90[3] | 20 |

*Source: SLR*

Note 1: Sound power level for heavy vehicles based on noise measurements undertaken by Renzo Tonin & Associates (RTA).

Note 2: Sound power level for Warehouse 9 and Warehouse 8A transit/sprinter vans measured at Winnings facility in Rosehill NSW (Warehouse 9 customers' existing site) and takes slow speed movements and acceleration into account.

Note 3: Sound power level for light vehicles based on SLR measurement data.

**Loading Docks**

Consistent with the MOD 2 NIA, external forklift movements (i.e. outside of the warehouses) have been modelled across the at-grade dock areas of the hardstands at a rate of one forklift per heavy vehicle onsite, operating continuously during any one 15-minute period. Warehouse 9 and 8A will have electric forklifts, with the other warehouses assumed to have gas forklifts (consistent with the MOD 2 NIA).

Warehouse 8A will accommodate compactor operations which will take place in the south-western hardstand area of Warehouse 8A only during the daytime/evening periods (not during the night-time). The sound power level of the Warehouse 8A rotary drum compactor was measured by SLR on 15 March 2023 at VGA's facility in Chullora NSW (Warehouse 8A customer's existing site).

Warehouse 9 compactor operation and skip bin loading/unloading as well as the refrigerated truck trailers for Warehouse 1 are approved operational noise sources which have also been modelled.

**Mechanical Plant**

External mechanical plants on Warehouses 2 to 8 have been modelled on the warehouse rooftops with an indicative cumulative SWL of 90 dBA per warehouse (modelled as two point-sources with a SWL of 87 dBA each), consistent with the MOD 2 NIA. It is noted that for the acoustic modelling, around half of the Warehouses 2 to 8 rooftop smoke extraction fans could be operated to provide ventilation to the warehouses. While this is a non-typical operation of smoke extraction fans, it has been included in the noise model to provide a conservative, worst-case scenario assessment.

Manufacturer data was used, identifying the specific units being installed at Warehouse 1 and Warehouse 9 for the purposes of acoustic modelling.

## 6.2.3. Operational Noise Impacts

**Predicted Noise Levels**

The modelling of the operational noise sources listed in the sections above modelled the typical, worst-case operational noise levels from the AIE as proposed. The modelling finds that the proposal will comply with the relevant noise limits during all periods. The predicted, operational noise impacts to the nearest sensitive receivers are detailed in **Table 24** below.

As detailed in **Section 6.2.1** of this EIS, the noise limits under Condition A16 were prescribed to account for the cumulative impacts of the AIE within the context of the approved and future developments across the MRP. By complying with the Condition A16 noise limits, the noise modelling results demonstrate that the proposal will not result in any adverse cumulative impacts to the nearest sensitive receivers.

These modelled outcomes accounts for the recommended mitigation measures.

Table 24 Operational Noise Assessment – MOD 6 Masterplan Development

| Receiver Area | Period (weather) | LAeq(15 minutes) Noise Level (dBA) | | | | | Compliance |
|---|---|---|---|---|---|---|---|
| | | Noise Limit | MOD 6 Predicted | Exceedance | WH2 NIA Predicted | Change | |
| West Residential | Daytime (standard) | 39 | 30 | - | 31 | -1 | Yes |
| | Evening (standard) | 34 | 30 | - | 31 | -1 | Yes |
| | Night-time (standard) | 29 | 28 | - | 29 | -1 | Yes |
| | Night-time (noise-enhancing) | 29 | 28 | - | 29 | -1 | Yes |
| Southeast Residential | Daytime (standard) | 39 | 27 | - | 28 | -1 | Yes |
| | Evening (standard) | 34 | 27 | - | 28 | -1 | Yes |
| | Night-time (standard) | 29 | 26 | - | 27 | -1 | Yes |
| | Night-time (noise-enhancing) | 29 | 26 | - | 27 | -1 | Yes |
| BAPS Temple | When in use (day/ evening) (standard) | 36 | 33 | - | 34 | -1 | Yes |

*Source: SLR*

**Sleep Disturbance**

As the development would operate 24-hours a day, noise emissions during the night-time were assessed for potential sleep disturbance in the residential receiver areas. A summary of the predicted LAmax noise levels from the AIE during the night-time period is shown in **Table 25**. The predicted LAmax levels are compared to the sleep disturbance screening level.

Table 25 Sleep Disturbance Screening Assessment – MOD 6 Masterplan Development

| Receiver Area | Period | Screening Noise Level (dBA) | Predicted LAmax Noise Level (dBA)[1] | Exceedance (dB) | Compliance |
|---|---|---|---|---|---|
| West Residential | Night | 52 | 42 | - | Yes |
| Southeast Residential | Night | 52 | 41 | - | Yes |
| BAPS Temple | n/a | n/a | n/a | n/a | n/a |

*Source: SLR*

LAmax noise levels from the development are not predicted to exceed the 52 dBA sleep disturbance screening noise level. As such, sleep disturbance impacts are unlikely and further detailed assessment of maximum noise levels is not required.

**Intermediate Monitoring Locations**

As part of the Operational Noise Management Plan prepared for the AIE (AIE ONMP) (SLR Report 610.V14410.00002-ONMP-R01-v1.1-20230817, dated August 2023), intermediate monitoring locations and associated reference noise levels were specified as part of the operational noise compliance monitoring. The locations and noise levels in the AIE ONMP were sourced from the WH9 DNVR. The reference noise levels correspond to the maximum allowable LAeq(15minute) noise levels at the intermediate locations that are predicted to result in compliance with the noise limits at the relevant compliance locations.

The reference noise levels have been reviewed for the proposed MOD 6 development and are detailed below. The MOD 6 reference noise levels at each intermediate location and their correlation to the noise limits at the relevant compliance locations are summarised in **Table 26**.

Table 26 Intermediate Monitoring Location Reference Levels

| Location | Period | Noise Level LAeq(15minute) (dBA) | | | | |
|---|---|---|---|---|---|---|
| | | Noise Limit at Compliance Location | Correlation Between Intermediate and Compliance Location – MOD 6 | Reference Level at Intermediate Location – MOD 6 | Reference Level at Intermediate Location – WH9 DNVR | Change in Reference Level |
| L01 West Residential | Day (standard weather) | 39 | 32 | 71 | 71 | 0 |
| | Evening (standard weather) | 34 | 32 | 66 | 66 | 0 |
| | Night (standard | 29 | 28 | 57 | 57 | 0 |

| Location | Period | Noise Level LAeq(15minute) (dBA) | | | | |
|---|---|---|---|---|---|---|
| | | Noise Limit at Compliance Location | Correlation Between Intermediate and Compliance Location – MOD 6 | Reference Level at Intermediate Location – MOD 6 | Reference Level at Intermediate Location – WH9 DNVR | Change in Reference Level |
| | weather) | | | | | |
| | Night (noise-enhancing weather) | 29 | 28 | 57 | 57 | 0 |
| L02 West Residential | Day (standard weather) | 39 | 24 | 63 | 63 | 0 |
| | Evening (standard weather) | 34 | 24 | 58 | 58 | 0 |
| | Night (standard weather) | 29 | 24 | 53 | 53 | 0 |
| | Night (noise-enhancing weather) | 29 | 24 | 53 | 53 | 0 |
| L03 Southeast Residential | Day (standard weather) | 39 | 37 | 76 | 76 | 0 |
| | Evening (standard weather) | 34 | 37 | 71 | 71 | 0 |
| | Night (standard weather) | 29 | 36 | 65 | 65 | 0 |
| | Night (noise-enhancing weather) | 29 | 36 | 65 | 65 | 0 |
| L03 BAPS Temple | When in use (day/evening) (standard weather) | 36 | 30 | 66 | 66 | 0 |
| L04 Southeast Residential | Day (standard weather) | 39 | 35 | 74 | 74 | 0 |
| | Evening (standard weather) | 34 | 35 | 69 | 69 | 0 |
| | Night (standard weather) | 29 | 35 | 64 | 64 | 0 |
| | Night (noise-enhancing weather) | 29 | 35 | 64 | 64 | 0 |

| Location | Period | Noise Level LAeq(15minute) (dBA) | | | | |
|---|---|---|---|---|---|---|
| | | Noise Limit at Compliance Location | Correlation Between Intermediate and Compliance Location – MOD 6 | Reference Level at Intermediate Location – MOD 6 | Reference Level at Intermediate Location – WH9 DNVR | Change in Reference Level |
| L04 BAPS Temple | When in use (day/evening) (standard weather) | 36 | 28 | 64 | 64 | 0 |

*Source: SLR*

The above table shows that the reference levels at the intermediate locations for the MOD 6 development are consistent with the previous reference levels for the WH9 DNVR and ONMP. As such, no change is required to the reference noise levels or locations in relation to MOD 6.

#### 6.2.3.1. Mitigation Measures and Recommendations

Potential feasible and reasonable mitigation measures have been considered during the various design phases of the proposal, including several that were considered through the original Concept Approval and others that have been (or can be) conditioned as part of an approval. These measures include:

- Optimising site layout to minimise noise emissions from the site.
- Use broadband and/or ambient sensing alarms on trucks and forklifts where they are required to reverse during the night-time.
- Appropriate design of site layout to minimise the need for trucks to stop or brake outside of loading docks with line of sight to residential receivers.
- PA systems designed to reduce noise nuisance to receiver areas.
- No speed humps or uneven pavements.
- Building services and mechanical plant selection as not to exceed the sound power level limits.
- Building material selection so that any noise breakout from internal activities would result in negligible increase in overall noise emissions.
- Review of noise emissions from new tenants.
- Production of an operational noise management plan.
- Noise monitoring of the post construction operational period.

### 6.2.4. Construction Noise and Vibration Assessment

Construction noise and vibration assessment criteria and methodology for the AIE is detailed in the Estate Construction Noise and Vibration Management Plan (AIE CNVMP) (SLR Report *610.19127-CNVMP-R05-v3.0-20230419*, dated April 2023).

Construction noise from the proposed Warehouse 8A and 8B construction can be appropriately controlled to achieve the construction noise and vibration management levels detailed in the AIE CNVMP. The impacts during construction of the proposal are predicted to be consistent with major construction work near to sensitive receivers. The predicted noise levels are lower than those for the AIE estate construction earthworks (refer to AIE CNVMP). A Construction Noise and Vibration Management Plan (CNVMP) with specific feasible and reasonable mitigation and management measures would be prepared prior to commencement of construction.

