

Operational Environmental Management Plan

230 Martin Road Badgerys Creek
EMKC³

ineco

AN INDIGECO COMPANY





INECO acknowledges the Traditional Custodians of Country throughout Australia and recognise their connection to land, water and community.

We pay our respects to our Indigenous brothers and sisters, their culture, and to the Elders past, present and future.



DOCUMENT CONTROL

Document Control	
Document Type	Operational Environmental Management Plan
Project Name	230 Martin Road Badgerys Creek
Project Address	230 Martin Road Badgerys Creek
Client	Pawan Lala
Developed By	Brae Haddock, Brodhie Slavin
Document Approver	Dominic Oldfield
Current Issue Date	April 2026
Project Version	Version C
Proposed Review Date	TBC

Disclaimer

This report has been prepared by Ineco with input from a number of other expert consultants (if relevant). To the best of our knowledge, the information contained herein is neither false nor misleading and the contents are based on information and facts that were correct at the time of writing. Ineco accepts no responsibility or liability for any errors, omissions or resultant consequences including any loss or damage arising from reliance in information in this publication.

Copyright © Ineco
ABN 69 638 462 790

TABLE OF CONTENTS

1. Introduction	8
1.1. Development Background	8
1.2. Operational Environmental Management Plan	15
1.3. Overview of Facilities.....	15
2. Environmental Management Framework	15
2.1. Statutory Requirements	15
2.2. SEARs	15
2.3. Community Enquiries	16
2.4. Environmental Training	16
2.5. Incident and Non-Compliance Response Handling and Procedure.....	16
2.6. Complaints Response and Handling Procedure	17
2.7. Dispute Resolution.....	18
2.8. Consultation	18
3. Environmental Management Measures.....	19
3.1. General.....	19
3.2. Traffic and Transport	20
3.3. Noise and Vibration.....	26
3.4. Air Quality and Odour	38
3.5. Waste	43
3.6. Water Management and Stormwater Drainage.....	48
3.7. Hazard, Risk and Emergency	52
3.8. Bushfire and Fire Safety	56
3.9. Flooding.....	63
3.10. Biodiversity.....	66
3.11. Ecologically Sustainability Development	82
4. Monitoring and Reporting.....	85
4.1. Monitoring and Inspections.....	85
4.2. Reporting	86
4.3. Auditing.....	86
4.4. Roles and Responsibilities	87
5. Contingency Management	88
6. OEMP Review	89
7. References	90
7.1. Referral Agencies	90
7.2. Legislation	90
7.3. Standards and Guidelines	90

7.4. Existing Documents/ Assessments	90
---	-----------

TABLE OF TABLES

Table 1 - Project Details.....	8
Table 2 - Key Features of Site and Locality.....	10
Table 3 - General Environmental Management Controls.....	19
Table 4 - Car Parking Requirements (TIA, 2023)	22
Table 5 – Traffic Environmental Management Controls.....	24
Table 6 - Summary of Project Operational Noise Trigger Levels (NVIA, 2024).	28
Table 7 - Operational Sleep Disturbance Assessment Trigger Levels (NVIA, 2024).	29
Table 8 - RNP Road Traffic Noise Criteria (NVIA, 2024)	29
Table 9 - Noise Environmental Management Controls	34
Table 10 - Background air quality data and criterion adopted for the development (AQIA, 2024)....	38
Table 11 - Predicted annual average NO2, TSP, PM10 and PM2.5 concentrations (AQIA, 2024) ..	40
Table 12 - Air Quality Environmental Management Controls	42
Table 13 - Waste Generation Rates.....	43
Table 14 - Waste Generation Assessment – Warehouse 1	43
Table 15 - Waste Generation Assessment – Warehouse 2	43
Table 16 - Bin sizes for areas of Operation	45
Table 17 - Bin Size and Collection Frequency – Warehouse 1.....	46
Table 18 - Bin Size and Collection Frequency – Warehouse 2.....	46
Table 19 - Waste Management Measures	47
Table 20 - On Site Detention (OSD) Tank Design (Civil Infrastructure Report, 2024).....	48
Table 21 - Non-potable water demand calculations (Civil Infrastructure Report, 2024)	50
Table 22 - Stormwater Management Controls.....	50
Table 23 - Dangerous Goods in Storage (RHIA, 2024).	53
Table 24 - Hazard, Risk and Emergency Environmental Management Controls	54
Table 25 - Vegetation Formation and Acceptable Fuel Loads (BPA, 2024).....	56
Table 26 - Bushfire Attack Assessment (BPA, 2024).	58
Table 27 - Bushfire Environmental Management Controls	61
Table 28 - Predicted Flood Impacts	63
Table 29 - Flooding Environmental Management Controls.....	65
Table 30 - Proposed Vegetation Management Zones (VMP, 2024).	67
Table 31 - Management Zone Performance Criteria (VMP, 2024).	70
Table 32 - The Western Sydney Aerotropolis Development Control Plan 2022 Performance Outcomes and Benchmark Solutions (WHMP, 2024).	75
Table 33 - Biodiversity Environmental Management Controls	79

Table 34 - Environmentally Sustainable Design Management Controls	83
Table 35 - Monitoring and Inspection Requirements	85
Table 36 - Reporting Requirements	86

TABLE OF FIGURES

Figure 1 - Development Site and Local Context	13
Figure 2 - Proposed Development	14
Figure 3 - Existing Elizabeth Drive / Martin Road Intersection (TIA, 2023)	21
Figure 4 - Elizabeth Drive / Martin Road Intersection Upgrades (TIA, 2023)	
Figure 5 - Proposed Access Locations (TIA, 2023)	24
Figure 6 - Site location, nearby noise sensitive receivers and NCAs (NVIA, 2024)	27
Figure 7 - Air Quality Receptor Locations (AQIA, 2024)	41
Figure 8 - NSW EPA Waste Hierarchy	44
Figure 9 - Bin station example	45
Figure 10 - Bushfire Prone Land Map (BPA, 2024).	57
Figure 11 - Bushfire Protection Measures Plan (BPA, 2024).....	60
Figure 12 - Plant Community Types on the development site (BDAR, 2024).....	
Figure 13 - Management Zones and Monitoring Points (VMP, 2024).	74
Figure 14 - Threatened Fauna Records and Habitat Features (VMP, 2024).....	

APPENDICES

Appendix A Development Consent	91
Appendix B Mitigation Measures.....	92
Appendix C Traffic Impact Assessment (TA).....	104
Appendix D Noise and Vibration Impact Assessment (NVIA).....	105
Appendix E Air Quality Impact Assessment (AQIA).....	106
Appendix F Waste Management Plan (WMP).....	107
Appendix G Civil Infrastructure Report.....	108
Appendix H Preliminary Hazard Assessment (PHA)	109
Appendix I Bushfire Protection Assessment (BPA)	110
Appendix J Flood Impact and Risk Assessment (FIRA)	111
Appendix K Biodiversity Development Assessment Report (BDAR).....	112
Appendix L EPBC Impact Assessment (EPBC IA)	113

Appendix M Vegetation Management Plan (VMP) 114
Appendix N Wildlife Hazard Assessment and Wildlife Management Plan (WHMP) 115
Appendix O Ecologically Sustainable Development (ESD) 116

1. INTRODUCTION

This Operational Environmental Management Plan (OEMP) has been prepared to accompany the Environmental Impact Statement (EIS) for the development of 230 Martin Road Industrial Development. It will establish an Environmental Management Framework for the operation of two warehouses located at 230 Martin Road, Badgerys Creek, 2555 NSW, Australia (Lot A, DP406215).

The development aims to:

- support the early activation of the Western Sydney Aerotropolis (WSA) by delivering high quality warehousing and employment floorspace within the Badgerys Creek Precinct in a suitable location adjacent to Western Sydney International Airport (WSI).
- support the continued economic growth of the Western Parkland City through the delivery of new employment opportunities.
- deliver new employment and warehouse floorspace in a location close to future transport routes that will support the efficient movement of freight.
- support the vision for the WSA by promoting the principles of 'Connecting with Country' and through an integrated approach to stormwater management and landscaping.

1.1. Development Background

The State Significant Development Application (SSD-65529236) was approved on 6 December 2023 for an industrial development at 230 Martin Road, Badgerys Creek NSW 2555 (Lot A in Deposited Plan 406215). The development will include construction and operation of a warehouse and distribution facility comprising:

Table 1 - Project Details

Component	Details
Project Area	The site has a total area of 24.28ha. Approximately 81,021 m ² will be affected by the project (excluding the potential park edge street which separates ENT land from ENZ).
Proposed use	Lot 1: Large format warehouse with ancillary office and manufacturing (steel cutting). Lot 2: Large format warehouse with ancillary office.
Project Description	The project comprises: ▪ Bulk earthworks and site preparation works. ▪ Utility services and stormwater infrastructure (interim and ultimate scenarios) excluding the regional stormwater basin. ▪ Subdivision of the existing allotment into three (3) new allotments. ▪ Construction and operational use of two warehouse and distribution centres with ancillary office and manufacturing (Warehouse 1 only). Approval is sought for the fit-out of Warehouse 1. ▪ Landscaping ▪ Site Access
Subdivision	Proposed Lot 1: 4.19 ha Proposed Lot 2: 9.1ha Proposed Lot 3: 10.52 ha
Warehouse 1 (Lot 1)	Gross Floor Area: • Warehouse and distribution centre – 16,465m². • Ancillary office – 600m². • Amenities block – 37m².

Component	Details
	Total – 17,102m². Maximum Building Height = 12.95m. 24 loading docks. Access: - Truck entry driveway in the northwest corner of the site. - Combined car park entry / exit located to the south of the truck entry. - The truck exit driveway located in the southwest corner of Lot 1. The layout for the warehouse is presented in Figure 2.
Warehouse 2 (Lot 2)	GFA: - Warehouse and distribution centre – 18,564m² - Ancillary office building 2A – 600m² - Ancillary office building 2B - 504m² Total – 19,668m² Maximum Building Height = 12.65m 18 loading docks Access: - Combined car park entry / exit driveway located opposite Office 2A - Truck entry / exit driveway located to the north of the car park entry / exit The layout for the warehouse is presented in Figure 2.
Carparking	Lot 1: 86 spaces Lot 2: 119 spaces
Site Access	Access to the site is provided from Martin Road (north-south), connecting to Elizabeth Drive and the future Eastern Ring Road.
Landscaping	Lot 1: 4,206m² Lot 2: 3,412m²
Earthworks	Bulk cut and fill will be required to achieve flat pads for industrial development; access to the site from Martin Road; and flood immunity. The proposed surface grading will follow the existing site topography.
Infrastructure Upgrades	Interim: - The proposal includes provision for on-site stormwater detention that can appropriately service the site from a stormwater management perspective, until such a time as the regional stormwater basin is delivered by Sydney Water. - Noting the low traffic generation proposed, the proposal will have a negligible material impact to the performance of the external road network when compared to the existing site. Note: ongoing discussions with Council and investigations are currently being undertaken to determine whether the proposal will generate the requirement for pavement upgrades along a portion of Martin Road. - The proposal includes provision to upgrade the frontage of Martin Road to accommodate the future Collector Road in accordance with the Precinct Plan and Liverpool Aerotropolis 7.12 Contributions Plan (7.12 Plan) by means of a half-width upgrade for the length of the frontage only. - The proposal accommodates the possible future provision of a corridor for the future Park Edge Street – which is not a contributions road and

Component	Details
	will be delivered by the relevant roads authority (Council), subject to separate planning approval processes. Connections to the Park Edge Street will be provided by a future Riparian Street (contributions road) which is located in the property directly north providing a permeable and accessible solution to the future Park Edge Street. The subject proposal does not propose the dedication of land or carrying out of works for the future Park Edge Street. Ultimate: ▪ The proposal will provide connection to the future regional stormwater basin once constructed by Sydney Water and the regional scheme is operational. ▪ The proposal will utilise the future Collector Road and Eastern Ring Road for access to regional road network once delivered. ▪ Ongoing discussions are required with Council (and adjacent landowners) to understand the full extent of upgrades required to Martin Road.
Employment opportunities	Construction: 60 FTE jobs Operational: 108 FTE jobs
Estimated Development Cost	\$108,866,194 (excluding GST) The Estimated Development Cost (EDC) has been calculated in accordance with DPHI's required form and is provided within the EDC Report located at Appendix T which also satisfies DPHI's requirements.
Staging/Phasing	The proposal will be constructed over a single construction phase. Note: staged construction certificates would be issued; however, the proposal does not constitute staged development pursuant to the Act.

The key features of the site which have the potential to impact or be impacted by the proposed development are summarised in the Table below and shown in **Figure 1**.

Table 2 - Key Features of Site and Locality

Descriptor	Site Details
Local Government Area	Liverpool City Council
Land Ownership	The site is currently in private ownership.
Local Context	The land immediately adjoining the site forms part of the Western Sydney Aerotropolis and is expected to undergo significant transformation. The surrounding area is described below: • North: The adjacent site is operated by Australian Native Landscapes (ANL), a landscaping, agricultural and gardening supplier. It includes several 'warehouse' buildings. Aerial imagery shows large stockpiles on the site. Further north, the area is characterised by agricultural

Descriptor	Site Details
	landholdings and some dwellings. • East: The Wianamatta South Creek waterway runs north to south along the sites eastern boundary and is Crown Land. An agricultural research station and cemetery is located beyond its eastern bank. • South: The adjacent land currently comprises agricultural farm holdings, with South Creek beyond. • West: A large brick manufacturing facility operated by CSR (comprising several structures and existing dams) is located to the southwest of the site on the opposite side of Martin Road.
Existing Attributes	Agricultural land with an existing farm dam and associated structures. The Wianamatta South Creek vegetated riparian corridor runs along the eastern boundary.
Topography	The site is broadly flat albeit there is a gradual rise in levels towards the south.
Bushfire Project Land	The site contains 'Vegetation Category 1'; Vegetation Category 3' and 'Vegetation Buffer' land. The Vegetation Category 1 land is limited to a small area around the site's eastern boundary (at its interface with South Creek). The majority of the land is 'Vegetation Category 3'.
Flora and Fauna	The site contains a High Biodiversity Value Area (existing native vegetation). The area of existing native vegetation is limited to around the eastern boundary of the site (at its interface with South Creek). The Growth Centres Biodiversity Certification Order identifies the site as 'certified' and 'non-certified' biodiversity.
Aboriginal Cultural Heritage	The eastern part of the site is identified as 'Aboriginal cultural sensitivity – high' and 'Aboriginal cultural sensitivity – moderate' in the Aerotropolis Precinct Plan. These areas of Aboriginal cultural sensitivity are limited to the part of the site closest to South Creek.
Historic (European) Heritage	The Aerotropolis Precinct Plan identifies a potential local Heritage item on the site. The Aboriginal and Non-Aboriginal Cultural Heritage Assessment (October 2020) prepared for the Precinct Plan identifies the site as Item 307 – potential archaeological site. However, the Heritage Map for the Precincts SEPP does not identify a heritage item on or near the site.
Noise Exposure	The Precincts SEPP Noise Exposure Map identifies an Australian Noise Exposure Concept (ANEC) contour of 20 – 25 for the site. The Precincts SEPP (section 4.17) states that development consent must not be granted to noise sensitive development located on land that has an ANEC contour of 20 or greater. Noise sensitive development includes centre-based childcare facilities; educational establishments; exhibition homes; exhibition villages; funeral homes; hospitals; information and education facilities; places of worship; residential accommodation; respite day care centres; and school-based childcare (other than an existing) school.
Wildlife Buffer Zone	The site is located within the 3km Wildlife Buffer Zone as defined in the Precincts SEPP. Development for livestock processing industries, turf farming and waste or resource management facilities that consist of outdoor processing, storage or handling of organic or putrescible water are

Descriptor	Site Details
	prohibited within the 3km Wildlife Buffer Zone.
Lightning Buffer Area	Within 6km lightning buffer area.

The expected tenant in each proposed warehouse includes:

- Warehouse 1 (Lot 1): At this project stage, it is understood that Warehouse 1 will be tenanted by Metroll. Metroll is a manufacturer and supplier of steel building products including roofing, cladding, rainwater, structural and fencing. Operations are proposed to be consistent with similar existing steel manufacturing facilities.
- Warehouse 2 (Lot 2): The final operations of the warehouse and distribution facility are not clearly understood as the final tenants of the facility have not been determined. As such, the requirement for different types of vehicles, the times of operation and nature of operations are subject to the type of final tenants.



Figure 1 - Development Site and Local Context

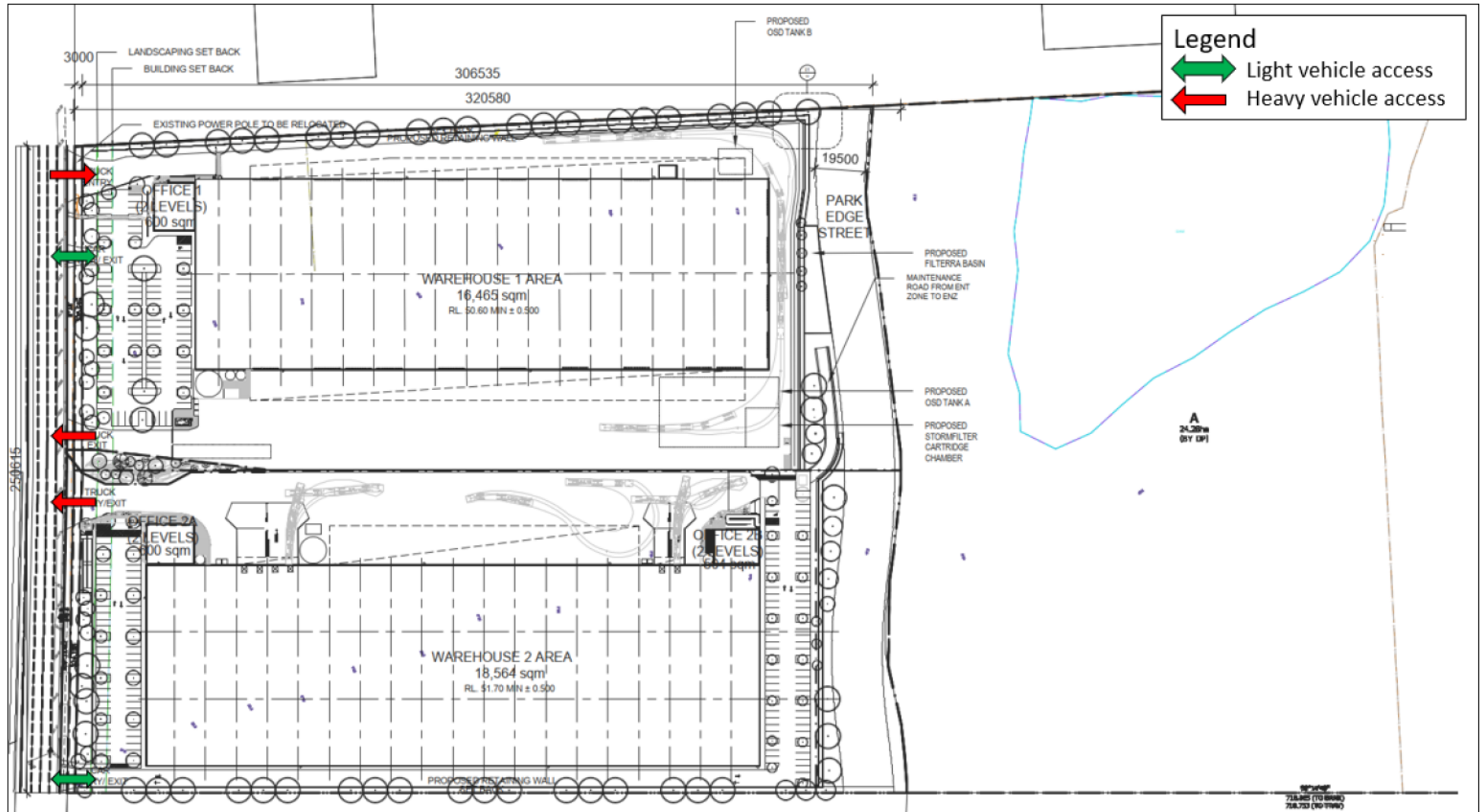


Figure 2 - Proposed Development

1.2. Operational Environmental Management Plan

1.2.1. Scope

This Operational Environmental Management Plan (OEMP) has been prepared to satisfy the conditions of approval for SSD-65529236 in relation to the operation of the industrial development at 230 Martin Road, Badgerys Creek.

1.2.2. Objectives

The objectives of this OEMP are:

- To guide and assist in ensuring the operational environmental management requirements under SSD-65529236 are undertaken in line with the relevant SEAR's requirements.
- Establish the framework for managing potential environmental impacts from the operation of the development.
- Document the mitigation measures from the Environmental Impact Statement, Response to Submissions and conditions of approval that are required to be implemented during operation.
- Demonstrate how the applicant proposes to meet regulatory obligations.
- Document the conditions imposed by SSD-65529236 that are required to be implemented during operation.

1.3. Overview of Facilities

The OEMP anticipates that the site will house two operational warehouses for manufacturing or distribution, involving heavy truck traffic and aligning with regional and nearby land uses. The facilities will be open 24/7, 365 days a year. They will employ around 111 full-time staff and generate additional jobs through ancillary services. Management will primarily be handled by the owner and tenants.

2. ENVIRONMENTAL MANAGEMENT FRAMEWORK

2.1. Statutory Requirements

The development will be operated in accordance with the approval associated with SSDA-35604261 and the mitigation measures referenced in the conditions of approval. Pending Development Consent, the operator will be required to update this OEMP to include conditions of consent. It is anticipated that these conditions will largely include:

1. Administrative Conditions;
2. Environmental Performance and Management Conditions; and
3. Environmental Management, Reporting and Auditing Conditions.

The Applicant must ensure that all licences, permits and approvals/consents are obtained as required by law and maintained as required throughout the life of the Development.

Should the factories undertake work described in [Schedule 1](#) of the *Protection of Environment Operations Act 1997*, further approval would be required and the facility would be required to obtain an Environment Protection Licence in accordance with Part 3.1 of the act.

2.2. SEARs

The EIS for the development addressed the Secretary's Environmental Assessment Requirements (SEARs) issued on 21 December 2023. The SEARs relevant to the operation of the development are:

- Traffic and Transport

- Noise and Vibration
- Water
- Waste
- Bush Fire
- Airport Safeguard
- Ecologically Sustainable Development
- Air Quality

2.3. Community Enquiries

Contact details for community enquiries will be provided on the project website. Enquiries will be directed to the Facility Manager.

2.4. Environmental Training

The Facility Manager is responsible for ensuring all employees and contractors are appropriately inducted and aware of their obligations under this OEMP. Records of training will be maintained.

2.5. Incident and Non-Compliance Response Handling and Procedure

2.5.1. Objectives

To ensure any environmental incident or non-compliance caused by the operation is effectively responded to, and adverse impacts are promptly prevented or managed.

2.5.2. Responsibility

The Facility Manager is responsible for ensuring the appropriate management response and handling procedures are carried out in the event of an incident or non-compliance.

All employees and contractors are responsible for:

- Notifying the Facility Manager of any hazard or potential hazard that may result in an incident.
- Taking immediate action to prevent, stop, contain and/or minimize any adverse impact from an incident.

2.5.3. Notification Requirements

2.5.3.1. Incidents

The NSW EPA must be notified immediately of any pollution incident where material harm to the environment is caused or threatened.

Material harm occurs under the POEO Act if:

- It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
- It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$50,000 (or such other amount as is prescribed by the regulations), and

N.B. Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

The Facility Manager will be responsible for notifying the relevant authorities of any reportable incident.

A written incident notification will be emailed to compliance@planning.nsw.gov.au within 7 days of an

incident occurring. A detailed incident report will be provided within 30 days.

2.5.3.2. Non-Compliances

The Department will be notified in writing to compliance@planning.nsw.gov.au within 7 days of becoming aware of any non-compliance.

2.5.4. Incidents and Non-Compliance Handling Procedure

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

1. Preventative Action: Where possible, immediate action will be taken to prevent, stop, contain and/or minimise the environmental impact.
2. Assistance: If adequate resources are not available and the incident threatens public health, property or the environment, Fire and Rescue NSW will be contacted for emergency assistance.
3. Notify: The Facility Manager will notify the relevant authorities in accordance with Section 2.5.3.
4. Investigate: The cause of the incident and/or non-compliance will be investigated.
5. Remedial Action: Appropriate remedial action will be undertaken to address the cause and mitigate any further environmental impact.
6. Record: The incident or non-compliance will be recorded using the Incident/Non-Compliance Report Form.
7. Preventative Action: Appropriate measures will be identified and implemented to reduce the possibility of re-occurrence.

2.5.5. Incidents and Non-Compliance Register

Records of all incidents and non-compliances will be maintained in an Incident and Non-Compliance Register. Details will be retained for at least 5 years after the event to which they relate.

2.5.6. Minor Environmental Incidents

Minor environmental incidents that do not cause or threaten material harm to the environment will still be handled under the process outlined in 2.6.4 except there will be no requirement for government notification. Minor incidents will be recorded in the register.

2.6. Complaints Response and Handling Procedure

2.6.1. Objective

To ensure that all environmental complaints are promptly and effectively received, handled and addressed.

2.6.2. Responsibility

The Facility Manager is responsible for ensuring the appropriate response and handling procedures are instigated in the event of an environmental complaint.

All employees and contractors will immediately notify the Facility Manager of any complaint received.

2.6.3. Handling Procedure

Upon receiving a complaint, the following procedure will be implemented:

1. Record and Acknowledge: The Facility Manager will record the complaint details and

acknowledge receipt of the complaint to the complainant.

2. Investigate: The complaint will be investigated to determine the cause and identify any required actions.
3. Action: Once the cause has been established, appropriate action will be taken to address the issue and mitigate any further impact.
4. Communicate: The complainant will be advised of the outcomes of the investigation and any actions taken.
5. Record: The complaint, investigation and action taken will be recorded using the Complaint Form.

2.6.4. Complaints Register

A Complaints Register will be maintained that includes all complaint details, the outcomes of investigations, and actions taken. Records will be retained for at least 5 years after the complaint was made.

2.7. Dispute Resolution

In the event of a dispute between the applicant and Council or a public authority, the matter may be referred to the Planning Secretary for resolution.

For any dispute between the applicant and community, the matter may be referred to the relevant regulatory authority for advice or mediation. If the matter escalates, a third-party mediator may be required.

2.8. Consultation

Consultation has been undertaken with relevant stakeholders in accordance with the SEARs and conditions of approval, including:

- Transport for NSW regarding traffic impacts, access arrangements and the Green Travel Plan
- Liverpool City Council regarding stormwater management
- Department of Planning regarding noise, air quality and waste management.

These consultations were summarised in the Community Engagement report and will be ongoing through the SSDA process.

3. ENVIRONMENTAL MANAGEMENT MEASURES

3.1. General

The development's general environmental controls include a combination of administrative actions, monitoring, reporting, and preventive strategies to ensure proper processes, procedures, and management measures are maintained throughout the project's operation.

The general environmental controls that will be implemented throughout the life of the development to minimise potential impacts are listed in **Table 3**.

Table 3 - General Environmental Management Controls

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
G01	Develop and implement an Operational Environmental Management Plan.	Yes	Yes	Ongoing	Anticipated Condition
G02	An environmental induction will be undertaken by all workers prior to the commencement of work to ensure that they are aware of their obligations.	Yes	Yes	Ongoing	Section 2.4
G03	All reasonable measures to prevent/minimize harm to the environment will be implemented.	Yes	Yes	Ongoing	Best Practice
G04	Monitoring records will be maintained to demonstrate compliance with the OEMP.	Yes	Yes	Ongoing	Section 4
G05	Environmental incidents and complaints will be managed by the management strategies in Sections 2.5 and 2.7 will be implemented.	Yes	Yes	Ongoing	Sections 2.5 and 2.7

3.2. Traffic and Transport

The Transport Assessment (TA) was prepared by Ason Group (9 February 2026) assessed the traffic and transport impacts of the proposed development. The main intersection associated with the development is the Elizabeth Drive / Martin Road intersection, which has recently undergone an interim upgrade to a signalised intersection, as shown in **Figure 3**.

The TA found that the development will generate:

- AM Network Peak: 56 movements per hour (movements, in & out combined)
- PM Network Peak: 77 movements per hour (movements, in & out combined)
- Daily: 975 movements per day (movements, in & out combined)

A SIDRA Intersection 10 analysis was undertaken to determine the operational capacity the proposed development will induce on the external road network. This is not expected to have more than a negligible material impact to the performance of the external road network when compared to the existing site.

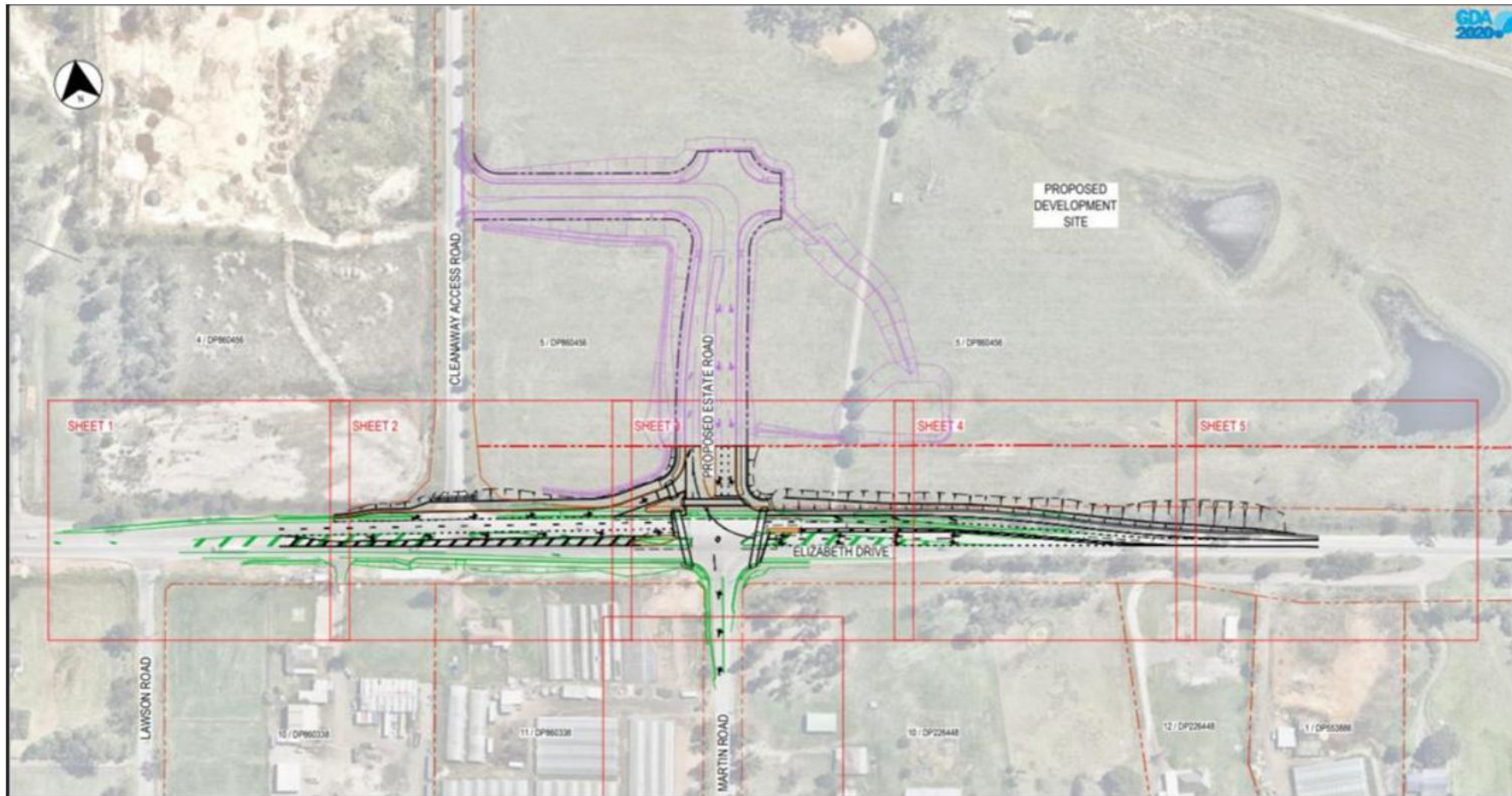


Figure 3 - Existing Elizabeth Drive / Martin Road Intersection Showing the Interim Upgrade (TA, 2026)

3.2.1. Parking

The car parking rates and requirements will be in accordance with Western Sydney Aerotropolis Development Control Plan (DCP) 2022 as summarised in **Table 4**.

Table 4 - Car Parking Requirements (TA, 2026)

Tenancy	Landuse	GFA (m ²)	Car Parking Requirement	Proposed Car Parking
Lot 1	Warehouse	16,465	Min: 56 Max: 167	87
	Office	600	Min: 15 Max: 15	
	Subtotal	17,065	Min: 71 Max: 182	
Lot 2	Warehouse	18,564	Min: 62 Max: 186	123
	Office	1,104	Min: 28 Max: 28	
	Subtotal	19,668	Min: 90 Max: 214	
Total			Min: 161 Max: 396	210

As shown in Table 4 above, the parking rates indicates that Warehouse and Office on Lot 1 requires a minimum of 71 and a maximum of 182 parking spaces and Warehouse and Office on Lot 2 requires a minimum of 90 and a maximum of 214 parking spaces. The development proposes to provide 87 parking spaces with Lot 1 and 123 parking spaces with Lot 2. As such, the minimum parking requirements are satisfied.

Bicycle parking is also required for the development in accordance with Western Sydney Aerotropolis DCP 2022. The bicycle parking rate is 1 space per 1,000m² of gross floor area of industrial activities. Given the rate and area of each warehouse, 18 spaces are required for Warehouse 1 and 20 spaces

are required for Warehouse 2. The Proposal provides for 38 bicycle parking spaces, meeting the DCP parking requirements.

3.2.2. Site Access

The warehouse development light vehicle and heavy vehicle access strategy is shown below in **Figure 4**. The design incorporates separate access driveways for light vehicles and heavy vehicles to reduce the occurrence of any such interactions between light and heavy vehicles and between Lot 1 with Lot 2 whilst improve internal circulation within the Site. AS2890.2 specifies that the width of a driveway is determined by the swept path of the design vehicle needing to enter and exit the site. To verify the suitability of the proposed driveway widths, a swept path assessment was conducted for the largest vehicles accessing each crossover for both heavy vehicle and light vehicle access points. The assessment confirms that these vehicles can safely and efficiently manoeuvre in and out of the site in forward gear at the proposed heavy vehicle and light vehicle access points.

.

.

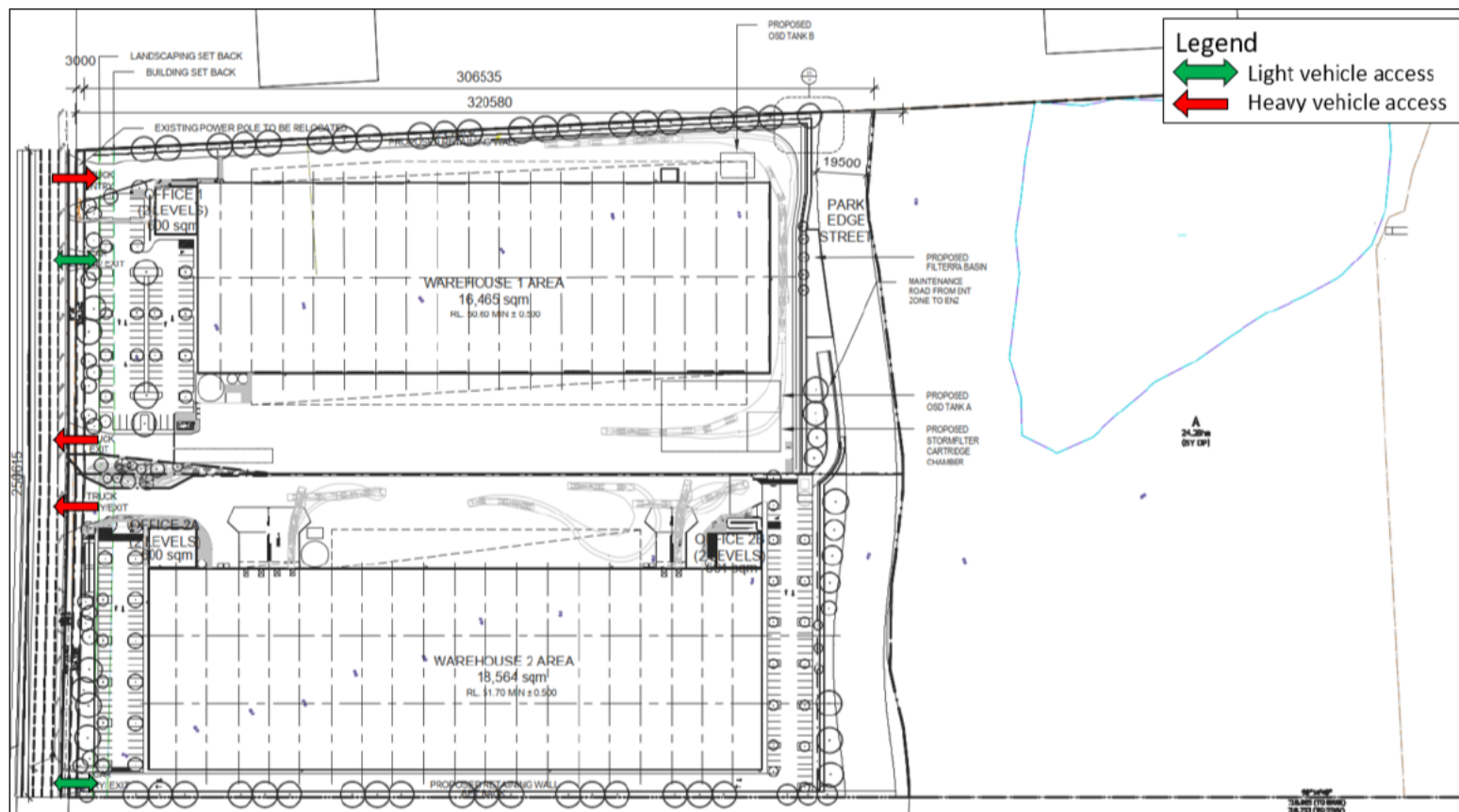


Figure 4 - Proposed Access Strategy (TA, 2026)

Traffic and parking will be managed in accordance with the Traffic Management Plan (TMP) prepared to address the SEARs and conditions of approval. The key management controls are summarised in **Table 5**.

3.2.3. Environmental Management Control

The environmental management controls to management operational traffic and transport are detailed in Table 5 below.

Table 5 – Traffic Environmental Management Controls

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
TT01	Heavy vehicle movements will comply with approved site access routes and hours of operation in the conditions of approval and TMP.	Yes	Yes	Ongoing	Best Practice
TT02	The Green Travel Plan will be implemented to promote sustainable transport.	Yes	Yes	Ongoing	Best Practice
TT03	Vehicles must enter and exit in a forward direction.	Yes	Yes	Ongoing	Best Practice
TT04	All trucks must have their loads covered and not track dirt on to the public road.	Yes	Yes	Ongoing	Best Practice
TT05	Oversized vehicles must obtain required permits and approvals prior to travelling to the site.	Yes	Yes	Ongoing	Best Practice

3.3. Noise and Vibration

The Noise and Vibration Impact Assessment (NVIA) prepared by Renzo Tonin & Associates (20 February 2026) assessed the development's operational noise triggers for sensitive receivers in close proximity to the development as shown in **Table 6** below. As the existing acoustic environment varies at the nearby sensitive receivers, or the applicable noise criteria varies, these sensitive receivers have been grouped into Noise Catchment Areas (NCAs) based upon areas with similar acoustic environments or criteria groupings including:

- NCA1 contains rural residences to the North-East to East of the Proposal.
- NCA2 contains rural residences to the South to South-East of the Proposal.
- NCA3 contains rural residences within the Western Sydney Airport (WSA) Badgerys Creek precinct in the area rezoned Enterprise (ENT) to the west of the Proposal.
- Other receivers – A number of industrial premises and commercial premises (Elanco Animal Health) are located around the site, in addition to a church (Our Lady Queen of Peace Kemps Creek) and a cemetery (Kemps Creek Cemetery & Crematorium).

The locations of these NCA boundaries and the surrounding sensitive receivers are shown in **Figure 5** below.