With regard to cumulative construction noise impacts, the NIA notes that where multiple construction activities are being undertaken concurrently on different stages of the AIE or adjacent estates there is potential for cumulative construction noise impacts to occur. Typically, noise impacts would be dominated by the nearest construction to the receiver, or the noisier activity if quiet works are being undertaken at the closer site. Instances where the noisiest works from multiple sites/activities are roughly equivalent at any particular receiver would be unlikely and infrequent, and noise levels at the receiver would be unlikely to be significantly higher than the predicted noise levels from the individual activities. As such, the standard construction noise mitigation and management measures discussed in the AIE CNVMP would also be likely to be sufficient for cumulative construction noise impacts.

Construction noise levels are generally expected to comply with the management levels. Minor to moderate exceedances are, however, predicted at the nearest sensitive receivers during some of the noisier scenarios, particularly when noise intensive items of equipment, such as dozers, are in use. Mitigation measures have been identified in the AIE CNVMP to address the potential construction impacts.

### 6.2.5. Summary

An assessment of cumulative, operational noise impacts generated by the proposal, including worst-case scenario, sleep disturbance during the night-time period as well as the intermediate monitoring locations, found that the operational noise levels are predicted to comply with the relevant noise limits during all periods. Construction noise and vibration impacts will be and managed in accordance with the AIE CNVMP.

## 6.3. Air Quality

An Air Quality Impact Assessment (**AQIA**) has been prepared by SLR and is attached at **Appendix K**. This AQIA assesses the proposed changes from the original AQIA prepared in support of SSD-10448 and makes recommendations in light of the construction and operational phases of Warehouse 8.

### 6.3.1. Mod 6 / Warehouse 8 Construction Phase

The main air quality issue associated with construction works relate to emissions of fugitive dust. The potential for dust to be emitted during the construction works will be directly influenced by the nature of the activities being performed at any given time. No significant changes in construction activities are expected due to MOD 6 and thus, the dust emission magnitudes for each phase of the construction works remain the same as that presented in the AQIA prepared for SSD-10448. No changes are required to the previously identified mitigation strategies would be recommended as a result of MOD 6.

### 6.3.2. Warehouse 8 Operational Phase

The AQIA for the whole AIE concluded that the air quality impacts due to the traffic movements are considered negligible. The nearest sensitive receptors to the Warehouse 8 are located approximately 300m west from the closest boundary. The Warehouse 8A operations are proposed to include workshops which accommodate vehicles. Accordingly, the proposal may result in potential air quality impacts generated by the following elements as set out in **Table 27** below.

Table 27 Potential Air Quality Impacts and Mitigation Measures

| Potential Emission Source | Potential Action | Mitigation Measures |
|---|---|---|
| **Transport** | The cars in the workshops will be powered by fuel or EV, will be driven to the workshop under their own power. Emissions due to fuel combustion are likely to occur inside the building during the vehicle entry and exit through the building, and during any start up or operation of the engines while in the building. | Cars within the workshop will have exhaust gases which will be extracted through a duct system attached to the exhaust pipe and then emissions are to be vented at the roof of Warehouse 8A through a vertical stack. Emissions due to fuel combustion are likely to occur inside the building during the vehicle entry and exit through the building, and during any start up or operation of the engines while in |

| Potential Emission Source | Potential Action | Mitigation Measures |
|---|---|---|
| | | the building.<br><br>To further reduce the impact significance, additional mitigation can be put in place to reduce or remove these impacts:<br><br>▪ NSW EPA's Air Quality Toolkit [AQT] (EPA 2021) – Module 3 Part1 of the AQT discusses and set out the key principles for air pollution control techniques for non-scheduled activities.<br><br>▪ Discharges of pollutants to the air from the building will be captured by a Building Code of Australia (BCA) and Australian Standard (AS1668.2-2012) "The use of ventilation and air conditioning in building, Part 2: Ventilation design for indoor air contaminant control" compliant extractions system and directed to rooftop vents. |

Given the scale of on-site vehicle parking in the workshop is 23 cars, it is considered that the emissions generated due to the combustion of fuel in light vehicles generated by the Warehouse 8A are small. Vehicles will not be left to 'idle', and all emissions will be ducted to the extraction system and vented from a vertical stack on the roof. With regard to the duct system, it is recommended that:

- the stack is in a location which is 'central' to reduce the length of required duct work.
- the location of the stack must allow for acceptable dispersion. For example, it should be unobstructed eg away from walls or other structures.
- for better plume control and dispersion, it is further recommended that the car exhausts from the workshops are vented out of the building through a single stack.
- Be situated a minimum separation distance of 6 m (where the airflow rate is ≥ 1,000 L/s) from any outdoor) air intake opening, natural ventilation device or opening, and boundary to an adjacent allotment, except that where the dimensions of the allotment make this impossible, then the greatest possible distance shall apply.

Considering the number of cars to be accommodated at the workshop and the duct system, the Warehouse 8A operation will result in negligible impact. The emissions do not require an environmental protection license.

Additionally, air emissions generated across both Warehouse 8A and 8B would include the products of fuel combustion and particulate matter (from brake and tyre wear as well as re-entrainment of road dust) associated with the trucks and other vehicles entering and leaving the AIE Site. There are no significant changes in the location or distance travelled that would be expected to change the risk of air emissions from the operational phase. Any typical vehicular movement emissions will be managed through standard management measures including:

- Staff awareness and training.
- Maintenance of vegetated buffers.
- General compliance with Australian Standards, Building Code of Australia (BCA).

- Preparation of an Environmental Management Plan which will manage operating procedures, internal checking protocols, staff training requirements and awareness of air quality control measures and other environmental initiatives and commitments.

### 6.3.3. Summary

Consistent with the concept approval (SSD-10448), the proposed Warehouse 8 construction will be subject to standard air quality management strategies.

The operational emissions during normal operations will be consistent with other standard warehouse operations. The ancillary vehicular and workshop activities have neutral significance of the residual risk of air quality impacts and thus, additional mitigation measures are recommended to conservatively protect the surrounding sensitive receptors from any increase in magnitude in air quality impacts. These are detailed in **Table 27.** Subject to these measures, the proposal is supportable with consideration air quality.

## 6.4. Environmentally Sustainable Development

An Ecologically Sustainable Development Report (**ESD Report**) has been prepared by Stantec Australia to support the proposal (**Appendix L**). The report provides an overview of the ESD principles and greenhouse gas and energy efficiency measures that will be implemented as part of the development consistent with:

- Secretary's Environmental Assessment Requirements (SEARs).
- The NSW Environmental Planning and Assessment Act 1979;
- The NSW Environmental Planning and Assessment Regulation 2021;
- State Environmental Planning Policy (Industry and Employment) 2021;
- State Environmental Planning Policy (Sustainable Buildings) 2022;
- Penrith Development Control Plan (DCP) 2014; and
- Mamre Road Precinct Development Control Plan (DCP) 2021.

### 6.4.1. ESD Opportunities

Through the implementation of a range of ESD initiatives, the proposal will mitigate against any negative environmental, social and economic impacts associated with the development. Fundamental to the success of improving the ESD outcome for the project has been the adoption of strong design philosophy. This includes passive design features which have the ability to:

- Lower operational energy demand via improved thermal performance.
- Promote greater indoor environmental quality.
- Reduce the requirements for artificial lighting & power.
- Reduce the buildings' reliance on HVAC systems.
- Improve building occupant comfort.
- Improve the project's capacity to deliver a responsible development.

### 6.4.2. Greenhouse Gas and Energy Efficiency

Methods to achieve the greenhouse gas & energy efficiency goals of the projects will go above and beyond the regulatory requirements and industry benchmarks. The below is proposed to be implemented:

- Buildings to be net positive for carbon emissions.
- On-site Renewable Energy Production – 720 kW Solar System at Warehouse 8a, Min. 100kW Solar System at Warehouse 8b.
- Electric car and truck charging dedicated bays.

- Energy Efficient lighting systems (internal and external).
- Control of lighting systems.
- Façade Thermal Performance / Building Thermal Mass comply with NCC 2019 Section J requirements.
- Maximise natural lighting (including through the application of translucent roof materials where possible).
- Solar Gain Reduction / Shadings.
- Efficient HVAC System Equipment within Office spaces.
- Embodied Energy reduction associated to construction material selection.

### 6.4.3. Water Efficiency

A variety of water efficiency measures can be applied to the proposed development. These best practice water efficiency measures to reduce water consumption include:

- Water efficient fixtures and fittings (WELS rating).
- Water efficient appliances (WELS rating).
- Rainwater harvesting and reuse. A rainwater tank will be implemented as required. Further feasibility will be completed regarding the ideal tank sizing, capture area and end-use for any non-potable water collected.
- Water use metering and monitoring.
- Selection of native & low water plants / trees.

The above initiatives are sufficient to allow the project to meet best practice consumption benchmarks considering the HVAC mechanical design will most likely apply waterless heat rejection systems due to the size and volume of the commercial office spaces within the development.

### 6.4.4. Mitigation Measures

Warehouse 8 will incorporate a number of ESD initiatives to reduce the greenhouse gas emissions, potable water consumption and material resources across the broader estate. The ESD initiatives outlined in the ESD report are intended to be used as a design guide for the development. Once the new development is completed, operational guidelines, best practice procedures and appropriate monitoring and control measures will be defined by the building occupant to ensure environmental impacts associated with operational processes are minimised wherever possible.

The project's as-built environmental performance will be equivalent to a 5 Star Green Star project, ensuring that the development will accommodate the best practice measures consistent with the Concept Approval SSD-10448 and will continue to provide a positive ESD built form and operation.

## 6.5. Waste Management

A Waste Management Plan (**WMP**) has been prepared by MRA consulting group (**Appendix Q**). This WMP considers better practice, necessary equipment, and integration with other guidance documents including *The NSW Waste and Sustainable Materials Strategy 2041*, *National Waste Policy: Less Waste, More Resources* (DEE, 2018) and the MRP DCP. The key policy aims that are considered are:

- Avoidance (to prevent the generation of waste);
- Reduce the amount of waste (including hazardous waste) for disposal;
- Manage waste as a resource; and
- Ensure that waste treatment, disposal, recovery and re-use are undertaken in a safe, scientific and environmentally sound manner.

## 6.5.1. Demolition Works

The quantum of waste generated as part of the demolition works will be commensurate with that considered for the site wide demolition works approved under the Stage 1 consent to SSD-10448. No changes to demolition and site preparation works are proposed as part of the development of the proposed building and therefore, no changes to demolition or related wastes are expected to be generated.

## 6.5.2. Warehouse 8 Construction Waste

All construction waste materials from the Warehouse 8 construction will be appropriately reused, recycled or disposed of where necessary, which includes returning materials to manufacturer, recycling at construction and demolition processors, or disposal of waste to a landfill. The anticipated quantities of the construction waste are set out within the WMP.