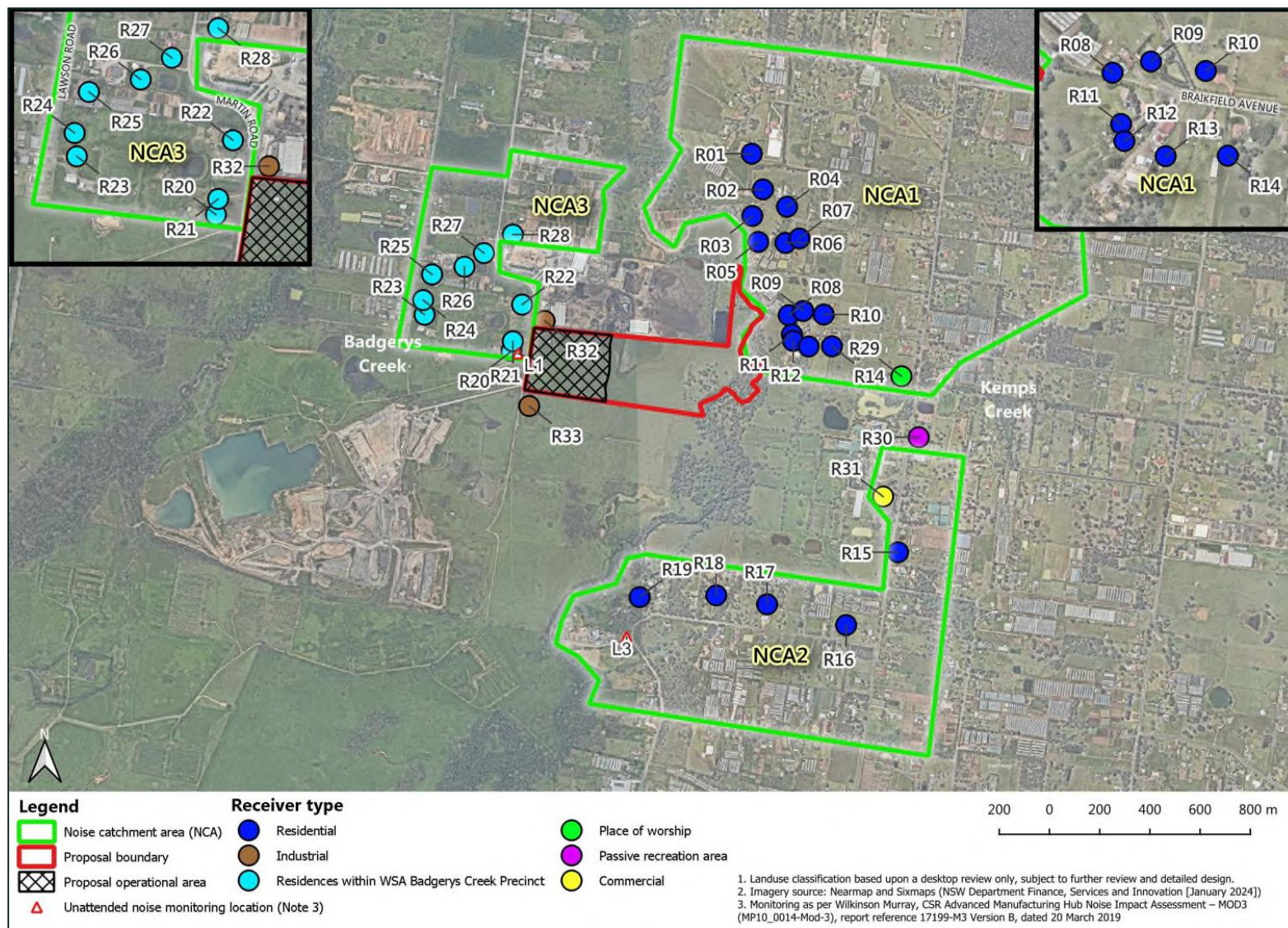


Figure 5 -Site location, nearby noise sensitive receivers and NCAs (NVIA, 2026)

Potential sources of noise within the warehouse facility are likely to include warehouse trucks, passenger vehicle movements and car parking, warehouse loading dock receiving and dispatching activities, internal warehouse activities and building services.

Table 6 - Summary of Project Operational Noise Trigger Levels (NVIA, 2026).

Receiver Location	L _{Aeq, 15min} Project noise trigger levels, dB(A)			
	Day	Evening	Night	Morning shoulder
Residential receivers – NCA1	42	37	32	42
Residential receivers – NCA2	42	37	32	42
Residential receivers – NCA3	45	40	38	43
Place of worship (external)	42	N/A	N/A	42
Passive recreation area (cemetery)	42	42	42	42
Commercial	63	63	63	63
Industrial	68	68	68	68

Note: Daytime 7:00am to 6:00pm; Evening 6:00pm to 10:00pm; Night-time 10:00pm to 5:00am, Morning-shoulder 5:00am to 7:00am. On Sundays and Public Holidays, Daytime 8:00am to 6:00pm; Evening 6:00pm to 10:00pm; Night-time 10:00pm to 5:00am, Morning-shoulder 5:00am to 7:00am.

3.3.1. Sleep Disturbance

The potential for sleep disturbance due to maximum noise level events from the operational activities at the development site during the night-time period has been assessed. The sleep disturbance noise trigger levels for the Proposal are presented in **Table 7** below.

Table 7 - Operational Sleep Disturbance Assessment Trigger Levels (NVIA, 2026).

Receiver Location	L _{Aeq, 15min} Sleep disturbance levels, dB(A)		L _{Amax} Sleep disturbance levels, dB(A)		
	Night	Morning shoulder	Night	Morning shoulder	Awakening reaction
Residential receivers – NCA1	39	43	52	53	65
Residential receivers – NCA2	42	43	52	53	65
Residential receivers – NCA3	39	43	52	53	65

Note: Night-time 10:00pm to 5:00am, Morning-shoulder 5:00am to 7:00am.

3.3.2. Traffic Noise

The noise impacts from potential increases in traffic on the surrounding road network, due to operational activities associated with the development, have been assessed in line with the Road Noise Policy (RNP) and based on the traffic volumes identified in the Transport Assessment (TA) prepared by Ason Group (9 February 2026). The RNP outlines criteria applicable to specific road types and land uses. In accordance with the RNP, Martin Road is classified as a "principal haulage route," meaning that certain local public roads servicing industrial areas experience a different volume and mix of traffic compared to typical residential roads. The RNP recommends that noise criteria for principal haulage routes should align with those for arterial or sub-arterial roads, acknowledging the unique traffic conditions these roads handle. For existing residences affected by additional traffic on existing sub-arterial / arterial roads generated by land use developments, the below RNP road traffic noise criteria shown in **Table 8** will apply.

Table 8 - RNP Road Traffic Noise Criteria (NVIA, 2026)

Road Category	Type of Project/Land Use	Assessment Criteria, dB(A)	
		Day (7am – 10pm)	Night (10pm – 7am)
Freeway/arterial/sub-arterial roads	Existing residences affected by additional traffic on existing freeways/ arterial/ sub-arterial roads generated by land use developments.	60 L _{Aeq, 15hr} (external)	55 L _{Aeq, 9hr} (external)

3.3.3. Vibration

There are no expected vibration impacts to nearby sensitive receivers from the operational activities of the development site.

3.3.4. Design Mitigation and Management Measures

The NVIA recommended a series of design mitigation and management measures to ensure the development achieves the required project specific noise trigger levels and minimise noise emissions from the site during operations as shown in **Figure 7** below.

M1.1 Broadband reversing alarms “quackers” (i.e., non-tonal) shall be adopted across the tenant truck fleet that operates through warehouse facility. This should be adopted for all permanent and tenants owned/ controlled vehicles where feasible and reasonable. Where tenants do not have control over

vehicles that operate through the facility, management of potential impacts should be reviewed further as part of the tenant operational management plan, with particular consideration as to whether these trucks would operate during the night period.

M1.2 Any PA systems required as part of normal operation that emit sounds outside of the facility, are to be designed so that they would result in a negligible increase in overall noise emissions from the facility. PA announcements as part of normal operations would be restricted to within the enclosed areas of the facility during the night period.

M1.3 Alternate methods and practices to the use of horns as a safety warning for onsite moving forklifts should be reviewed and incorporated into site operations and safety practices, where feasible and reasonable and ensuring safety requirements are maintained.

M1.4 Development of a methodology to manage the individual contributions of tenants within any approved noise requirements for the Proposal as part of the Operational Noise Management Plan/ Operational Management Plan developed for the Proposal.

M1.5 When a new tenant or change of tenant is proposed for a warehouse space, and during the final planning and detailed warehouse design stage for Warehouse 1 (Metroll), an acoustic review is to be undertaken.

During the preparation for occupancy of a warehouse tenancy (ie. warehouse fit-out design stage) for any specific tenant, the potential noise emissions from the tenant's proposed operations are to be reviewed to confirm that:

- 1) The tenant operational noise emissions will satisfy any noise emission allowances and noise mitigation/management measures identified for the individual tenant in the Proposal Operational Noise Management Plan / Operational Management Plan to satisfy M1.4 above, and if there are any further mitigation and/or management measures required to do so.
- 2) Confirm if any further mitigation and/or management measures are required to ensure that noise emissions from the warehouse tenancy will be consistent with the noise emission outcomes presented in this NVIA.
- 3) Review potential sources of high noise events associated with the proposed operations that could occur during the night (10pm to 7am) to determine if further mitigation/management is required to achieve noise emission allowances.
- 4) Identify operations that are non-typical operations but could have the potential to exceed noise emission allowances (ie. garbage compactor operations, scheduled waste truck operations, etc.). Determine if/what feasible and reasonable controls would be required to manage these infrequent activities in a feasible and reasonable manner.

M1.6 Waste disposal activities external of the warehouse, inclusive of forklift manoeuvring and dumping of waste that will generate loud noise events (ie. metallic waste), should only occur during day and evening periods. During the night and morning shoulder period (10pm to 7am) waste disposal should be managed to occur internally, until external disposal can occur during the day and evening periods.

M2.1 Materials of the warehouse facility facade and roof construction would be selected during detailed design, so that any noise break-out from internal activities, including through louvres, opening or penetrations, would result in a negligible increase in overall noise emissions from the facility.

M2.2 Ensure that for all non-enclosed areas of the facility (ie. hardstand/ramp interface), and entry and exit areas:

- All pavement is smooth (ie. no speed bumps)
- Transitions from the external public road to the site or between internal road elements (ie. hardstand to ramp) are smooth, as to not result in jolting, or unnecessary accelerating of the truck the truck is required.

- Drainage grates are designed to not result in noise events. Design elements should also minimise the requirement for trucks to not have to stop/brake and then accelerate (ie. pedestrian crossing points) outside of dock areas with line of sight to nearby sensitive receivers, in particular where they are required to operate during the night period.
- These will be reviewed at detailed design to avoid competing traffic issues and traffic management at required pedestrian interfaces like footpath crossings.

M3.1 Warehouse 1 and 2 eastern perimeter – A two part noise barrier along the eastern boundary of the Proposal site across both Warehouse 1 and 2. The barrier will extend for approximately 180 metres, with the top of the barrier at RL57 (ranging between 5 to 6 metres high) and overlapping parts to allow for roadway access through the barrier. The barrier is to shield line of sight to Warehouse 1 and 2 hardstands and truck entry/exit roads for the extent shown in Figure 6-3. The noise barrier is to be designed as per Section 6.3.3, including being constructed of durable material with sufficient mass to prevent direct noise transmission.

M4.1 Warehouse 1 – Temporary noise barrier to be installed extending from the south-western corner of the warehouse to the exit road gatehouse for approximately 17 metres. The barrier is only required if at the time of construction potentially impacted residences directly west of the Proposal are still occupied and expected to be following the commencement of operations. The noise barrier shall be 6 metres high (above ground level RL51). The noise barrier is to be designed as per Section 6.3.3, including being constructed of durable material with sufficient mass to prevent direct noise transmission.

M5.1 A detailed assessment of noise emissions from building services, mechanical plant and plantroom spaces is to be undertaken during detailed design. All building services, mechanical plant and plantroom spaces are to be designed to not increase total site noise emissions, cumulatively with other onsite noise generating operations (ie. trucks and loading activities). This should consider any annoying characteristics due to the nature of the proposed plant items (eg. intermittent), and the final location where they will be installed and operate. During the detailed design process, the building services, mechanical plant and plantroom spaces should be designed to achieve the predicted noise levels in Section 6.5.3, or where this is not feasible or reasonable, ensure that the mechanical and building services, and façade breakout noise levels achieve at least 9 dB(A) below the relevant overall Proposal criteria, to be consistent with Section 6.5.3.

M5.2 Warehouse 1 To minimise internal noise breakout contribution, the roof mounted turbine ventilators to be fitted with rotating attenuator such that performance can be achieved as outlined in Table 6-6 (Section 6.2.3.6).

M5.3 Warehouse 1 To minimise steady state fan noise contribution, the warehouse exhaust fans are to be inline fans and fitted with intake and discharge attenuators to achieve the acoustic performance as outlined in Table 6-6 (Section 6.2.3.6).

M5.4 Warehouse 2 To minimise steady state fan noise contribution, the warehouse exhaust fans are to be inline fans and fitted with intake and discharge attenuators to achieve the acoustic performance as outlined in Table 6-6 (Section 6.2.3.6)

M6.1 All roller doors on the eastern end of Warehouse 1, are to be closed during the night period, and are to be constructed of solid material with no openings and all perimeter gaps minimised (ie. not to include perforations for the purposes of airflow and be oversized to minimise the gap at the top of the roller door).

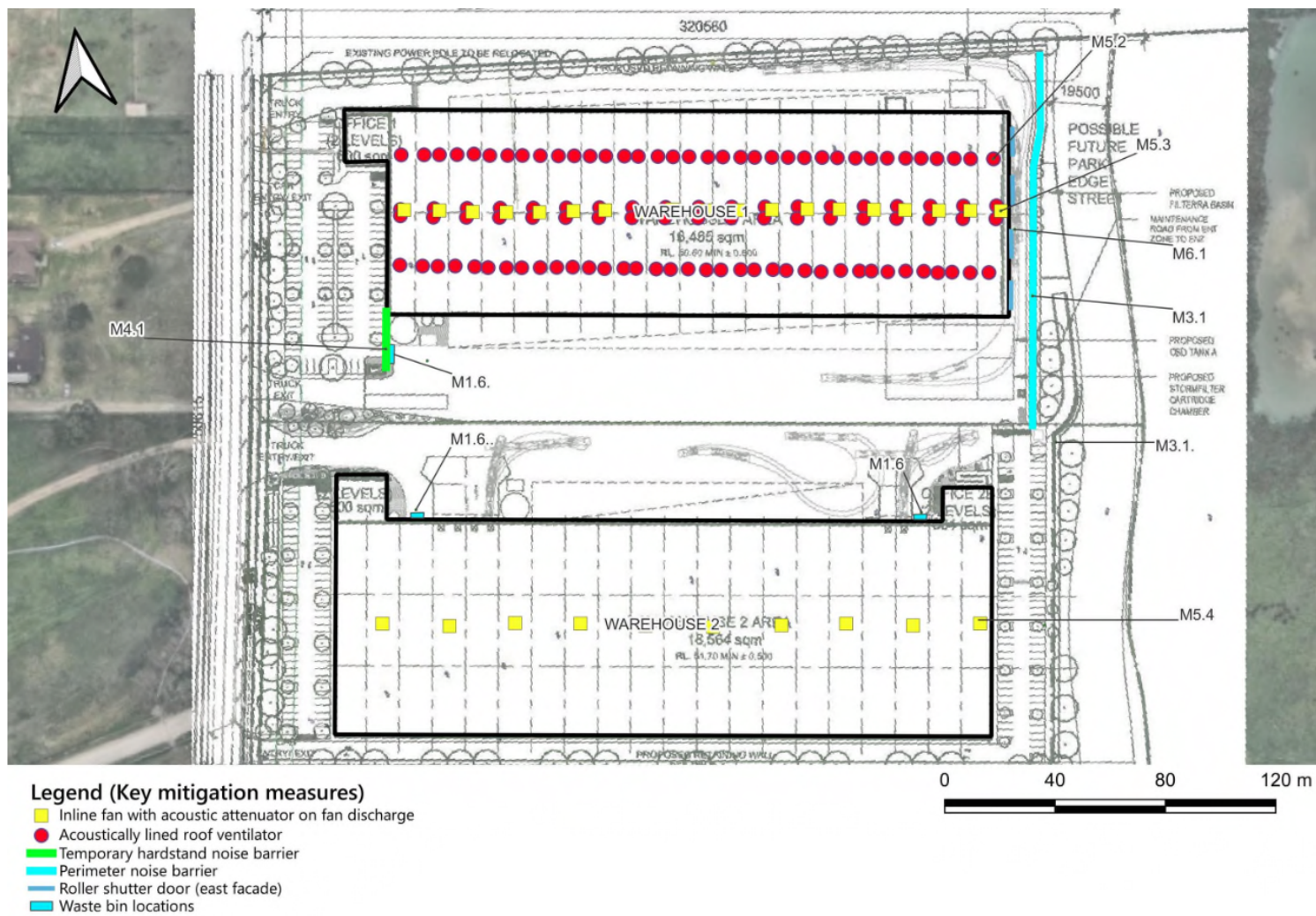


Figure 7 Proposed indicative noise mitigation measures considered in the design

3.3.5. Noise Predictions

The predicted operational noise levels indicate that following the implementation of all feasible and reasonable mitigation measures outlined in Section 3.3.4, the project noise levels are achieved for all receivers in NCA01 and NCA02 where there are existing residential receivers. There are up to 7 existing residences within the WSA Badgerys Creek precinct (NCA03) within the rezoned Enterprise zoned area where there is residual noise impacts predicted. It is expected that residences within this land will be progressively redeveloped for future industrial developments. Temporary feasible and reasonable operational noise mitigation and management strategies are proposed as the residences may only be occupied in the short term, as it would not be feasible and reasonable to strictly achieve the project noise trigger levels. It is proposed that for a feasible and reasonable approach to mitigation, a negotiated agreement would be entered into with these receivers, which may include at-property noise mitigation treatments, to manage noise impacts on these receivers until the existing residential use ceases.

The agreement should be with consideration of the predicted level of noise impact, which may be reviewed and updated as part of the detailed design review, or when a tenant and their associated noise emissions become known. Additionally, noise verification monitoring may also be undertaken following the commencement of operations to assist with determining actual noise emissions. This may mean that receivers identified in the NVIA may no longer be identified as above the PNTL.

Road traffic noise on public roads was reviewed. Martin Road already experiences substantial heavy vehicles movements due the nature of the existing industrial premises on this road, with some additional heavy vehicles added by the Proposal. However, noting the future context and the upgrades of the surrounding road network are currently in planning, potential impacts of overall traffic noise levels changes would be addressed as part of these road network upgrades, as it is required by the RNP for all traffic noise be considered, and not only the noise from an individual noise generating development.

As the site is located in close proximity to Western Sydney International Airport, a noise assessment has been carried out in accordance with current accepted procedures for aircraft noise, consistent with AS/NZS 2021:2015 Acoustics – Aircraft Noise Intrusion – Building Siting and Construction, with reference to the WSI ANEC 2055. Typical commercial and industrial façade constructions are expected to achieve the required internal aircraft noise levels.

3.3.6. Noise Controls

Noise will be managed in accordance with the Noise Management Plan prepared to address the SEARs and conditions of approval. The key management controls are summarised in **Table 9** below.

Table 9 - Noise Environmental Management Controls

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
NV01	Broadband reversing alarms “quackers” (i.e., non-tonal) shall be adopted across the tenant truck fleet that operates through warehouse facility. This should be adopted for all permanent and tenants owned/ controlled vehicles where feasible and reasonable. Where tenants do not have control over vehicles that operate through the facility, management of potential impacts should be reviewed further as part of the tenant operational management plan, with particular consideration as to whether these trucks would operate during the night period.	Yes	Yes	Ongoing	NVIA Management Measure
NV02	Alternate methods and practices to the use of horns as a safety warning for onsite moving forklifts should be reviewed and incorporated into site operations and safety practices.	N/A	Yes	Ongoing	NVIA Management Measure
NV03	Development of a methodology to manage the individual contributions of tenants within any approved noise requirements for the Proposal as part of the Operational Noise Management Plan/ Operational Management Plan developed for the Proposal.	Yes	Yes	Prior to operations commence	NVIA Management Measure

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
NV04	When a new tenant or change of tenant is proposed for a warehouse space an acoustic review is to be undertaken. During the preparation for occupancy of a warehouse tenancy (i.e. warehouse fit-out design stage) for any specific tenant, the potential noise emissions from the tenant's proposed operations are to be reviewed to confirm that: 1) The tenant operational noise emissions will satisfy any noise emission allowances and noise mitigation/management measures identified for the individual tenant in the Proposal Operational Noise Management Plan / Operational Management Plan to satisfy M1.7 above, and if there are any further mitigation and/or management measures required to do so. 2) Confirm if any further mitigation and/or management measures are required to ensure that noise emissions from the warehouse tenancy will be consistent with the noise emission outcomes presented in this NVIA. 3) Review potential sources of high noise events associated with the proposed operations that could occur during the night (10pm to 7am) to determine if further mitigation/management is required to achieve noise emission allowances. 4) Identify operations that are non-typical operations but could have the potential to exceed noise emission allowances (i.e. garbage compactor operations, scheduled waste truck operations, etc.). Determine if/ what feasible and reasonable controls would be required to manage these infrequent activities in a feasible and reasonable manner.	Yes	Yes	Ongoing	NVIA Management Measure

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
NV05	Reducing peak 15-minute heavy vehicles movement across the site by staggering delivery / arrival / departure times during sensitive time periods (i.e., night).	Yes	Yes	Ongoing	Best Practice
NV06	Minimising concurrent use of mobile plant near hardstand openings (i.e. ground floor exit) and/or limiting their use to the less sensitive daytime and evening periods.	Yes	Yes	Ongoing	Best Practice
NV07	Minimising the use of reversing alarms by providing forward manoeuvring where practicable.	N/A	Yes	Ongoing	Best Practice
NV08	Switching vehicles and plant off when not in use.	N/A	Yes	Ongoing	Best Practice
NV09	Keeping equipment well-maintained and operating it in a proper and efficient manner.	N/A	Yes	Ongoing	Best Practice
NV10	Training staff and drivers on the effects of noise and the use of quiet work practices (e.g. informing drivers of the noise impacts from sudden braking or accelerating, bangs and clangs, etc.).	Yes	Yes	Ongoing	Best Practice
NV11	The use of quieter mobile plant, such as electric forklifts instead of fuel-powered forklifts, where possible.	N/A	Yes	Ongoing	Best Practice
NV12	Using equipment with efficient muffler design.	N/A	Yes	Ongoing	Best Practice
NV13	Fitting and maintaining noise reduction packages on plant and equipment.	N/A	Yes	Ongoing	Best Practice
NV14	Ensure hardstand surfaces, roadways and vehicular access points are smooth as not to result in jolting of the truck (i.e. at entrance to site).	Yes	Yes	Prior to and Ongoing	Best Practice
NV15	Noise compliance measurements are conducted once operations commence, to determine that noise emissions are consistent with those documented in this assessment, and to determine that the mitigation measures are effective.	Yes	Yes	Once operations commence	Best Practice

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
NV16	Review of noise reduction opportunities during changes or refinements of site noise generating activities (i.e. new tenant/change of tenant).	Yes	Yes	Ongoing	Best Practice
NV17	Reviewing noise levels of plant, equipment and activities, during both ongoing compliance checks and in response to complaints.	Yes	Yes	Ongoing	Best Practice
NV18	All roller doors on the eastern end of Warehouse 1, are to be closed during the night period, and are to be constructed of solid material (i.e., not to include perforations for the purposes of airflow).	Yes	Yes	Ongoing	NVIA

3.4. Air Quality and Odour

The Air Quality Impact Assessment (AQIA) prepared by Northstar (2 December 2025) assessed the development's operational impacts on air quality.