Appropriate contractors will be appointed for waste collection, off-site recycling and disposal at licenced landfill sites. Waste management during the demolition and construction phases of development will include the use of a logbook which will record key waste management entries including the:

- Time and date.
- Description of waste and quantity.
- Waste/processing facility that will receive the waste; and
- Vehicle registration and company name.

## 6.5.3. Warehouse 8 Operational Waste

**Warehouse 8A**

Ongoing waste management for Warehouse 8 will be undertaken to support the daily operation of the proposed warehouse use as well as the wholesale showrooms. The predicted waste generation for the Warehouse 8A VGA operations were informed by the existing operations of the Chullora VGA site. The anticipated waste generated includes speciality waste streams that result from the activity, such as timber, dry waste and secure documents. The extrapolated waste generation are identified in **Table 28** below.

Table 28 Warehouse 8A – Operational Waste

| Waste Stream | Warehouse 8A – Average Weekly Generation (L) |
|---|---|
| General waste | 929 |
| Paper/Cardboard Recycling | 3,174 |
| Comingled Recycling | 135 |
| Secure Documents | 36 |
| Timber | 3,180 |
| Dry Waste | 172 |
| Security Waste | 926 |

*Source: MRA Consulting*

**Warehouse 8B**

Ongoing waste management for Warehouse 8B is based off an anticipated warehouse and distribution operation within Warehouse 8B. The estimated waste generation for a 7-day week operation is set out in **Table 29** below.

Table 29 Warehouse 8B - Operational Waste

| Use | Weekly Waste Generation (L) | Weekly Recycling generation (L) |
|---|---|---|
| Warehouse | 3,710 | 3,710 |
| Office | 245 | 245 |
| Total | 20,748 | 20,748 |

*Source: MRA Consulting*

The WMP identifies the waste storage and collection from warehouse 8A and 8B as follows:

Table 30 Waste Storage and collection

| Area | Waste Stream | Bin Type / Collection Frequency |
|---|---|---|
| Warehouse 8A | General waste | 1 x 1100L / collected once per week |
| | Paper/Cardboard Recycling | 1 x 4.5m3 / once per week |
| | Comingled Recycling | 1 x 360L / once per fortnight |
| | Secure Documents | 1 x 240L / once per month or as required |
| | Timber | 1 x 4.5m3 / once per week |
| | Dry waste | 1 x 4m3 / twice yearly |
| | Security waste | 1 x 1,100L / collected once per week |
| | Waste Oil | 2 x 900L tanks / frequency TBC with contractor |
| Warehouse 8B | General Waste | 1 x 4.5m3 / collected once per week |
| | Commingled Recycling | 1 x 4.5m3 / collected fortnightly |
| | Paper and Cardboard | 1 x 4.5m3 / collected fortnightly |

*Source: MRA Consulting*

The proposed waste storage areas will be sized and located to accommodate the necessary waste storage bins and other associated waste management equipment. The warehouse will facilitate rear-lift and front-lift style bins for the management of general waste and recycling onsite, with more frequent collections to mitigate any food waste odour.

A range of bins will be utilised on site for the management of different waste streams. It is expected that the warehouse will use various mobile bins and bulk bins that will be identified in accordance with relevant Australian Standards and will be serviced by the contracted waste service provider in accordance with agreed collection schedules.  Bulky goods can be stored at the spaces near the bin storage areas.

A fully loaded and compacted unit would have a capacity of greater than the expected weekly waste and recycling generation. Large volumes of recycling waste are expected to be generated as a result of onsite warehouse activity. Equipment to reduce volumes of cardboard and plastic waste will allow the number of bins required onsite to be reduced.

A paper and cardboard baler may be appropriate for use in each of the industrial units as this material is typically bulky and easily separated from other recycling streams. Paper and cardboard is also valuable as a separated commodity and may be able to be collected for free or sold for a profit, rather than incurring a fee for collection.

The Warehouse 8A is expected to generate some food waste which will be managed through alternative measures such as separate food organics collection. Any potentially hazardous materials according to the Dangerous Goods Code, including fuels and chemicals, are not expected to be realised as significant waste streams and will be managed by specialist contractors as necessary. Waste Oil and battery dousing water will be removed from the site on a regular basis, as required, by a suitably qualified waste contractor.

**Prevention of Pollution and Litter**

To minimize dispersion of litter and prevent pollution, the waste management plan identifies the following management measures:

- Maintenance of open and common site areas;
- Ensuring waste storage areas are well maintained and kept clean, including:
  - Prevention of overflow,
  - Keeping lids closed, and
  - Checking for bung leaks and damage bins.
- Securing the waste storage area from vandalism and the escape of litter;
- Identification and appropriate disposal of goods with hazardous material content (paints, fluorescent tubes, smoke detectors);
- Acting to prevent dumping and unauthorised use of waste areas; and
- Requiring contractors to clean up any spillage that may occur during waste servicing or other work.

In light of the above measures, it is considered that waste management within the Warehouse 8 development can be suitably managed in accordance with the relevant policies and guidance.

# 6.6. Aboriginal and Non-Aboriginal Heritage Assessment

A heritage letter has been prepared by Artefact Heritage Services (**Appendix X**) which details the historic assessments conducted in preparation of the original SSD and subsequently, a heritage analysis of the proposed MOD and SSD in consideration of the heritage context.

As part of the Concept Proposal application (SSD-10448) Artefact Heritage Services prepared a combined Aboriginal and non-Aboriginal Heritage Assessment. The non-Aboriginal Heritage Statement identified no heritage constraints for the proposal with one heritage item located outside the study area and nil to low potential for archaeological, non-aboriginal heritage at the AIE site. The Aboriginal Heritage Assessment identified one Aboriginal site (MAM AS 1901) in the eastern portion of the AIE site and an area of Potential Archaeological Deposit (PAD). Additionally, one Aboriginal site, Bakers Lane SLR AFT1 (AHIMS ID 45-5-5274), was identified as being adjacent to the study area.

## 6.6.1. Aboriginal Heritage

Through the approved Concept Plan and Stage 1 Development it was identified that there would be a direct/ total/ total loss of value for the MAM AS 1901 as a result of the bulk earthworks approved and a no loss of values for the Bakers Lane SLR PAD1 as excavation works will be undertaken at a distance from the PAD.

The proposal will not result in any further archaeological impacts to those approved under the site preparation works and excavation works (SSD-10448). As such, the proposal will not result in any adverse Aboriginal heritage impacts.

Further to this an Aboriginal Cultural Heritage Assessment Report (ACHAR) was prepared in consultation with registered Aboriginal parties. The ACHAR noted that the proposal would not impact the identified site, and it recommended that mitigation measures should be implemented for conservation purposes including:

- Undertaking a salvage excavation program.
- Reburying encountered artefacts retrieved from test excavation and salvage excavation.
- Providing registered Aboriginal parties opportunities to collect encountered artefacts.

The established recommendations of the ACHAR for the concept approval will continue to be relevant for the proposal.

The proposed MOD 6/Warehouse 8 study area is outside of the Aboriginal site MAM AS 1901. No additional impacts to the Aboriginal site would occur as a result of MOD 6/Warehouse 8 works. The impact to Aboriginal heritage as a result of the proposed MOD 6/Warehouse 8 works would be in accordance with findings of the revised ACHAR. As such, an updated ACHAR would not be required for the MOD 6/Warehouse 8 Planning Approval submissions.

### 6.6.2. Non-Aboriginal Heritage

There is one local heritage item located 290 m southwest of the heritage study area, Bayly Park – House (LEP item no. 104). The house was initially constructed from the 1810s and has historic associations with settler families and colonial era rural enterprise. There is also nil-low potential for local archaeological heritage items at the heritage study area.

As there were no non-Aboriginal heritage impacts assessed for the SSD-10448 SoHI, and MOD 6 is within the same footprint, there are no additional impacts to non-Aboriginal heritage identified. No additional management would be required.

The impact to non-Aboriginal heritage from the proposed MOD 6/Warehouse 8 works would be in accordance with findings of the original EIS assessment. As such, an updated SoHI and archaeological assessment would not be required for the MOD 6/Warehouse 8 submissions.

The heritage recommendations from the SoHI prepared for the original EIS would apply for the MOD 6/Warehouse 8 proposal.

### 6.6.3. Summary

The Warehouse 8 development aligns with the MOD 6 works and will also result in no changes in the degree of impact to either Aboriginal heritage or non-Aboriginal heritage across the study area. As such, an updated ACHAR or SoHI is not required for the proposed development and the proposal will not result in any adverse heritage impacts.

## 6.7. Visual Impact Assessment

A Landscape Character and Visual Impact Assessment (**LCVIA**) was prepared by Clouston Associates for the approved Concept Proposal under SSD-10448. This assessed the potential, visual impacts of the AIE development on surrounding receivers and included impacts from the warehouse built forms, civil works (including retaining walls) and landscaping works.

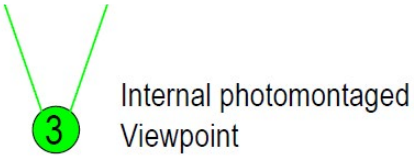
The report noted that the area is transforming from rural land uses to employment and industrial uses, with substantial alterations occurring to the visual environment surrounding the site. Several SSD applications are being progressed around the site for industrial uses which have the potential to alter the landscape and give rise to visual impacts on surrounding receivers. Further, in approving the SSD, DPE noted that the site is surrounded on all sides by active and proposed industrial uses, and in the long-term visual impacts on adjoining receivers would no longer be an issue when these adjoining sites are redeveloped into industrial uses.

An updated Visual Impact Assessment has been prepared by Clouston Associates in support of this proposal and is attached at **Appendix H1**. This considers the assessment undertaken with the SSD-10448

and includes 3 additional viewpoints from Mamre Road (5b, 5c and 5d) and three additional, internal views were also developed from the viewpoint of Access roads 1, 4, and their intersection in response to the SEARs requirements. The additional views 5b, 5c and 5d better demonstrate the visual impacts of the proposed Warehouses 8A and 8B from public vantage points. The additional viewpoints are demonstrated in **Figure 18** below.

Figure 18 Location of LCVIA Viewpoints


Picture 3 Additional Viewpoints 5b, 5c and 5d


Picture 4 Additional Internal Viewpoints

*Source: Clouston Associates*

The LCVIA concludes that the view impacts of the MOD and SSD proposal will not result in any adverse visual impacts and that the extent of the visual effects generated is acceptable in the immediate and wider visual context as modelled.

## 6.7.1. MOD 6

Similar to the original SSD proposal, an assessment of the visual catchment found that:

- The local and wider visual context is characterised by rural-pastoral landscapes, intermittent residential dwellings and a number of industrial warehouse developments to the north and north-east.
- Public domain views are predominantly restricted to close views from Mamre Road due to surrounding topography, particularly the ridgeline to the east of the site obstructing views.
- Potential views from residential dwellings are largely restricted to the immediate surrounding area, specifically a small number of dwellings adjacent the site along Mamre Road and along the ridgeline to the east of the site, accessed from Aldington Road.
- The proposal will not result in any changes to the visual impact assessments and ratings across Viewpoints 1, 2, 3, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17.
- The approved AIE development at Viewpoint 4 features partial views of the warehouse developments at Lot 9 and Lot 10. The proposal seeks to deliver a 13.7m warehouse building at Lot 9. This represents a 0.3m reduction from the previous assessment conducted at viewpoint 4. As such, the proposal will result in a minor reduction to the visual scale of change and will continue to result in a high/moderate visual impact.
- At Viewpoint 5, the proposed development will deliver a warehouse building that is 0.57m higher than the previously assessed plans (MOD 3) with an RL of 52.57 (+-1000mm). The massing is slightly narrower on the western elevation, when viewing from Mamre Road. This is due to the warehouse being set back further from Access Road 1, with the setback now accommodating additional car parks. Up to 3 layers of Landscape Feature Walls are provided at the estate entrance, along Mamre Road and Access Road 1. Associated modifications to the landscape have slightly softened the massing.

  WH8 will also include exhaust vents above the workshop area along the North Western area of the WH8 Roof (above the workshops only), their exact quantity and measurements will be determined through detailed calculations in a future phase of the project. it is anticipated to be minimally visible from the current viewpoint over the longer term due to the natural screening provided by the new trees within the surrounding landscape as well as the minor massing of the exhaust vents compared to the Warehouse massing and pad height. Considering the distance of observation, these exhausts are anticipated to have a discreet presence.

  As such, the proposal is considered to result in a high/moderate visual impact rating, consistent with the approved AIE development.
- Additional Viewpoints 5b, 5c and 5d have been prepared as part of the updated LCVIA which provides additional 3D renders and visual impact analysis for the proposed Warehouses 8A and 8B development.
  - **Viewpoint 5b**: **High/Moderate Visual Impact Rating**

    The proposed 13.7-metre-high warehouse of Lot 8 will be partially visible on top of the flat pad. Office 8A with a parapet height of 4.4m and architectural screen structure between 7-8m is more prominent in this view. This will increase the level of built form in the view and diminish views of open sky.

    In the foreground the 20-metre setback and frontage planting will be visible. As the planting matures this will help filter views of the warehouse, particularly the trees.

    MOD 6 FFL has an RL of 52.57 (+-1000mm) and up to 3 layers of Landscape Feature Walls at the estate entrance, along Mamre Road and Access Road 1. Associated modifications to the landscape have slightly softened the massing.

Figure 19 Viewpoint 5b Photomontage

Picture 5 Existing Viewpoint 5b

*Source: Clouston associates*


Picture 6 Proposed Viewpoint 5b

*Source: Clouston associates*

– **Viewpoint 5c and 5d: High/Moderate Visual Impact Rating**

The proposed 13.7-metre-high warehouse of Lot 8 will be visible on top of the flat pad. Office 8A with a parapet height of 4.4m and architectural screen structure between 7-8m is present in this view. Together they will significantly increase the level of built form in the view and slightly diminish views of open sky.

In the foreground Mamre Road's intersection with Access Road 1 is visible. Lot 8's landscaped internal and external setback is just beyond. Up to 3 layers of Landscape Feature Walls at the estate entrances proposed, along Mamre Road and Access Road 1. As the planting matures this will help filter views of the warehouse and retaining walls, particularly the trees.

Figure 20 Viewpoint 5c and 5d Photomontage


Picture 7 Existing Viewpoint 5c

*Source: Clouston associates*


Picture 8 Proposed Viewpoint 5c

*Source: Clouston associates*

Figure 21 Viewpoint 5d Photomontage

Picture 9 Existing Viewpoint 5d

*Source:* *Clouston associates*


Picture 10 Proposed Viewpoint 5d

*Source: Clouston associates*

In light of the above, the visual impacts of the proposed built form on Lot 8 are acceptable and can be supported on visual impact grounds.

### 6.7.2. Warehouse 8 Development

The proposed built form of Warehouse 8 construction will be accommodated within the building envelopes set by the MOD 6 proposal above.

As such, the new warehouse proposal will not result in any adverse visual impacts from the surrounding properties and viewpoints and the proposed development is not considered to be incompatible with the height, scale, siting and character of the immediate rural context.

## 6.8. Bushfire

A Bushfire Hazard Assessment has been prepared by Blackash Bushfire Consulting (**Appendix Y**), which considers the proposed development in accordance with *Planning for Bushfire Protection 2019* (**PBP 2019**). The site and its surrounds are presently characterised by agricultural and rural uses such as grazing, market gardens and horticulture and is zoned for warehouse uses with several SSDA's currently with the NSW Department of Planning and Environment for similar styled developments to that proposed.

The AIE site is identified as being bushfire prone with category 2 vegetation, therefore consideration is required for the implementation of bushfire protection measures such as Asset Protection Zones (APZ). This was considered as part of the Concept Approval SSD-10448 with APZ recommended to be implemented as per **Figure 22**. The layout proposed through MOD 6 provides APZ consistent with the original bushfire report and advice by the NSW RFS.

Figure 22 Asset Protections Zones


*Source: Blackash*

The modified lots to the south of Access Road 1, including Warehouse 8, are not identified within the bushfire prone part of the wider estate as there are no bushfire hazards adjoining the relevant lots. The proposal is identified industrial development and considered as “other” development in *Planning for Bushfire Protection 2019* and as such the proposal complies with the aims and objectives of that document.

## 6.8.1. Mitigation Measures

The original approval was supported with recommendations for an asset protection zone, conditions for fire hydrants be provided and buildings within identified zoned be built in accordance with the Australian Standard. The proposed MOD 6 does not seek to modify these buildings or conditions and therefore the proposal remains consistent with the original assessment.

With consideration of the context of Warehouse 8, the identified measures are relevant and/or not required:

- Warehouse 8 is not required to be subject to any Asset Protection Zone requirements as it is substantially separated from any bushfire hazard (see **Figure 22**).
- The Bushfire Attack Level (BAL) is not relevant to Warehouse 8 and subsequently, the building is not required to be constructed in accordance with the Australian Standard requirements for BAL affected sites.
- Fire hydrants are to be provided for buildings in accordance with Australian Standards.

The fire hydrant requirement will remain in place for the broader AIE and as the proposed warehouse is not located within the mapped bushfire zone, no further consideration of bushfire impact is needed. Accordingly, the proposal will readily achieve compliance with the relevant fire safety requirements under the PBP 2019.

## 6.9. Crime Prevention Through Environmental Design

The proposal will maintain the appropriate degree of safety with consideration of the four key Crime Prevention Through Environmental Design (**CPTED**) principles. The principles are as follows:

- Surveillance,
- Access Control,
- Territorial Reinforcement, and
- Site and Activity Management.

**Car Parking**

Car parking is considered a priority area for this assessment as the Bureau of Crime Statistics and Research (BOCSAR) indicates the site is a hotspot for 'malicious damage to property'. The proposal addresses CPTED principles by providing clear sightlines within at-grade car parking areas.

**Entry and Exit Points**

The proposal addresses CPTED principles by providing boom gates at vehicular entry and exit points to control access to the site. Vehicular entry and exit points are also clearly visible and identifiable from the modified Access Roads.

**Site Layout**

The proposal addresses CPTED principles by maintaining approved fencing around the perimeter of the site to prevent unauthorised access. The parking areas for trucks and heavy vehicles will be clearly delineated from the standard car parking areas. The warehouse building has been designed with clear pedestrian entry points and pedestrian paths.

**Surveillance**

Further to the clear sightlines provided across the at-grade car parking area and surrounding hardstand areas, the modified development will maintain substantial glazing across the main office area. Accordingly, the multi-level office area will provide substantial passive surveillance to the surrounding, external areas. The site will also be supported with the appropriate CCTV installations.

**Lighting**

The site layout will be supported by lighting across the external warehouse areas and parking areas. All the proposed lighting will be designed with a minimum average lux level in the warehouse, office, awning and carpark. All street lighting will be designed in accordance with AS1158. Accordingly, the proposed lighting will both disincentivise opportunistic crime and improve passive surveillance.

# 6.10. BCA & Fire Engineering

## 6.10.1. BCA (Warehouse 8)

Blackett Maguire + Goldsmith have undertaken a review of the warehouse building design against the deemed-to-satisfy (DtS) provisions of the Building Code of Australia 2022 Volume 1 (BCA) (see BCA Report at **Appendix M**). The Warehouse 8 construction is comprised as Class 5 Office, Class 7b warehouse and Class 9b training room building, with a rise in storey of 3.

Arising from the review, the proposed development can readily achieve compliance with the relevant provisions of the BCA. It is identified that BCA Clause C2D3, C2D10, C2D14, C3D8, C3D9, C4D4, C3D13, C3D14, D3D25, Part D4 / F4D5, E1D15, E1D17, E2D21, F3P1 and Section J are matters that can be addressed in the detailed design process through non-fire safety performance solutions.

Where compliance matters are proposed to comply with the Performance Requirements (rather than the DtS Provision) the development of a Performance Solution Report will be required prior to the issue of the Construction Certificate.

**Table 31** details BCA matters that are required to be resolved for the new building works.

Table 31 Fire Safety Measures

| **Statutory Fire Safety Measure** | **Design/ Installation Standard** |
|---|---|
| Alarm Signalling Equipment | AS 1670.3 – 2018 |
| Automatic Fire Detection & Alarm System | BCA Spec. 20<br>AS 1670.1 – 2018 & AS/NZS 1668.1 – 2015 |
| Automatic Fire Suppression Systems | BCA Spec. 17<br>AS 2118.1 – 2017 |
| Building Occupant Warning System activated by the Sprinkler System | BCA Spec. 17, Clause 8 and/or<br>Clause 3.22 of AS 1670.1 – 2018 |
| Emergency Lighting | BCA Clause E4D4<br>AS 2293.1 – 2018 |
| Exit Signs | BCA Clauses E4D5, E4D6 & E4D8<br>AS 2293.1 – 2018 |
| Fire Doors (TBC) | BCA Clause C3D13, C3D14<br>AS 1905.1 – 2015<br>Manufacturer’s specification |
| Fire Hose Reels (Class 7b & 9b parts only) | BCA Clause E1D3<br>AS 2441 – 2005 |
| Fire Hydrant Systems | BCA Clause E1D3<br>AS 2419.1 – 2021 |
| Fire Seals (TBC) | BCA Clause C4D15 |

| Statutory Fire Safety Measure | Design/ Installation Standard |
|---|---|
| | AS 1530.4 – 2014 & AS 4072.1 – 2018<br>Manufacturer's specification |
| Lightweight Construction (TBC) | BCA Clause C2D9<br>AS 1530.4 – 2014<br>Manufacturer's specification |
| Paths of Travel | EP&A (DC&FS) Regulation 2021 Clause 109 |
| Perimeter Vehicular Access | BCA Clause C3D5 |
| Portable Fire Extinguishers | BCA Clause E1D14<br>AS 2444 – 2001 |
| Smoke Hazard Management Systems (including automatic shutdown of air-handling systems serving the Class 9b areas) | BCA Part E2<br>AS/NZS 1668.1 – 2015 |
| Warning & Operational Signs | BCA Clause D4D7 & E3D4<br>AS 1905.1 – 2015 |

## 6.10.2. Fire Engineering

CORE Engineering Group has prepared a new Fire Safety Strategy (**FSS**) for the Warehouse 8 development (**Appendix N1**). Additionally, CORE Engineering Group has prepared an updated estate Masterplan Fire Safety Strategy (FSS) (**Appendix N1**) which accommodates the modifications to the estate as sought under MOD 6.