During the operation of the proposed development, the following activities are expected to have the potential to result in air emissions:

- Vehicle movement on paved internal roads within the site.
- Combustion emissions from diesel and petrol used in trucks transporting materials and cars accessing the car park. These emissions would primarily include particulate matter (PM₁₀ and PM_{2.5}) and nitrogen oxides (NO_x), including nitrogen dioxide (NO₂). Additionally, smaller amounts of carbon monoxide (CO), sulphur dioxide (SO₂), and air toxics (such as benzene and 1,3-butadiene) would be emitted, but NO_x was considered the main pollutant for the assessment.

The impact of vehicle emissions suggests that the key pollutants of concern are particulate matter (PM₁₀ and PM_{2.5}) and NO₂, in line with short-term air quality criteria. NO_x/NO₂ levels have been used in the AQIA as indicators for all other combustion-related pollutants from traffic. In terms of road traffic emissions, particulate matter and NO₂ are the main factors determining compliance with air quality standards. Therefore, SO₂ and CO are not typically assessed in studies of this scale due to their low risk.

The hardstand surface of the development site, combined with the nature of the activities (assumed to be warehousing and distribution, with no significant dust-generating operations), is expected to result in low silt loading on site roads. Consequently, the potential for wheel-generated particulate matter is anticipated to be minimal and has not been quantitatively assessed. However, it is important to note that particulate emissions from brake and tyre wear, as well as those generated from fuel combustion, have been evaluated in the AQIA, considering both truck and passenger vehicle movements.

Given the nature of the development, it is not anticipated that odour would be emitted in any significant quantity during operation. Therefore, odour was not further considered in the assessment.

Based on existing background data from Bringelly's Air Quality Monitoring Station (AQMS) operated by NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW) and the criterion in the NSW EPA 'Approved Methods for the Modelling and Assessment of Air Pollutants in NSW' (2022), the below air quality monitoring data and assumptions have been adopted for the development.

Table 10 - Background air quality data and criterion adopted for the development (AQIA, 2025)

Pollutant	Averaging period	Units	NSW EPA Criteria	Bringelly AQMS Measured value	Notes
Total Suspended Particulates (TSP)	Annual	µg·m ⁻³	90	31.4	Bringelly AQMS - Estimated on a TSP:PM ₁₀ ratio of 2.0551:1
Particulate Matter (PM ₁₀)	24-hour	µg·m ⁻³	50	Daily varying	Bringelly AQMS - The 24-hour maximum PM ₁₀ concentration
	Annual	µg·m ⁻³	25	15.3	

Pollutant	Averaging period	Units	NSW EPA Criteria	Bringelly AQMS Measured value	Notes
					in 2021 was 69.0 $\mu\text{g}\cdot\text{m}^{-3}$
Particulate Matter (PM _{2.5})	24-hour	$\mu\text{g}\cdot\text{m}^{-3}$	25	Daily varying	Bringelly AQMS - The 24-hour maximum PM _{2.5} concentration in 2021 was 57.4 $\mu\text{g}\cdot\text{m}^{-3}$
	Annual	$\mu\text{g}\cdot\text{m}^{-3}$	8	7.2	
Nitrogen dioxide (NO ₂)	1-hour	$\mu\text{g}\cdot\text{m}^{-3}$	164	49.2	Bringelly AQMS - Hourly maximum 1-hr average in 2021
	Annual	$\mu\text{g}\cdot\text{m}^{-3}$	31	7.1	Bringelly AQMS - Annual average in 2021

Due to the industrial and agricultural activities in the area surrounding the development site, there is a possibility that emissions from both the development and nearby facilities could collectively affect nearby sensitive receptors. Furthermore, emissions from surrounding sources may contribute to adverse air quality impacts at the development site. Existing surrounding receivers include:

- Australian Native Landscapes
 - Immediately north of the development site.
 - Activities include stockpile management, composting, and vehicle movements.
- Boral Quarry and Brickworks
 - 400 m to the southwest of development site.
 - Activities include extraction activities, brick manufacturing, stockpile management, and vehicle movements.

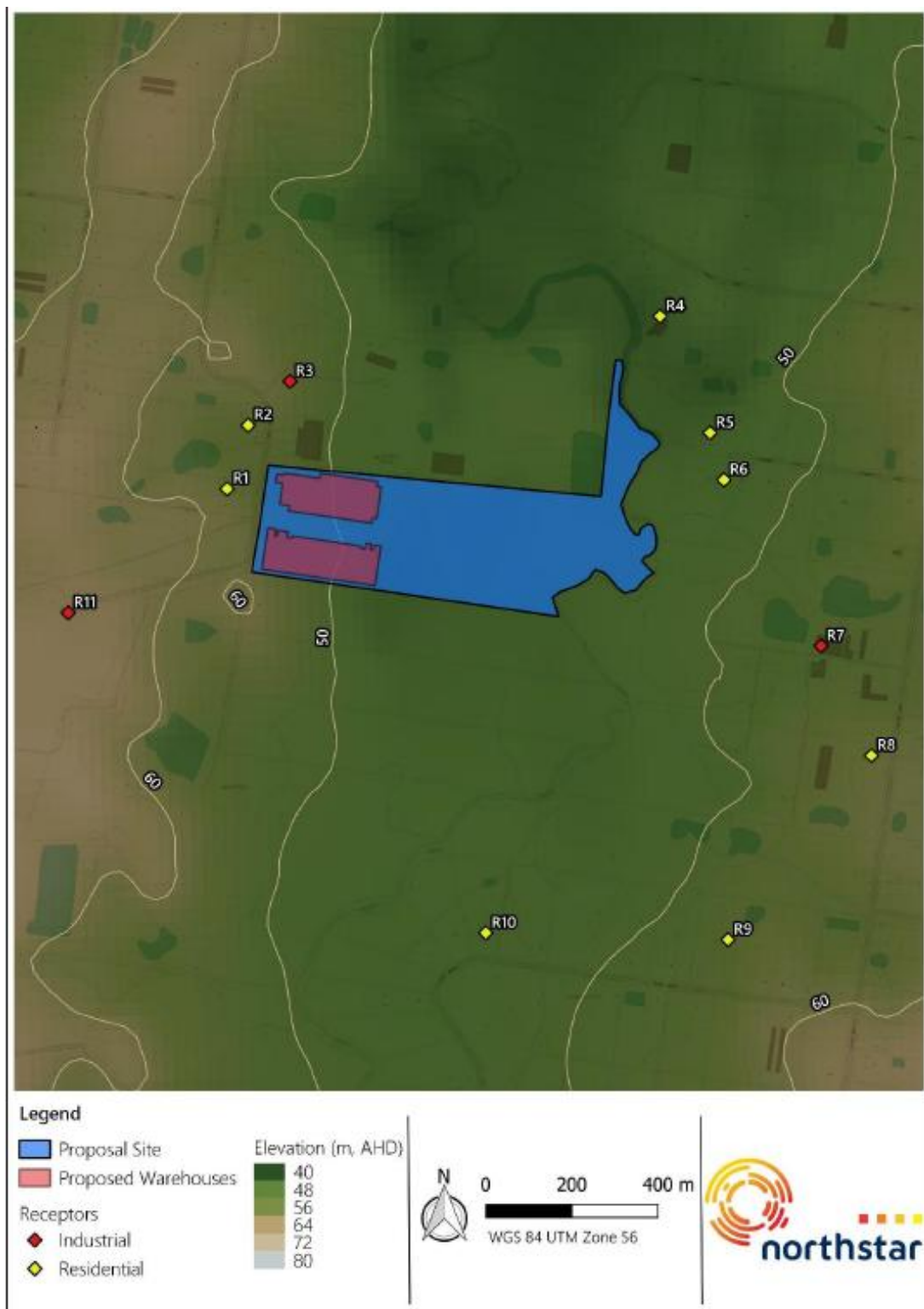
There are also a number of approved and likely future developments surrounding the development site.

The findings of the AQIA indicate that the operation of the development is not predicted to result in any additional exceedance of the air quality criteria. Whilst the development site is located in close proximity to a number of industrial activities, the demonstrated low incremental impacts associated with the development is not likely to result in adverse cumulative impacts at surrounding receptor locations, as shown in **Table 11**.

Table 11 - Predicted annual average NO₂, TSP, PM₁₀ and PM_{2.5} concentrations (AQIA, 2025)

Annual average concentration (µg·m ⁻³)								
Criteria	TSP 90 µg·m ⁻³		PM ₁₀ 25 µg·m ⁻³		PM _{2.5} 8 µg·m ⁻³		NO ₂ 31 µg·m ⁻³	
Receptor	Incremental Impact	Cumulative Impact	Incremental Impact	Cumulative Impact	Incremental Impact	Cumulative Impact	Incremental Impact	Cumulative Impact
R1	<0.1	31.5	<0.1	15.3	<0.1	7.3	3.0	10.1
R2	<0.1	31.5	<0.1	15.3	<0.1	7.3	2.0	9.1
R3	<0.1	31.5	<0.1	15.3	<0.1	7.3	1.5	8.6
R4	<0.1	31.5	<0.1	15.3	<0.1	7.3	0.8	7.9
R5	<0.1	31.5	<0.1	15.3	<0.1	7.3	0.4	7.5
R6	<0.1	31.5	<0.1	15.3	<0.1	7.3	0.3	7.4
R7	<0.1	31.5	<0.1	15.3	<0.1	7.3	0.1	7.2
R8	<0.1	31.5	<0.1	15.3	<0.1	7.3	<0.1	7.2
R9	<0.1	31.5	<0.1	15.3	<0.1	7.3	<0.1	7.2
R10	<0.1	31.5	<0.1	15.3	<0.1	7.3	0.1	7.2
R11	<0.1	31.5	<0.1	15.3	<0.1	7.3	0.6	7.7

Air quality receptor locations are shown in Figure 8 below.



Source: Northstar

Figure 8 - Air Quality Receptor Locations (AQIA, 2025)

Air quality will be managed in accordance with the AQIA prepared to address the SEARs and conditions of approval. The AQIA concluded that in consideration of the background air quality assumptions and applying worst-case scenarios related to truck idling, the operational impact of the development will not generate any additional exceedances of the relevant criteria for the pollutants assessed as a result of the development's operations. Implementing good site management practices, such as adhering to speed limits and minimising vehicle use by avoiding engine idling, will be sufficient to reduce off-site impacts. Given the development's incremental contribution to air quality impacts in the surrounding area, no air quality monitoring is required or proposed. The key management controls are summarised in **Table 12**.

Table 12 - Air Quality Environmental Management Controls

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
AQ01	Minimise vehicle idling by switching vehicles and plant off when not in use.	N/A	Yes	Ongoing	Best Practice
AQ02	Adhering to speed limits.	N/A	Yes	Ongoing	Best Practice
AQ03	Keeping equipment well-maintained and operating it in a proper and efficient manner.	N/A	Yes	Ongoing	Best Practice
AQ04	Reviewing emission levels of plant, equipment and activities, during both ongoing compliance checks and in response to complaints.	Yes	Yes	Ongoing	Best Practice
AQ05	The use of lower emissions mobile plant, such as electric forklifts instead of fuel-powered forklifts, where possible.	N/A	Yes	Ongoing	Best Practice

3.5. Waste

The Waste Management Plan (WMP) developed by SALT (11 December 2025) outlines the management of operational waste in accordance with the NSW EPA *Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities* (2012).

Projected commercial waste generation rates are detailed in **Table 13**, with calculations based on a 7 days per week operation for both warehouse and office areas. Office waste rates are derived from the average figures outlined in the NSW EPA's *Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities* (2012).

Since there are no specific warehouse waste generation rates in the Liverpool Development Control Plan, Western Sydney Airport Development Control Plan, or the NSW EPA guidelines, rates for warehouses are based on the commercial waste generation rates from the Sustainability Victoria *Better Practice Guide for Waste Management and Recycling in Multiunit Developments* (2019).

The generation of organic waste is anticipated to be low throughout the site, so this particular waste stream hasn't been assessed separately. All organic waste will be discarded in the general bins, or specific green-waste bins if available.

Table 13 - Waste Generation Rates

Use	Garbage (L/100m ² /week)	Commingled Recycling (L/100m ² /week)
Warehouse	70	70
Office	56	42

Waste generation assessments are provided in **Table 14** and **Table 15**.

Table 14 - Waste Generation Assessment – Warehouse 1

Use	Area	Waste Per Week	
		Garbage	Recycling
Warehouse	16,465m ²	11,525L	11,525L
Office	600m ²	336L	252L
Total Waste Generated per Week		11,861L	11,777L

Table 15 - Waste Generation Assessment – Warehouse 2

Use	Area	Waste Per Week	
		Garbage	Recycling
Warehouse	18,564m ²	12,995L	12,995L
Office	1,104m ²	618L	464L
Total Waste Generated per Week		13,613L	13,459L

3.5.1. Waste Hierarchy

The NSW EPA waste management hierarchy has been adopted as the framework to guide the waste management practices of the proposed development as detailed in Figure 9 below.

The waste hierarchy provides a reference on the order of approaches to achieve efficient resource use. The aspects of the hierarchy are applicable to the operational stages of this project. As a key objective for all employees and personnel, the avoidance of waste generation and reuse of materials will have priority over recycling, and recycling will have priority over disposal.



Figure 9 - NSW EPA Waste Hierarchy

3.5.2. Waste Systems

Waste will be sorted on-site by staff and cleaners into the following streams:

- Garbage (General Waste)
- Commingled Recycling
- Bulk Waste and
- Hazardous Waste

3.5.3. Bin Stations

According to a case study conducted by Westpac NZ, implementing bin stations into offices reduced waste sent to landfill by approximately 40%. This case study highlights the importance of promoting waste diversion and creating numerous waste streams in all areas of operations. The installation of bin stations similar to the example shown in **Figure 10**, encourages individuals to consider their waste disposal and therefore promote proper waste management.



Figure 10 - Bin station example

The table below outlines the capacity of the bins recommended for the operations waste stream management.

Table 16 - Bin sizes for areas of Operation

Use	Waste Stream and Bin Capacity (Litres)	
	General Waste	Comingled Recycling
Warehouse 1	550	280
Warehouse 2	680	340
Office 1	20	15
Office 2	30	20

All bulky waste will be managed independently by the respective warehouse tenants. All bulky waste will be temporarily stored within the respective warehouses prior to when collections occur. The tenants would arrange for bulky waste collections to occur via a private contractor, as required.

Due to the operational practices and manufacturing component of the subject site, additional space for 1 x skip bin/waste container (4.5m³) has been calculated within the area of waste storage for warehouse lot (1), to assist with the separation and disposal of metal profiling, offcuts and filings forming a part of the ancillary manufacturing operations. The collection frequency and appropriate bin size of metal recycling streams would be arranged by building management on an as required basis, once site operational capacities and volumes are known.

Any hazardous waste generated on-site must be removed and disposed of in accordance with the requirements of WorkSafe, NSW EPA and the relevant environmental legislations and applicable guidelines.

Bin Quantity, Size, and Collection Frequency

The tables below outline the bin sizes, number of bins, and the recommended frequency of waste collection for different waste streams. The disposal and collection of waste will be left up to the discretion of the staff and cleaners once operations commence.

Table 17 - Bin Size and Collection Frequency – Warehouse 1

Waste Stream	Collections per Week	Bin Size	No. Bins	Weekly Capacity	Weekly Volume
Garbage	3	4.5m ³	1	13,500L	11,861L
Comingled Recycling	3	4.5m ³	1	13,500L	11,777L

Table 18 - Bin Size and Collection Frequency – Warehouse 2

Waste Stream	Collections per Week	Bin Size	No. Bins	Weekly Capacity	Weekly Volume
Garbage	2	4.5m ³	2	18,000L	13,613L
Comingled Recycling	2	4.5m ³	2	18,000L	13,459L

Waste will be managed in accordance with the Waste Management Plan prepared to address the SEARs and conditions of approval. The key management controls are summarised in **Table 19**.

Table 19 - Waste Management Controls

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
WM01	Vehicles collecting the waste are to follow the rules and directions for collection outlined in the Waste Management Plan.	Yes	Yes	Ongoing	WMP Management Measure
WM02	Commercial tenants to be provided with Work Health and Safety approved waste handling and training on safe disposal of hazardous substances and sharp objects.	Yes	Yes	Ongoing	WMP Management Measure
WM03	Waste vehicle operators should be trained and informed on safe handling of unknown substances.	Yes	Yes	Ongoing	Best Practice
WM04	Individuals handling hazardous substances or sharp objects to be provided with PPE.	Yes	Yes	Ongoing	WMP Management Measure
WM05	Individuals to be provided with NSW EPA approved waste handling and training.	Yes	Yes	Ongoing	Best Practice
WM06	The NSW EPA waste hierarchy to be implemented to avoid excessive waste being sent to landfill.	Yes	Yes	Ongoing	WMP Management Measure
WM07	Separation of waste streams to be implemented to ensure waste management is followed.	Yes	Yes	Ongoing	WMP Management Measure
WM08	Waste signage to be displayed for bin locations and waste streams.	Yes	Yes	Ongoing	WMP Management Measure

3.6. Water Management and Stormwater Drainage

A Civil Infrastructure Report prepared by Acardis (25 November 2025) was developed to address the SEARs key civil infrastructure issues including stormwater infrastructure, On Site Detention (OSD), Water Sensitive Urban Design (WSUD) and measures to minimise water use.

3.6.1. Stormwater Drainage

A key objective of the proposed stormwater drainage system is to manage post-development runoff so that it does not exceed pre-development levels. OSD will be implemented under the handstand area to the north and south of the northern warehouse. This will ensure that post-development peak flows are restricted to match pre-development rates, thereby preventing any adverse flooding impacts downstream.

The stormwater pit and pipe network has been engineered to handle flows during both 5% AEP and 1% AEP events. Runoff from the development will be captured via the drainage system and directed to OSD tanks under the handstand area to the north and south of the northern warehouse. Discharge from these tanks will flow into a Filterra basin, which will ultimately discharge to the existing pond. There are no proposed modifications to the existing pond's spillway, which directs flows towards South Creek.

Additionally, twin 1200mm diameter stormwater pipes are designed to convey runoff from the external 25.8-hectare catchment through the development site to the ENZ land zone area. Overland flows from this upstream catchment will be intercepted at the north-west corner of the development. Since this external catchment is not part of the site's water quality and quantity management plan, its flows will bypass the OSD tanks and bioretention basin without being retained or treated.

The parameters of the OSD tanks are summarised in Table 20 below.

Table 20 – Detention system design parameters (Civil Infrastructure Report, 2025)

Parameter	OSD Tank A	OSD Tank B
Area (m ²)	1,250	130
Required internal tank depth (m)	2.58	2.66
Minimum detention volume (m ³)	3,225	346

3.6.2. Water Quality

To minimise stormwater pollution leaving the site and reaching South Creek, WSUD principles have been incorporated into the stormwater design. Stormwater management measures include:

- Rainwater tanks (for non-potable reuse)
- Gully Pit Baskets
- Proprietary Ocean Protect StormFilters filtration cartridges
- OSD
- Filterra basin

Gully pit baskets are used as a means of primary stormwater treatment and capture of gross pollutants such as litter, debris, and coarse sediment prior to tertiary treatment downstream.

The OSD tanks include 44 proprietary Ocean Protect StormFilter cartridges to provide tertiary stormwater treatment and contribute to the removal of suspended solids, phosphorus, and nitrogen.