### 6.10.2.1. Fire Safety Strategy (Warehouse 8)

The Warehouse 8 FSS provides a review of the elements of the proposal that do not comply with the DtS requirements of the BCA as well as the fire hazards across the proposed development. The FSS highlights specific design considerations for fire safety measures in support of the proposal. These measures will undergo analysis under a future Fire Engineering Report to ascertain whether the relevant Performance Requirements of the BCA are satisfied.

The list below is not exhaustive.

- **Fire hazards protective measures**.
  - A block plan shall be provided at all FDCIE for Warehouse 8 that nominates the location where charging facilities are installed.
  - Provision for External Truck Chargers
    - Parking bays with charging stations are to be either located under awnings or be open to the sky, thereby permitting the free venting of smoke and heat.
    - If beneath awnings, parking bays with charging stations can be protected by the operation of the awning sprinkler system. Consideration may have to be given to extending the ESFR sprinkler system under the awning to manage the presence of these charging stations.

- Parking bays with charging stations shall not located adjacent to fire services infrastructure, except for external hydrants that are provided with compliant hydrant coverage from fall-back hydrants.

– External Pedestrian Vehicle Chargers

- It is understood that parking bays (for pedestrian vehicles) with charging stations shall be located in positions that are open to the sky, thereby permitting the free venting of smoke and heat.
- Parking bays with charging stations shall not be located adjacent to the Dangerous Goods and battery storage enclosures.
- These charging stations shall be located no less than 6 m away from the main entry of the office(s).
- These charging stations shall be provided with compliant hydrant coverage from fall-back hydrants.

– Internal Workshop & Training Facility Chargers

- Internal workshop areas shall either be protected by the roof-level ESFR sprinkler system, or if enclosed with a ceiling, they shall protected by the ceiling-level sprinkler system.
- Consideration may have to be given to providing exhaust/ventilation from within rooms containing these charging stations to manage the build-up of hazardous gases.
- The building shall be provided with hydrant coverage via external and internal hydrants.

– Battery storage rooms and dangerous goods storage are proposed as part of the Warehouse 8 development. The design of the Dangerous Goods and battery storage enclosures are each to be provided with fire-rated bounding construction. Details of the appropriate fire safety management measures are provided within the SEPP 33 and Dangerous Goods reports prepared by Riskon (at **Appendix AA, BB and FF**). The findings of these reports are summarized in **Section 6.17** of this EIS.

- **Passive fire protection** – due to the presence of the internal mezzanine within Warehouse 8A, the building is BCA DtS provisions for Type B fire-resisting construction as a large-isolated building. This includes the construction standard for external columns, internal columns, external walls as well as ancillary elements signage. With regard to the internal columns, a Performance Solution is proposed to rationalise the columns supporting the mezzanine to a nil FRL, reliant on workshops with the structural engineer regarding structural collapse mechanisms in a fire event to ensure that failure of a supporting column does not initiate the progressive collapse of the mezzanine (i.e. localised failure only such that up to 1 egress stair is compromised). Further, storage height shall be restricted to being no greater than 5 m above or below the mezzanine.
- **Vehicular perimeter access** It should be noted that whilst the perimeter access path does not fully comply with FRNSW's guideline, the Fire Safety Strategy identifies Performance Solution shall holistically be presented to FRNSW for their review and endorsement. Around the whole of the building is to be constructed of an all-weather surface with the appropriate load-bearing capacity and sprinkler booster suction. Security fencing and boom gates should be readily openable by fire authorities.
- **Egress provisions**:

  – Warehouse Storage: Variations to the nearest exit travel distances can be addressed through a performance solution involving detailed computational smoke modelling and evacuation analysis, and potentially by considering the awning as a place of safe refuge. Given the minor compartment size of Warehouse 8B, smoke detection may be necessary to support extended travel distances within this space, subject to detailed CFD modelling.

  With regard to the Dangerous Goods and battery storage enclosures, DtS-compliant travel distances are to be provided and an additional door is to direct to outside from the northern perimeter of the building to afford the option of alternative exits in opposite directions. If any physical barriers are used to delineate areas of the warehouse, sufficient breaks in these barriers should be afforded such that travel paths around the mezzanine and across the width of the warehouse are not diminished.

  - Warehouse 8A Training Areas: the Performance Solution shall rely upon the provision of a smoke detection and alarm system within this area – subject to final confirmation of the layout and use of this space. Further, egress from training rooms should ensure that exits are provided adjacent to roller shutters, to afford occupants with sufficient opportunity to evacuate through these spaces without undue delay, and that occupants are provided with DtS-compliant travel distances to a point of choice (i.e. 20 m).
  - Offices: The main office serving Warehouse 8A is single-storey only, and the footprint of the 8B office is minimal, such that travel distances are expected to be DtS-compliant within both offices. A performance solution is to be used should the design be amended.
  - Door Hardware, Operation and Mechanisms: Dedicated fire-rated exit doors should serve each of the Dangerous Goods and battery storage enclosures, such that the roller shutters are not relied upon for egress and travel to a point of choice remains DtS-compliant (i.e. up to 20 m). To achieve this from the Dangerous Goods store, an additional door is required direct to outside from the northern perimeter of the building.

- Firefighting equipment including number and location of fire hydrants, fire hose connections, hydrant boosters, hose reels, sprinkler systems and fire control centre. Of note, considering the extent of travel distances throughout the building, careful consideration is to be made to ensure that all points on the floor shall be within 100 m of an external hydrant. With regard to the fire sprinkler systems, additional measures are to be established to support the proposed Dangerous Goods storage in accordance with AS2118.1:2017.
- Smoke hazard management including minimum requirements for an automatic smoke clearance system.
- A building occupant warning system.
- Emergency lighting; and
- Building management procedures.

The Fire Safety Strategy will inform the detailed design of the building and the fire safety measures required to meet the Performance Solutions of the BCA.

**Mitigation Measures**

- Ensure building works comply with DtS or Performance Solutions of the BCA, incorporating Fire Engineering solutions where required.

Subject to the measures recommended in the BCA Assessment and the Fire Safety Strategy, the proposed Warehouse 8 can be constructed in accordance with the relevant BCA standards and facilitate safe and effective operations for the intended tenant.

#### 6.10.2.2. Updated Estate Fire Safety Strategy (MOD 6)

The updated estate Master FSS updates the established estate FSS (under the approved SSD-10448 MOD 3) with the latest provisions under the Building Code of Australia 2022 and the requirements to support the proposed modification.

The estate Masterplan FSS updates the fire hazard and protective measures, BCA DtS non-compliance assessment as well as the proposed fire safety strategy to reflect the provisions under the current BCA while also integrating the new measures and design considerations identified to support the Warehouse 8 as detailed in the Warehouse 8 FSS (**Appendix N1**).

Consistent with the approved FSS, the updated strategy continues to provide an holistic summary of the measures anticipated to be necessary in developing the relevant Performance Solutions. This demonstrates that the modified AIE is capable of meeting the Performance Requirements of the BCA.

## 6.11. Stormwater Management

A Civil Infrastructure Report has been prepared by AT&L, attached at **Appendix P**. This identifies that the original Concept Approval and Stage 1 development established initiatives to meet the relevant stormwater management objectives, including flood detention, flow frequency characteristics and stormwater quality to reflect the scope of work proposed across the AIE at that time. This was approved in the original SSDA on

24 May 2022 and the WSMP was most recently amended as part of the MOD 3 application, approved on 2 March 2023.

### 6.11.1. AIE Waterway Health Strategy Overview

As detailed in **Section 1.3.2** of this EIS, **SSD-10448 MOD4** seeks to incorporate the Mirvac owned EEP site and the AIE Site within a combined stormwater management approach across both sites. This will provide a concept approach to stormwater management across AIE as well as identifying the specific measures to be incorporated on each future development lot to achieve the waterway health requirements of Mamre Road DCP.

The intended amendments to the established stormwater management strategy (approved as part of SSD-10448 MOD 3) has been informed by feedback and commentary received from DPE, EHG and Sydney Water. The MOD4 application is currently being assessed by NSW DPE.

The waterway health measures required to be delivered in accordance with MOD 4 to achieve waterway health compliance include the following:

- Stage 1 / Phase 1 relies on utilisation of the approved Estate OSD basin (between Lot 1 and Mamre Road), the natural infiltration of water within 132Ha of EEP estate and on-lot rainwater tanks and GPTs to support issuance of Occupation certificate for Warehouse 1.
- In addition to the Stage 1 / Phase 1 works supporting Warehouse 1, Stage 1 / Phase 2 proposes the undertaking of the following works in support of development at Warehouse 3:
    - Retention pond to be incorporated into the approved estate detention basin between Mamre Road and Lot 1 for stormwater.
    - Transfer of retained stormwater from the approved estate basin for irrigation of the approved realigned trunk drainage channel along the Estate's northern boundary.
    - Incorporation of a conventional bio-retention system within the Estate basin between Lot 1 and Mamre Road. It is noted that this bio0retention system is already approved for this basin as part of the SSD-46516461 consent.
    - Delivery of on-lot rainwater tanks and GPTs already approved under the Stage 1 consent pertaining to Warehouse 3.
- From Stage 3 onwards, on-lot rainwater tanks (to meet at least 80% of non-potable demand) and GPTs are to be provided for each development lot (Lots 2, 6, 7, 8 & 9) as part of subsequent stage DAs, in accordance with the Concept Water and Stormwater Management plan the subject of SSD-10448 MOD 4.
- The on-lot requirements for Warehouse 8 include
    - 2.399ha of roof area draining to tank
    - 2.109ha of roof area bypassing tank
    - 9.099ha of paved area
    - 0.964ha of pervious area
    - 2 x GPTs designed to capture litter, debris, coarse sediment, as well as some oils and greases.
    - 3 x rainwater tanks (approx 220kL volume) to meet the DCP requirement of supplying 80% of non-potable water demand by by rainwater re-use

The waterway health approach for Lot 8 relies on the approval of the MOD 4 Waterway health approach. The on-lot measures for Warehouse 8 (GPTs and rainwater tank provisioning) is consistent with what is identified as required for Warehouse 8 as part of the MOD 4 application currently being assessed by DPE.

## 6.11.2. MUSIC Modelling

Catchment plans and tables were prepared by AT&L accompanying the WSMP for SSD-10448 MOD4 which identify the catchments and land types (roof, parking, road and ground level) which drain to each stormwater management measure across the AIE during Stage 1 / Phase 1 (Warehouse 1), Stage 1, Phase 2 (Warehouse 1 &3), Stage 2 (Warehouse 1,3 & 9), Stage 3 (Warehouse 1, 3, 9 &2), Stage 4 (Warehouse 1, 3, 9, 2 &8) and Stage 5 (Warehouse 1, 3, 9, 2, 8 and 6&7). This includes consideration of all AIE estate roads and the 132ha of land within EEP. Updated MUSIC modelling files are provided within SSD-10448 MOD 4 which detail the anticipated results.

Further to discussions with DPE, EHG and Sydney Water, the following water management measures and their respective input into the MUSIC modelling has been appropriately updated as follows:

- Updated rainwater tank volumes to meet the 80% non-potable water demand for lots 1, 2, 3, 6, 7, 8 and 9 in accordance with revised site area calculations and the respective non-potable water demands. This has been informed by the catchment plans prepared by AT&L.
- Use of the current stormwater detention pond in the north eastern corner of the estate as an interim retention pond for stormwater harvesting and reuse is to be established across Stage 1 / Phase 2 onward to Stage 5 of the strategy for storage and transfer of stormwater for irrigation of the realigned trunk drainage channel adjacent to the northern boundary of the AIE Site.
- The modified usage of the retention pond does not include any changes to the size or configuration of the approved estate basin.

An assessment of the performance of stormwater quantity (peak flow rates) was undertaken for both the interim Phase 5 and the ultimate concept approval post-development scenario to ensure that post development peak flow rates do not exceed pre-development peak flow rates (for the AIE site). 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 1-year ARI and 100-year ARI events in both the interim Phase 4 and ultimate AIE concept Masterplan post-development scenario. Therefore, the stormwater drainage system and detention basins as proposed would satisfy the development controls relating to stormwater quantity management.

A flow duration curve was prepared by AT&L which demonstrates that the Stage 1, 2, 3, 4 and 5 development scenarios will satisfy the DCP stormwater flow targets for the AIE Site per DCP Option 1 (Mean Annual Runoff Volume (MARV) and flow duration). The results presented demonstrate the proposed stormwater management measures that will be implemented for the Staged development scenarios will satisfy the DCP stormwater flow targets for the AIE Site per DCP Option 1, with the exception of the 10-percentile flow. However, it is noted that the the calculated 10-percentile flow from the site represents a value too small to practically measure.

## 6.11.3. On Lot Management Measures

Stormwater quality and flow management measures have been incorporated into the estate-wide infrastructure works to be approved under SSD-10448 MOD 4. These measures have been designed to satisfy the stormwater quality and flow controls outlined in the Mamre Road Precinct DCP for the AIE Site, including Lot/Warehouse 8.

On-lot measures that will be constructed as part of the Lot/Warehouse 8 development will be limited to:

- Rainwater tanks with a total capacity of 250 kL to capture roof runoff for non-potable reuse at Lot 8 (limited to toilet flushing and landscape irrigation).
- Gross pollutant traps (GPTs) at the points of discharge from the internal stormwater drainage network to the stormwater reuse tank.

The proposed on-lot measures described above and presented on drawings DA.C2840 to DA.C2843 inclusive in **Appendix P** are consistent with the measures incorporated into the Water Management Strategy outlined in the MOD4 above.

## 6.11.4. Water Demands and Sources

Water demands that will be generated by the proposed development of Lot/Warehouse 8 will include:

- Internal potable water (e.g., employee amenities, kitchen and showers)
- Internal non-potable water (e.g., toilet and urinal flushing)
- External non-potable water (e.g., landscape irrigation)
- Fire management services (e.g., sprinklers, hydrants)

The AIE Site will be serviced by reticulated potable and recycled water. The provision of these services will form part of the infrastructure works approved under SSD-10448.

### 6.11.5. Summary

The Water and Stormwater Management Plan (AT&L, August 2023) for Warehouse 8 has been developed in a manner consistent with the concept stormwater approach for the AIE proposed as part of SSD-10448 MOD 4. This will ensure that, following approval of SSD-10448 MOD 4, the stormwater quality and flow targets adopted in the Mamre Road Precinct DCP will be satisfied for Phase 4 development condition as it relates to Warehouse 8.

The proposal for MOD6 and Warehouse 8 is therefore in accordance with above and meets the relevant stormwater management policies and the requirements of the SEARs.

## 6.12. Contamination

A Site Investigation letter was prepared by Arcadis (**Appendix CC**) which provides an assessment of the proposed development works with consideration of the identified level of contamination at the site. The level of contamination at the site was confirmed subject to the Phase 1 Preliminary Site Investigation and Phase 2 Detailed Site Investigations that were prepared for the approved concept approval. The Detailed Site Investigation identified the following contaminants across the site:

- Soils with some exceedances in contaminant levels.
- Dam Sediments.
- Surface water with observed pollution.
- Groundwater with moderate EC.
- ACM and fragments of PACM.

The approved Concept and Stage 1 works (SSD-10448) confirmed that a Remediation Action Plan (RAP) is to be prepared for asbestos removal. Additionally, the Detailed Site Investigation included recommendations for the removal of asbestos, development of the RAP, the unexpected finds protocol, preparation of a construction environmental management plan and on-site surface water management as well as additional investigation and sampling works to be undertaken.

Remediation Action Plan was prepared in May 2022 by Arcadis which details the remediation and validation works and procedures to be undertaken across the AIE site to ensure no impacted materials remain on-site to pose any risk to health or the environment. A copy of the RAP is provided at **Appendix V**.

The proposal will not change the validity of the approved contamination remediation and management works established under the approved Concept and Stage 1 development. As such, the proposed modifications as well as the Warehouse 8 construction and operations will be able to be supported subject to the established measures. No additional health risk or contamination, environment impacts will be generated by the proposed development.

## 6.13. Groundwater

A letter was prepared by Arcadis (**Appendix T**) which provides an assessment of the proposed development works with consideration of the groundwater condition and management measures established as part of the approved SSD-10448. The Groundwater Management Plan prepared by Arcadis in 2022 to form part of the Construction Environmental Management Plan for the approved SSD-10448, identifies the ongoing management required for groundwater dewatering at the site, any licensing requirements, the estimated volume of groundwater to be extracted and any other further investigation works required.

Subject to the previously undertaken investigations, Arcadis has identified that the proposed Warehouse 8 development has the potential to encounter groundwater as the final site level will be 52mAHD while the highest groundwater contour level is 51mAHD. This is consistent with the findings of the Groundwater Management Plan. The following management measures are recommended as part of the management plan:

- Pump groundwater from the excavated service trench.
- Monitor volume of extracted groundwater.
- Monitor groundwater quality of the extracted groundwater.
- Monitor groundwater in the existing groundwater wells around the site.

Ground water re-use options, subject to meeting the adopted groundwater quality guidelines are outlined below.

- Dust suppression.
- On-site irrigation.
- Wheel washing.
- Topping up neighbouring dams.
- Discharge to the on-site sediment basin.

If, however, the intersected groundwater does not meet the water quality criteria adopted it must be managed appropriately. Groundwater treatment or disposal options are outlined below.

- Treatment for turbidity.
- Treatment for pH.
- Treatment for saline groundwater; and
- Disposal.

As such, the established groundwater management measures and actions in the Arcadis Groundwater Management Plan 2022 will be able to ensure the proposal will not result in any adverse environmental impacts. The proposal will not result in any ongoing impacts to the local hydrogeological regime.

## 6.14. Soil and Salinity Management

A Geotechnical Assessment letter was prepared by PSM (**Appendix Z**) which provides an assessment of the proposal with consideration of the soil condition and the earthworks. Additionally, the Civil Report prepared by AT&L (**Appendix P**) establishes recommendations for environmental protection measures with consideration of the proposed earthworks.

The proposed development will not result in any adverse impacts with consideration of the following:

- **Soil Resources:** the proposed bulk earthworks have close to no impact to the soil resource at the site. The earthworks will comprise cut and fill balance on site with minor import.
- **Riparian Impact**: no works are proposed within the riparian area, hence the industrial development will have little to no impact to it.
- **Soil Erosion**: The appropriate erosion control, surface flow management will be established during the construction phase of development. The civil designer will appropriately design the stormwater system, surface gradients and landscaping requirements to control surface flows and minimise soil erosion and the effects of soil erosion. It is noted that the vast majority of the site will be sealed by the proposed development and appropriate surface runoff collection will be designed. An Erosion Sediment Control Plan that has been prepared by ErSed (**Appendix W**).
- **Salinity:** the Construction Salinity Management Plan prepared for AIE (Ref: PSM3739-031L) will be adopted. On this basis the proposed development will have close to no impact on soil salinity on site.

- **Infiltration/exfiltration of stormwater**: in the instance infiltration/exfiltration of stormwater is proposed, the development will have close to no impacts on the site salinity and sodicity as prior to the AIE development, the site was greenfield which allowed for subsurface infiltration as well as unsealed farm dams with infiltration. The proposed warehouse development will result in the bulk of the site being sealed with the appropriate surface water management. Any infiltration and exfiltration will be managed to meet the stormwater quality requirements.

## 6.15. Biodiversity

A BDAR Waiver letter has been prepared by Eco-Logical Australia (ELA) attached at **Appendix S**.

The original SSD-10448 Application was accompanied by a Biodiversity Development Assessment Report (BDAR) (version 7) prepared by ELA, which assessed impacts to the entirety of the development site.

The proposal is generally consistent with the overall footprint of the concept masterplan approved under SSD-10448 and no additional vegetation is proposed to be removed. The assessment concluded that the proposed development will not result in any impact on biodiversity values beyond those assessed as part of the existing BDAR for SSD-10488. Therefore, the assessment concludes that the proposal will not result in impacts to biodiversity values and no mitigation measures are required. As such, it is requested that a waiver is granted for both the MOD 6 and Warehouse 8 applications.