The Filterra basin contributes to the removal of suspended solids, phosphorus, and nitrogen. The

basin has a filter media area of 306m², a filter depth of 530mm, and an extended detention depth of 150mm. The vegetation included in the basin is effective for nutrient removal. The underdrain serves as a flow outlet to the existing pond which allows the filter media to freely drain so that the bioretention basin does not have a submerged zone.

3.6.3. Water Use Management

The potable water supply in the greater Sydney region is under increasing pressure due to population growth, potential impacts from climate change, and periods of drought. As such the development has adopted a sustainable approach to integrated water cycle management (potable water, sewerage, stormwater, and rainwater) to minimise potable water demand and maximise water reuse on site for non-potable purposes where feasible.

Sydney Water's potable water network is the primary source of water to the development site, and onsite rainwater tanks is the primary source of non-potable water for the development. A reticulated recycled water network is proposed by Sydney Water to supply non-potable water throughout the Western Sydney Aerotropolis (WSA). This will provide a secondary source of water to the development for non-potable purposes once it's in operation.

The rainwater tanks will collect roof water to meet at least 80% of the development's demand, as calculated in Table 21 below, for non-potable water including toilet flushing and landscape irrigation. Modelling software MUSIC was used to determine the rainwater tanks size required to meet 80% of the non-potable water demand. Based on the calculated demand in the table below and the proposed combined roof catchment area of 3.59ha, five 27kL rainwater tanks will supply 89% of non-potable water demand, thus achieving requirements.

Table 21 - Non-potable water demand calculations (Civil Infrastructure Report, 2025)

Water Use	Water Demand
Toilet flushing	15L/persons/ha/day Assuming 21 persons/ha Demand = 15L x 21 persons/ha x 7.2ha = 2268L/day = 2.3kL/day (1 d.p.)
Irrigation	Area = 50% of landscape areas Irrigation rate = 600mm/y Demand = 0.5 x 4166m ² x 600mm/y = 1250m ³ /y = 1250kL/y This annual demand was distributed using the monthly pattern provided in the technical guidance document.

Advice and guidance on minimising water use and improving water efficiency is provided by Sydney Water. Although warehouses use relatively little water compared to other industrial developments, the water use minimisation measures below are applicable to the development. Stormwater and water usage will be managed in accordance with the Civil Infrastructure Report (CIR) prepared to address the SEARs and conditions of approval. The key management controls are summarised in **Table 22 - Stormwater Management Controls**.

Table 22 - Stormwater Management Controls

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
SW01	Rainwater Tanks installed to collect roof water to meet at least 80% of the development's demand for non-potable water (toilet flushing and landscape irrigation).	Yes	N/A	Design/ Operations	CIR Management Measure
SW02	Gross Pollutant Traps installed to remove gross pollutants prior to tertiary treatment downstream.	Yes	N/A	Design/ Operations	CIR Management Measure
SW03	Proprietary Ocean Protect StormFilters filtration cartridges to be installed within the proposed OSD tank to contribute to the removal of suspended solids, phosphorus, and nitrogen.	Yes	N/A	Design/ Operations	CIR Management Measure

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
SW04	Bioretention basin to be constructed to contribute to the removal of suspended solids, phosphorus, and nitrogen.	Yes	N/A	Design/ Operations	CIR Management Measure
SW05	Where possible, avoid using water by opting for alternatives like sweeping hard surfaces instead of hosing them down.	Yes	Yes	Ongoing	CIR Management Measure
SW06	Reduce water use by installing water efficient appliances and equipment (e.g. dishwashers, toilets).	Yes	Yes	Operations	CIR Management Measure
SW07	Reuse water for non-potable purposes (e.g. collect rainwater for landscape irrigation and toilet flushing).	Yes	N/A	Design/ Operations	CIR Management Measure
SW08	An Inspection and Maintenance Plan will be prepared in accordance with the requirements outlined in applicable standards and outline the function of each measure, qualifications required to manage and maintain each measure, inspection activities and schedule, and requirements in relation to record keeping.	Yes	N/A	Prior to operations	CIR Management Measure

3.7. Hazard, Risk and Emergency

A Preliminary Hazard Analysis (PHA) (SLR Consulting, 15 December 2025) was prepared to address the development's hazards and risks in accordance with State Environmental Planning Policy (Resilience and Hazards) 2021 (the SEPP) and Applying SEPP 33 (DoP, 2011).

The Preliminary Risk Screening for storage and transport of dangerous goods indicated that the development would not be classified as a hazardous or offensive industry with regards to offsite risks. However, as there will be two tenants onsite, (Lot 1 and Lot 2) then a further screening of dangerous good storage against Safework Placard Quantities found there maybe the potential for onsite hazards to impact the two tenancies. Accordingly, a further hazard analysis was undertaken in the form of a PHA assessing the following hazards in Lot 1.

- LPG storage
- Gas cylinders storage (other than LPG)
- Class 3 Dangerous Goods storage

The PHA found that the residual risks associated with the above Lot 1 hazards, once controls are implemented were rated as Negligible to ALARP (i.e. the risk is acceptably low).

The risk of onsite propagation of an accident causing a “domino” effect on adjoining premises in Lot 2 is considered unlikely. This conclusion is based on the assumption that Lot 2 storage of dangerous goods will be limited to quantities less than the Safework Placard Quantities and Lot 1 will have the required engineering and design controls in place.

If future tenants of Lot 2 want to increase dangerous goods storage to quantities greater than the Safework Placard Quantities then an undated PHA must be undertaken by the tenant or their representative. The resulting PHA will then need to be reviewed and approved by relevant planning authorities before the tenant moves into Lot 2.

The risk of biophysical damage outside the Site is considered unlikely based on the engineering and design controls that will be in place.

The PHA concluded that the development would be identified as a suitable development for the area, with suitable engineering controls, operational controls and management controls in place. These controls are a standard industry practice and readily implemented as part of safety engineering.

Dangerous goods storage quantities are detailed in Table 23 below.

Table 23 - Dangerous Goods in Storage – Lot 1 Warehouse (PHA, 2025).

Substance	Hazardous Class	Packing Group	Total Storage on Site	Resilience and Hazard SEPP Threshold Quantity	Placard Quantity	Findings
Liquified Petroleum Gas (LPG)	2.1	N/A	1,304 L Comprised of gas cylinders 2 x 190kg (450 L water capacity), 11 x15 kg (36.7 L water capacity)	10,000kg or 16m ³	200L	Below SEPP threshold
Acetylene	2.1	N/A	125L Comprised of 5 x E2 gas bottles (25 L water capacity)	100kg and greater compare against separation distances	200L	Below SEPP threshold
Total Storage	2.1		1,429 L		200L	Above Placard Quantity
Oxygen	2.2 Subsidiary risk group 5.1	N/A	125L Comprised of 5 x E2 gas bottles (25 L water capacity)	5 tonnes (Subsidiary risk group 5.1)	1,000L	Below SEPP threshold
Argoshield	2.2	N/A	204L Comprised of 6 x F3VIR gas cylinders (34 L water capacity)	N/A	1,000L	N/A
Total Storage	2.2		329 L		1,000L	Below Placard Quantity
Recosol	3	ii	1,100L Comprised of 4 x 200L and 2 x 150L	5 tonnes	250L	Below SEPP threshold
Brake	3	ii	40L	5 tonnes	250L	Below SEPP

Cleaner			Comprised of 2 x 20L			threshold
Total Storage			1,140L			Below SEPP threshold Above Placard Quantity
Degreaser	8	ii	20L	25 tonnes	250L	Below SEPP threshold Below Placard Quantity
Renoform MW	9	iii	3 x 200L	N/A	N/A	N/A

The key hazard, risk and emergency management controls are summarised in the table below.

Table 24 - Hazard, Risk and Emergency Environmental Management Controls

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
HR01	Chemicals to be stored in bunded chemical containers, located as far as possible from drainage lines, vegetated areas, and sensitive areas.	Yes	Yes	Ongoing	Best Practice
HR02	SDS to be stored with hazardous chemicals at all times.	Yes	Yes	Ongoing	Best Practice
HR03	Additional controls to be implemented around hazardous chemical storage areas, including additional bunds and specific spill kits designated to these areas.	Yes	Yes	Ongoing	Best Practice
HR04	Refuelling of vehicles, plant and equipment will take place as far as possible from any waterway or drainage system and over a bund/plant nappy.	Yes	Yes	Ongoing	Best Practice
HR05	Spill kits will be on standby while refuelling is taking place.	Yes	Yes	Ongoing	Best Practice

HR06	Any fuel or oil spills shall be contained using a spill kit.	Yes	Yes	Ongoing	Best Practice
------	--	-----	-----	---------	---------------

3.8. Bushfire and Fire Safety

A Bushfire Protection Assessment (BPA) was prepared by Travers Bushfire Ecology (18 December 2025). The proposed development is identified as bushfire prone on the Liverpool City Council bush fire prone land map, as shown in **Figure 6** below. This triggers a formal assessment in respect of the NSW Rural Fire Service (RFS) policy against the provisions of *Planning for Bush Fire Protection* (PBP). The intent of bushfire protection measures for this development is to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents and others assisting firefighting activities.

The PBP guidelines require the identification of the predominant vegetation formation in accordance with David Keith (2004) when using the simplified acceptable solutions in PBP. This is to determine the acceptable fuel loads. The vegetation is calculated for a distance of at least 140m from a proposed building envelope. The vegetation within 140m of the development site is detailed in Table 25 below.

Table 25 - Vegetation Formation and Acceptable Fuel Loads (BPA, 2025).

Vegetation Community	Vegetation Formation (Keith, 2004)	Vegetation Classification (Keith, 2004)	PBP Classification	Acceptable fuel loads surface/ elevated (t/ha) (PBP, 2019)
Cumberland Shale Plains Woodland (PCT 3320)	Grassy Woodlands	Coastal Valley Grassy Woodland	Grassy Woodland	10.5t/ 20.2ha
Cumberland Red Gum River-flat Forest (PCT 4025)	Forested Wetland	Coastal Floodplain Wetland	Forested Wetland	8.0t/ 15.1ha
Unmanaged Grassland	Grassland			6.0t/ 6.0ha

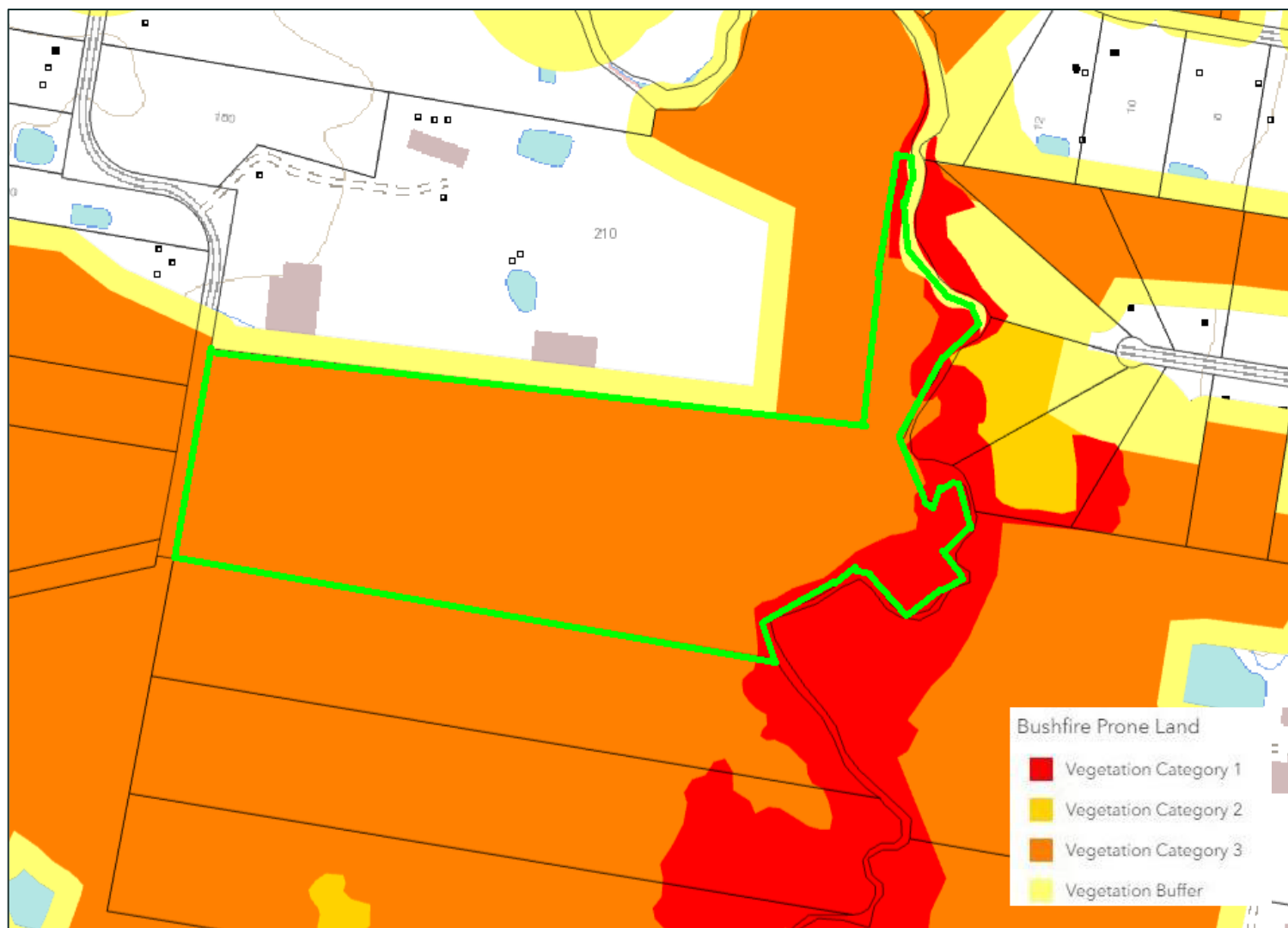


Figure 11 - Bushfire Prone Land Map (BPA, 2025).

The effective slope has been assessed for up to 100 meters from the development site. This refers to the slope that has the greatest influence on potential fire behaviour, rather than simply relying on a mean average slope, which may not provide enough detail for an accurate assessment. The effective slope within the hazardous vegetation is detailed in the table below, along with a summary of the bushfire attack assessment for residential development and the methodologies used. The assessment has determined the Asset Protection Zone (APZ) and Bushfire Attack Level (BAL) using the following approaches:

- A Fire Danger Index (FDI) of 100 has been applied to calculate bushfire behaviour based on the site's location within the Greater Sydney region.
- Table A1.12.2 of PBP 2019.

The APZ must be entirely within the site's boundaries and should not depend on adjacent land. APZ's can extend beyond a site's boundaries in cases where structures or features of a landscape are considered permanent and act as barriers against fire spread. The minimum APZ setback required for a non-residential building is a rating of BAL-29, which ensures buildings are not exposed to a radiant heat flux exceeding 29 kW/m².

Land being retained for environment and recreation is assessed as grassy woodland.

Table 26 - Bushfire Attack Assessment (BPA, 2025).

Aspect	Vegetation Formation	Effective Slope	Recommended APZ Required (BAL-29)	APZ provided	Comment
East	Grassy Woodland	0-5° downslope	16m	49m	The APZ provided includes the potential Park Road and car park area.
South	Grassland	Flat/ upslope	10m	10m	The APZ provided includes a 10m setback zone from the edge of warehouse 2 and the site's southern boundary.
West	Grassy Woodland	Flat/ upslope	12m	>28m	The APZ provided includes the Martin Road reserve and car park areas.
North	Managed Land	N/A			

In accordance with the PBP guidelines for commercial and industrial development, the proposed landscape plans have been designed to ensure fire safety through appropriate setbacks and compliance with bushfire protection measures. A minimum setback for APZs of 10 metres has been incorporated, which includes provision for a perimeter road, ensuring separation between vegetation and buildings. If the surrounding hardstand area is used for vehicle storage or parking, a 16-meter setback outside the apron area is required. Alternatively, an 8-meter no parking/storage zone must be maintained on the hardstand apron. The bushfire attack assessment confirms that all APZs can be fully contained within the site boundaries, ensuring that buildings are not exposed to radiant heat flux exceeding 29 kW/m², refer to **Figure 7**.

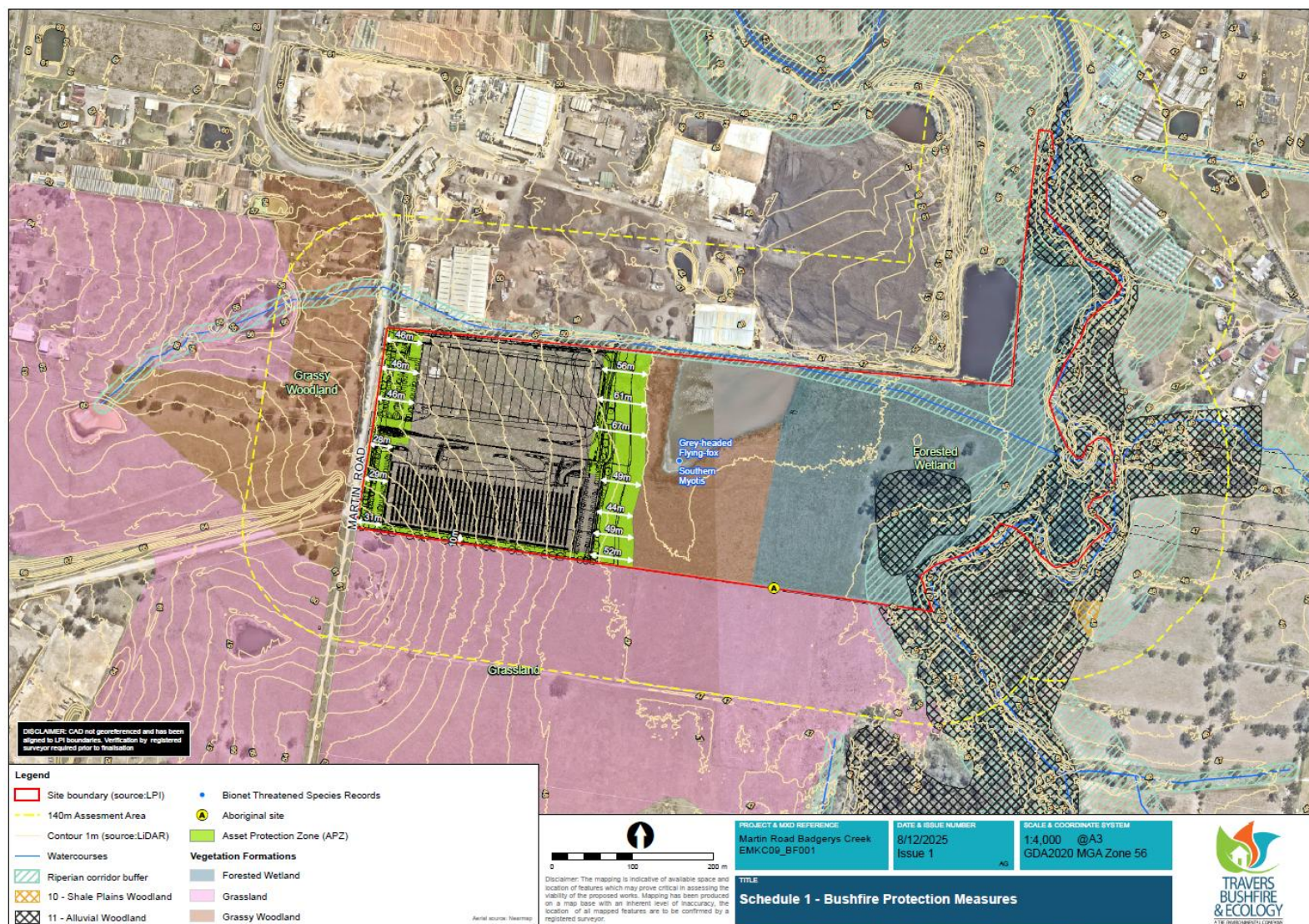
Lots containing warehouses 1 and 2 will have separate access/ egress that are site specific (refer to Figure 5). For the site of Warehouse 1, there will be a single access/ egress point from Martin Road in the north-west to the rear as a perimeter road in its western section. There will also be a separate egress points for trucks in its southern western corner from Martin Road. The width of the perimeter road for the Warehouse 1 site will vary but will not be less than 6m wide. Carparking for Lot 1 is to the front of the site (west) near the northern entry point.

The site for Warehouse 2 will have a single access/ egress point for trucks from Martin Road, situated in its northwestern corner. The internal access road which runs parallel to the southern boundary and provides access to the car parks which are located at the western and eastern ends of the lot. These points will have specific routes for cars and trucks. There is no perimeter road for the warehouse 2 site other than offered by the carpark. There is an area of hard standing to the north of the warehouse. The widths of these roads within the warehouse 2 site will vary but won't be less than 8 metres wide.

The access provisions for both the warehouse 1 and 2 sites are designed to provide frontage access to the main bushfire threats to the west, east and south of the development. The proposed Park Road that will run along both sites eastern aspect will provide additional frontage access and create an additional buffer zone between the bushfire threat to the east and the development.