## 6.16. Warehouse 8 Built Form and Design

The proposal has been developed based on robust principles and an iterative design process, underpinned by carefully considered design principles related to bulk and scale, accessibility and permeability, landscaping and public domain, materials and finishes and integration with the surrounding land use character and context.

These principles and design responses have been developed by Mirvac's specialist industrial architects, who have also sought to design the building to accommodate the needs of the proposed end user, whilst also readily being integrated within the wider AIE and the Mamre Road Precinct.

The Industry and Employment SEPP requires that in determining a development application that relates to land to which this Policy Clause 2.30 applies, the consent authority must take into consideration whether or not:

*(a) the development is of a high-quality design, and*

The proposed building materials and design are of a high quality as demonstrated in the architectural package at **Appendix F**. The design will present a modern structure to the internal access roads, complemented by well-designed and located landscaped areas which provide cohesion throughout the estate.

*(b) a variety of materials and external finishes for the external facades are incorporated, and*

The proposal allows for a variety of materials and the warehouse has been designed to present as high quality and architecturally interesting forms. Materiality proposed includes concrete, metal screens, and cladding. Materials have been selected to reflect the industrial nature of the building, being concrete, steel and metal cladding in various shades of grey with decorative channels, perforated mesh providing more visual interest.

*(c) high quality landscaping is provided, and*

Landscaping is proposed within the development and presents a cohesive response complementing the rest of the AIE.

*(d) the scale and character of the development is compatible with other employment-generating development in the precinct concerned.*

The proposed building will be a maximum of 13.7m in height which is compatible with the scale of general warehousing across the broader site. Notwithstanding that this will be an earlier development within the Mamre Road Precinct, it is anticipated that the proposed building scale will not be detrimental or inconsistent with the future scale of development anticipated for this Precinct. As such, the design and built form proposed is entirely suitable for the development site at Lot 8 on AIE and for the wider precinct.

# 6.17. Dangerous Goods

## 6.17.1. Resilience and Hazards SEPP

Resilience and Hazards SEPP Reports have been prepared by Riskcon (**Appendix AA & BB**) which provides an assessment of the dangerous goods that may be stored on-site. The reports provide recommendations and identify design measures to ensure any dangerous goods are stored in accordance with the relevant Australian Standards and will not result in adverse impacts.

The proposed Warehouse 8A will house a warehouse and distribution premises by VGA and will involve the storage and handling of Dangerous Goods (DGs). The assessment identifies that the quantities of dangerous goods proposed to be stored at Warehouse 8A will not exceed the relevant SEPP 33 thresholds and thus, a Preliminary Hazard Analysis (PHA) is not required. This is demonstrated in **Table 32** below.

Table 32 Quantities Stored and SEPP 33 Threshold for Overall Storage

| Class | Description | Maximum Quantity (kg) | SEPP 33 Threshold (kg) | SEPP 33 Exceeded? |
|---|---|---|---|---|
| 2.1 | Flammable gases (i.e. aerosols) | 59 | 10,000 | N |
| 2.2 | Non-flammable, non-toxic gases | 1,647 | N/A | N |
| 3 (II & III) | Flammable liquids | 6,394 | 4 m to site boundary (see Figure 4-1) | N |
| 4.1 | Flammable solids | 11 | 5,000 | N |
| 8 (II & III) | Corrosive substances | 24,730 | 25,000 | N |
| 9 (II) | Miscellaneous substances | 1,550 | N/A | N |

*Source: Riskcon*

The proposed Warehouse 8B does not currently have an assigned tenant and will provide an option for expansion of the Warehouse 8A operator, potentially for storage of car parts. Accordingly, the report provides a speculative assessment against Chapter 3 of the Resilience and Hazards SEPP in accordance with the SEARs requirement for Warehouse 8B. 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.

For Warehouse 8A and Warehouse 8B (in the instance the proposed Warehouse 8B operations includes the storage of any dangerous goods) the following measures are recommended:

- 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 (Ref. [2]) 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 (Ref. [3]) shall be prepared to ensure that an ignition source does not enter a hazardous atmosphere as required by the WHS Regulations.

**EV Battery Storage Risk Assessment**

An EV Battery Storage Risk Assessment Report has been prepared by Riskcon (**Appendix FF**) which provides a qualitative risk assessment of the storage and handling of EV batteries with consideration of the potential for off-site risk. The proposed EV battery storage at the Warehouse 8A will comprise of 20 complete EV batteries (700 kg each) and 40 smaller modules. A first principles assessment has been conducted to satisfy the requirements of the WHS Regulation 2017 relating to dangerous good storage or operation risks.

The report identifies EVs as a Class 9 Dangerous Good with the following hazardous scenario:

- Fire Incident or Toxic Gas Emission
  - Lithium batteries (such as those used in electric vehicles and to be stored at the facility) pose significant fire risk primarily associated with the damage or degradation of EV batteries.
  - The hazard risks associated with lithium batteries can be caused by physical damage to batteries, overcharging or overly quick charging.

The proposed EV batteries will be appropriately stored to mitigate the risks of fire incidents or toxic gas emissions. All of the batteries are proposed to be stored within a 240/240/240 FRL battery storage room, adjacent to the site DG bunker. This room will be mechanically ventilated, overhead sprinkler protected and no workshop operations will be conducted here.

For workshop related activities, the Technical Services Centre will be utilised. This room will only be used with both roller shutter doors (**RSD**) open to provide crossflow ventilation and the area will also be sprinkler protected. In the event of a battery fault, malfunction or any detection of heat rise, the unit will be immediately transported the short distance outside the building to the water dousing quarantine area. The site will also utilise dedicated EV Bridgehill Car Fire Blankets which will be strategically located within clearly marked cabinets.

As such, the risk posed by the storage and handling of EV batteries at the facility is considered to be minimised So Far As Is Reasonably Practicable (**SFARP**) as required by the NSW WHS Regulation 2017.

## 6.18. Flooding

A Flood Impact Assessment was prepared by Stantec (**Appendix U**) which provides an assessment of flood impacts generated by the Aspect Industrial Estate as proposed to be modified by MOD 6 and with consideration of the proposed Warehouse 8 development.

The site is affected by 100-year overland flows. This was assessed through methods including a hydrological model, local TUFLOW model and an analysis of the South Creek flood extent. Storm burst events for the 2 yr ARI, 5 yr ARI, 100 yr ARI, 200 yr ARI, 500 yr ARI and PMF events were modelled. Flood levels and extent, depths, velocities and hazards under Masterplan Conditions are plotted for each of these events.

The modelling was conducted with the intended lot and warehouse layout as established in the Concept Plan for MOD 6, which reflects the Warehouse 8 development.

Under MOD6 Masterplan Conditions all external inflows up to the 500 yr ARI are conveyed through the project site without interacting with proposed warehouses. The project site is higher than the Kemps Ck / South Ck PMF levels and accordingly no development is proposed in mainstream floodways, flood storage or flood fringe areas. Flood function was not mapped for overland flowpaths through the project site.

The modelling identifies that subject to the proposed development, the flood velocity difference plots would result in negligible adverse impacts on flood velocities elsewhere downstream of Mamre Road in the 2 yr ARI, 5 yr ARI, 100 yr ARI, 200 yr ARI and 500 yr ARI events. In a PMF there are localised modest increases in the flood velocities downstream of Mamre Road north of the new intersection.

Overland flows that spilled from the southwest corner of the Estate under Benchmark Conditions have been eliminated in the 2 yr ARI, 5 yr ARI, 100 yr ARI, 200 yr ARI, 500 yr ARI events and reduced to a minor overflow only in the PMF event.

The approved flood management measures under the original SSD-10448 approval included the following:

- Capturing upstream runoff just inside the southern site boundary and conveying this via the proposed diversion line to convey upstream runoff to the head of the extended riparian corridor which conveys the combined upstream runoff from the southern and eastern drainage lines to the existing Mamre Road.

- Directing all runoff from within the Stage 1 development to a dual-purpose basin in order to mitigate the impacts on the rate of runoff in all events up to the 100 yr ARI event and to mitigate impacts on stormwater quality.

These mitigation measures will appropriately manage any potential flood impacts generated under MOD 6 as well as the Warehouse 8 development.

Additionally, it is noted that a Flood Emergency Response Plan (FERP) for the construction phase of the Aspect Industrial Estate development was prepared separately in 2022 which will support the proposal.

## 6.19. Social Impact

A Social Impact Assessment addendum has been prepared by Urbis and is attached at **Appendix O**. The addendum provides an update to the potential social impacts of the Warehouse 8 development with consideration of the original SIA lodged with the SSD-10448 application. With consideration of the noise, construction and traffic impacts of the proposed development, it is considered that:

- Operational noise: with consideration of the proposed acoustic mitigation measures, the proposal's operational noise limits are generally consistent with those in the Warehouse 2 NIA and are anticipated to comply with relevant operational noise limits during both day and night, and are not expected to exceed sleep disturbance levels.
- Construction impacts: As noted in the SIA addendum letter prepared for Warehouse 9 (January 2023), there may be some short-term construction impacts such as noise, dust, and increased traffic on sensitive receivers. Amenity impacts related to the construction of Warehouse 8 are likely to have a low social impact on nearby sensitive residential receivers due to the separation between them and the site.
- There may be some ongoing and cumulative construction impacts as the Estate is built out in a staged approach, and the site is one of the first projects to be undergoing construction within the Mamre Road Precinct. This may result in construction fatigue for nearby residential receivers and possibly future workers of the site. With the implementation of the SIA recommendations, this is likely to be managed, and have a low social impact.
- Operational traffic impacts: The proposal will operate at satisfactory levels. No additional mitigation measures are required as all were implemented during the Concept Masterplan stage. The residual impact is therefore assessed as low.

As such, the proposed development will generally remain consistent with the findings of the SIA. The proposed development will support the delivery of the warehouse and logistics floorspace in accordance with market demand and operational requirements. The proposal will continue to deliver these positive social impacts and will not result in additional, adverse social impacts.

## 6.20. Minimal Environmental Impact (MOD 6)

Section 4.55(1A) of the EP&A Act requires that an application to modify a consent under this part demonstrate that it results in minimal environmental impact. As detailed above, the proposal has been accompanied by various consultant reports each attached in the appendix of this report that consider the impacts of the proposed MOD 6.

It is concluded that from the above and accompanying technical reports, the proposed modification is considered to give rise to only a minimal environmental impact in accordance with 4.55 (1A) of the EP&A Act.

# 7. Justification of the Project

This section of the report provides a comprehensive evaluation of the project having regard to its economic, environmental and social impacts, including the principles of ecologically sustainable development.

It assesses the potential benefits and impacts of the proposed development, considering the interaction between the findings in the detailed assessments and the compliance of the proposal within the relevant controls and policies.

## 7.1. Project Design

The proposal has been designed to retain the key principles of the overall Aspect Industrial Estate layout approved in the Concept Proposal and Stage 1 Development consent.

These principles include:

- The proposed development will not affect the design and location of the intersection works with Mamre Road, or provision of the creek and riparian extent along the north of the AIE.
- Connectivity of the internal road network with neighbouring lots in accordance with the Mamre Road DCP Road Network plan.
- Contribution to the long-term future supply of industrial land.
- Logical lot layout arrangement and accessibility.
- Facilitation of staged development across the AIE over time in line with infrastructure delivery and market demand for industrial and urban services land.
- Delivery of a co-ordinated architectural design and form across the site that facilitates visual diversity while responding to the potential view impacts across from the surrounding area.
- Appropriate acoustic mitigation design elements, internal access roads, services infrastructure as well as stormwater and drainage elements. These ensure the modified development will continue to deliver an appropriate development outcome that does not adversity impact the area.
- The proposal generally retains a consistent GFA (less than 1% change) and parking rates to the approved estate.
- Deliver functional layouts for future warehouse buildings and respond to the operational needs of future tenants to suit the needs of the current market.

The updated MOD 6 estate layout and detailed Warehouse 8 design will deliver high quality landscaped lots with sustainable and attractive warehouse buildings which are functional and respond to the operational needs of future tenants.

The assessment of the proposal has determined that the appropriate mitigation measures (detailed in **Appendix E**) will align with the mitigation measures established under the AIE concept proposal (SSD-10448). These are required to be implemented before or during the construction or operational phases of the project in order to ameliorate environmental impacts.

## 7.2. Strategic Context

The proposal will allow Warehouse 8 and future warehouses and development lots within the Aspect Industrial Estate to be tailored to the operational needs of future tenants so to support the delivery of usable warehousing and industrial facilities in South-Western Sydney. The Warehouse 8 development has been designed to be tailored to the operational needs of the VGA operation.

The Mamre Road Precinct was rezoned specifically to facilitate land release for warehouse and industrial purposes and therefore the proposal is highly consistent with the strategic intent for this part of the WSEA, as identified in the *Western City District Plan*, the *Greater Sydney Region Plan: The Metropolis of Three Cities* and the *Penrith Local Strategic Planning Statement*.

The modified development will deliver this employment land use consistent with the strategic principles of the relevant policies as:

- The modified warehouse and logistics estate and Warehouse 8 construction will provide employment land uses in alignment with the relevant transport infrastructure and utilities.
- The modifications to the Estate layout and building form (including Warehouse 8) responds to market requirements and will realise the delivery of the employment land within 30-minutes of residential suburbs.
- The proposal will maintain the staged delivery of the development, responding to long-term projected population and development growth.

The proposal is consistent with the Mamre Road DCP with regard to waterway health and ecological principles, maintaining the riparian corridor land along the northern site boundary to support creek line revegetation of the Ropes Creek tributary.

The proposal will support the functionality of strategically important employment lands, continue to support the supply of e-commerce in the Sydney metropolitan region while appropriately delivering an appropriate environmental outcome within the region.

## 7.3. Statutory Context

The relevant State and local environmental planning instruments are listed in **Section 5** and assessed in **Appendix C**. The assessment concludes that the proposal complies with the required provisions within the relevant instruments as summarised below:

- The proposal has been assessed and designed in respect to the relevant objects of the EP&A Act as defined in Section 1.3 the Act and addressed **Appendix C**.
- This EIS has been prepared in accordance with the SEARs as required by Schedule 2 of the EP&A Regulations.
- Consideration is given to the relevant matters for consideration as required under the BC Act and the SSD is supported by a BDAR waiver accordingly.
- The proposal complies will all of the relevant provisions of SEPP (Industry and Employment) 2021 as detailed in **Appendix C**. The proposal is consistent with the objectives of IN1 General Industrial zone.
- The relevant State and local environmental planning instruments are outlined in Section 5 and assessed in detail within **Appendix C**. The assessment concludes that the proposal complies with the relevant provisions within the relevant instruments as summarised below:
  - The proposal complies with all of the relevant provisions under the Industry and Employment SEPP 2021 as detailed in **Appendix C**.
  - The development will not result in any impacts to the relevant species and maintains compliance with the EPBC Act.
  - Concurrence from TfNSW will be required as per the Transport and Infrastructure SEPP.
  - The proposal has been prepared to maintain general compliance with the Mamre Road Development Control Plan 2021 provisions.
  - The proposal will not change the extent of impact assessed under the originally approved BDAR. No additional offsets are required from that approved under SSD-10448 in accordance with the *Biodiversity Conservation Act 2016*.

## 7.4. Community Views

As set out in Section 5, there was significant engagement with neighbouring landowners during the preparation phase of SSD-10448. Targeted engagement with neighbouring private landowners for SSD-10448 MOD 6 and Warehouse 8 SSD.

Engagement with neighbouring institutional landowners has occurred throughout preparation and assessment phase of SSD-10448 and is ongoing in respect to the MOD 5 and Warehouse 8 detailed building applications. Coordination of boundary conditions design has occurred as part of the MOD 5 package. No specific response was required to be incorporated into the Warehouse 8 detailed design.

Consultation feedback received during the finalisation and assessment of the application will continue to be considered.

## 7.5. Likely Impacts of the Proposal

The proposed development has been assessed considering the potential environmental, economic and social impacts as outlined below:

- **Natural Environment:** the proposal addresses the principles of ecologically sustainable development (ESD) in accordance with the requirements of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation) and as outlined below:
  - Precautionary principle: the precautionary principle relates to uncertainty around potential environmental impacts and where a threat of serious or irreversible environmental damage exists, lack of scientific certainty should not be a reason for preventing measures to prevent environmental degradation. The proposal will not result in any threat of serious environmental damage or degradation.
  - Intergenerational equity: the needs of future generations are considered in decision making and environmental values are maintained or improved for the benefit of future generations. The development represents sustainable development, making use of a recently rezoned site for this purpose in a strategically accessible location. The proposal will not have any unacceptable impacts on the environment.
  - Conservation of biological diversity and ecological integrity: the proposal will not have any unacceptable impacts on the conservation of biological diversity and ecological integrity. The proposal includes landscaped areas and setbacks including native species planting.
  - Improved valuation, pricing and incentive mechanisms: this requires the holistic consideration of environmental resources that may be affected as a result of the development including air, water and the biological realm. It places a high importance on the economic cost to environmental impacts and places a value on waste generation and environmental degradation. The proposal will not have any unacceptable environmental impacts in relation to air quality, water quality or waste management. The effects of the development will be acceptable and managed accordingly by the proposed mitigation measures as required.

Overall, the proposal will not have any unacceptable impacts on the natural environment. The ESD Report (**Appendix L**) identifies a number of different ecological sustainability initiatives including energy savings, energy efficiency and waste minimisation which will be incorporated into the operation of the development.

- **Built Environment:** the proposal has been assessed in relation to the following built environment impacts:
  - **Visual Impacts:** As set out in **Section 6.7** and the VIA, the proposal will not generate any significant visual impacts and the proposal is considered acceptable in visual impact terms.
  - **Traffic Impacts**: As set out in **Section 6.1** and the TIA, it is concluded that MOD 6 does not give rise to any additional adverse traffic impacts and remains consistent with parking, traffic, and design conclusions of the approved development. Surrounding intersections will continue to operate at an acceptable level.
  - **Trees and Landscaping:** As set out in **Section 3.2** and the Landscape Plans, the proposal includes a high level of indigenous species planting and large canopy landscaping across the site. As detailed in the statutory compliance table **Appendix C**, the proposal will deliver 14% tree canopy coverage across Lot 8. It is noted that the proposal will deliver 12.6% tree canopy coverage across the estate and will provide substantial tree and landscape planting around the carpark area to provide amenity benefits as well as urban heat island mitigation. The proposal will provide an appropriate depth of landscape setbacks which will be able to accommodate substantial tree plantings.
  - **Air Quality:** As set out in **Section 6.3** and the AQIA, the operation of the proposal would result in the achievement of all air quality criteria. Accounting for the background air quality conditions, and adopting worst-case assumptions in relation to truck idling, the proposal will not have any unacceptable air quality impacts including in relation to nearby residential receivers.

  - **Noise and Vibration**: As set out in **Section 6.2** and the Noise Report, while exceedances of the approved on-site noise limits are predicted for the MOD 6 development, noise levels at the nearest sensitive receivers not zoned IN1 General Industrial are predicted to comply with the relevant noise criteria for those receiver areas.

- **Social:** The proposal will have positive social impacts by enabling employment generating uses to be delivered on site in the short-term, providing local employment opportunities both in the construction and operational phases.
- **Economic**: The proposal will have positive economic impacts through enabling the delivery of industrial uses on site which will result in investment and economic benefit for Sydney as well as the wider region.

The potential impacts can be mitigated, minimised or managed through the measures discussed in detail within **Section 6** and as summarised in **Appendix C** to this EIS.

## 7.6. Suitability of the Site

The site is considered highly suitable for the proposed development for the following reasons:

- The warehouse and distribution centre use is permissible within the IN1 zone and is consistent with the zone objectives including to provide a wide range of industrial and warehouse land uses; to encourage employment opportunities; and to minimise any adverse effect of industry on other land uses.
- The proposal is compliant with the SEPP (Industry and Employment) and substantially compliant with the Mamre Road DCP 2021 including in relation to built form setbacks, car parking, visual impacts and landscaping.
- The site is located within a zoned industrial area and the character and scale of the development is in keeping with the site's evolving and expected future context.
- Having regard to the requirement for remediation of the site in accordance with a RAP, as required by SSD-10448, the site will be made suitable for the proposed industrial use prior to commencement of warehouse operations.

Having considered all relevant matters, we conclude the development as modified is appropriate for the site.

## 7.7. Public Interest

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

- The proposal is consistent with relevant State and local strategic plans and substantially complies with the relevant State and local planning controls.
- No adverse environmental, social or economic impacts will result from the proposal.
- The proposal will provide up to 90 jobs during the construction phase, and 120 jobs once complete and fully operational. The proposal will stimulate local investment and contribute significant economic output and value add to the economy each year.
- Subject to the various mitigation measures recommended by the specialist consultants, no adverse, social or economic impacts will result from the proposal in terms of traffic, car parking, built form or views during construction and ongoing operation of the facility.
- The issues identified during the stakeholder engagement have been addressed through the assessment of the impacts of the modified project.

**Having considered all relevant matters, we conclude that the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.**

# 8. Disclaimer

This report is dated 27 November 2023 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd **(Urbis)** opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Mirvac **(Instructing Party)** for the purpose of EIS **(Purpose)** and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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