Adequate water services will be provided for the protection of the warehouses during and after the passage of bushfire. The development will rely on tank water as an interim solution until Sydney Water provide reticulated water infrastructure to the site. The development is compliant with the acceptable solutions for reticulated water supply (PBP guidelines), and the requirements of the NCC.

The development is also compliant with the acceptable solutions outlined in PBP 2019 for electricity and gas, where the intent of the measures are to locate electricity and gas so as not to contribute to the risk of fire to the warehouses. The development's electrical transmission lines will be underground. As for gas, there are currently no plans to have gas supplied to the site and will only be made available if the future tenant requires it, however, gas supply is not recommended.



The key bushfire management controls are summarised in **Table 27**.

Table 27 - Bushfire Environmental Management Controls

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
BR01	APZs in accordance with the minimum setbacks outlined within PBP 2019.	Yes	N/A	Design	BPA Management Measure
BR02	Review of the site's current landscaping plans to comply with Appendix 4 of PBP 2019 and shown in schedule 2.	Yes	N/A	Design	BPA Management Measure
BR03	Building construction in accordance with the requirements of NCC and ember protection within section 7.5 of PBP (sarking to be non-combustible).	Yes	N/A	Design	BPA Management Measure
BR04	Provision of access, water, and electricity supply in accordance with the acceptable solutions outlined in PBP 2019 (no gas to be supplied).	Yes	N/A	Design & Ongoing	BPA Management Measure
BR05	APZs are to be provided to the proposed development as generally depicted within Figure 7 - Bushfire Protection Measures Plan (BPA, 2025) and maintained in perpetuity.	Yes	N/A	Design & Ongoing	BPA Recommendation
BR06	Access is provided in accordance with section 3.2 of this report and set out in Figure 7 - Bushfire Protection Measures Plan (BPA, 2025) . It is noted that the northern hardstand area has water availability in the event of a bushfire.	Yes	N/A	Design	BPA Recommendation
BR07	Water and electricity supply is provided in accordance with sections 3.3 & 3.6 of the BPA report. Water supplies to conform to the requirements of the NCC. Street hydrants not to be located in roadway.	Yes	N/A	Design	BPA Recommendation

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
BR08	Landscaping plans for the site are to be finalised which demonstrates compliance with Appendix 4 of PBP 2019 and a letter provided to that effect from a suitably qualified bush fire consultant prior to occupation.	Yes	N/A	Design	BPA Recommendation
BR09	All site-fencing should be made of non-combustible material.	Yes	N/A	Design	BPA Recommendation
BR10	Bushfire Emergency and Evacuation Plan be prepared for and implemented for the site and subject to regular drills and maintenance. To be prepared and finalised prior to occupation and updated annually.	Yes	N/A	Ongoing	BPA Recommendation

3.9. Flooding

A Flood Impact and Risk Assessment (FIRA) was prepared by Worley Consulting Pty Ltd (January 2026) given the site's location at the western edge of the South Creek floodplain on the eastern boundary of the site. South Creek is a major tributary of the Hawkesbury River and flows past the site from south-to-north. The development will be limited to the western part of the site and will be positioned outside the *Critical Flood Storage* area for South Creek.

The RMA-2 model was used to assess the peak flood levels and peak flow velocities (and hazard classification) of the proposed development. The post-development model was used to simulate the 5%, 1% and 1 in 500 Annual Exceedance Probability (AEP) design events and the Probable Maximum Flood (PMF). The predicted impacts of the development are summarised below.

Table 28 - Predicted Flood Impacts

Flood Conditions	Peak Flood Levels	Peak Flow Velocities
5% AEP	No changes to peak 5% AEP flood levels within or outside of the development site.	No increases in peak 5% AEP flow velocities.
1% AEP	Maximum change in peak 1% AEP flood levels of +0.01 metres outside of the site. The impact is predicted to be very localised, extending less than 10 metres into the adjoining property to the south.	Maximum offsite increase in peak 1% AEP flow velocities of 0.04 m/s.
1 in 500 AEP	Maximum change in peak 1 in 500 AEP flood levels of +0.01 metres outside of the site.	Maximum offsite increase in peak 1 in 500 AEP flow velocities of 0.04 m/s. The impact is predicted to reduce to 0.02 m/s within 10 metres of the site boundary.
PMF	Maximum change in peak PMF levels of +0.04 metres. The impact occurs to the south of the development site and the proposed fill. The impact reduces to less than 0.02 metres within 40 metres of the southern boundary of the property.	Maximum offsite increase in peak PMF flow velocities of 0.13 m/s.

Regarding peak flood levels, the predicted impacts are considered negligible during floods up to and including the 1 in 500 AEP event, being only 0.01 metres or less in offsite areas, including along the eastern edge of the Enterprise (ENT) zone future developable area to the south. The impacts predicted during the PMF event are considered acceptable based on the extreme nature of such flooding, which has an annual exceedance probability of at least 1 in 10,000. There is not expected to be any impact on existing emergency response considerations.

Regarding peak flood velocities, the impacts that are predicted upstream of the development site occur across areas designated as flood fringe and flood storage at the eastern edge of the future developable land in the ENT zone. Modelling for existing conditions shows that velocities at these locations are relatively low (less than 0.4 m/s) for floods up to and including the 1 in 500 AEP event. The minor velocity increases of up to 0.04 m/s during these events will therefore result in post-development velocities of less than 0.5 m/s, which remain low and will not have the potential to increase the existing flood hazard classification or cause any scour / erosion.

Post-development flood modelling indicates that the proposed development will remain flood-free in events up to and including the PMF, placing the buildings and hardstand areas above the predicted peak PMF levels. However, workers and visitors may still be affected by road flooding leading to and from the site. There are no suitable upstream river gauges that could be used to provide advanced warning of a flood. However, this is not expected to be a major concern due to the readily available access to land above the PMF at the site and areas immediately west.

If evacuation is necessary during a flood event, flood-free access to Elizabeth Drive will be available in a northerly direction during the PMF. While Elizabeth Drive may be inundated during the 1% AEP flood event and larger floods, the duration of inundation is predicted to be less than four hours in the 1% AEP. The PMF model results show that the duration of inundation of the existing Elizabeth Drive at the Badgerys Creek crossing is not expected to be longer than six hours, and therefore a dedicated emergency response effort from NSW State Emergency Services, such as rescue or resupply by air or boat, will not be required. Accordingly, the proposed development is not expected to increase the burden on the SES.

The Liverpool City Flood Emergency Sub Plan (2015) outlines the preparedness measures, as well as response and recovery operations for flooding within the Liverpool Council LGA. As the development site is located outside the PMF extent, evacuation is not a primary concern. While the sub plan does not provide specific guidance for the site and its vicinity, the development is expected to align with its requirements, as no intervention from the SES will be necessary.

The key flooding management controls are summarised in **Table 29**.

Table 29 - Flooding Environmental Management Controls

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
FR01	A Flood Emergency Response Plan (FERP) be prepared for the development prior to occupation.	Yes	N/A	Prior to operations	FIRA Management Measure
FR02	The FERP will contain provisions to monitor rainfall and flooding along the South Creek corridor upon receipt of a severe weather warning or flood warning from the Bureau of Meteorology (BOM).	Yes	N/A	Prior to operations & Ongoing	FIRA Management Measure
FR03	The development is expected to be consistent with the requirements of the Liverpool City Flood Emergency Sub Plan (2015).	Yes	N/A	Prior to operations	FIRA Management Measure
FR04	Flood levels along South Creek should be monitored according to the river level gauge located immediately upstream of Elizabeth Drive (Station Number 567070).	Yes	N/A	Ongoing	FIRA Management Measure
FR05	The nominated flood warden(s) at the proposed warehouse developments would also monitor for any SES warnings and advise workers against leaving the site once 1% AEP flood conditions are expected in South Creek and Badgerys Creek. At this point, workers would be asked to shelter-in-place until the flooding has passed.	Yes	N/A	Ongoing	FIRA Management Measure

3.10. Biodiversity

The Biodiversity Development Assessment Report (BDAR) (11 February 2026) and EPBC Impact Assessment (EPBC IA) (2 February 2026) prepared by Land Eco Consulting assessed the development's operational impacts on biodiversity. The proposed development has been designed to avoid and minimise impacts on biodiversity values, aligning with the intended use of the site and its location within the WSA. This has been achieved by positioning the majority of the development on exotic grassland, thereby reducing the need for native vegetation clearing and minimising impacts on threatened species habitats.

3.10.1. Vegetation

The proposed development will involve the removal of 8.80 ha of native vegetation; however, the majority of this vegetation has been previously conferred Biodiversity Certification. Only 2.95 ha of non-biodiversity certified native vegetation was assessed in accordance with the Biodiversity Assessment Method (BAM), as well as the calculation and retirement of biodiversity offset credits to address associated impacts. This vegetation belongs to two plant community types (PCTs):

- PCT 3962: Coastal Floodplain Phragmites Reedland (0.56 ha removal)
- PCT 4025: Cumberland Red Gum Riverflat Forest (2.39 ha removal)

The majority of vegetation mapped as PCT 4025 within the site consists of historically cleared, exotic-dominated, pasture-improved grassland. While it was classified as PCT 4025 Cumberland Red Gum River-flat Forest, it represents a highly degraded and species-poor example of this vegetation type.

Thirteen (13) Ecosystem Credits are required to be retired to offset the biodiversity impacts of the proposal. 20 Species Credits for the threatened Southern Myotis (*Myotis macropus*) are required to be retired to offset the biodiversity impacts of the proposal.

Given that internationally important habitat for Latham's Snipe occurs within the Subject Property and will be impacted by the proposed action, a referral to the Commonwealth is required to determine whether the action is a controlled action under the EPBC Act. Overall, the proposed action is not expected to result in significant impacts to MNES, provided appropriate management measures are implemented to avoid or minimise indirect effects.

A Vegetation Management Plan (VMP) was developed by Land Eco Consulting (11 February 2026) to meet the relevant SEARs issued for the proposed development. The VMP will be implemented for at least 5 years or until the objectives and performance criteria outlined in the plan are met to the satisfaction of the consent authority. The proponent aims to rehabilitate existing site features and minimise potential impacts on local habitats and species. The site is divided into six Management Zones, as detailed in **Table 30** and **Figure 12** below.

Table 30 - Proposed Vegetation Management Zones (VMP, 2026).

Management Zone	Objective / Aim	Key Management Actions	Plantings Required
Management Zone A: The rehabilitation of the River-flat Eucalypt Forest vegetation outside of the Vegetated Riparian Zones within the site. Area: 48,635m².	- Retain mature canopy. - Restore canopy tree species. - Reduce cover of exotic vegetation foliage cover to <1% of zone. - Prevent weed encroachment. - Maintain soil stability and prevent erosion.	- Existing native vegetation should be allowed too naturally regenerate. - Where canopy is absent, infill plantings of indigenous canopy species are required. Plantings must not deviate from the list provided in this report. These trees should be of minimum 15L pot size (ideally 45L). - It is expected that the understorey will naturally expand and regenerate. Planting in these stratum will not be necessary. - Exotic vegetation needs to be removed to help the natural regeneration process. Bush regenerators are required to be engaged for this Zone. - At the discretion of the bush regenerator and project ecologist, spray circles (see VMP Section 3.2.5) may be created to improve the success of plantings.	Trees: One plant per ~50m². Number of trees required: 1,000. The recommended planting density for tree species in this vegetation community is 1 per 50m² (Sydney Water 2014). However, due to the existing canopy trees Land Eco have recommended reduced density.
Management Zone B: The rehabilitation of the freshwater wetland and its vegetation. Area: 24,956m².	- Weed control and monitoring. - Removal of old wire fencing inside the freshwater wetland. - The area is inclusive of the freshwater wetland, there is very little vegetation cover across the waterbody. - Reduce exotic vegetation foliage cover to <1% of zone.	- Decrease the prevalence of extant weeds. - Ongoing monitoring for the presence of aquatic weeds. - Plants are not recommended to be planted in and around the wetland. The wetland will naturally regenerate to a self-sustainable state. - The freshwater wetland has an old fence that runs through the water. This poses a threat to sensitive species via entanglement. This should be removed to remediate the wetland back to a more natural state.	N/A – Regeneration will occur naturally.
Management Zone C: Planting of trees within the grassland area within the site. Area: 45,247m².	- Weed control and monitoring. - No tree species should be planted in this area to reduce the risk of attracting hazardous wildlife. - Only Shrubs and groundcover/	- Trees pose a risk of attracting hazardous wildlife. Therefore, a select list of shrubs are recommended (VMP Appendix 1). - When shrubs/groundcover and grass are planted into this zone large spray circles should be created for planting into. <i>Cenchrus clandestinus</i> often requires	Shrubs: 1 plant per ~10m². Groundcover: 2 plants per ~m². Number of shrubs required: 800 Number of Groundcover/

Management Zone	Objective / Aim	Key Management Actions	Plantings Required
	grasses need to be planted in this zone. Reduce exotic vegetation foliage cover	multiple spraying events to kill it. Prior planning is required so at least two applications of herbicide occurs prior to planting. This is a requirement for planting survival. - All plantings required for this zone need to go into pre-prepared spray circles. - Spray circles (see VMP Section 3.2.5) must be created by bush regeneration officers prior to any planting works - Maintenance to keep weeds out of these circles is vital. Regular watering maintenance visits will be required to bed in the plantings. Water crystals need to be placed into the ground at the time of planting. - Revegetation of the entire grassland is not considered feasible in the short term. As such, plantings should only be undertaken within pre-prepared spray circles. Land Eco have conservatively estimated number of plantings based on the provision of 20 spray circles, each with an area of approximately 400m². As such, the total revegetation area in 8,000m². - The circles displayed in Figure 12 Zone C are not prescriptive. Discretion is given to the bush regenerator in consultation with the project ecologist to determine the best course of action if it is found that a substantial amount of native species are found to occur within the grassland areas. This may involve spot spraying rather than wholesale application of herbicide or clearing 1m² buffers around individual plantings rather than 400m² spray circles.	Grass required: 16,000
Management Zone D: The majority of the	To be managed in accordance with the Landscape Plan	N/A	N/A

Management Zone	Objective / Aim	Key Management Actions	Plantings Required
proposed development footprint. Planting is to be in accordance with Landscape Plans. Area: 82,187m ² .	(Geoscapes 2024). - To be managed in accordance with APZ requirements (Travers Bushfire & Ecology 2024). - Screen planting is recommended to be erected alongside the development footprint and the retained habitat. This is to reduce light spillage and noise pollution impacts on sensitive biodiversity values.		
Management Zone E: Vegetated Riparian Zone This Zone includes all parts within the Subject Property within the 10m buffer surrounding the unnamed first order tributary and within the 40m buffer surrounding South Creek. Area: 38,839m ²	- Full scale revegetation of all structural layers within the zone surrounding the mapped watercourse. - Intensive weeding. - Weed maintenance.	- The main aim of this zone is to reduce weed cover and stop it from spreading into other zones. - Sensitive weed management to be undertaken as it is in close proximity to a waterbody. - Where canopy is absent, infill plantings of indigenous canopy species are required. Plantings must not deviate from the list provided in this report. These trees should be of minimum 15L pot size (ideally 45L).	Trees: One plant per ~100m² Number of trees required: 400 Shrubs: One plant per ~12.5m² Number of shrubs required: 3100 Groundcovers: 2 plants per ~m² Number of groundcovers required: 40 000
Management Zone F: To be managed in accordance with APZ requirements (Travers Bushfire & Ecology 2025) Area: 5,315m ² .	- This Management Zone which lies within the eastern border of the Subject Land is to be managed in accordance with APZ requirements (Travers Bushfire & Ecology 2025). - Weed control should progressively reduce exotic vegetation foliage cover.	Discretion is given to the bush regeneration contractor in consultation with the project ecologist to determine appropriate weed control levels. This approach will ensure that management actions do not adversely affect soil stability within the zone, while supporting the establishment of native groundcover vegetation and maintaining APZ compliance.	Groundcovers: 2 plants per ~m² Number of groundcovers required: 11 000

Management Zone	Objective / Aim	Key Management Actions	Plantings Required
	To help prevent the re-establishment and spread of weeds within this area, <i>Juncus usitatus</i> (slender rush) and <i>Carex appressa</i> (sedge) should be densely or mass planted across the zone. Establishing a continuous cover of these locally native species will reduce competition from invasive plants, stabilise the soil surface, and create an effective vegetative buffer that limits future weed encroachment.		

Based on the above proposed management actions the following performance criteria has been developed for over the five-year maintenance period. If any of the performance criteria are not met, the responsible land manager must double the effort/cost allocation for the following month, or longer, until the performance criteria are met.

Table 31 - Management Zone Performance Criteria (VMP, 2026).

Management Action	Within 6months of operations	Year 1	Year 2	Year 3	Year 4	Year 5
Rubbish/ debris removal	Remove the litter and existing internal fencing. Treat and/ or secure all other waste.	The site is maintained free of anthropogenic litter/rubbish through opportunistic rubbish removal.				
Weed Control: Initial and maintenance weeding	Spray circles established and maintained weed free	Spray circles established and maintained weed free	Spray circles established and maintained weed free	Spray circles established and maintained weed free	Spray circles established and maintained 100% weed free.	Spray circles established and maintained 100% weed free.

Management Action	Within 6months of operations	Year 1	Year 2	Year 3	Year 4	Year 5
	Evidence of progressive weed removal consistent with the Bradley Method throughout remaining zones.	Evidence of progressive weed removal consistent with the Bradley Method throughout remaining zones. This must be demonstrated through a reduction in weed coverage from previous monitoring periods. If non-compliant, effort must be doubled until compliance is achieved. Where dense weed infestations are present outside of monitoring plots that are impacting the success of the Bradley Method, these must be documented and appropriately managed during the following monitoring period.	Evidence of progressive weed removal consistent with the Bradley Method throughout remaining zones. This must be demonstrated through a reduction in weed coverage from previous monitoring periods. If non-compliant, effort must be doubled until compliance is achieved. Where dense weed infestations are present outside of monitoring plots that are impacting the success of the Bradley Method, these must be documented and appropriately managed during the following monitoring period.	Evidence of progressive weed removal consistent with the Bradley Method throughout remaining zones. This must be demonstrated through a reduction in weed coverage from previous monitoring periods. If non-compliant, effort must be doubled until compliance is achieved. Where dense weed infestations are present outside of monitoring plots that are impacting the success of the Bradley Method, these must be documented and appropriately managed during the following monitoring period.	Spray circles established and maintained weed free Evidence of progressive weed removal consistent with the Bradley Method throughout remaining zones. This must be demonstrated through a reduction in weed coverage from previous monitoring periods. If non-compliant, effort must be doubled until compliance is achieved. Where dense weed infestations are present outside of monitoring plots that are impacting the success of the Bradley Method, these must be documented and appropriately managed during the	Spray circles established and maintained weed free Maximum 1% weed cover across the site (excluding Zone C), measured in a 100m2 area around each photo point. If non-compliant, effort must be doubled until compliance is achieved. If this is not considered feasible, justification must be provided and signed off by Council.

Management Action	Within 6months of operations	Year 1	Year 2	Year 3	Year 4	Year 5
					following monitoring period.	
Planting	Plants of local provenance procured.	Planting undertaken within 1 year from commencement. Tree guards installed.	90% of plantings are healthy and intact, in any 400m ² area. Replacement plantings have been completed along with tree guards if target not met.	90% of plantings are healthy and intact, in any 400m ² area. Replacement plantings have been completed along with tree guards if target not met.	90% of plantings are healthy and intact, in any 400m ² area. Replacement plantings have been completed along with tree guards if target not met.	90% of plantings are healthy and intact, in any 400m ² area. Replacement plantings have been completed along with tree guards if target not met.
Monitoring: Photo Points	Photo points established using a metal stake, clearing indicating photo direction. Photos to be taken in annual report.	Photo monitoring stake intact. Photo taken to be included in the annual report.	Photo monitoring stake intact. Photo taken to be included in the annual report.	Photo monitoring stake intact. Photo taken to be included in the annual report.	Photo monitoring stake intact. Photo taken to be included in the annual report.	Photo monitoring stake intact. Photo taken to be included in the annual report.
Monitoring: Plantings/Weeds	Document weeding effort and record observations /recommendations for inclusion in annual report	Weed coverages are to be monitored using rapid vegetation assessments in a 10m x 10m area around each photo point and averaged across each management zone. Document survival rate of existing plantings.	Weed coverages are to be monitored using rapid vegetation assessments in a 10m x 10m area around each photo point and averaged across each management zone. Document survival rate of existing plantings.	Weed coverages are to be monitored using rapid vegetation assessments in a 10m x 10m area around each photo point and averaged across each management zone. Document survival rate of existing plantings.	Weed coverages are to be monitored using rapid vegetation assessments in a 10m x 10m area around each photo point and averaged across each management zone. Document survival rate of existing plantings.	Weed coverages are to be monitored using rapid vegetation assessments in a 10m x 10m area around each photo point and averaged across each management zone. Document survival rate of existing plantings.

Management Action	Within 6months of operations	Year 1	Year 2	Year 3	Year 4	Year 5
Reporting: Annual Report	Annual report submitted to the Council. Annual report detailing performance criteria results in relation to monitoring data.	Annual report submitted to the Council. Annual report detailing performance criteria results in relation to monitoring data.	Annual report submitted to the Council. Annual report detailing performance criteria results in relation to monitoring data.	Annual report submitted to the Council. Annual report detailing performance criteria results in relation to monitoring data.	Annual report submitted to the Council. Annual report detailing performance criteria results in relation to monitoring data.	Annual report submitted to the Council. Annual report detailing performance criteria results in relation to monitoring data.



3.10.2. Fauna

The following threatened fauna species were recorded on the site by Land Eco as shown in **Figure 13**:

- Southern Myotis (*Myotis macropus*) – BC Act: Vulnerable; Species Credit
- White-bellied Sea-eagle (*Haliaeetus leucogaster*) - BC Act: Vulnerable; Ecosystem Credit
- Grey-headed Flying-fox (*Pteropus poliocephalus*) (foraging) – BC Act: Vulnerable, EPBC Act: Vulnerable; Ecosystem Credit
- Latham's Snipe (*Gallinago hardwickii*) – BC Act: Vulnerable, EPBC Act: Vulnerable, Migratory
- Eastern Coastal Free-tailed Bat (*Micronomus norfolkensis*) – BC Act: Vulnerable; Ecosystem Credit
- Eastern False Pipistrelle (*Falsistrellus tasmaniensis*) – BC Act: Vulnerable; Ecosystem Credit
- Greater Broad-nosed Bat (*Scoteanax rueppellii*) – BC Act: Vulnerable; Ecosystem Credit
- Large Bent-winged Bat (foraging) (*Miniopterus orianae oceanensis*) - BC Act: Vulnerable; Ecosystem Credit
- Sharp-tailed Sandpiper (*Calidris acuminata*) – BC Act: Vulnerable, EPBC Act: Vulnerable, Migratory

Impacts will include the removal of 2.95 ha of native vegetation and two hollow-bearing stags with small to medium-sized hollows suitable for microbats including the Southern Myotis. Minor indirect impacts may influence the artificial wetland within the Subject Property. There will be no Serious and Irreversible Impacts as a result of the proposed development. There will be no Serious and Irreversible Impacts as a result of the proposed development. 20 Species Credits for the Southern Myotis are required to be retired to offset the biodiversity impacts of the proposal.

A Wildlife Hazard Assessment and Wildlife Management Plan (WHMP) was prepared by Land Eco (6 February 2026) to prevent and reduce the risk of attracting birds and bats that could pose a threat to aviation activities at and around the WSA. The WHMP was developed in reference to the *State Environmental Planning Policy (Precincts – Western Parkland City) 2021*, the *Western Sydney Aerotropolis Development Control Plan 2022*, and the *Aviation Safeguarding Guidelines – Western Sydney Aerotropolis and surrounding areas*. The following sections of the *Western Sydney Aerotropolis Development Control Plan 2022* were deemed relevant.

Table 32 - The Western Sydney Aerotropolis Development Control Plan 2022 Performance Outcomes and Benchmark Solutions (WHMP, 2026).

DCP 2022 Section	Performance Outcome	Benchmark Solutions
“Vegetation and Biodiversity (2.4). Objectives (2.4.4) On Lot and Streetscape Landscaping and Preferred Plant Species. • Landscaping and green (vegetation) assets are effectively managed, maintained and consistent with airport safeguarding requirements.”	“Plant species are provided in accordance with the preferred species identified for the Aerotropolis.”	“Landscaping is to incorporate a diverse range of plant species, as per the Aerotropolis DCP preferred Species List provided at Appendix B of the DCP.” The VMP (Land Eco 2024) has incorporated a diverse range of plant species based on Appendix B of the DCP and suitability within the landscape position and within the proposed development layout.

DCP 2022 Section	Performance Outcome	Benchmark Solutions
<i>“Airport Safeguarding (2.10). Objectives (2.10.3) Wildlife Hazards.</i> <i>“Safeguard the Airport from incompatible development that could compromise safe operations.”</i>	<i>“Development does not attract wildlife which would create a safety hazard to the operations of the Airport.”</i>	1. All waste bins will be designed and installed with fixed lids. 2. Any bulk waste receptacle or communal waste storage area will be contained within enclosures that cannot be accessed by birds or flying foxes. 3. No new stormwater detention basins or open water bodies are proposed. 4. Buildings and structures have been designed to minimise the opportunity for roosting areas.
	<i>“Landscaping does not attract wildlife that could create a safety hazard to the operations of the Airport.”</i>	1. The VMP (Land Eco 2024) has incorporated a diverse range of plant species based on Appendix B of the DCP and suitability within the landscape position and within the proposed development layout. 2. In areas within the 3km wildlife buffer but outside of the Parkland Priority Areas (such as the site), a report prepared by a suitability qualified and experienced ecologist is to be submitted with any application when the landscaping plan: a) Incorporates alternative landscape species not listed within Appendix B; b) Incorporates landscape species denoted within the landscape species list; c) Will result in more than 5 trees being planted in 1 group (group refers to touching mature canopies); and/or d) Provides a spacing between a group of 5 or more trees that is less than 100m. Any deviations from the above points recommended in the VMP (Land Eco 2024) were made to reduce the overall wildlife hazard risk while protecting the sensitive ecological entities that occur within the site. 3. The ecologist report (the WHMP) has considered building, site, and water body design outcomes and/or landscape maintenance measures that will mitigate bird and flying fox attraction and roosting areas. No new waterbodies are proposed.

The artificial wetland at the rear of the development and the riparian zone of South Creek along the eastern boundary of the site will remain undisturbed. While birds and bats will continue to be attracted to the wetland, their numbers are not expected to increase significantly beyond the baseline. The remnant vegetation along South Creek within the site primarily consists of species that attract wildlife (e.g., *Eucalyptus amplifolia* and *Eucalyptus tereticornis*), the proposed revegetation in this area is unlikely to significantly increase wildlife attraction beyond its existing levels.

Any species planted within the site that have been identified as ‘Subject to monitoring and/or

maintenance plan to ensure potential for wildlife attraction is managed' will be appropriately monitored to manage wildlife attraction. This includes certain grasses that produce seeds or fruits for wildlife. However, Land Eco Consulting has assessed these species as low risk, as they are unlikely to attract large birds or flying foxes. The primary birds likely to forage on these grasses are finches, Red-rumped Parrots (*Psephotus haematonotus*), and Eastern Rosellas (*Platycercus eximius*), none of which fall within the hazardous weight range. As such, these groundcovers are considered suitable for planting and do not increase the risk beyond the property's current baseline level.

In the unlikely event that hazardous wildlife species richness and abundance rise to unsatisfactory levels post-development, an experienced ornithologist (bird specialist) should be consulted to implement impact mitigation measures to safely disperse the wildlife and reduce attractants on the property. Qualified ecologists will regularly monitor hazardous bird and bat populations on the site, assessing population size, behaviour, and associated strike risks. If any hazards are identified during monitoring, additional mitigation measures will be implemented.

Migratory shorebirds rest and feed in NSW wetlands and other parts of Australia from September to March, preparing for their annual migrations to breeding grounds in the Arctic. They arrive in northern Australia around September and gradually disperse across the country, reaching southeastern regions like NSW by October. In March, the shorebirds return to their staging areas, forming large flocks and feeding continuously to build energy reserves for their journey north (NSW DEH 2023; Commonwealth DCCEE 2023). During these migration periods, the windows of buildings on the site will be illuminated at night to reduce the risk of bird collisions.

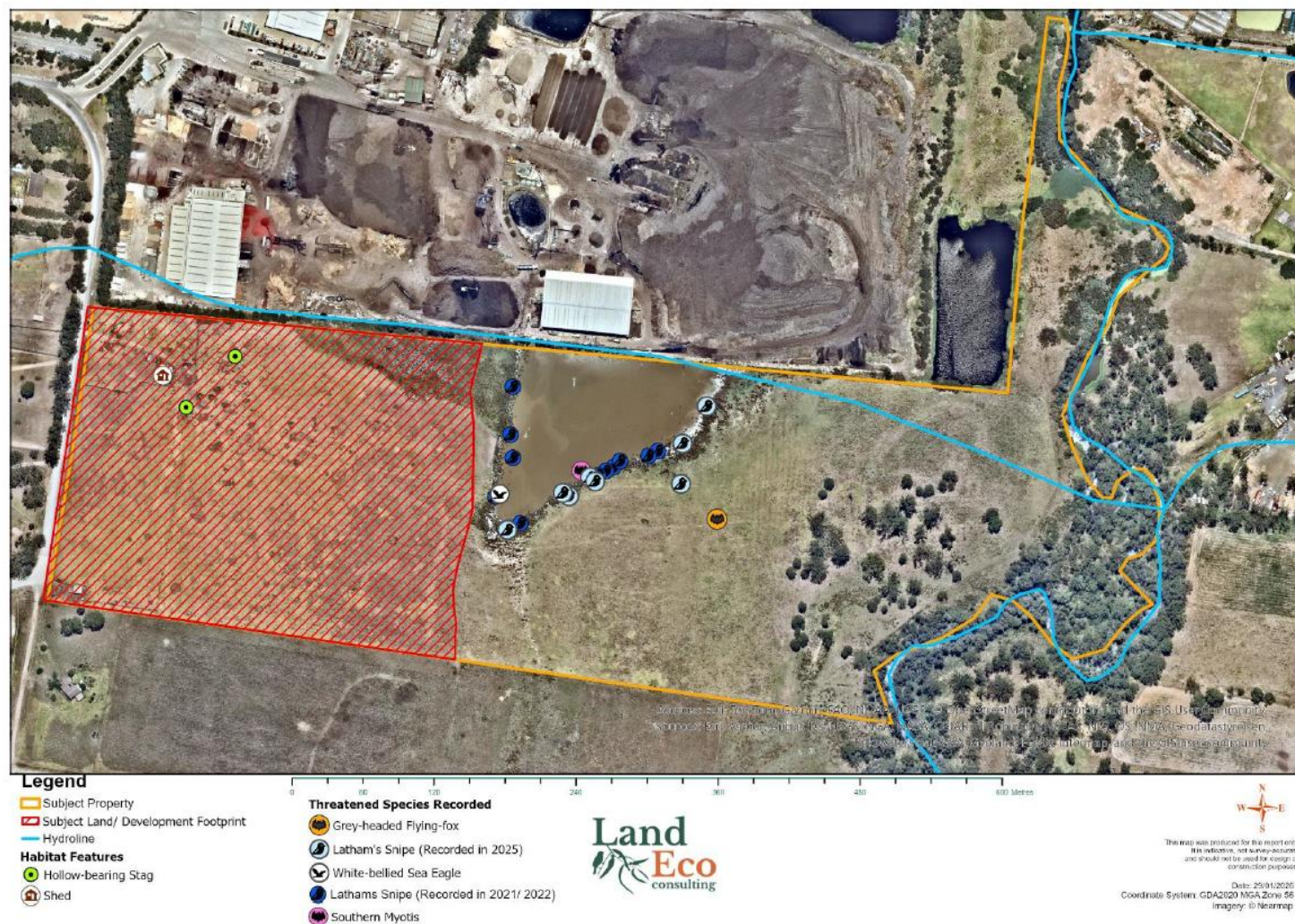


Figure 14 - Threatened Fauna Records and Habitat Features (VMP, 2026)

Biodiversity will be managed in accordance with the Vegetation Management Plan (VMP) and the Wildlife Assessment and Management Plan (WHMP) prepared to address the SEARs and conditions of approval. The key management controls are summarised in the Table 33 below.

Table 33 - Biodiversity Environmental Management Controls

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
B01	Incorporate locally indigenous flora species representative of River-flat Eucalypt Forest in soft landscaping associated with the development.	Yes	N/A	Design	BDAR Management Measure
B02	Limit plantings to trees, shrubs and groundcovers that are less likely to attract hazardous wildlife (i.e. avoid flowering or fruiting trees that attract flying foxes, ibis etc).	Yes	Yes	Design	BDAR Management Measure
B03	The construction of a protective wall between the retained habitat and the proposed development will minimise light spill and reduce noise.	Yes	N/A	Design	BDAR Management Measure
B04	Implement ongoing management of priority weeds according to statutory requirements.	Yes	Yes	Ongoing, 24 in the first year, 12 visits per year after that at monthly intervals.	BDAR & VMP Management Measure
B05	Watering plants and replacing dead plants. Minimum 80% survival must be maintained.	Yes	Yes	Once per week for the month following plantings. Replacement of dead plants as required.	VMP Management Measure
B06	Any areas of exotic dominated grassland should be slashed and managed in a way that is less attractive to birds.	Yes	Yes	Ongoing	BDAR Management Measure

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
B07	Implement vertebrate pest control during operations of the development.	Yes	Yes	Ongoing	BDAR Management Measure
B08	Enforce strict waste management and littering prevention. Ensure all bins have lids and are not left open. Ensure any putrescible waste generated by the project is stored in waste receptacles with lids that cannot be opened by wildlife and is disposed of offsite at suitably licensed facilities.	Yes	Yes	Ongoing	BDAR Management Measure
B09	Induct all site workers of the hazards associated with bird and wildlife attraction.	Yes	Yes	Ongoing	BDAR Management Measure
B10	Lighting will be minimised to wherever it is required. Warm coloured LED street lighting is recommended to be used where possible.	Yes	Yes	Ongoing	BDAR Management Measure
B11	Conduct quarterly (four times per year) bird and flying-fox surveys for one year after the commencement of construction. This is to be reviewed at the conclusion of one year by an experienced ecologist and extended if the ecologist is of the opinion the monitoring will provide value.	Yes	N/A	Quarterly for 1 year post-construction	WHMP Management Measure
B12	During migration periods for wetland birds the windows of the buildings within the site are to be lit up during nighttime to minimise the risk of collision.	Yes	Yes	Annually from October & March	BDAR Management Measure
B13	If monitoring reveals an increase in hazardous wildlife, engage an experienced ecologist to prepare a suitable bird/bat eviction strategy. This must also be undertaken in the event the project attracts more birds/bats to the locality (i.e. roost colonies), or if the project is considered likely to	Yes	N/A	Ongoing	BDAR Management Measure

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
	disturb birds in a manner that could increase risk to Nancy Walton Airport.				
B14	Communicate with Nancy Walton airport before undertaking any actions that could displace birds from the site into the airspace of aircraft that are departing or arriving at the airport. Engage with Airport Wildlife Management Committee if/when it is established.	Yes	N/A	Ongoing	BDAR Management Measure
B15	Monitor the wetlands water levels approximately every 6 months and following periods of high rainfall. Water depths which exceed 1 metre can attract hazardous wildlife such as swans and pelicans.	Yes	N/A	Biannually and following high rainfall periods.	WHMP Management Measure

3.11. Ecologically Sustainability Development

An Ecologically Sustainable Development (ESD) report was completed by Aspire Sustainability Consulting in December 2025, evaluating the ESD initiatives of the project. The report outlines the integration of ESD principles into the development's design, construction, and operation.

Key design principles implemented throughout the design include:

- National Construction Code 2022 Section J Compliance;
- State Environmental Planning Policy (SEPP): Sustainable Buildings;
- Planning Secretary's Environmental Assessment Requirements (warehouses and distribution centres); and
- WSA DCP 2022.

The design of the buildings will inevitably impact on their operational efficiency, minimising additional requirements to be completed by the tenants of each facility. Matters that are being considered under Ecologically Sustainable Design include:

- Passive Design & Energy Efficiency;
- Water
- Emissions
- Construction
- Waste
- Materials
- Land Use & Ecology
- Climate Change Adaptation

Because these environmental factors are accounted for and primarily handled during the design stage of the project, operational management mainly focuses on continuous maintenance and ensuring that appliances remain in line with existing approvals. Based on this, it is recommended that the guiding principles within the ESD Report are considered during the replacement and maintenance of the building, in addition to considering any more sustainable products that enter the market.

3.11.1. Operational Sustainability

Aspire has also identified opportunities for continuous sustainability efforts. These initiatives encompass reducing energy use, offsetting emissions, promoting sustainable travel choices for staff, minimising material impacts, incorporating water-sensitive design and maintenance, and managing waste efficiently. The implementation of these initiatives will be a combined effort from the facility management as well as tenants to ensure effective management.

Table 34 - Environmentally Sustainable Design Management Controls

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
ESD01	Provide a Net-Zero Statement in line with SEPP C4 Net Zero Provisions	Yes		Ongoing	SEAR's ESD Report
ESD02	Procurement of offsets in line with SEPP C4 Net Zero Provisions	N/A	Yes	Ongoing	SEAR's ESD Report
ESD03	A car-pooling system for the staff shall be implemented	N/A	Yes	Ongoing	SEAR's ESD Report
ESD04	Develop and implement an Integrated Sustainable Transport Plan	N/A	Yes	Ongoing	SEAR's ESD Report
ESD05	Consider the viability of sustainable products during procurement including: • Environmental Performance Declarations (EPD's) for major materials • Disclosure of embodied emissions in line with SEPP C3 Embodied Emissions • Recycled content products where appropriate • FSC timber • Use local materials • Use prefabricated modules • Paints, adhesives and sealants specified to contain low VOC & formaldehyde, improving internal air quality.	N/A	Yes	Ongoing	SEAR's ESD Report
ESD06	Future landscaping will implement drought tolerant native species.	Yes	N/A	Ongoing	SEAR's ESD Report
ESD07	Install and use rainwater tanks for landscaping irrigation	Yes	N/A	Ongoing	SEAR's ESD Report
ESD08	Re-use water captured from sprinkler systems	Yes	N/A	Ongoing	SEAR's ESD Report

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
ESD09	Water efficient fixtures and appliance will be installed by tenants: Taps => 3 Stars Urinals => 3 Stars Toilet => 3 Stars Showers => Starts (>4.5 but = <= 6.0) Clothes Washing Machines => 3 Stars Dishwashers => Stars	N/A	Yes	Ongoing	SEAR's ESD Report
ESD10	Plant beds and trees providing canopy cover, providing shade and improving air quality will be maintained.	Yes	N/A	Ongoing	SEAR's ESD Report
ESD11	Facilities will separate waste streams and provide receptacles for different resources including glass, plastic, cardboard and organic (green) waste.	N/A	Yes	Ongoing	SEAR's ESD Report

4. MONITORING AND REPORTING

4.1. Monitoring and Inspections

Regular monitoring and reporting are essential to maintain compliance and evaluate control effectiveness. Continuous monitoring is necessary for these facilities to ensure high-quality results and reduce environmental impacts from the warehouse operations. The monitoring and inspection requirements for the operation of 230 Martin Road are summarised in **Table 35**.

Table 35 - Monitoring and Inspection Requirements

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
MM01	Noise compliance measurements	Yes	Yes	Once operations commence	Section 1.1
MM02	Review of on-site noise mitigation and management practices	Yes	Yes	Annually	Section 3.3.6
MM03	Vegetation Monitoring - permanent photo locations and Weed Assessment	Yes	N/A	Annually for the first 5 years of operations	Section 3.8
MM04	Bird Monitoring Surveys	Yes	N/A	Quarterly for 1-year post-construction	Section 3.8
MM05	Monitor the wetlands water levels	Yes	N/A	Biannually and following high rainfall periods.	Section 3.8

4.2. Reporting

The reporting requirements for the operation of 230 Martin Road are summarized in **Table 36**.

Table 36 - Reporting Requirements

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
RR01	Noise/ Acoustic Assessment Review	Yes	Yes	New/ change of Tenant	Section 1.1 NVIA Management Measure M1.8
RR02	Vegetation Monitoring Report	Yes	Yes	Annually for the first 5 years of operations	Section 3.8
RR03	Wildlife Hazard Management Plan Review	Yes	Yes	12 months after operations commence.	Section 3.8
RR04	Bushfire Emergency and Evacuation Plan Review	Yes	Yes	Annually	Section 3.7.1

4.3. Auditing

The current auditing requirements for operating 230 Martin Road are unknown. Regular audits are expected to be part of operational controls, aligning with Environment Protection licenses or conditions of consent. This section will be updated before operations begin.

4.4. Roles and Responsibilities

The key personnel responsible for environmental management of the development are listed below.

Role: Facility Manager

Responsibilities:

- Ensure obligations of the OEMP are implemented.
- Advise and assist in implementation of the OEMP.
- Implement the Complaints and Incident Handling Procedures.

Role: Tenants/Employees/Contractors

Responsibilities:

- Work in a manner that will not harm the environment or impact surrounding receptors.
- Report all environmental incidents and complaints to the Facility Manager.
- Report any inappropriate environmental management practices to the Facility Manager.

5. CONTINGENCY MANAGEMENT

Section 2.5 lists the actions to be implemented if monitoring, inspections or audits indicate the mitigation measures are not effective in managing environmental impacts.

6. OEMP REVIEW

The OEMP will be reviewed and updated within 3 months of:

- Submitting an annual Compliance Report
- Submitting an incident report
- Approval of a consent modification
- Direction by the Planning Secretary

7. REFERENCES

7.1. Referral Agencies

- Department of Planning & Environment
- Transport for NSW
- Liverpool City Council

7.2. Legislation

- *Environmental Planning & Assessment Act 1979*
- *Protection of the Environment Operations Act 1997*

7.3. Standards and Guidelines

- ISO 14001 Environmental Management Systems
- NSW EPA (2017) Noise Policy for Industry
- Storing and Handling Liquids: Environmental Protection (DECC 2007)
- Australian Standard AS 4282: Control of the Obtrusive Effects of Outdoor Lighting
- NSW Department of Climate Change and Water (2011), Road Noise Policy

7.4. Existing Documents/ Assessments

- *230 Martin Road, Badgerys Creek State Significant Development Application: Scoping Report*, Urbis, 17 November 2023.
- *Traffic Assessment, 230 Martin Road, Badgerys Creek*, Ason Group, 9 February 2026.
- *Noise & Vibration Impact Assessment Proposed Warehouse Development, 230 Martin Road, Badgerys Creek*, Renzo Tonin & Associates, 20 February 2026.
- *Badgerys Creek Warehouse Air Quality Impact Assessment*, Northstar Air Quality Pty Ltd, 2 December 2025.
- *Waste Management Plan*, SALT, 11 December 2025.
- *Civil Infrastructure Report*, Arcadis, 25 November 2025.
- *Biodiversity Development Assessment Report*, Land Eco Consulting, 11 February 2026.
- *Commonwealth Environment Protection and Biodiversity Conservation Act 1999 Impact Assessment*, Land Eco Consulting, 2 February 2026.
- *Vegetation Management Plan*, Land Eco Consulting, 11 February 2026.
- *Wildlife Hazard Assessment and Wildlife Management Plan*, Land Eco Consulting, 6 February 2026.
- *Bushfire Protection Assessment*, Travers Bushfire & Ecology, 18 December 2025
- *Flood Impact and Risk Assessment*, Worley Consulting, 19 January 2026.
- *Ecologically Sustainable Design (ESD) Report*, Aspire Sustainability Consulting, 17 December 2025.
- *Preliminary Hazard Analysis (PHA)* SLR Consulting, 15 December 2025

Appendix A Development Consent

Appendix B Mitigation Measures

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
G01	Develop and implement an Operational Environmental Management Plan.	Yes	Yes	Ongoing	Anticipated Condition
G02	An environmental induction will be undertaken by all workers prior to the commencement of work to ensure that they are aware of their obligations.	Yes	Yes	Ongoing	Section 2.4
G03	All reasonable measures to prevent/minimize harm to the environment will be implemented.	Yes	Yes	Ongoing	Best Practice
G04	Monitoring records will be maintained to demonstrate compliance with the OEMP.	Yes	Yes	Ongoing	Section 4
G05	Environmental incidents and complaints will be managed by the management strategies in Sections 2.5 and 2.7 will be implemented.	Yes	Yes	Ongoing	Sections 2.5 and 2.7
TT01	Heavy vehicle movements will comply with approved site access routes and hours of operation in the conditions of approval and TMP.	Yes	Yes	Ongoing	Best Practice
TT02	The Green Travel Plan will be implemented to promote sustainable transport.	Yes	Yes	Ongoing	Best Practice
TT03	Vehicles must enter and exit in a forward direction.	Yes	Yes	Ongoing	Best Practice
TT04	All trucks must have their loads covered and not track dirt on to the public road.	Yes	Yes	Ongoing	Best Practice
TT05	Oversized vehicles must obtain required permits and approvals prior to travelling to the site.	Yes	Yes	Ongoing	Best Practice
NV01	Broadband reversing alarms “quackers” (i.e., non-tonal) shall be adopted across the tenant truck fleet that operates	Yes	Yes	Ongoing	NVIA Management

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
	through warehouse facility. This should be adopted for all permanent and tenants owned/ controlled vehicles where feasible and reasonable. Where tenants do not have control over vehicles that operate through the facility, management of potential impacts should be reviewed further as part of the tenant operational management plan, with particular consideration as to whether these trucks would operate during the night period.				Measure
NV02	Alternate methods and practices to the use of horns as a safety warning for onsite moving forklifts should be reviewed and incorporated into site operations and safety practices.	N/A	Yes	Ongoing	NVIA Management Measure
NV03	Development of a methodology to manage the individual contributions of tenants within any approved noise requirements for the Proposal as part of the Operational Noise Management Plan/ Operational Management Plan developed for the Proposal.	Yes	Yes	Prior to operations commence	NVIA Management Measure
NV04	When a new tenant or change of tenant is proposed for a warehouse space an acoustic review is to be undertaken. During the preparation for occupancy of a warehouse tenancy (i.e. warehouse fit-out design stage) for any specific tenant, the potential noise emissions from the tenant's proposed operations are to be reviewed to confirm that: 1) The tenant operational noise emissions will satisfy any noise emission allowances and noise mitigation/management measures identified for the individual tenant in the Proposal Operational Noise Management Plan / Operational Management Plan to satisfy M1.7 above, and if there are any further mitigation and/or management measures required to do so.	Yes	Yes	Ongoing	NVIA Management Measure

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
	2) Confirm if any further mitigation and/or management measures are required to ensure that noise emissions from the warehouse tenancy will be consistent with the noise emission outcomes presented in this NVIA. 3) Review potential sources of high noise events associated with the proposed operations that could occur during the night (10pm to 7am) to determine if further mitigation/management is required to achieve noise emission allowances. 4) Identify operations that are non-typical operations but could have the potential to exceed noise emission allowances (i.e. garbage compactor operations, scheduled waste truck operations, etc.). Determine if/ what feasible and reasonable controls would be required to manage these infrequent activities in a feasible and reasonable manner.				
NV05	Reducing peak 15-minute heavy vehicles movement across the site by staggering delivery / arrival / departure times during sensitive time periods (i.e., night).	Yes	Yes	Ongoing	Best Practice
NV06	Minimising concurrent use of mobile plant near hardstand openings (i.e. ground floor exit) and/or limiting their use to the less sensitive daytime and evening periods.	Yes	Yes	Ongoing	Best Practice
NV07	Minimising the use of reversing alarms by providing forward manoeuvring where practicable.	N/A	Yes	Ongoing	Best Practice
NV08	Switching vehicles and plant off when not in use.	N/A	Yes	Ongoing	Best Practice
NV09	Keeping equipment well-maintained and operating it in a proper and efficient manner.	N/A	Yes	Ongoing	Best Practice
NV10	Training staff and drivers on the effects of noise and the use of quiet work practices (e.g. informing drivers of the noise impacts from sudden braking or accelerating, bangs and	Yes	Yes	Ongoing	Best Practice

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
	clangs, etc.).				
NV11	The use of quieter mobile plant, such as electric forklifts instead of fuel-powered forklifts, where possible.	N/A	Yes	Ongoing	Best Practice
NV12	Using equipment with efficient muffler design.	N/A	Yes	Ongoing	Best Practice
NV13	Fitting and maintaining noise reduction packages on plant and equipment.	N/A	Yes	Ongoing	Best Practice
NV14	Ensure hardstand surfaces, roadways and vehicular access points are smooth as not to result in jolting of the truck (i.e. at entrance to site).	Yes	Yes	Prior to and Ongoing	Best Practice
NV15	Noise compliance measurements are conducted once operations commence, to determine that noise emissions are consistent with those documented in this assessment, and to determine that the mitigation measures are effective.	Yes	Yes	Once operations commence	Best Practice
NV16	Review of noise reduction opportunities during changes or refinements of site noise generating activities (i.e. new tenant/change of tenant).	Yes	Yes	Ongoing	Best Practice
NV17	Reviewing noise levels of plant, equipment and activities, during both ongoing compliance checks and in response to complaints.	Yes	Yes	Ongoing	Best Practice
NV18	All roller doors on the eastern end of Warehouse 1, are to be closed during the night period, and are to be constructed of solid material (i.e., not to include perforations for the purposes of airflow).	Yes	Yes	Ongoing	Best Practice
AQ01	Minimise vehicle idling by switching vehicles and plant off when not in use.	N/A	Yes	Ongoing	Best Practice
AQ02	Adhering to speed limits.	N/A	Yes	Ongoing	Best Practice

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
AQ03	Keeping equipment well-maintained and operating it in a proper and efficient manner.	N/A	Yes	Ongoing	Best Practice
AQ04	Reviewing emission levels of plant, equipment and activities, during both ongoing compliance checks and in response to complaints.	Yes	Yes	Ongoing	Best Practice
AQ05	The use of lower emissions mobile plant, such as electric forklifts instead of fuel-powered forklifts, where possible.	N/A	Yes	Ongoing	Best Practice
WM01	Vehicles collecting the waste are to follow the rules and directions for collection outlined in the Waste Management Plan.	Yes	Yes	Ongoing	WMP Management Measure
WM02	Commercial tenants to be provided with Work Health and Safety approved waste handling and training on safe disposal of hazardous substances and sharp objects.	Yes	Yes	Ongoing	WMP Management Measure
WM03	Waste vehicle operators should be trained and informed on safe handling of unknown substances.	Yes	Yes	Ongoing	Best Practice
WM04	Individuals handling hazardous substances or sharp objects to be provided with PPE.	Yes	Yes	Ongoing	WMP Management Measure
WM05	Individuals to be provided with NSW EPA approved waste handling and training.	Yes	Yes	Ongoing	Best Practice
WM06	The NSW EPA waste hierarchy to be implemented to avoid excessive waste being sent to landfill.	Yes	Yes	Ongoing	WMP Management Measure
WM07	Separation of waste streams to be implemented to ensure waste management is followed.	Yes	Yes	Ongoing	WMP Management Measure
WM08	Waste signage to be displayed for bin locations and waste streams.	Yes	Yes	Ongoing	WMP Management Measure

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
SW01	Rainwater Tanks installed to collect roof water to meet at least 80% of the development's demand for non-potable water (toilet flushing and landscape irrigation).	Yes	N/A	Design/ Operations	CIR Management Measure
SW02	Gross Pollutant Traps installed to remove gross pollutants prior to tertiary treatment downstream.	Yes	N/A	Design/ Operations	CIR Management Measure
SW03	Proprietary Ocean Protect StormFilters filtration cartridges to be installed within the proposed OSD tank to contribute to the removal of suspended solids, phosphorus, and nitrogen.	Yes	N/A	Design/ Operations	CIR Management Measure
SW04	Bioretention basin to be constructed to contribute to the removal of suspended solids, phosphorus, and nitrogen.	Yes	N/A	Design/ Operations	CIR Management Measure
SW05	Where possible, avoid using water by opting for alternatives like sweeping hard surfaces instead of hosing them down.	Yes	Yes	Ongoing	CIR Management Measure
SW06	Reduce water use by installing water efficient appliances and equipment (e.g. dishwashers, toilets).	Yes	Yes	Operations	CIR Management Measure
SW07	Reuse water for non-potable purposes (e.g. collect rainwater for landscape irrigation and toilet flushing).	Yes	N/A	Design/ Operations	CIR Management Measure
SW08	An Inspection and Maintenance Plan will be prepared in accordance with the requirements outlined in applicable standards and outline the function of each measure, qualifications required to manage and maintain each measure, inspection activities and schedule, and requirements in relation to record keeping.	Yes	N/A	Prior to operations	CIR Management Measure
HR01	Chemicals to be stored in bunded chemical containers, located as far as possible from drainage lines, vegetated areas, and sensitive areas.	Yes	Yes	Ongoing	Best Practice
HR02	SDS to be stored with hazardous chemicals at all times.	Yes	Yes	Ongoing	Best Practice

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
HR03	Additional controls to be implemented around hazardous chemical storage areas, including additional bunds and specific spill kits designated to these areas.	Yes	Yes	Ongoing	Best Practice
HR04	Refuelling of vehicles, plant and equipment will take place as far as possible from any waterway or drainage system and over a bund/plant nappy.	Yes	Yes	Ongoing	Best Practice
HR05	Spill kits will be on standby while refuelling is taking place.	Yes	Yes	Ongoing	Best Practice
HR06	Any fuel or oil spills shall be contained using a spill kit.	Yes	Yes	Ongoing	Best Practice
BR01	APZs in accordance with the minimum setbacks outlined within PBP 2019.	Yes	N/A	Design	BPA Management Measure
BR02	Review of the site's current landscaping plans to comply with Appendix 4 of PBP 2019 and shown in schedule 2.	Yes	N/A	Design	BPA Management Measure
BR03	Building construction in accordance with the requirements of NCC and ember protection within section 7.5 of PBP (sarking to be non-combustible).	Yes	N/A	Design	BPA Management Measure
BR04	Provision of access, water, and electricity supply in accordance with the acceptable solutions outlined in PBP 2019 (no gas to be supplied).	Yes	N/A	Design & Ongoing	BPA Management Measure
BR05	APZs are to be provided to the proposed development as generally depicted within Figure 7 - Bushfire Protection Measures Plan (BPA, 2025) and maintained in perpetuity.	Yes	N/A	Design & Ongoing	BPA Recommendation
BR06	Access is provided in accordance with section 3.2 of this report and set out in Figure 7 - Bushfire Protection Measures Plan (BPA, 2025) . It is noted that the northern hardstand area has water availability in the event of a bushfire.	Yes	N/A	Design	BPA Recommendation

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
BR07	Water and electricity supply is provided in accordance with sections 3.3 & 3.6 of the BPA report. Water supplies to conform to the requirements of the NCC. Street hydrants not to be located in roadway.	Yes	N/A	Design	BPA Recommendation
BR08	Landscaping plans for the site are to be finalised which demonstrates compliance with Appendix 4 of PBP 2019 and a letter provided to that effect from a suitably qualified bush fire consultant prior to occupation.	Yes	N/A	Design	BPA Recommendation
BR09	All site-fencing should be made of non-combustible material.	Yes	N/A	Design	BPA Recommendation
BR10	Bushfire Emergency and Evacuation Plan be prepared for and implemented for the site and subject to regular drills and maintenance. To be prepared and finalised prior to occupation and updated annually.	Yes	N/A	Ongoing	BPA Recommendation
FR01	A Flood Emergency Response Plan (FERP) be prepared for the development prior to occupation.	Yes	N/A	Prior to operations	FIRA Management Measure
FR02	The FERP will contain provisions to monitor rainfall and flooding along the South Creek corridor upon receipt of a severe weather warning or flood warning from the Bureau of Meteorology (BOM).	Yes	N/A	Prior to operations & Ongoing	FIRA Management Measure
FR03	The development is expected to be consistent with the requirements of the Liverpool City Flood Emergency Sub Plan (2015).	Yes	N/A	Prior to operations	FIRA Management Measure
FR04	Flood levels along South Creek should be monitored according to the river level gauge located immediately upstream of Elizabeth Drive (Station Number 567070).	Yes	N/A	Ongoing	FIRA Management Measure
FR05	The nominated flood warden(s) at the proposed warehouse developments would also monitor for any SES warnings and advise workers against leaving the site once 1% AEP flood conditions are expected in South Creek and Badgerys	Yes	N/A	Ongoing	FIRA Management Measure

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
	Creek. At this point, workers would be asked to shelter-in-place until the flooding has passed.				
B01	Incorporate locally indigenous flora species representative of River-flat Eucalypt Forest in soft landscaping associated with the development.	Yes	N/A	Design	BDAR Management Measure
B02	Limit plantings to trees, shrubs and groundcovers that are less likely to attract hazardous wildlife (i.e. avoid flowering or fruiting trees that attract flying foxes, ibis etc).	Yes	Yes	Design	BDAR Management Measure
B03	The construction of a protective wall between the retained habitat and the proposed development will minimise light spill and reduce noise.	Yes	N/A	Design	BDAR Management Measure
B04	Implement ongoing management of priority weeds according to statutory requirements.	Yes	Yes	Ongoing, 24 in the first year, 12 visits per year after that at monthly intervals.	BDAR & VMP Management Measure
B05	Watering plants and replacing dead plants. Minimum 80% survival must be maintained.	Yes	Yes	Once per week for the month following plantings. Replacement of dead plants as required.	VMP Management Measure
B06	Any areas of exotic dominated grassland should be slashed and managed in a way that is less attractive to birds.	Yes	Yes	Ongoing	BDAR Management Measure

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
B07	Implement vertebrate pest control during operations of the development.	Yes	Yes	Ongoing	BDAR Management Measure
B08	Enforce strict waste management and littering prevention. Ensure all bins have lids and are not left open. Ensure any putrescible waste generated by the project is stored in waste receptacles with lids that cannot be opened by wildlife and is disposed of offsite at suitably licensed facilities.	Yes	Yes	Ongoing	BDAR Management Measure
B09	Induct all site workers of the hazards associated with bird and wildlife attraction.	Yes	Yes	Ongoing	BDAR Management Measure
B10	Lighting will be minimised to wherever it is required. Warm coloured LED street lighting is recommended to be used where possible.	Yes	Yes	Ongoing	BDAR Management Measure
B11	Conduct quarterly (four times per year) bird and flying-fox surveys for one year after the commencement of construction. This is to be reviewed at the conclusion of one year by an experienced ecologist and extended if the ecologist is of the opinion the monitoring will provide value.	Yes	N/A	Quarterly for 1 year post-construction	WHMP Management Measure
B12	During migration periods for wetland birds the windows of the buildings within the site are to be lit up during nighttime to minimise the risk of collision.	Yes	Yes	Annually from October & March	BDAR Management Measure
B13	If monitoring reveals an increase in hazardous wildlife, engage an experienced ecologist to prepare a suitable bird/bat eviction strategy. This must also be undertaken in the event the project attracts more birds/bats to the locality (i.e. roost colonies), or if the project is considered likely to disturb birds in a manner that could increase risk to Nancy Walton Airport.	Yes	N/A	Ongoing	BDAR Management Measure

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
B14	Communicate with Nancy Walton airport before undertaking any actions that could displace birds from the site into the airspace of aircraft that are departing or arriving at the airport. Engage with Airport Wildlife Management Committee if/when it is established.	Yes	N/A	Ongoing	BDAR Management Measure
B15	Monitor the wetlands water levels approximately every 6 months and following periods of high rainfall. Water depths which exceed 1 metre can attract hazardous wildlife such as swans and pelicans.	Yes	N/A	Biannually and following high rainfall periods.	WHMP Management Measure
ESD01	Provide a Net-Zero Statement in line with SEPP C4 Net Zero Provisions	Yes		Ongoing	SEAR's ESD Report
ESD02	Procurement of offsets in line with SEPP C4 Net Zero Provisions	N/A	Yes	Ongoing	SEAR's ESD Report
ESD03	A car-pooling system for the staff shall be implemented	N/A	Yes	Ongoing	SEAR's ESD Report
ESD04	Develop and implement an Integrated Sustainable Transport Plan	N/A	Yes	Ongoing	SEAR's ESD Report
ESD05	Consider the viability of sustainable products during procurement including: • Environmental Performance Declarations (EPD's) for major materials • Disclosure of embodied emissions in line with SEPP C3 Embodied Emissions • Recycled content products where appropriate • FSC timber • Use local materials • Use prefabricated modules Paints, adhesives and sealants specified to contain low VOC & formaldehyde, improving internal air quality.	N/A	Yes	Ongoing	SEAR's ESD Report

Management Control Reference	Environmental Management Control	Responsible Person		Timing / Frequency	References / Notes
		Facility Representative	Tenant Representative		
ESD06	Future landscaping will implement drought tolerant native species.	Yes	N/A	Ongoing	SEAR's ESD Report
ESD07	Install and use rainwater tanks for landscaping irrigation	Yes	N/A	Ongoing	SEAR's ESD Report
ESD08	Re-use water captured from sprinkler systems	Yes	N/A	Ongoing	SEAR's ESD Report
ESD09	Water efficient fixtures and appliance will be installed by tenants: Taps => 3 Stars Urinals => 3 Stars Toilet => 3 Stars Showers => Starts (>4.5 but = <= 6.0) Clothes Washing Machines => 3 Stars Dishwashers => Stars	N/A	Yes	Ongoing	SEAR's ESD Report
ESD10	Plant beds and trees providing canopy cover, providing shade and improving air quality will be maintained.	Yes	N/A	Ongoing	SEAR's ESD Report
ESD11	Facilities will separate waste streams and provide receptacles for different resources including glass, plastic, cardboard and organic (green) waste.	N/A	Yes	Ongoing	SEAR's ESD Report

Appendix C Traffic Impact Assessment (TA)

Appendix D Noise and Vibration Impact Assessment (NVIA)

Appendix E Air Quality Impact Assessment (AQIA)

Appendix F Waste Management Plan (WMP)

Appendix G Civil Infrastructure Report

Appendix H Preliminary Hazard Assessment (PHA)

Appendix I Bushfire Protection Assessment (BPA)

Appendix J Flood Impact and Risk Assessment (FIRA)

Appendix K Biodiversity Development Assessment Report (BDAR)

Appendix L EPBC Impact Assessment (EPBC IA)

Appendix M Vegetation Management Plan (VMP)

Appendix N Wildlife Hazard Assessment and Wildlife Management Plan (WHMP)

Appendix O Ecologically Sustainable Development (ESD)